

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Municipal DEPARTMENT/ First DISTRICT

City of Chicago Plaintiff

v.

Joseph Yane, et al. Defendant

No. 17 M 400 775

Claimed \$: _____

Return Date: _____

Court Date: _____

Room No.: 1105 Richard J.

Daley Center
Address of Court District for Filing

APPEARANCE AND JURY DEMAND*

- General Appearance 0900 - Fee Paid 0909 - No Fee
- 0904 - Fee Waived 0908 - Trial Lawyers Appearance - No Fee
- Jury Demand* 1900 - Appearance and Jury Demand/Fee Paid
- 1909 - Appearance and Jury Demand/No Fee Paid

17 JUL 13 AM 11:18

The undersigned enters the appearance of: Plaintiff Defendant

Joseph Yane
(Insert Litigant's Name)

[Signature]
Signature

- Initial Counsel of Record Pro Se (Self-represented) 2810 Rule 707 Out-of-State Counsel (pro hac vice)
- Additional Appearance Substitute Appearance

Atty. No.: 33492 Pro se 99500

Name: H. Howard

Atty. for: Defendant

Address: 166 W. Washington #600

City/State/Zip Code: Chicago IL 60602

Telephone: (312) 281-1302

Primary Email: howard.hughes@gmail.com

Secondary Email: _____

Tertiary Email: _____

Important

Once this Appearance form is filed, photocopies of this form must be sent to all other parties named in this case (or to their attorneys) using either regular mail, facsimile transmission (fax), Email transmission or personal delivery. (See Illinois Supreme Court Rules 11 and 13 for more information.)

Pro Se Only: I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address: _____

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

[Signature]
Attorney for Plaintiff Defendant

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

425
4579

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

No: 17 MI 400775

v. Joseph Yarnes

Re: 1720 N. Sedgewich St.

et al.,
Defendant(s).

Courtroom 1105, Richard J. Daley Center

ORDER

This cause coming to be heard on the set call, the court having jurisdiction over the subject matter and the below-named defendant(s), being fully advised in the premises, and having heard evidence and testimony:

IT IS HEREBY ORDERED THAT Defendant(s) _____

- Must personally appear before this court on the next court date. Corporate entities must appear through an attorney.
- Must schedule and be present for an interior / exterior inspection of the entire premises before the next court date with the
 - Department of Buildings Health Department Fire Department
 - and an additional inspection _____ with plans and permits on site.
- Must correct the following violations in the complaint: _____ before the next court date or by _____.
- Must board and secure the _____ by _____.
- Shall be subject to a preliminary injunction not to rent, use, lease, or occupy the _____ and must keep the same vacant and secure until further order of court.
- Must keep the entire premises vacant and secure until further order of court.
- Must immediately post notice at all levels of the front / rear porch(es) and notify all tenants and occupants that the porch(es) are to be used for emergency exiting only and not for recreation or storage, and maintain such notice until further order of court.
- Must register the premises as a vacant building pursuant to the Municipal Code of Chicago §§ 13-12-125 to -128 within _____ days and must present proof of registration to the court on the next court date.
- _____

ADDITIONALLY, THAT:

- All prior orders shall continue in full force and effect until further order of court, including receivership
- An alias summons shall issue to: _____
- The following shall be joined as defendant(s) with summons waived / to issue : _____
- The following defendants are dismissed without prejudice, no fines, no costs: _____
- Defendant(s) _____ has / have failed to appear in court or otherwise answer the complaint and is / are in default, the complaint herein is confessed against said defendant(s) and
 - an ex parte judgment in the amount of \$ _____ .00 plus court costs of \$ _____ .00 prove-up is continued for a total amount of \$ _____ .00 is entered against said defendant(s). to a later date.
- City is granted immediate authority to enforce the \$ _____ .00 default judgment entered on ____ / ____ / ____ against _____ there being no just cause to delay enforcement.
- Unknown owners and nonrecord claimants and _____ having failed to appear in court or otherwise

plead as of the publication default date of ____ / ____ / ____ are in default and the complaint is confessed against them.

