

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
BMO HARRIS BANK N.A. f/k/a HARRIS )  
BANK N.A. AS SUCCESSOR IN )  
BUSINESS TO AMCORE BANK N.A., )  
f/k/a AMCORE TRUST COMPANY, )  
SUCCESSOR TO DIXON NATIONAL )  
BANK, AS TRUSTEE UNDER )  
AGREEMENT DATED APRIL 19, 1977 )  
KNOWN AS TRUST NO. 1058, and not )  
personally; UNKNOWN OWNERS; and )  
NONRECORD CLAIMANTS; )  
Defendants. )

Case No. 3:12-cv-50064

**MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE**

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

Attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1", Affidavit).

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: /s/ Kimberly J. Goodell  
KIMBERLY J. GOODELL  
Attorney for the United States  
223 W. Jackson Blvd., Suite 610  
Chicago, IL 60606  
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**CERTIFICATE OF SERVICE**

I, Kimberly J. Goodell, certify that a true and correct copy of the foregoing **MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE** was served upon counsel of record through operation of the Court's Case Management/Electronic Case Files system on June 11, 2012, and on the following non-ECF filers:

Colleen Hennessy, Registered Agent  
BMO HARRIS BANK N.A. f/k/a HARRIS  
BANK N.A. AS SUCCESSOR IN  
BUSINESS TO AMCORE BANK N.A.,  
f/k/a AMCORE TRUST COMPANY,  
SUCCESSOR TO DIXON NATIONAL  
BANK, AS TRUSTEE UNDER  
AGREEMENT DATED APRIL 19, 1977  
KNOWN AS TRUST NO. 1058, and not personally;  
111 West Monroe Street, 22<sup>nd</sup> Floor  
Chicago, Illinois 60603

Louise F. Gotsch, Land Trust Administrator  
BMO HARRIS BANK N.A. f/k/a HARRIS  
BANK N.A. AS SUCCESSOR IN  
BUSINESS TO AMCORE BANK N.A.,  
f/k/a AMCORE TRUST COMPANY,  
SUCCESSOR TO DIXON NATIONAL  
BANK, AS TRUSTEE UNDER  
AGREEMENT DATED APRIL 19, 1977  
KNOWN AS TRUST NO. 1058, and not personally;  
501 7<sup>th</sup> Street  
Rockford, Illinois 61104-1242

Unknown Owners and NonRecord Claimants  
601 Countryside Lane  
Dixon, Illinois 61021

By: *Kimberly J. Goodell*  
KIMBERLY J. GOODELL  
Potestivo & Associates, P.C.  
Attorneys for Plaintiff  
223 W. Jackson Blvd., Suite 610  
Chicago, Illinois 60606  
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