

**IN THE CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT – FIRST DISTRICT**

FILED
11/23/2020 3:53 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019CH00998

COUNTY OF COOK D/B/A COOK COUNTY
LAND BANK AUTHORITY,

Plaintiff

v.

EQUITABLE 10, LLC,

Defendants.

11241963

Case Number: 2019CH00998

Property: 2011 W. 68th Place

Courtroom: 2408

**COUNTY OF COOK D/B/A COOK COUNTY LAND BANK AUTHORITY'S MOTION
FOR DEFAULT**

NOW COMES plaintiff, COUNTY OF COOK D/B/A COOK COUNTY LAND BANK AUTHORITY (“CCLBA”), by its attorneys, DENZIN SOLTANZADEH, LLC, and pursuant to the Illinois Code of Civil Procedure and Illinois Supreme Court Rules, petitions this Court for entry of an order of default against Equitable 10, LLC (Defendant). In support of this Motion, CCLBA, states as follows:

1. On January 24, 2019, Plaintiff filed its Summons and Complaint to Quiet Title for Ejectment and was issued a future hearing date of May 24, 2019. A copy of the Complaint is attached hereto as Exhibit “A”.
2. The Cook County Sheriff made multiple attempts to serve the Defendant but was unable to due to no contact. A copy of the Sheriff’s result is attached hereto as Exhibit “B”.
3. On the May 24, 2019 hearing date, an order was entered appointing Firefly Legal, Inc as the special process server for this matter and the case was set for status for July 29, 2019. A copy of the Order is attached hereto as Exhibit “C”.
4. On June 21, 2019, Plaintiff filed its Alias Summons. A copy of the Alias is attached hereto as Exhibit “D”.

5. The Special Process Server was unable to make contact with the Defendant. A copy of the Non Service Affidavit is attached hereto as Exhibit "E".

6. On July 29, 2019, a continuance order was entered for Plaintiff to present its motion on September 4, 2019. A copy of the Continuance Order is attached hereto as Exhibit "F".

7. On September 6, 2019, an order was entered to continue this matter for status for October 30, 2019. A copy of the order is attached hereto as Exhibit "G".

8. On October 30, 2019, an order was entered to continue this matter for November 21, 2019. A copy of the order is attached hereto as Exhibit "H".

9. On November 5, 2019, Plaintiff filed its Notice and Motion for Service by Special Order of Court to be heard on November 21, 2019. A copy of the Notice is attached hereto as Exhibit "I".

10. On November 21, 2019, an order was entered for the Plaintiff to attempt service on Defendant by regular and certified mail at 1001 W. 15th St., Unit 126, Chicago, IL 60608. Additionally, the Plaintiff shall attempt service on Defendant by the Secretary of State at 69 W. Washington, Room 1240, Chicago, IL 60602. This matter was continued to January 23, 2020. A copy of the Order is attached hereto as Exhibit "J".

11. On December 4, 2019, the Special Process Server mailed copies of the Alias Summons and Complaint via certified and regular mail to the 1001 W. 15th St., Unit 126, Chicago, IL 60608, address. A copy of the Affidavit is attached hereto as Exhibit "K".

12. On January 23, 2020, an order was entered to continue this matter to February 27, 2020. A copy of the Order is attached hereto as Exhibit "L".

13. On February 7, 2020, Plaintiff filed its Alias Summons. A copy of the Alias is attached hereto as Exhibit "M".

14. On February 27, 2020, an order was entered to continue this matter to April 16, 2020. A copy of the Order is attached hereto as Exhibit "N".

15. On February 27, 2020, the Special Process Server served a copy of the Alias Summons and Complaint at the Secretary of State at 69 W. Washington, Room 1240, Chicago, IL 60602. A copy of the Affidavit is attached hereto as Exhibit "O".

16. On November 23, 2020, a search was conducted on the Cook County Clerk of the Circuit Court's electronic docket and no appearances or answers has not been filed. An Affidavit is attached hereto as Exhibit "P".

WHEREFORE, CCLBA respectfully requests that the Court enter an Order of Default against the Defendant Equitable 10, LLC.