~~Plaintiff's Motion to Intervene is hereby stricken as the movant is not in court~~

This cause be continued for: case management trial, settlement, or dismissal / hearing / jurisdiction.

IT IS FURTHER ORDERED THAT this cause be continued to 7 / 20 / 2017 at 11:00 a.m. p.m., Courtroom 1105, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice. Patrice Ball-Reed Associate Judge

HEARING DATE: 7 / 13 / 17

By: _____
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

JUL 13 2017
Circuit Court - 1987
Patrice Ball-Reed
Judge
Ball-Reed

Pink Copy for Defendant(s) (photocopy if required)
Yellow Copy for City of Chicago Department of Law
White Original for Court Records

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

425
4519

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

No: 17 MI 400775

v. Joseph Yarnes

Re: 1720 N. Sedgewick St.

et al.,
Defendant(s).

Courtroom 1105, Richard J. Daley Center

ORDER

This cause coming to be heard on the set call, the court having jurisdiction over the subject matter and the below-named defendant(s), being fully advised in the premises, and having heard evidence and testimony:

IT IS HEREBY ORDERED THAT Defendant(s) _____

- Must personally appear before this court on the next court date. Corporate entities must appear through an attorney.
- Must schedule and be present for an interior / exterior inspection of the entire premises before the next court date with the
 - Department of Buildings
 - Health Department
 - Fire Department and an additional inspection _____ with plans and permits on site.
- Must correct the following violations in the complaint: _____ before the next court date or by _____.
- Must board and secure the _____ by _____.
- Shall be subject to a preliminary injunction not to rent, use, lease, or occupy the _____ and must keep the same vacant and secure until further order of court.
- Must keep the entire premises vacant and secure until further order of court.
- Must immediately post notice at all levels of the front / rear porch(es) and notify all tenants and occupants that the porch(es) are to be used for emergency exiting only and not for recreation or storage, and maintain such notice until further order of court.
- Must register the premises as a vacant building pursuant to the Municipal Code of Chicago §§ 13-12-125 to -128 within _____ days and must present proof of registration to the court on the next court date.
- _____

ADDITIONALLY, THAT:

- All prior orders shall continue in full force and effect until further order of court, including receivership
- An alias summons shall issue to: _____
- The following shall be joined as defendant(s) with summons waived / to issue : _____
- The following defendants are dismissed without prejudice, no fines, no costs: _____
- Defendant(s) _____ has / have failed to appear in court or otherwise answer the complaint and is / are in default, the complaint herein is confessed against said defendant(s) and
 - an ex parte judgment in the amount of \$ _____ .00 plus court costs of \$ _____ .00 prove-up is continued for a total amount of \$ _____ .00 is entered against said defendant(s). to a later date.
- City is granted immediate authority to enforce the \$ _____ .00 default judgment entered on ____ / ____ / ____ against _____ there being no just cause to delay enforcement.
- Unknown owners and nonrecord claimants and _____

_____ having failed to appear in court or otherwise plead as of the publication default date of ____ / ____ / ____ are in default and the complaint is confessed against them.

~~Patrice Ball-Reed is hereby stricken as the movant if not in court~~

This cause be continued for: case management / trial, settlement, or dismissal / hearing / jurisdiction.

IT IS FURTHER ORDERED THAT this cause be continued to 7 / 20 / 2017 at 11:00 a.m. Patrice Ball-Reed Judge
Courtroom 1105, Richard J. Daley Center, 50 W. Washington St., Chicago, without further notice.

HEARING DATE: 7 / 13 / 17

By: _____
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791

JUL 13 2017
Circuit Court - 1987
Patrice Ball-Reed
Judge
Ball-Reed

Pink Copy for Defendant(s) (photocopy if required)
Yellow Copy for City of Chicago Department of Law
White Original for Court Records

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

No: 17 MI 400775
Re: 1720 N. Sedgwick
Courtroom 11 05, Richard J. Daley Center

v. Joseph Younes
et al.,
Defendant(s).

