STATE OF ILLINOIS Firm No.: 59049

COUNTY OF COOK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS,

- COUNTY DEPARTMENT - CHANCERY DIVISION -

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| BANK OF AMERICA, N.A. | Case No. 2017CH14505 |
| Plaintiff,  vs. | Cal No.: 64 |
| 50TH COURT CONDOMINIUM ASSOCIATION, JOHN LYDON, AS SPECIAL REPRESENTATIVE FOR MANUEL TRONCOSO, DECEASED, MARIA TRONCOSO, UNKNOWN HEIRS AND LEGATEES OF MANUEL TRONCOSO; UNKNOWN OWNERS AND NON-RECORD CLAIMANTS | Property Address:  3239 SOUTH 50TH COURT #302  CICERO, IL 60804 |
| Defendant(s). |  |

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

NOW COMES the Plaintiff, BANK OF AMERICA, N.A by and through its attorneys of MARINOSCI LAW GROUP, P.C., and moves this Honorable Court for leave to file instanter an Amended Complaint and in support thereto states as follows:

1. That mortgagor MANUEL TRONCOSO died on DECEMBER 16, 2016.
2. That on December 19, 2017, this Court entered an Order appointing JOHN LYDON as Special Representative for MANUEL TRONCOSO, deceased.
3. That Plaintiff conducted a due and diligent inquiry into any possible heirs of MANUEL TRONCOSO, deceased. (Affidavit of Due and Diligent Inquiry as to the Heirs of Deceased Defendant, Exhibit A).
4. That the heirs and their relationship to MANUEL TRONCOSO, deceased, discovered through said investigation are as follows:
   1. VICTORIA TRONCOSO – Daughter
   2. MANUEL TRONCOSO - Son
5. Plaintiff, BANK OF AMERICA N.A, , seeks to file an Amended Complaint as follows:
   1. TO ADD AS PARTY DEFENDANT VICTORIA TRONCOSO;
   2. TO ADD AS PARTY DEFENDANT MANUEL TRONCOSO;

WHEREFORE, Plaintiff requests the Motion be granted and MARINOSCI LAW GROUP, P.C. be granted leave to file their Amended Complaint instanter and any other relief this Court deems fair and just.

Respectfully submitted,

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| Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_ | By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Brian Guyer  Attorney, Marinosci Law Group, P.C.  ARDC No.: 6312967 |

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