Respectfully submitted,

County of Cook d/b/a Cook County Land
Bank Authority

By: Julie Suhl
One of its Attorneys

Denzin Soltanzadeh LLC #63153
190 S. LaSalle, Suite 2160
Chicago, Illinois 60603
(312) 380-7260
jknosher@denzinlaw.com
Brent Denzin, ARDC #6294953
Stephen Soltanzadeh, ARDC #6297668
Caitlyn Sharrow, ARDC #6318104
Joel Knosher, ARDC #6298481
Julie Suhl, ARDC #6306387

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

COUNTY OF COOK D/B/A)
COOK COUNTY LAND)
BANK AUTHORITY,)
)
Plaintiff) Case No. 2019CH00998
)
)
v.)
)
Equitable 10, LLC) 2011 W. 68th Pl. Chicago, IL 60636
)
)
Defendant.)

COMPLAINT TO QUIET TITLE AND FOR EJECTMENT

Now comes Plaintiff, County of Cook d/b/a Cook County Land Bank Authority (“CCLBA”), by and through its attorneys, Denzin Soltanzadeh, LLC and in support of its Complaint to Quiet Title and for Ejectment states as follows:

NATURE OF THE CASE

1. The Defendant, Equitable 10, LLC, has breached the condition subsequent contained in an March 7, 2016 deed from CCLBA to Equitable 10, LLC by failing to bring the property commonly known as 2011 W. 68th Pl., Chicago, IL 60636, (“Property”) into compliance with all federal, state, and local building and housing codes applicable to the Property and obtain all necessary approvals and certifications to permit occupancy of primary structures on the Property within twelve (12) months of Equitable 10, LLC’s acquisition.
2. Plaintiff brings this action seeking an order quieting title to the Property in CCLBA, a judicial deed reflecting that CCLBA is the sole party in title to the Property, and an order granting

CCLBA possession of the Property. The Property, commonly known as 2011 W. 68th Pl., Chicago, IL 60636, is legally described as follows:

LOT 281 IN ALLERTON'S ENGLEWOOD ADDITION IN THE SOUTWEST ¼ OF SECTION 19, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Commonly known as 2011 W. 68th Pl., Chicago, IL 60636

Permanent Index Number: 20-19-320-019-0000

3. On or about October 26, 2015, CCLBA and Equitable 10, LLC ("Equitable") entered into a purchase-sale agreement ("Purchase Agreement") under which Equitable was to purchase the Property from CCLBA.

4. Under the Purchase Agreement, Equitable further agreed that it would purchase the property subject to a deed restriction ("Deed Restriction") under which CCLBA would have the right to reenter, retake and repossess the Property if Equitable did not, within twelve (12) months of the date of execution of the deed conveying title from CCLBA to Equitable, bring the Property into compliance with all federal, state, and local building and housing codes applicable to the Property and obtain all necessary approvals and certifications to permit occupancy of primary structures on the Property.

5. The closing occurred on or about March 7, 2016, and on that day title to the Property transferred from CCLBA to Equitable.

6. The deed conveying the property from CCLBA to Equitable was executed on March 7, 2016, and recorded on March 9, 2016, in the Cook County Recorder of Deeds as Document No. 1606901018 ("Deed"), and included the Deed Restriction. A copy of the Deed including the Deed Restriction is attached hereto as Exhibit A.

7. In accordance with the Purchase Agreement, the Deed Restriction reserved a right of reentry in favor of CCLBA for breach of the conditions set forth in the Deed Restriction.

COUNT I – QUIET TITLE

CCLBA repeats and incorporates the allegations in Paragraphs 1-7 of this complaint in this Count I.

8. The Property is not currently compliant with state and local building codes.

9. Equitable has not obtained necessary approvals and certifications to permit occupancy of primary structures on the Property.

10. As of the filing of this Complaint, the Property is vacant.

11. The non-compliant state of the Property and Equitable's failure to obtain necessary approvals and certifications as set forth herein is a breach of the conditions set forth in the Deed Restriction by Equitable.

12. Equitable's breach of the Deed Restriction entitles CCLBA to exercise the right of reentry reserved in favor of CCLBA.

13. CCLBA has formally exercised its right of reentry by giving notice to Equitable that it was doing so and filing and serving this lawsuit.

