

STATE OF ILLINOIS

COUNTY OF PIKE

IN THE CIRCUIT COURT FOR THE 8TH JUDICIAL CIRCUIT
PIKE COUNTY-PITTSFIELD, ILLINOIS

DELMAR FINANCIAL

PLAINTIFF) NO. 10 CH 19

VS

) JUDGE
) Presiding Judge

ALLEN MOTLEY AKA ALLEN LEE MOTLEY;
CATHY MOTLEY AKA CATHY ANN MOTLEY;
UNKNOWN OWNERS AND NON RECORD CLAIMANTS
;

DEFENDANTS)

MOTION FOR JUDGMENT FOR FORECLOSURE AND SALE

Plaintiff, moves this court for the entry of a Judgment for Foreclosure and Sale based on the pleadings of record with this Court.

BY: 

Pierce & Associates, P.C.
Attorneys for Plaintiff

PIERCE & ASSOCIATES
Attorneys for Plaintiff
1 N. Dearborn
Suite 1300
Chicago, IL 60602
Tel. (312) 346-9088
Fax (312) 346-1557

PA1012535

IN THE CIRCUIT COURT FOR THE 8TH JUDICIAL CIRCUIT
PIKE COUNTY-PITTSFIELD, ILLINOIS

DELMAR FINANCIAL)	
)	
	PLAINTIFF) NO. 10 CH 19
))
VS) JUDGE)
) Presiding Judge)
ALLEN MOTLEY AKA ALLEN LEE MOTLEY;)	
CATHY MOTLEY AKA CATHY ANN MOTLEY;)	
UNKNOWN OWNERS AND NON RECORD CLAIMANTS)	
;)	
)	
)	
	DEFENDANTS)

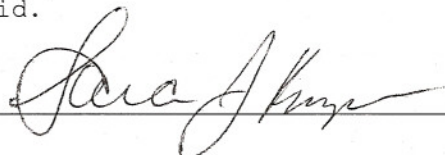
NOTICE OF MOTION

TO:

ALLEN MOTLEY AKA ALLEN LEE MOTLEY; 224 WEST PERRY STREET;
 PITTSFIELD, IL 62363
 CATHY MOTLEY AKA CATHY ANN MOTLEY; 224 WEST PERRY STREET;
 PITTSFIELD, IL 62363
 CITY OF PITTSFIELD C/O CITY CLERK *IL SB1894 NOTICE*; 215
 N MONROE; PITTSFIELD, IL 62363

On June 3, 2011, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Presiding Judge, in the courtroom usually occupied by him/her, at 10:30 AM, or any judge sitting in his/her stead, in the courtroom usually occupied by him/her in the Court House for the Circuit Court of PIKE County, Illinois, and shall then and there move the Court for the entry of an Order of Summary Judgment (if applicable), Default, Judgment of Foreclosure and Sale, and Appointment of Foreclosure Sale Officer.

I, Sara Jane Roupe, (a non-attorney,) certify that I served the following Motions: Motion for Judgment, Motion for Order of Default, Petition for Summary Judgment (if applicable) and Motion for Appointment of Selling Officer by mailing a copy to the above-titled addresses and depositing same in the U.S. mail at 1 N. Dearborn, Chicago, Illinois 60602 at 5:00 p.m. on May 26, 2011, with proper postage prepaid.

SIGNATURE 

Name: PIERCE & ASSOCIATES Attorneys for: Plaintiff
 Address: 1 N. Dearborn Telephone: (312) 346-9088
 City: Chicago, Illinois 60602 PA1012535

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UNKNOWN OWNERS AND NON RECORD CLAIMANTS

DEFENDANTS)

MOTION FOR ORDER OF DEFAULT

Now comes Plaintiff by and through its attorneys Pierce & Associates P.C. and moves this Honorable Court for an Order of Default as against the following defendants:

ALLEN MOTLEY AKA ALLEN LEE MOTLEY; CATHY MOTLEY AKA CATHY ANN MOTLEY; UNKNOWN OWNERS AND NON RECORD CLAIMANTS ;

WHEREFORE Plaintiff prays that this Honorable Court enter an Order for Default as against:

ALLEN MOTLEY AKA ALLEN LEE MOTLEY; CATHY MOTLEY AKA CATHY ANN MOTLEY; UNKNOWN OWNERS AND NON RECORD CLAIMANTS ;

BY: 

Pierce & Associates, P.C.
Attorneys for Plaintiff

PIERCE & ASSOCIATES
Attorney for Plaintiff
1 N. Dearborn
Suite 1300
Chicago, IL 60602
Tel. (312) 346-9088
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Richard Norton