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

GMAC Mortgage LLC, U.S. Bank National Association, a national banking association as successor trustee to Bank of America, N.A., as Trustee for Morgan Stanley Loan Trust 2006-16AX, Plaintiff/Counter-Defendant, v. Richard Daniggelis, Defendant/Counter-claimant and cross-claimant,

Joseph Younes, Mortgage Electronic Registration Systems, Inc., as nominee for HLB Mortgage, Paul Shelton, Erika Rhone and Stewart Title of Illinois and Unknown Owners. Defendants/Cross-Defendants.

To: Andjelko Galic, Esq.

134 N. LaSalle Street, Suite 1810 Chicago, Illinois 60602

Peter King, Esq. King Holloway LLC 101 N. Wacker Drive, Suite 2010 Chicago, Illinois 60606

John K. Kallman, Esq. 221 N. LaSalle St., Suite 1200 Chicago, Illinois 60601

20/3 JAN / 8 Case No. 07 CH 29.7 Judge Michael F.

Cal. 61

1720 North Sedgwick Ave., Chicago, Illinois

**NOTICE OF FILING** 

Paul Shelton, Esq. Shelton Law Group LLC 700 E. Ogden Ave - Suite 101 Westmont, Illinois 60559

John J. Knopic II, Esq. Pierce and Associates 1 N. Dearborn, Suite 1300 Chicago, Illinois 60602

Robert Haney, Esq. Kropik, Papuga & Shaw 120 S. LaSalle Street, Suite 1327 Chicago, Illinois 60603

PLEASE TAKE NOTICE that on the 18th day of January, 2013, I caused to be filed with the Clerk of the Circuit Court, of Cook County Illinois, County Department, Chancery Division, the following:

## PLAINTIFF'S ANSWER TO RICHARD DANIGGELIS' MOTION FOR SUMMARY JUDGMENT ON COUNTS I, II AND III OF PLAINTIFF'S THIRD AMENDED COMPLAINT

## **PROOF OF SERVICE**

Under penalties as provided by law, pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that a copy of the aforegoing document was served by mailing to the above person(s) by First Class Mail from the U.S. Mail Chute at 221 North LaSalle St., Chicago, Illinois, before 5:00 p.m. on the 18th day of January, 2013

Richard Indyke One of Plaintiff's attorney 221 N. LaSalle St., Suite 1200, Chicago, Illinois 60601 (312) 332-2828 Atty No. 20584