14. CCLBA's interest in the Property is superior to that of Equitable.

15. The Deed, as it currently exists in the public record, represents an outstanding claim that is invalid because CCLBA has exercised its right to reenter, retake, and repossess the Property. The Deed puts CCLBA's ownership of the Property in question. As a result, the Deed is a cloud on title.

16. CCLBA is the owner of the Property and is entitled to have the cloud removed.

17. CCLBA has no adequate remedy at law.

WHEREFORE, Plaintiff, County of Cook d/b/a Cook County Land Bank Authority requests the following relief:

A. An order quieting title to the Property in favor of County of Cook d/b/a Cook County Land Bank Authority.

B. A judicial deed free and clear of Equitable's interest and in favor of County of Cook d/b/a Cook County Land Bank Authority.

COUNT II – EJECTMENT

CCLBA repeats and incorporates the allegations in Paragraphs 1-17 of this complaint in this Count II.

18. CCLBA has a valid subsisting interest in the Property and a right to recover the Property by virtue of the Deed Restriction.

19. As of the filing of this Complaint, the Property is vacant and Equitable is joined as a person claiming ownership of the Property.

20. CCLBA was possessed of the Property on or about June 18, 2015.

21. Equitable took possession of the Property on or about March 7, 2016.

22. As of the filing of this Complaint, Equitable wrongfully withholds possession of the Property.

23. CCLBA's interest in the property is fee simple.

WHEREFORE, Plaintiff, County of Cook d/b/a Cook County Land Bank Authority requests the following relief.

A. A finding that County of Cook d/b/a Cook County Land Bank Authority recovers possession of the Property from Equitable 10, LLC.

Respectfully submitted,

County of Cook d/b/a Cook County Land
Bank Authority

By: /s/ Joel A. Knosher
One of its 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**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook d/b/a Cook County Land Bank Authority

v.

No. 19 CH 998Equitable 10, LLC

ORDER

FILED DATE: 11/23/2020 3:53 PM 2019CH00998

This matter coming on for Management; Plaintiff by Counsel; no Defendant appearing; and this Court being fully advised;

IT IS SO ORDERED:

1) Firefly Legal, Inc. (License Number 117-001465) is hereby appointed special process server.

2) This matter is set for status on July 29, 2019 at 9:30 AM in Room 240B.

Attorney No.: 63153Name: Denzin Saltzweideh-KruegerAtty. for: 11Address: 190 S LaSalle, Ste 2160City/State/Zip: Chicago, IL 60605Telephone: 312-380-7760

ENTERED:

Dated: _____, _____

Judge

Judge's No.



Return Date: No return date scheduled
Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

EXHIBIT D

FILED
6/21/2019 9:59 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019CH00998

5503139

2120 - Served 2121 - Served
2220 - Not Served 2221 - Not Served
2320 - Served By Mail 2321 - Served By Mail
2420 - Served By Publication 2421 - Served By Publication
Summons - Alias Summons

(08/01/18) CCG 0001 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook d/b/a Cook County Land Bank

Authority

(Name all parties)

v.

Equitable 10, LLC

Case Number 2019CH00998

☐ SUMMONS ☒ ALIAS SUMMONS

To each Defendant: Equitable 10, LLC c/o Richard Chambers 1001 W. 15th Street, Unit 126,
Chicago, IL 60608

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please [visit www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

Atty. No.: 63153

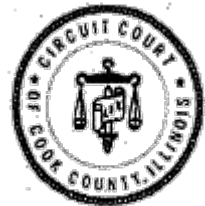
Witness: _____

Atty Name: Denzin Soltanzadeh, LLC6/21/2019 9:59 AM DOROTHY BROWNAtty. for: PlaintiffDOROTHY BROWN, Clerk of CourtAddress: 190 S. LaSalle St., Suite 2160City: Chicago

Date of Service: _____

State: IL Zip: 60603

(To be inserted by officer on copy left with Defendant or other person):

