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

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| THE CITY OF CHICAGO, a municipal corporation;  Plaintiff,  -vs-  KIMBERLY BRADFORD, et al;  Defendant(s). |  | Case No. 15 M1 402140  *Property Address:* 8915 S. May Street  Chicago, IL 60620 |

**DEFENDANT’S EMERGENCY MOTION TO STAY DEMOLITION**

Now comes Defendant The Northern Trust Company (hereinafter “Defendant”), by and through its attorneys Marinosci Law Group, P.C., and submits this Motion to Stay Demolition and moves this Court to stay demolition of the property located at 8915 S. May Street, Chicago, Illinois 60620. In support of its motion, Defendant states as follows:

1. Plaintiff filed its Complaint on July 21, 2015.
2. At the initial hearing on September 16, 2015 counsel for Defendant was granted leave to file an appearance on behalf of Defendant and the matter was continued.
3. On October 13, 2015 counsel for the Defendant filed its appearance.
4. On October 15, 2015 the inspector for the City informed the Court the condition at property had become dangerous and hazardous. The inspector testified that there were bricks falling from the property. The matter was continued to give Defendant an opportunity to address the violations.
5. On November 5, 2015 the Court gave Defendant one additional week to address the dangerous and hazardous masonry condition at the property.
6. On November 10, 2015 Defendant had begun to address the condition at the property but had not yet completed the work to abate the falling bricks,
7. On November 12, 2015 this Court entered an order authorizing the demolition of the property, stayed until November 19, 2015.
8. On November 19, 2015 the demolition order was not stayed further. A permit for repairing and replacing bricks, tuckpointing, and repairing parapet was issued by the Department of Buildings. (Exhibit A)
9. On December 10, 2015 the repairs to the dangerous and hazardous condition were completed. (Exhibit B)

WHEREFORE, Defendant, The Northern Trust Company, prays this Honorable court stay the Order of Demolition entered November 12, 2015 and allow Defendant time to abate the remaining violations at the property.

Respectfully submitted,

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One of Defendant’s Attorneys

MARINOSCI LAW GROUP, P.C.

134 N. LaSalle Street, Suite 1900

Chicago, IL 60602

Telephone: 312-940-8580

Fax: 401-234-5130

[mlgil@mlg-defaultlaw.com](mailto:mlgil@mlg-defaultlaw.com)