ORDER

This cause coming to be heard on the set call, the court having jurisdiction over the subject matter and the below-named defendant(s), being fully advised in the premises, and having heard evidence and testimony:
IT IS HEREBY ORDERED THAT Defendant(s) Younes

- Must personally appear before this court on the next court date. Corporate entities must appear through an attorney.
- Must schedule and be present for an interior / exterior inspection of the entire premises before the next court date with the
 - Department of Buildings
 - Fire Department
 - Health Department
 - with plans and permits on site.
- and an additional inspection _____ before the next court date or by _____ by _____
- Must correct the following violations in the complaint: _____
- Must board and secure the _____
- Shall be subject to a preliminary injunction not to rent, use, lease, or occupy the _____ and must keep the same vacant and secure until further order of court.
- Must keep the entire premises vacant and secure until further order of court.
- Must immediately post notice at all levels of the front / rear porch(es) and notify all tenants and occupants that the porch(es) are to be used for emergency exiting only and not for recreation or storage, and maintain such notice until further order of court.
- Must register the premises as a vacant building pursuant to the Municipal Code of Chicago §§ 13-12-125 to -128 within _____ days and must present proof of registration to the court on the next court date.
- _____

ADDITIONALLY, THAT:

- All prior orders shall continue in full force and effect until further order of court.
- An alias summons shall issue to: _____
- The following shall be joined as defendant(s) with summons waived / to issue: _____
- The following defendants are dismissed without prejudice, no fines, no costs: _____
- Defendant(s) _____ has / have failed to appear in court or otherwise answer the complaint and is / are in default, the complaint herein is confessed against said defendant(s) and
 - an ex parte judgment in the amount of \$ _____ .00 plus court costs of \$ _____ .00
 - for a total amount of \$ _____ .00 is entered against said defendant(s).
 - [] prove-up is continued to a later date.
- City is granted immediate authority to enforce the \$ _____ .00 default judgment entered on ____/____/____ against _____ there being no just cause to delay enforcement.
- Unknown owners and nonrecord claimants and _____ having failed to appear in court or otherwise are in default and the complaint is confessed against them.

The receiver shall remain in place. The receiver shall monitor the construction and submit reports to Landmarks staff weekly during case management / trial, settlement, or dismissal / hearing / jurisdiction.

IT IS FURTHER ORDERED THAT this cause be continued to 8/31/2017 at 11:00 (a.m.) / p.m., subject to the parts. agreed by the parts.

HEARING DATE: 8/20/2017

By: _____
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791
FORM CONS.1001 rev. 3/2013

Associate Judge
Patricia Ball
Judge 1-11

Pink Copy for Defendant(s) (photocopy if required)
City of Chicago Department of Law

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT-FIRST DISTRICT

THE CITY OF CHICAGO, a municipal corporation,
Plaintiff,

No: 17 MI 400775
Re: 1720 N. Sedgwick
Courtroom 11 05, Richard J. Daley Center

v. Joseph Younes
et al.,
Defendant(s).

ORDER

This cause coming to be heard on the set call, the court having jurisdiction over the subject matter and the below-named defendant(s), being fully advised in the premises, and having heard evidence and testimony:
IT IS HEREBY ORDERED THAT Defendant(s) Younes

- Must personally appear before this court on the next court date. Corporate entities must appear through an attorney.
- Must schedule and be present for an interior / exterior inspection of the entire premises before the next court date with the Department of Buildings Fire Department Health Department with plans and permits on site.
- and an additional inspection _____ before the next court date or by _____ by _____.
- Must correct the following violations in the complaint: _____
- Must board and secure the _____
- Shall be subject to a preliminary injunction not to rent, use, lease, or occupy the _____ and must keep the same vacant and secure until further order of court.
- Must keep the entire premises vacant and secure until further order of court.
- Must immediately post notice at all levels of the front / rear porch(es) and notify all tenants and occupants that the porch(es) are to be used for emergency exiting only and not for recreation or storage, and maintain such notice until further order of court.
- Must register the premises as a vacant building pursuant to the Municipal Code of Chicago §§ 13-12-125 to -128 within _____ days and must present proof of registration to the court on the next court date.
- _____

