STATE OF ILLINOIS ARDC No.: 6312808

COUNTY OF DUPAGE

IN THE CIRCUIT COURT OF THE 18TH JUDICIAL CIRCUIT

DUPAGE COUNTY, WHEATON, ILLINOIS

|  |  |
| --- | --- |
| VENTURES TRUST 2013-I-H-R BY MCM CAPITAL PARTNERS, LLC, ITS TRUSTEE |  |
| Plaintiff, | Case No. 2016 CH 001119 |
| vs. |  |
| Property Address:  95 EAST FOSTER AVE |
| DENISE COCONATO-ESPOSITO, CUONO ESPOSITO, ADVANTAGE NATIONAL BANK, UNKNOWN OWNERS AND NON-RECORD CLAIMANTS | ROSELLE, IL 60172 |
| Defendant(s). |  |

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT, *INSTANTER***

NOW COMES VENTURES TRUST 2013-I-H-R BY MCM CAPITAL PARTNERS, LLC, ITS TRUSTEE (“Plaintiff”), through counsel (Marinosci Law Group, PC), with its Motion for Leave to file an Amended Complaint, *Instanter*.

1. Plaintiff filed the underlying Complaint on July 19, 2016.

2. Plaintiff now seeks leave of the Court to file an Amended Complaint (Exhibit A), *instante*r:

A. To add as party Defendant, SCHAUMBERG BANK & TRUST, who may have an interest in the property at issue, through a recorded lien,

B. To add a new lien in favor of defendant ILLINOIS DEPARTMENT OF REVENUE.

WHEREFORE, Plaintiff asks the Court for leave to file an Amended Complaint, *Instanter*,

Respectfully submitted,

|  |  |
| --- | --- |
| Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_ | By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Roderic Fleming  Attorney, Marinosci Law Group, P.C.  ARDC No.: 6312808 |

MARINOSCI LAW GROUP, P.C.

134 N. LaSalle Street, Suite 1900

Chicago, IL 60602

Telephone: 312-940-8580

Facsimile: 401-262-2114

ARDC No.: 6312808

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