

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

PNC Bank, National Association, successor to
National City Bank, successor in interest to Mid
America Bank, fsb

Plaintiff,

v.

Jose Jesus Gomez a/k/a Jose De Jesus Gomez;
Angelina Gomez

Defendants.

Case No. 14 cv 07875

Assigned Judge: Joan B. Gottschall

Magistrate Judge: Maria Valdez

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, successor to National City Bank, successor in interest to Mid America Bank, fsb, 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):

Jose Jesus Gomez a/k/a Jose De Jesus Gomez

Angelina Gomez

and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file with 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, successor in interest to Mid America Bank,
fsb

By: /s/ Matthew L. Hendricksen

One of Its Attorneys

James M. Crowley (ARDC #6182597)
Matthew L. Hendricksen (ARDC#6296720)
CROWLEY & LAMB, P.C.
221 N. LaSalle Street, Suite 1550
Chicago, Illinois 60601
(312) 670-6900
jcrowleylamb@crowleylamb.com
mhendricksen@crowleylamb.com