ADDITIONALLY, THAT:

- All prior orders shall continue in full force and effect until further order of court.
- An alias summons shall issue to: _____
- The following shall be joined as defendant(s) with summons waived / to issue: _____
- The following defendants are dismissed without prejudice, no fines, no costs: _____
- Defendant(s) _____ has / have failed to appear in court or otherwise answer the complaint and is / are in default, the complaint herein is confessed against said defendant(s) and _____
- an ex parte judgment in the amount of \$ _____,00 plus court costs of \$ _____,00 prove-up is continued to a later date.
- for a total amount of \$ _____,00 is entered against said defendant(s).
- City is granted immediate authority to enforce the \$ _____,00 default judgment entered on ____/____/____ there being no just cause to delay enforcement.
- Unknown owners and nonrecord claimants and _____ having failed to appear in court or otherwise

The receiver shall remain in place. The receiver shall monitor the construction and submit reports to Landmarks staff weekly during
plead as of the publication default date of ____/____/____ are in default and the complaint is confessed against them.

This cause be continued for: case management / trial, settlement, or dismissal / hearing / jurisdiction. 11:00 a.m. subject to notice. 8/31/2017 agreed by the parties.

IT IS FURTHER ORDERED THAT this cause be continued to _____ at _____, Chicago, without further notice.

HEARING DATE: 8/20/2017

By: _____
Attorney for Plaintiff
Corporation Counsel #90909
30 N. LaSalle, Room 700
Chicago, IL 60602 (312) 744-8791
FORM CONS.1001 rev. 3/2013

Associate Judge
Patricia Ball
Judge 8-11

Pink Copy for Defendant(s) (photocopy if required)

City of Chicago Department of Law

3100

IN THE CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT - FIRST DISTRICT

CITY OF CHICAGO,
Plaintiff,

-v-

JOESEPH YOUNES, et al.,
Defendant.

Case No.: 2017 M1 400775

Re: 1720 N. Sedgwick St.
Chicago, Illinois 60644

Court Rm. 1105

Amt. Claimed: \$6,500.00

FILED-09
17 JUL 21 AM 10:07
CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT

ANSWER

NOW COMES, the Defendant, Joseph Younes (hereinafter "Younes"), by and through the Law Offices of Hugh D. Howard and his Answer to the City's Complaint states as follows:

GENERAL ALLEGATIONS

1. Admits City is bringing this cause of action pursuant to the sections of the Illinois Municipal code site. Defendant denies the remaining allegations.
2. Admits.
3. Admits.
4. Admits.
5. For purposes of the prefatory paragraph, Younes admits he is the owner of the real estate which is subject to this litigation. Denies the remaining allegations contained in this paragraph.
 - A. Admits.
 - B. Admits.
 - C. Younes has insufficient information with which to admit or deny the allegations contained herein and neither admits nor denies same but demands strict proof thereof.

6. Admits.

**COUNT I:
BUILDING CODE VIOLATIONS: CIVIL RELIEF**

7. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth herein.

8. Paragraph 8 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the city of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

9. Paragraph 9 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

10. Paragraph 10 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the city of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

11. Denies.

A. Denies.

1. Denies

2. Denies.

3. Denies.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

**COUNT II:
BUILDING CODE VIOLATIONS: EQUITABLE RELIEF**

12. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth in paragraph 12 herein.

13. Paragraph 13 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states that any remedy the City may seek to have imposed is based the conclusion plead herein are wholly inapplicable and are denied.

