

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CITIBANK, N.A., a national banking association,)
)
Plaintiff,)

vs.)

Case No. 1:17-cv-00207

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.)

CONSENT JUDGMENT

This matter comes before the Court by consent of the parties to this Case.

The Court being fully advised in the premises **FINDS** that

1. At a status conference held in this Case on July 5, 2017, counsel to Defendants proposed entry of a consent judgment against Defendants as the means of resolving this Case.

2. 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”).

3. 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.

4. In consideration of the foregoing, the parties are agreeing to entry of this Order and Judgment in this Case in favor of Plaintiff and solely against Defendant INTERFACE PROTEIN TECHNOLOGY INC., an Illinois corporation, on the terms set forth below.

ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT judgment is entered against Defendant INTERFACE PROTEIN TECHNOLOGY INC., as follows:

1. Judgment is entered on Count I of the Complaint in favor of Citibank, N.A. and against INTERFACE PROTEIN TECHNOLOGY INC. for \$1,587,334.88 (consisting of unpaid principal due pursuant to the Loan Documents executed and delivered by Interface Protein Technology Inc. for the benefit of Plaintiff as described in the Complaint (\$1,499,260.76), plus interest accrued thereon through August 9, 2017 (\$58,074.12), plus reasonable attorneys’ fees and costs (\$30,000.00) through June 30, 2017). From and after August 9, 2017, interest shall accrue on the sum of \$1,587,334.88 at the applicable federal statutory rate.

2. Defendant INTERFACE PROTEIN TECHNOLOGY INC. understands its rights to appeal this order and judgment pursuant to applicable law. To induce Plaintiff to agree to this Consent Judgment, Defendant INTERFACE PROTEIN TECHNOLOGY INC. understands that such Defendant is waiving its rights to appeal. This is a final order and judgment as regards INTERFACE PROTEIN TECHNOLOGY INC. respecting the Note, the Loan Agreement and

the Loan described in the Complaint and there is no just reason for delaying the enforcement of this Consent Judgment as against INTERFACE PROTEIN TECHNOLOGY INC.

3. This Judgment is solely against Interface Protein Technology Inc., and nothing in this Judgment and Order is intended to nor shall constitute an effort to collect or enforce indebtedness against Defendants Han and Liu who are debtors in the Bankruptcy Case.

Date: August 3, 2017

Entered: _____
District Judge

Consented to and prepared by:

Seen and agreed to:

On behalf of Plaintiff, Citibank, N.A.

On behalf of Defendant Interface Protein Technology, Inc.

By: /s/ Cheryl A. Kelly
Todd A. Rowden (ARDC #6201929)
Cheryl A. Kelly (ARDC #6203101)
Audrey D. Mense (ARDC #6302524)
Thompson Coburn LLP
55 E. Monroe Street
Chicago, IL 60603
Ph: 312-346-7500
trowden@thompsoncoburn.com
ckelly@thompsoncoburn.com
amense@thompsoncoburn.com

By: /s/ Michael C. Whitticar
Michael C. Whitticar
NOVA IP Law, PLLC
7001 Heritage Village Plaza, Suite 205
Gainesville, VA 20155
Phone: 571-334-2671
Fax: 855-295-0740
E-Mail: mikew@novaiplaw.com;
novaiplaw@gmail.com