

Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

FILED
11/5/2019 11:46 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019CH00998

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – CHANCERY DIVISION**

COUNTY OF COOK D/B/A)
COOK COUNTY LAND)
BANK AUTHORITY,)
)
Plaintiff)
)
)
)
v.)
)
Equitable 10, LLC)
)
)
Defendant.)

7238128

Case No. 2019 CH 00998

2011 W. 68th Pl. Chicago, IL 60636

MOTION FOR SERVICE BY SPECIAL ORDER OF COURT

Now Comes Plaintiff, County of Cook d/b/a Cook County Land Bank Authority, by and through its attorneys, Denzin Soltanzadeh, LLC, and in support of its Motion for Service by Special Order of Court states as follows:

- 1) Plaintiff filed its Complaint to Quiet Title and for Ejectment on January 24, 2019.
- 2) The Secretary of State indicates on its website that Equitable 10, LLC was involuntarily dissolved on November 10, 2016.
- 3) Pursuant to 805 ILCS 5/5.05(c), the registered agent and the registered office of the corporation on record with the Secretary of State on the date of the issuance of the certificate or judgment of dissolution shall be an agent of the corporation upon whom claims can be served or service of process can be had during the 5-year, post-dissolution period, unless such agent resigns or the corporation properly reports a change of registered office or registered agent.
- 4) Service was attempted by the Sheriff on the registered agent at the registered office on February 15, 2019. The Sheriff remarks that multiple attempts were made without

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contact. A report of the service attempts from the Sheriff's website is attached hereto as Exhibit A.

- 5) On May 24, 2019, the Court appointed Firefly Legal, Inc. (hereafter, "Firefly") as special process server in this matter.
- 6) Firefly made nine attempts at service on the registered agent at the registered office from June 23, 2019 through July 21, 2019 at varying times of day. An affidavit of due and diligent search and inquiry is attached hereto as Exhibit B.
- 7) Firefly verified with other neighbors in the building that the registered agent resides at the registered office.
- 8) A diligent inquiry was made to determine additional addresses at which the registered agent could be served.
- 9) As of the filing of this motion, Plaintiff is unaware of the resignation of the registered agent, or that a change of registered agent or office has been reported to the Secretary of State.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order allowing for service of process in this matter to be made upon Equitable 10, LLC by certified mail, care of Richard Chambers, at 1001 W. 15th St., Unit 126, Chicago, IL 60608, or by any other means the Court deems appropriate.

Respectfully Submitted,

/s/ Joel A. Knosher
One of Plaintiff's Attorneys

Joel A. Knosher (ARDC #6298481)
Denzin Soltanzadeh, LLC
190 South LaSalle, Suite 2160
Chicago, Illinois 60603
Phone: (312) 380-7260
jknosher@denzinlaw.com
Firm No. 63153

Cook County

SHERIFF

THOMAS J DART

**Civil Process
Service Lookup**

Search Results:

Sheriff #	Name	Address	Status
03000107	EQUITABLE 10, LLC	1001 W 15TH ST UNIT 126, CHICAGO, IL 60608	NOT SERVED

Reason not served: No Contact
 Date: 2/15/2019

Additional Remarks: multiple attempts, no contact

[Search Again](#)

By using this search tool, you acknowledge that you understand that it is solely your responsibility to verify any information you may obtain herein before relying on said information for any type of legal action.

Cook County Sheriff's Office Civil Division • 50 W. Washington, Room 701
Chicago, IL 60602 • **(312) 603-3365**

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EXHIBIT B

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, COUNTY DEPARTMENT - CHANCERY DIVISION

COUNTY OF COOK D/B/A COOK COUNTY LAND	Plaintiff(s)	
BANK AUTHORITY,	VS.	
		Court No.: 2019CH00998
Equitable 10, LLC	Defendant(s)	

AFFIDAVIT OF DUE AND DILIGENT SEARCH

Before me, the undersigned authority, this day personally appeared, **Michelle Bibeau** (“Affiant”) employed by Firefly Legal Inc., an Illinois licensed private detective agency, license number 117.001465, and not party to the mentioned case, who upon being first duly sworn, upon his/her oath, deposes and says:

I, **Michelle Bibeau**, am employed by “Firefly Legal Inc.”, and have made due and diligent search and inquiry to discover the location of the subject by searching public and non-public databases, as well as, various other data resources and records, including, but not limited to: Social Security Death Index, Directory Assistance; Department of Motor Vehicles records; voter registration; professional licenses; department of corrections; real property tax rolls; and real property sales and transfer records.

An inquiry to discover the current location of, **Equitable 10, LLC**, was performed 8/18/2019 by the following acts set forth, as particularly as is known to Michelle Bibeau below.

