

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

IN RE:)	
Nick Lambros)	Case No. 14 B 82693
)	Judge: Thomas M. Lynch
)	Trustee: Bernard J. Natale
Debtor.)	Chapter: 7

NOTICE OF ROUTINE MOTION

SENT VIA CM/ECF:

Patrick Layng
United States Trustee
219 S. Dearborn; RM 800
Chicago, Illinois 60604

SENT VIA CM/ECF:

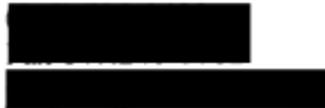
Bernard J Natale
Bernard J. Natale, Ltd.
6833 Stalter Drive, Suite 201
Rockford, IL 61108

SENT VIA FIRST CLASS MAIL:

Jeffrey Epstein c/o Kellerhals Ferguson Fletcher, 9100 Port of Sale Mall, Ste 15 St Thomas V.I. 00802
Jeffrey Epstein c/o Hepler Broom LLC, 130 N. Main St., POB 510 Edwardsville IL 62025
Jeffrey Epstein c/o Darren K. Indyke, PLLC, 575 Lexington Ave., 4th Floor, New York NY 10022
L.S.J.,LLC c/o Kellerhals Ferguson Fletcher, 9100 Port of Sale Mall, Ste 15 St Thomas V.I. 00802
L.S.J.,LLC c/o Hepler Broom LLC, 130 N. Main St., POB 510 Edwardsville IL 62025
L.S.J.,LLC c/o Darren K. Indyke, PLLC, 575 Lexington Ave., 4th Floor, New York NY 10022

YOU ARE HEREBY NOTIFIED that on the 19th day of November, 2014 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Thomas M. Lynch or any Judge sitting in his stead, in the courtroom 3100 usually occupied by him at the U.S. Courthouse, 327 South Church Street, Rockford, IL 61101, and shall then and there present the attached **Routine Motion to Avoid Judicial Liens**, a copy of which is attached hereto and herewith served upon you. You may appear if you so choose. **This matter is treated as a Routine Motion pursuant to Local Rule 9013-9.A(9). The Court may grant the relief sought without presentation in open court and without a hearing.**

LAVELLE LAW, LTD.
Timothy M. Hughes 6208982
501 W. Colfax
Palatine, Illinois 60067



CERTIFICATE OF SERVICE

I, Timothy M. Hughes, an attorney certify that I caused a copy of the foregoing Notice and Motion to be served on the parties listed above by electronic notice where indicated, or by first class mail by depositing with the United State Postal Service, Palatine, Illinois postage prepaid, prior to 5:00 P.M., this 6th day of November, 2014.

/S/Timothy M. Hughes 6208982

LAVELLE LAW, LTD.
Timothy M. Hughes 6208982
501 W. Colfax
Palatine, Illinois 60067



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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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IN RE:)	
Nick Lambros)	Case No. 14 B 82693
)	Judge: Thomas M. Lynch
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Debtor.)	Chapter: 7

MOTION TO AVOID JUDICIAL LIENS
of Jeffrey Epstein & L.S.J.,LLC

Now comes the debtor, Nick Lambros by and through his counsel, Timothy M. Hughes, and in support of his Motion to Avoid Judicial Liens pursuant to 11 U.S.C. §522(f)(1)(A), states to the court as follows:

1. The court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. This is a routine motion as defined by Local Bankruptcy Rule 9013-9(A)(9).
4. Debtor filed a petition for relief under Chapter 7 of the Bankruptcy Code on August 31, 2014.
5. Jeffrey Epstein & L.S.J.,LLC were granted a Default Judgment in the amount of \$246,000.56 and \$7,702.50 on or about October 15, 2010 by The Court for the Virgin Islands Division of St. Thomas & St. John which was registered 19TH Judicial Circuit, Lake County, Illinois case number 13 MR1617 (the "Epstein Judgments")
6. Jeffrey Epstein & L.S.J.,LLC subsequently filed two Memorandum of Judgments with the McHenry County Recorder of Deeds in the amount of \$246,000.56 and \$7,702.50 See Exhibit A— Recorded Memorandum of Judgment filed April 7, 2014 as document numbers 2014R0010649 and 2014R0010650.
7. The Memorandum of Judgments placed a lien on Debtor's homestead pursuant to

735 ILCS 5/9 – 104.2.

8. The liens are each a judicial lien as defined in 11 U.S.C. §101(36).

9. According to a market analysis done immediately prior to his case the property had a fair market value of about \$300,000.00 with a first mortgage balance of about \$140,000.00 and a second mortgage of about \$300,000.00 both of which have priority over Jeffrey Epstein & L.S.J.,LLC's judicial lien.

