

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

Bank of Hope, successor to Foster Bank,)	No: 17-cv-02116
)	
Plaintiff,)	Honorable Samuel Der-Yeghiayan
)	
v.)	Property: 2360-2400 Walnut Ave.,
)	Hanover Park, IL 60133
Min S. Suh and Angela Suh,)	
)	Commercial
Defendants.)	

**PLAINTIFF’S RULE 55(b) MOTION FOR DEFAULT JUDGMENT
AND FOR JUDGMENT OF FORECLOSURE AND SALE**

NOW COMES the Plaintiff, Bank of Hope, successor to Foster Bank, by and through Ashen|Faulkner, its attorneys, and in support of its Motion for Default Judgment and Judgment of Foreclosure and Sale pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, states as follows:

1. On March 17, 2017, Plaintiff filed its Complaint to Foreclose Mortgage and for Other Relief, seeking to foreclose its commercial mortgage (“Mortgage”) on the property commonly known as 2360-2400 Walnut Ave., Hanover Park, IL 60133 (“Property”). The Mortgage secures a note executed by Min S. Suh and Angela Suh (collectively, “Borrowers”) in favor of Plaintiff. *See* Docket No. 1.

2. On May 3, 2017, Plaintiff presented its Rule 55 Motion for Entry of Order of Default (“Default Motion”), alleging that Borrowers had been duly served, and had failed to appear before this Court as required by the Federal Rules of Civil Procedure. *See* Docket No. 11.

3. Plaintiff’s Default Motion was granted, and on May 3, 2017, this Court entered an order of default against Borrowers and continued this matter for prove-up. *See* Docket No. 13.

4. Plaintiff’s claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Judgment Affidavit attached hereto as “**Exhibit A**” and

affidavit of attorneys' fees and cost attached hereto as "**Exhibit B.**"

5. Borrowers' failure to defend and deny the allegations of Plaintiff's complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of Default Judgment and Judgment of Foreclosure and Sale.

WHEREFORE, the Plaintiff respectfully requests that this Court enter an (i) Order of Default Judgment and Judgment of Foreclosure and Sale for that amount set forth and made certain in its Judgment Affidavit, (ii) award Plaintiff its reasonable expenses, and (iii) grant such further or other relief as the Court may deem just or equitable.

Dated: June 6, 2017

Respectfully submitted,

ASHEN | FAULKNER

By: /s/Alexander Wright
Alexander N. Wright
Attorney for Bank of Hope

217 N. Jefferson St., Suite 601
Chicago, Illinois 60661
312.655.0800 / Atty. No.: 6314304
awright@ashenlaw.com