

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor in
interest by merger to National City Bank,

Plaintiff,

v.

Earl McCroy; Mary L. Bean-McCroy; Nichol
McCroy; State of Illinois Department of
Revenue,

Defendants.

Case No. 14 cv 2160

Assigned Judge: Robert W. Gettleman

Magistrate Judge: Sheila M. Finnegan

Property Address: 5145-5147 St.
Charles Road, Berkeley, IL 60163

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest by merger to National City Bank, 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):

Earl McCroy, Mary L. Bean-McCroy, and Nichol McCroy, and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of 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, successor to
National City Bank

By: /s/ Jennifer E. Frick
One of Its Attorneys

Patrick D. Lamb (ARDC #3128062)
Jennifer E. Frick (ARDC#6299794)
CROWLEY & LAMB, P.C.
221 N. LaSalle Street, Suite 1550
Chicago, Illinois 60601
(312) 670-6900
plamb@crowleylamb.com
jfrick@crowleylamb.com