10. Jeffrey Epstein & & L.S.J.,LLC's judicial lien impairs an exemption to which Debtor would have been entitled, and as such is avoidable under 11 U.S.C. § 522(f)(1)(A)

ARGUMENT

11. To avoid a lien under Section 522(f)(1), the Debtor must show that (1) the lien is judicial; (2) the Debtor has an interest in the property; and (3) the lien must impair an exemption to which the Debtor is otherwise entitled. 11 U.S.C. §522(f).

12. Debtor has an interest in the property he resides at the time of his bankruptcy filing and currently; namely 1351 Mulberry Lane, Cary, IL 60113.

13. The term "judicial lien" means lien obtained by judgment, levy, sequestration, or other legal or equitable process of proceeding. 11 U.S.C. § 101(36). A judicial lien arises by virtue of judicial proceedings in the absence of which there would not be such a lien. *In re Whitford*, 101 B.R.559 (S.D.Ill.1989).

14. Pursuant to 11 U.S.C. § 522(f)(2), "a lien shall be considered to impair an exemption to the extent that the sum of (i) the lien; (ii) all other liens on the property; and (iii) the amount of the exemption that the debtor could claim if here were no liens on the property; exceeds the value that the debtor's interest in the property would have in the absence of any liens." In this case, the Debtor could and did claim an exemption (homestead) if no liens were on the property.

WHEREFORE, Debtor, Nick Lambros, requests that the Court enters an order avoiding

both of the liens of Jeffrey Epstein & L.S.J.,LLC on 1351 Mulberry Lane, Cary, IL 60113, and grant such other relief as the Court deems just and proper.

Respectfully submitted,
Nick Lambros

By: /s/Timothy M. Hughes 6208982
Attorney for Debtor

Timothy M. Hughes 6208982
LAVELLE LAW, LTD.
501 W. Colfax
Palatine, IL 60067


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PHYLLIS K. WALTERS
RECORDER-MCHENRY COUNTY, IL
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RECORDING FEE 25.00
GIS FEE 15.00

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

Jeffrey Epstein and L.S.J., LLC

vs.

Nick Lambros and AVLC, LLC d/b/a Sound X

Gen. No. 13-MR-1617

MEMORANDUM OF JUDGMENT

I hereby certify that on December 13, 2012,
judgment was entered in favor of the (plaintiff) (defendant) Plaintiff, Jeffrey Epstein and L.S.J., LLC
c/o Christopher A. Kroblin, 9100 Port of Sale Mall, Ste. 15, St. Thomas, US Virgin Islands 00802-3602
and against (defendant) (plaintiff) Defendant, Nick Lambros and AVLC, LLC d/b/a Sound X,
360 W. Northwest Highway, Barrington, IL 60010
in the amount of \$ 7,702.50.

I further certify that the judgment order was signed by the Honorable Michael C. Dunston,
Judge of the Superior Court of the Virgin Islands, Division of St. Thomas and St. John.

MAR 28 2014
Clerk of the Circuit Court
[Signature]
By: _____
Deputy Clerk

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Return to:
Andrew Carruthers
HeplerBroom LLC
P. O. Box 510
Edwardsville, IL 62025

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Western Division

In Re:
Nick Lambros

Debtor(s)

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BK No.: 14-82693

Chapter: 7

Honorable Thomas M. Lynch

Order Avoiding Judicial Liens of Jeffrey Epstein & L.S.J.,LLC

This matter having come before this Court on the Debtor's Motion to avoid the judicial liens of Jeffrey Epstein & L.S.J.,LLC, the Court being advised in the premises, IT IS HEREBY ORDERED:

1. The Motion to Avoid the Judicial Liens is granted.
2. The Judicial Liens of Jeffrey Epstein & L.S.J.,LLC, identified in Debtor's motion, are hereby extinguished and each lien shall no longer affix to or remain enforceable against the residential real estate of the Debtor commonly known as: [REDACTED]

Enter:

Dated:

United States Bankruptcy Judge

Prepared by:

Timothy M. Hughes 6208982
Lavelle Law, Ltd.,
501 W. Colfax
Palatine, Illinois 60067

[REDACTED]

[REDACTED]