14. Denies.

15. Paragraph 15 is not a well plead fact but rather states a legal conclusion drawn based on recitations of specific sections of the City of Chicago Municipal Code referenced therein which Younes denies and affirmatively states are wholly inapplicable herein.

16. Paragraph 16 is not a well plead fact but rather states a legal conclusion drawn based on recitations of specific sections of the City of Chicago Municipal Code referenced therein which Younes denies and affirmatively states are wholly inapplicable herein.

17. Denies.

18. Paragraph 18 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

19. Paragraph 19 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

**COUNT III:
CHICAGO LANDMARKS VIOLATIONS: CIVIL PENALTIES**

20. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth in paragraph 20 herein.

21. Admits.

22. Paragraph 22 is not a well plead fact and as such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

23. Paragraph 23 is not a well plead fact and as such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

24. Denies.

A. Denies.

1. Denies.
2. Denies.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

**COUNT III:
CHICAGO LANDMARKS VIOLATIONS: EQUITABLE RELIEF**

25. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth in paragraph 25 herein.

26. Paragraph 26 is not a well plead fact and as such, no answer is required and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

12 (*sic*). Denies.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

Respectfully submitted,

By: Joseph Younes

s/Hugh D. Howard/s

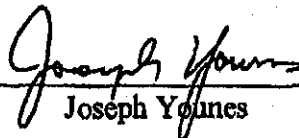
By:

Counsel for Noor Inc.

Hugh D. Howard
Law Offices of Hugh D. Howard
166 W. Washington, Suite 600
Chicago, Illinois 60602
(312) 781-1002
Atty. No.: 33492
howardhughd@gmail.com

CERTIFICATION

Under penalties as provided 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 as to such matters the undersigned certifies as aforesaid that the undersigned verily believe the same to be true and correct.


Joseph Younes

Law Offices of Hugh D. Howard
166 W. Washington, Suite 600
Chicago, Illinois 60602
(312) 781-1002
Atty. No. 33492

3100

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

CITY OF CHICAGO,
Plaintiff,

-v-

JOESEPH YOUNES, et al.,
Defendant.

Case No.: 2017 M1 400775

Re: 1720 N. Sedgwick St.
Chicago, Illinois 60644

Court Rm. 1105

Amt. Claimed: \$6,500.00

FILED-05
17 JUL 21 AM 11:07
CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT

ANSWER

NOW COMES, the Defendant, Joseph Younes (hereinafter "Younes"), by and through the Law Offices of Hugh D. Howard and his Answer to the City's Complaint states as follows:

GENERAL ALLEGATIONS

1. Admits City is bringing this cause of action pursuant to the sections of the Illinois Municipal code site. Defendant denies the remaining allegations.
2. Admits.
3. Admits.
4. Admits.
5. For purposes of the prefatory paragraph, Younes admits he is the owner of the real estate which is subject to this litigation. Denies the remaining allegations contained in this paragraph.
 - A. Admits.
 - B. Admits.
 - C. Younes has insufficient information with which to admit or deny the allegations contained herein and neither admits nor denies same but demands strict proof thereof.

6. Admits.

**COUNT I:
BUILDING CODE VIOLATIONS: CIVIL RELIEF**

7. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth herein.

8. Paragraph 8 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the city of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

9. Paragraph 9 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

10. Paragraph 10 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the city of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

11. Denies.

A. Denies.

1. Denies

2. Denies.

3. Denies.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

**COUNT II:
BUILDING CODE VIOLATIONS: EQUITABLE RELIEF**

12. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth in paragraph 12 herein.

13. Paragraph 13 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states that any remedy the City may seek to have imposed is based the conclusion plead herein are wholly inapplicable and are denied.

14. Denies.

15. Paragraph 15 is not a well plead fact but rather states a legal conclusion drawn based on recitations of specific sections of the City of Chicago Municipal Code referenced therein which Younes denies and affirmatively states are wholly inapplicable herein.