Telephone: 312.380.7260Primary Email: jknosher@denzinlaw.com

CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- ☐ Richard J Daley Center
50 W Washington
Chicago, IL 60602
 - ☐ District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
 - ☐ District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
 - ☐ District 4 - Maywood
1500 Maybrook Ave
Maywood, IL 60153
 - ☐ District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
 - ☐ District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
 - ☐ Domestic Violence Court
555 W Harrison
Chicago, IL 60607
 - ☐ Juvenile Center Building
2245 W Ogden Ave, Rm 13
Chicago, IL 60602
 - ☐ Criminal Court Building
2650 S California Ave, Rm 526
Chicago, IL 60608
 - ☐ Domestic Relations Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☐ Civil Appeals
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☐ Criminal Department
Richard J Daley Center
50 W Washington, Rm 1006
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☐ County Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☐ Probate Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☐ Law Division
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☐ Traffic Division
Richard J Daley Center
50 W Washington, Lower Level
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Daley Center Divisions/Departments**
- ☐ Civil Division
Richard J Daley Center
50 W Washington, Rm 601
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ☒ Chancery Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

EXHIBIT E

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

COUNTY OF COOK D/B/A COOK COUNTY LAND BANK
AUTHORITY,

Plaintiff(s)

VS.

Court No.: 2019CH00998

Equitable 10, LLC

Defendant(s)

AFFIDAVIT OF SPECIAL PROCESS SERVER

I, James Anderson, being first duly sworn on oath depose and state as follows: I am over the age of 18, not a party to this action, and an employee or agent of Firefly Legal, Inc., a licensed private detective agency, license number 117.001465 appointed by the court to serve process in the above referenced case. Following are the results of my efforts to serve process in the above captioned case:

Type of Process: Alias Summons and Complaint to Quiet Title and for Ejectment

Defendant to be served: Equitable 10, LLC

ADDRESS WHERE ATTEMPTED OR SERVED: c/o Richard Chambers, 1001 W. 15th Street, Unit 126
Chicago, IL, 60608

I **NON-SERVED** the within named defendant on: 7/21/2019 11:13 AM

X **NON-SERVICE** after due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of following reason(s): 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 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.

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the above statements set forth in this instrument are true and correct.

I certify that I am a United States citizen, over the age of 18 and not a party to, nor otherwise interested in the above action.

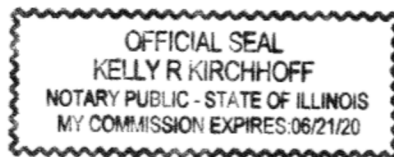
State of IL
County of Leas

Subscribed and sworn before me on 7/30/19



Signature of Process Server

James Anderson
Printed Name
Process Server
Title


Notary Public

772509_3795792_0_23_V4

Page 1 of 1 File Number: 1D5062119
Reference Number: 3795792
Case Number: 2019CH00998
Client: Denzin Soltanzadeh LLC
Doc Generated: 07/30/2019 12:05:00:326 PM

EXHIBIT F

Order

(Rev. 02/24/05) CCG N002

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook d/b/a Cook County Land Bank Authority

v.

No. 19 CH 998

Equitable 10, LLC

ORDER

This matter coming on for status; Plaintiff by Counsel; no Defendant appearing;
and this Court being fully advised;

IT IS SO ORDERED.

1) This matter is continued to September 4, 2019 at 9:30 AM for presentation
of Plaintiff's motion for service by comparable Method.

Attorney No.: 63153

Name: Denzin Sultan Zadeh-Kaasher

Atty. for: ↑

Address: 190 S. L. Sullivan St., Ste. 2160

City/State/Zip: Chicago, IL 60603

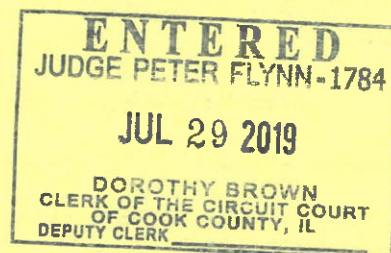
Telephone: 312-380-7760

ENTERED:

Dated: _____, _____

Judge

Judge's No.



DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FILED DATE: 11/23/2020 3:53 PM 2019CH00998

EXHIBIT G

**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.

Case No. 2019 CH 00998

2011 W. 68th Pl. Chicago, IL 60636

ORDER

This matter coming on to be heard on the court's own motion,

IT IS SO ORDERED:

- 1) This matter is hereby set for status on October 30, 2019 at 9:30 AM in room 2408 without further notice, as defendant Equitable 10, LLC has not been served with the complaint as of the entry of this order.

