IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION

UNITED STATES OF AMERICA, ON BEHALF OF)
ITS AGENCY, RURAL HOUSING SERVICE OR)
SUCCESSOR AGENCY, UNITED STATES)
DEPARTMENT OF AGRICULTURE,)
Plaintiff v.) No. 17-cv-8371
WIND A LIDELLING NUVA WIND A CWRODLIUC AUVA)
KINDA J PELLINO N/K/A KINDA SKROBLUS A/K/A	Judge Feinerman
KINDA J PELLINO-SKROBLUS; MORTON)
COMMUNITY BANK F/K/A PEKIN SAVINGS)
BANK; UNKNOWN OWNERS AND NON-RECORD)
CLAIMANTS,)
)
Defendant.)

<u>PLAINTIFF'S RULE 55 MOTION FOR DEFAULT JUDGMENT</u> AND FOR ENTRY OF JUDGMENT OF FORECLOSURE

The United States of America, by John R Lausch Jr., United States Attorney for the Northern District of Illinois, moves this Honorable Court for an Order of Default Judgment pursuant to Federal Rule of Civil Procedure 55 and in support, states as follows:

- 1. Plaintiff initiated these proceedings on November 17, 2017, seeking a Judgment of Foreclosure and Sale.
- 2. That the Defendant:
 - a. Kinda J Pellino was served by personal service on December 6, 2017 (see Docket Entry #8)
 - b. Morton Community Bank was served by corporate service on November 22,
 2017 (see Docket Entry #9)
- More than twenty one (21) days have elapsed since Defendants were served, and they
 have failed to answer, plead, or otherwise defend the allegations of the United States'
 Complaint.
- 4. Defendants' failure to defend and deny the allegations of the United States' complaint results in those allegations being admitted and the United States therefore moves the

Court for the entry of Default Judgment.

5. Defendants are not currently on active duty in the United States Military. (See Affidavit

as to Military Service attached as Exhibit A).

6. The United States' claim of damages is for a sum that is made certain by computation and

is more specifically set forth in its supporting Judgment Affidavit. (See Affidavit of

Amounts Due and Owing attached as Exhibit B; see Certificate of Prove-up of

Foreclosure Fees and Costs attached as Exhibit C).

WHEREFORE, the United States moves this Honorable Court for an Order of Default Judgment

of Foreclosure against the Defendants, Dawn M Berg, and for that amount as set forth and made

certain in its Judgment Affidavit and Certificate of Prove-up of Foreclosure Fees and Costs.

Respectfully submitted,

JOHN R LAUSCH Jr. United States Attorney

By: s/Ashley K Rasmussen_

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