After inquiry by Affiant, the current location of the subject is unknown to the affiant.

SUBJECT NAME: Equitable 10, LLC

**LAST KNOWN ADDRESS FOR THE ABOVE SUBJECT:
c/o Richard Chambers 1001 W. 15th Street, Unit 126 Chicago IL 60608**

A. I PERSONALLY PERFORMED AN INQUIRY OF TELEPHONE COMPANY:

1. DIRECTORY ASSISTANCE SEARCH:

DIRECTORY ASSISTANCE STATED THERE IS NO LAND LINE LISTING A CURRENT ALTERNATIVE ADDRESS FOR OUR SUBJECT IN COOK COUNTY, ILLINOIS

B. I PERSONALLY PERFORMED OTHER INQUIRIES:

1. SECRETARY OF STATE:

PER THE ILLINOIS SECRETARY OF STATE, EQUITABLE 10 LLC IS DISSOLVED AS OF 11/10/2016. LAST LISTED INFORMATION SHOWS RICHARD CHAMBERS AS THE REGISTERED AGENT AND MANAGER AT 1001 W 15TH ST UNIT 126, CHICAGO, IL 60608. NO OTHER ADDRESSES, OFFICERS, OR INFORMATION LISTED.

2. OTHER INQUIRIES:

MOST CURRENT ADDRESS FOUND FOR RICHARD CHAMBERS VIA SKIP TRACE IS THE ATTEMPTED ADDRESS OF 1001 W 15TH ST UNIT 126, CHICAGO, IL 60608. NO OTHER CURRENT INFORMATION OR ADDRESSES LOCATED VIA A SOCIAL MEDIA SEARCH, GOOGLE SEARCH, OR OTHERWISE.



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C. In the regular performance of my job functions, I have access to and am familiar with Firefly's business records relating to the service of process at issue in this legal action. The business records constitute records or data compilations ("the Records") of service of process attempts ("Service Attempts") relating to this legal action and it is Firefly's regular practice to make and keep such Records. The Records were made at the time of the act, transaction, occurrence, or event or a reasonable time thereafter by, or from information transmitted from, a person with knowledge of the Service Attempts. I have personal knowledge of the manner in which the Records are created, and I reviewed and relied upon the Records in executing this Affidavit. The following is a summary of the attempts made to service process on the Subject/Defendant based on my review of the Records. Additionally, the sworn affidavits for each of the process servers listed below have been separately filed with the Court and are attached hereto.

Process server, James Anderson, attempted to serve at c/o Richard Chambers 1001 W. 15th Street, Unit 126 Chicago, IL 60608 that resulted in NON-SERVICE. Diligent attempts were made on the following dates:

7/21/2019 at 11:13 AM Attempts were made at this address; however no contact could be made with the defendant at this address. There is no evidence that the property is vacant. Process server verified the defendant does live at this address through neighbors in the building. Blinds are closed and no answer from the intercom.

Attempts Made:

6/23/2019 10:42 AM Process server received no answer at the unit door. Blinds are closed and no lights appear to be on inside the unit. Defendant's name appears on the intercom.

6/27/2019 4:53 PM Process server received no answer at the unit door. Blinds are closed and no lights appear to be on inside the unit.

6/30/2019 10:17 AM Process server received no answer at the unit door. Blinds are closed and no lights appear to be on inside the unit.

7/12/2019 6:47 AM Process server found the blinds closed and no lights appear to be on inside the Unit. No answer at the Unit door or the intercom.

7/14/2019 11:51 AM Process server received no answer from the intercom at the front door of the building. Neighbor stated the defendant does live in the unit.

7/16/2019 10:10 PM Process server received no answer from the intercom at the front door of the building.

7/18/2019 7:32 AM Process server received no answer at the front door of the building or the intercoms.

7/19/2019 6:32 PM Process server received no answer from the intercom. Blinds are closed and no lights appear to be on inside the Unit.

7/21/2019 at 11:13 AM Attempts were made at this address; however no contact could be made with the defendant at this address. There is no evidence that the property is vacant. Process server verified the defendant does live at this address through neighbors in the building. Blinds are closed and no answer from the intercom.

8/19/2019

DATE

Michelle Bibeau

AFFIANT

Michelle Bibeau
Firefly Legal Inc.
19150 S. 88th Ave
Mokena, IL 60448



File #: 1DS062119

STATE OF: ILLINOIS

COUNTY OF: WILL

SUBSCRIBED AND SWORN TO ME BEFORE THIS 19 DAY OF Aug, 19 BY AFFIANT WHO IS PERSONALLY KNOWN TO ME.

Cristina Espinoza
Notary Public

My Commission Expires: 10/15/22