Judge Anna M. Loftus

SEP 6 2019

Circuit Court- 2102

Judge

Date

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

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook d/b/a Cook County Land Bank Authority

v.

No. 2019 CH 00998Equitable 10, LLC

ORDER

This matter coming on for status; Plaintiff by Counsel; and this Court being fully advised;

IT IS SO ORDERED:

1) This matter is continued to
room 2408 without further notice.

11/21/2019 at ~~9:30~~ AM in
9:45

Attorney No.: 63153Name: Denzil Soltyschek - KroshesAtty. for: 11Address: 160 S. La Salle, Ste. 2160City/State/Zip: Chicago, IL 60603Telephone: 312-380-7260

ENTERED:

Dated: _____

Judge Alison C. Conlon

OCT 30 2019

Judge

Circuit Court - 2140

Judge's No.

EXHIBIT I

FILED
11/5/2019 11:48 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.

Case No. 2019 CH 00998

2011 W. 68th Pl. Chicago, IL 60636

NOTICE OF MOTION

TO: Equitable 10, LLC c/o Richard Chambers, 1001 W. 15th St., Unit 126, Chicago, IL 60608

PLEASE TAKE NOTICE that on November 21, 2019 at 9:45 AM I shall appear before Judge Alison C. Conlon in Room 2408 of the Richard J. Daley Center, 50 W. Washington St., Chicago, IL 60602 and present Plaintiff's Motion for Service by Special Order of Court, copies of which are attached hereto and hereby served upon you.

County of Cook d/b/a Cook County
Land Bank Authority

By: /s/ Joel A. Knosher
One of its attorneys

Joel A. Knosher (ARDC #6298481)
Denzin Soltanzadeh LLC
190 S. LaSalle, Suite 2160
Chicago, Illinois 60603
(312) 380-7260
jknosher@denzinlaw.com
Firm #63153

CERTIFICATE OF SERVICE

I, Joel Knosher certify that a true and correct copy of the foregoing notice and corresponding document was served upon the below service list by depositing the same in the U.S. Mail at 190 S. LaSalle, Chicago, Illinois 60603 on November 5, 2019 at or before 5:00 p.m.

/s/ Joel A. Knosher

One of its attorneys

Service List

Equitable 10, LLC c/o Richard Chambers, 1001 W. 15th St., Unit 126, Chicago, IL 60608

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook d/b/a Cook County Land Bank Authority

v.

No. 19 CH 998Equitable ID, LLC

ORDER

This matter coming on to be heard on Plaintiff's Motion for Service by Special Order of Court; Plaintiff by Counsel; no Defendant appearing; and this Court being fully advised;

IT IS SO ORDERED:

1) Plaintiff's motion is hereby Granted.

2) Plaintiff shall serve Defendant by regular & certified mail at 1001 W. 15th St., Unit 126, Chicago, IL 60608.

3) Plaintiff shall also serve defendant by the Secretary of State at 69 W. Washington, Rm. 1210, Chicago, IL 60602

4) This matter is continued for status to January 23, 2020 at 9:30 AM in Room 2408.

Attorney No.: 63153

Name: Daniz Saltanzich LLC - Knishes

Atty. for: 11

Address: 190 S. La Salle, Ste. 2160

City/State/Zip: Chicago, IL 60603

Telephone: 312-380-7260

ENTERED:

Dated: Judge Alison C. Conlon

NOV 21 2019

Judge

Circuit Court - 2140
Judge's No.

EXHIBIT K

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

COUNTY OF COOK D/B/A COOK COUNTY LAND
BANK AUTHORITY,

Plaintiff(s)

VS.

