

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PNC Bank, National Association, as successor in interest to
National City Bank of Michigan/Illinois,

Plaintiff,

v.

Kevin Foss; Bonnie Foss; Smith-Greeley, LLC; Colfax
Condominium Association,

Defendants.

No. 13-cv-3029

Honorable Judge:
Matthew F. Kennelly

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, as successor in interest to National City Bank of Michigan/Illinois, by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Kevin Foss; Bonnie Foss; Smith-Greeley, LLC; and Colfax Condominium Association, and as grounds thereof state:

As appears from the Affidavit of Plaintiff attached as Exhibit "A" to this Motion, and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, as successor to
National City Bank of Michigan/Illinois

By: /s/ James D. Major
One of Its Attorneys

James M. Crowley (ARDC #6182597)
James D. Major (ARDC#6295217)
CROWLEY & LAMB, P.C.
221 N. LaSalle Street, Suite 1550
Chicago, Illinois 60601
(312) 670-6900
jcrowley@crowleylamb.com
jmajor@crowleylamb.com