16. Paragraph 16 is not a well plead fact but rather states a legal conclusion drawn based on recitations of specific sections of the City of Chicago Municipal Code referenced therein which Younes denies and affirmatively states are wholly inapplicable herein.

17. Denies.

18. Paragraph 18 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

19. Paragraph 19 is not a well plead fact but rather states instead a legal conclusion. As such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

**COUNT III:
CHICAGO LANDMARKS VIOLATIONS: CIVIL PENALTIES**

20. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth in paragraph 20 herein.

21. Admits.

22. Paragraph 22 is not a well plead fact and as such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

23. Paragraph 23 is not a well plead fact and as such, no answer is required and no and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

24. Denies.

A. Denies.

1. Denies.

2. Denies.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

**COUNT III:
CHICAGO LANDMARKS VIOLATIONS: EQUITABLE RELIEF**

25. YOUNES restates and incorporates his answers to paragraph 1-6 of the General Allegations as though fully set forth in paragraph 25 herein.

26. Paragraph 26 is not a well plead fact and as such, no answer is required and none is given. To the limited extent an answer is required Younes affirmatively states the Sections of the City of Chicago Municipal Code referenced therein speak for themselves and any legal conclusions the City seeks to have this Court infer therefrom are wholly inapplicable herein and are denied.

12 (*sic*). Denies.

WHEREFORE, the Defendant, Joseph Younes, prays for judgment in his favor and against the Plaintiff and further, for any other such relief as this Court deems just and proper.

Respectfully submitted,

By: Joseph Younes

s/Hugh D. Howard/s

By: _____

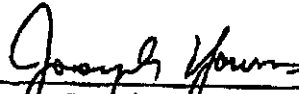
Counsel for Noor Inc.

Hugh D. Howard
Law Offices of Hugh D. Howard
166 W. Washington, Suite 600
Chicago, Illinois 60602
(312) 781-1002
Atty. No.: 33492
howardhughd@gmail.com

WDA 7/21/17

CERTIFICATION

Under penalties as provided 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 as to such matters the undersigned certifies as aforesaid that the undersigned verily believe the same to be true and correct.



Joseph Younes

Law Offices of Hugh D. Howard
166 W. Washington, Suite 600
Chicago, Illinois 60602
(312) 781-1002
Atty. No. 33492

IN THE CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT - FIRST DISTRICT

3321

CITY OF CHICAGO,
Plaintiff,

-v-

JOESEPH YOUNES, et al.,
Defendant.

)
)
) Case No.: 2017 M1 400775
)
)
) Court Rm. 1105
)
)
) Amt. Claimed: \$6,500.00
)
)
)

NOTICE OF FILING/NOTICE OF MAILING

TO: Greg Janes
Senior Corporation Counsel
City of Chicago-Department of Law
30 N. LaSalle St., Suite 700
Chicago, IL 60602

FILED
17 JUL 21 AM 11:06
COURT REPORTER
CITY OF CHICAGO
MUNICIPAL DEPARTMENT

Please take notice that on **July 21, 2017** the following documents were filed with Clerk of the Court of Cook County: **Defendant's Answer to the City of Chicago's Complaint**

Please take notice that on **July 11, 2017** the following documents were mailed to the above referenced party: **Defendant's Answer to the City of Chicago's Complaint** .

Name: Hugh D. Howard
Address: 166 W. Washington, #600
City: Chicago, IL 60602
Email: howardhughd@gmail.com

Attorney for: Joseph Younes
Telephone: (312) 781-1002
Atty. No. 33492

Certification of Service

I, Hugh D. Howard, certify that I served this Notice by: (a) facsimile to the telephone number listed above, (b) via email; (c) by hand delivery or (d) by mailing a copy to the above listed party by depositing the in the United States Mail box at 166 W. Washington, Suite 600, Chicago, Illinois 60602 on or before 5:00 p.m. on July 21, 2015 with proper postage prepaid.

s/Hugh D. Howard/s