Court No.: 2019CH00998

Equitable 10, LLC

Defendant(s)

AFFIDAVIT OF SPECIAL PROCESS SERVER

I, Grace Keltner, being first duly sworn on oath depose and state as follows: I am over the age of 18, not a party to this action, and an employee or agent of Firefly Legal, Inc., a licensed private detective agency, license number 117.001465 appointed by the court to serve process in the above referenced case. Following are the results of my efforts to serve process in the above captioned case:

Type of Process: Alias Summons, Order and Complaint to Quiet Title and for Ejectment

Defendant to be served: Equitable 10, LLC

ADDRESS WHERE ATTEMPTED OR SERVED: c/o Richard Chambers, 1001 W. 15th Street, Unit 126
Chicago, IL, 60608

I **SERVED** the within named defendant on: 12/4/2019 1:00 PM

☒ **CERTIFIED MAILING** by mailing by first-class, postage prepaid, a copy of this process to said defendant at the above address. I mailed the documents on the 4th day of December, 2019.

Additional Comments:

Certified and Regular mail sent out 12/4/19 at 1:00PM. Tracking number; 7019 1120 0000 2049 4817.

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the above statements set forth in this instrument are true and correct.

I certify that I am a United States citizen, over the age of 18 and not a party to, nor otherwise interested in the above action.

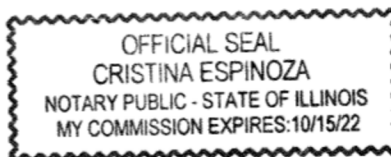
State of IL
County of Will

Grace Keltner
Signature of Process Server

Subscribed and sworn before me on 12/13/2019

Cristina Espinoza
Notary Public

Grace Keltner
Printed Name
Process Server
Title



File Number: 1DS062119
Reference Number: 3851231
Case Number: 2019CH00998
Client: Denzin Soltanzadeh LLC
Doc Generated: 12/12/2019 03:36:26:437 PM



772509_3851231_0_23_V4

7019 1120 0000 2049 4817

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Equitable 10, LLC c/o Richard Chambers
 1001 W. 15th Street, Unit 126,
 Chicago, IL, 60608
 3851231



772509_3851231_0_23_V4

File Number: 1DS062119
 Reference Number: 3851231
 Case Number: 2019CH00998
 Client: Denzin Soltanzadeh LLC
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**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.

Case No. 2019 CH 00998

2011 W. 68th Pl. Chicago, IL 60636

ORDER

This matter coming on for status, Plaintiff by counsel, no other party appearing, and this Court being fully advised,

IT IS SO ORDERED:

- 1) This matter is hereby continued to 2/27, 2020 at 9:30 AM in room 2408 ~~without further notice.~~

Judge Alison C. Conlon

Judge _____ Date JAN 23 2020
Circuit Court – 2140

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

EXHIBIT M

Return Date: No return date scheduled
Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

FILED
2/7/2020 11:07 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019CH00998

2120 - Served	2121 - Served
2220 - Not Served	2221 - Not Served
2320 - Served By Mail	2321 - Served By Mail
2420 - Served By Publication	2421 - Served By Publication
Summons - Alias Summons	(08/01/18) CCG 0001 A

8393023

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook, Illinois, a body politic and
corporate, d/b/a Cook County Land Bank

(Name all parties)

v.

Equitable 10, LLC

Case No. 2019CH00998

☐ SUMMONS ☒ ALIAS SUMMONS

To each Defendant: Equitable 10, LLC c/o Secretary of State
69 W. Washington, Room 1240, Chicago, IL 60602

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit www.cookcountyclerkofcourt.org to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

Atty. No.: 63153
Atty Name: Joel Knosher
County of Cook, Illinois, a body politic and corporate,
Atty. for: d/b/a Cook County Land Bank Authority
Address: 190 S. LaSalle, Suite 2160
City: Chicago
State: IL Zip: 60603
Telephone: (312) 380-7260
Primary Email: iknosher@denzinlaw.com

Witness: _____

2/7/2020 11:07 AM DOROTHY BROWN

DOROTHY BROWN, Clerk of Court

Date of Service: _____
(To be inserted by officer in cooperation with Defendant or other person):



Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- ☒ Richard J Daley Center
50 W Washington
Chicago, IL 60602
- ☐ District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
- ☐ District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
- ☐ District 4 - Maywood
1500 Maybrook Ave
Maywood, IL 60153
- ☐ District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
- ☐ District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
- ☐ Domestic Violence Court
555 W Harrison
Chicago, IL 60607
- ☐ Juvenile Center Building
2245 W Ogden Ave, Rm 13
Chicago, IL 60602
- ☐ Criminal Court Building
2650 S California Ave, Rm 526
Chicago, IL 60608
- Daley Center Divisions/Departments**
- ☐ Civil Division
Richard J Daley Center
50 W Washington, Rm 601
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Chancery Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Domestic Relations Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Civil Appeals
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Criminal Department
Richard J Daley Center
50 W Washington, Rm 1006
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ County Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Probate Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Law Division
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- ☐ Traffic Division
Richard J Daley Center
50 W Washington, Lower Level
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

County of Cook DBA Cook Countyv. Land Bank AuthorityNo. 19CH00998Equitable 10, LLC

ORDER

This matter coming on for status, Plaintiff by counsel, no other party appearing, and this Court being fully advised,

IT IS SO ORDERED.

1) This matter is hereby continued to 4-16-20 at 9:30 a.m. in room 2400.

Attorney No.: 63153Name: Julie SuniAtty. for: County of Cook DBA Cook County LandAddress: 190 S. LaSalle #2160 Bank AuthorityCity/State/Zip: Chicago, IL 60603Telephone: (312) 380-7260

ENTERED:

Dated: _____

Judge

Judge's No.

Judge Alison C. Conlon

FEB 27 2020

Circuit Court - 2140

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

EXHIBIT O

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

COUNTY OF COOK D/B/A COOK COUNTY LAND
BANK AUTHORITY,

Plaintiff(s)
VS.

Court No.: 2019CH00998

Equitable 10, LLC

Defendant(s)

AFFIDAVIT OF SPECIAL PROCESS SERVER

I, Kelly Kirchhoff, being first duly sworn on oath depose and state as follows: I am over the age of 18, not a party to this action, and an employee or agent of Firefly Legal, Inc., a licensed private detective agency, license number 117.001465 appointed by the court to serve process in the above referenced case. Following are the results of my efforts to serve process in the above captioned case:

Type of Process: Alias Summons, Order and Complaint to Quiet Title and for Ejectment

Defendant to be served: Equitable 10, LLC

ADDRESS WHERE ATTEMPTED OR SERVED: c/o Secretary of State, 69 W. Washington, Room 1240
Chicago, IL, 60602

I SERVED the within named defendant on: 2/27/2020 12:32 PM

X CORPORATE OR GOVERNMENT SERVICE by leaving a copy of this process with Joanne Schoepke, (Title): Customer Service Rep., a person authorized to accept service and informed that person of the contents thereof.

THE DESCRIPTION OF THE PERSON WITH WHOM THE COPY OF THIS PROCESS WAS LEFT IS AS FOLLOWS:

Age: 50s Gender: Female Race: Caucasian Height: Sitting Weight: 126-150 Hair: Blonde Eyes: Brown

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the above statements set forth in this instrument are true and correct.

I certify that I am a United States citizen, over the age of 18 and not a party to, nor otherwise interested in the above action.

State of Illinois

County of Will

Subscribed and sworn before me on 3/4/2020

Notary Public

Signature of Process Server

Kelly Kirchhoff

Printed Name

Process Server

Title

OFFICIAL SEAL
DENNIS MCMASTER
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES: 01/28/22



772509_3873971_0_23_V4

EXHIBIT P

**IN THE CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT – FIRST DISTRICT**

COUNTY OF COOK D/B/A COOK COUNTY
LAND BANK AUTHORITY,

Plaintiff

v.

EQUITABLE 10, LLC,

Defendants.

Case Number: 2019CH00998

Property: 2011 W. 68th Place

Courtroom: 2408

AFFIDAVIT

I, Julie Suhl, being first duly sworn on oath, depose and state that:

1. With respect to defendant Equitable 10, LLC, the defendant has not filed an appearance or answer.
2. This affidavit is based on search on the Cook County Clerk of the Circuit Court's electronic docket conducted on November 23, 2020.



Under penalties as provided by law pursuant to 735
ILCS 5/1-109 the above signed certifies that the
statements set forth herein are true and correct.

Julie Suhl, ARDC #6306387
Denzin Soltanzadeh LLC
190 S. LaSalle, Suite 2160
Chicago, Illinois 60603
(312) 380-7260
jsuhl@denzinlaw.com
Firm #63153