|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| STATE OF WISCONSIN | | CIRCUIT COURT | | [INSERT] COUNTY |
|  | | CIVIL DIVISION | |  |
| [PLAINTIFF NAME] | | |  | AFFIDAVIT OF DUE DILIGENCE |
|  | Plaintiff | |  | Case No. [INSERT] |
|  | | |  |  |
| Vs. | | |  | Case Code No. 30404 |
|  | | |  | Foreclosure of Mortgage |
| [DEFENDANTS] | | |  |  |
|  | Defendants | |  |  |

STATE OF ILLINOIS )

) SS

COUNTY OF COOK )

The undersigned Charles A. Walgreen, being first duly sworn on oath deposes and says:

That he is attorney for the Plaintiff in this case and that he has personal knowledge of the facts set forth herein based upon the mortgage documents and collection records in his possession. That I am an attorney licensed to practice in Wisconsin and make this affidavit upon my review of the attempts of service made by Plaintiff’s process server.

That Defendant [DEFENDANT NAME] (“Defendant”) executed and delivered a Note and Mortgage to [ORIGINAL LENDER] (the “subject loan”) on [LOAN DATE], which are secured by the property commonly described as [PROPERTY ADDRESS] (the “subject property”).

3. That Defendant defaulted on the subject loan, which is due and owing for the [DUE DATE] payment.

4. That Plaintiff initiated this cause on [FILING DATE] to foreclose the mortgage attached to the subject property.

5. That due investigation and review of public records reveal no new addresses for Defendant [DEFENDANT] aside from the following addresses that have been attempted:

[ADDRESSES ATTEMPTED]

6. That following the failure to serve Defendant through personal or substitute means, Plaintiff caused a Notice of Publication to be issued in [NEWSPAPER] for three consecutive weeks on [PUBLICATION DATES]. A true and correct copy of the Summons sent for Publication and the Proof of Publication have been filed herein.

6. That a review of the public records do not reveal any other possible addresses at which the Defendant may reside. A true and correct copy of the relevant portion of the Accurint Comprehensive Report dated [ACCURINT DATE] is attached hereto as **Exhibit A.**

7. That effectuating service of process through publication was proper as Plaintiff’s process server made numerous attempts to serve the Summons and Complaint upon Defendant at all known addresses.

8. That this affidavit is made in support of Plaintiff’s request for the entry of judgment of foreclosure of mortgage of residential real estate.

DATE: \_\_\_\_\_\_\_\_ \_\_\_, 2018.

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

Subscribed and sworn before me

this \_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_, 2018.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public, State of Illinois

My Commission expires \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Charles A. Walgreen

Attorney for Plaintiff

MARINOSCI LAW GROUP, P.C.

134 North LaSalle Street, Suite 1900

Chicago, Illinois 60602

Tel: (312) 940-8580

Fax: (401) 262-2114

E-mail: cwalgreen@mlg-defaultlaw.com

Service accepted by E-mail: mlgil@mlg-defaultlaw.com

MARINOSCI LAW GROUP, P.C. is the creditor’s attorney and is attempting to collect a debt on its behalf. Any information obtained will be used for that purpose.