

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CITIBANK, N.A., a national banking association,)
Plaintiff,)
vs.)
INTERFACE PROTEIN TECHNOLOGY INC., an)
Illinois corporation,)
and)
CHARLES XIAO QING HAN (also known as)
CHARLES X. HAN, CHARLES HAN, CHARLES)
XIAO-QING HAN, CHARLES XIAOQING HAN,)
XIAO QING CHARLES HAN, XIAOQING HAN,)
XIAO-QING HAN and HAN XIAOQING), an)
individual,)
and)
MINDY MINGXIA LIU (also known as MINDY M.)
LIU, MINGXIA MINDY LIU, MINGXIA LIU, and)
MING-XIA LIU), an individual,)
Defendants.)

**JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT
IN FAVOR OF PLAINTIFF AND SOLELY AGAINST
DEFENDANT INTERFACE PROTEIN TECHNOLOGY INC.**

Plaintiff Citibank, N.A. and Defendant Interface Protein Technology Inc. jointly move for the entry of a Consent Judgment, and in support thereof state as follows:

1. On January 11, 2017, Plaintiff filed its Complaint (the “Complaint”) including a Count for breach of Note and Loan Agreement against Defendant Interface Protein Technology Inc., and a Count for breach of Guarantee against each of Defendant Charles Xiao Qing Han and Mindy Mingxia Liu relating to the Loan more particularly described in the Complaint.

2. Defendants filed their Answer and Defenses to the Complaint on March 7, 2017 reflecting little at issue between the parties respecting the Loan described in the Complaint.

3. On July 5, 2017, during a status hearing before the Court, counsel for Defendants informed Plaintiff and the Court that Defendants wish to resolve this proceeding and their respective obligations on the Loan and Loan Documents described in the Complaint by entry of a Consent Judgment.

4. On July 16, 2017 (the “Petition Date”), Defendants Charles Xiaoqing Han (“Han”) and Mindy Mingxia Liu (“Liu”) filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (the “Bankruptcy Code”), in the United States Bankruptcy Court for the Northern District of Illinois (Chicago) (the “Bankruptcy Court”), commencing a case designated as In re Charles Xiaoqing Han and Mindy Mingxia Liu, Case No. 17-21154 (the “Bankruptcy Case”).

5. In accordance with the provisions of 11 U.S.C. § 362(a), any and all further proceedings in this action are stayed with respect to Mr. Han and Ms. Liu.

6. The parties have agreed to the entry of a Consent Judgment with respect to the Loan, the Note and the Loan Agreement described in the Complaint in favor of Plaintiff and solely against Defendant Interface Protein Technology Inc. in the form attached hereto as Exhibit A. A separate copy of this Consent Judgment is being submitted to the Court concurrently with the filing of this Motion at Proposed_Order_Blakey@ilnd.uscourts.gov in compliance with the Court’s standing order.

For these reasons, Plaintiff Citibank, N.A. and Defendant Interface Protein Technology respectfully request that this Court enter the proposed Consent Judgment attached hereto as Exhibit A.

Dated: August 3, 2017

Consented to and prepared by:

On behalf of Plaintiff, Citibank, N.A.

By: /s/ Cheryl A. Kelly

Todd A. Rowden (ARDC #6201929)
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Seen and agreed to:

On behalf of Defendant Interface Protein Technology, Inc.

By: /s/ Michael C. Whitticar

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 3, 2017, a true and correct copy of the foregoing **Joint Motion for Entry of Consent Judgment Solely Against Defendant Interface Protein Technology Inc.** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Cheryl A. Kelly