

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:12-cv-50298
	)	
WILLIAM P. BUTCHER, AS SPECIAL	)	
REPRESENTATIVE FOR THE ESTATE	)	
OF ALBERT CAMPER AND MATTIE	)	
CAMPER, CITY OF ROCKFORD,	)	Judge: Frederick J. Kapala
ILLINOIS, GORDON BEEKS,	)	
UNKNOWN HEIRS AND	)	
LEGATEES OF ALBERT CAMPER,	)	
UNKNOWN HEIRS and LEGATEES OF	)	
MATTIE CAMPER, UNKNOWN	)	
OWNERS and NON-RECORD	)	Designated Magistrate: P. Michael
CLAIMANTS,	)	Mahoney
Defendants.	)	

**MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE AND SALE**

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff’s Affidavit of Prove-Up. (See Exhibit “1”, Affidavit).

Respectfully submitted,

ZACHARY T. FARDON

United States Attorney

By: s/Caleb J. Halberg  
CALEB J. HALBERG  
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**CERTIFICATE OF SERVICE**

I, Caleb J. Halberg , certify that a true and correct copy of the foregoing **Motion for Entry of Judgment of Foreclosure** was served upon counsel of record, if any, through operation of the Court's Case Management/Electronic Case Files system on April 1, 2014, and on the following non-ECF filers by first class mailing:

William Butcher, Special Representative  
for the Estate of Albert Camper and Mattie Camper  
2044 Ridge Road  
Homewood, IL 60430

City of Rockford  
Nora Doyle, Legal Administration Asst.  
425 East State Street  
Rockford, IL 61104

Gordon Beeks  
15419 Dobson Avenue  
Dolton, IL 60419

Unknown Heirs and Legatees of Albert Camper  
424 Knowlton St.  
Rockford, IL 61102

Unknown Heirs and Legatees of Mattie Camper  
424 Knowlton St.  
Rockford, IL 61102

Unknown Owners and Non-Record Claimants  
424 Knowlton St.  
Rockford, IL 61102

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