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FILE No. (s) 6355	DATE: 4.8.14
TO: Andrew K. Carruthers	FAX NO.: (618) 656-1364
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CC:	FAX NO.:
CC:	FAX NO.:
FROM: Lavelle Law, Ltd. – Timothy Hughes	
RE:	
TOTAL NUMBER OF PAGES:8	ORIGINAL TO FOLLOW:

DESCRIPTION/SPECIAL INSTRUCTIONS:

 To follow please find a Notice of Emergency Motion Adverse Claim to Citation pertaining to case number 13 MR 1617.

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

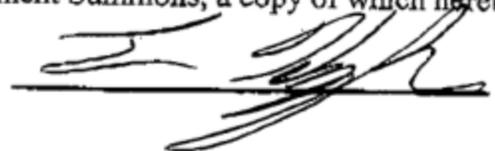
Jeffrey Epstein and L.S.J., LLC)
 Plaintiffs,)
 v.)
 Nick Lambros and AVLK, LLC d/b/a)
 Sound X)
 Defendants)
 and)
 American Chartered Bank, 1199 E. Higgins)
 Road, Schaumburg, IL 60173)
 Garnishee.)

Case Number: 13 MR 1617

**NOTICE OF
EMERGENCY MOTION
ADVERSE CLAIM TO CITATION**

To: Andrew K. Carruthers
130 N. Main St., P.O. Box 510
Edwardsville, IL 62025
Facsimile 618-656-1364
acarruthers@heplerbroom.com
acl@heplerbroom.com

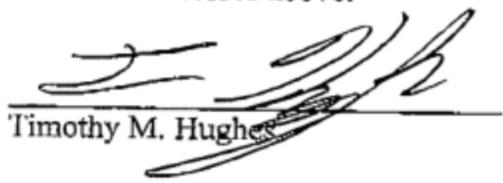
PLEASE TAKE NOTICE that on April 10, 2014, at 1:30 p.m., or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Simonian or any judge sitting in his stead in Courtroom 306, at 18 North County Street, Waukegan, Illinois, 60085, and shall then and there present the attached Emergency Motion Adverse Claim to Garnishment Summons, a copy of which hereby served upon you.



Timothy M. Hughes 6208982
Lavelle Law, Ltd.
501 West Colfax St.
Palatine, Illinois 60067
(847) 705-7555

CERTIFICATE OF SERVICE

I, Timothy M. Hughes, an attorney, certify that I served a copy of the foregoing document to each person to whom it is directed at their respective addresses by hand delivery or by depositing a copy in the United States Mail at 440 W. Colfax, Palatine, IL 60067 postage pre-paid, on April 8, 2014, before the hour of 5:00 p.m. and via facsimile and email to the addresses above.


Timothy M. Hughes

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

Jeffrey Epstein and L.S.J., LLC)
 Plaintiffs,)
 v.)
 Nick Lambros and AVLK, LLC d/b/a)
 Sound X)
 Defendants)
 and)
 American Chartered Bank, 1199 E. Higgins)
 Road, Schaumburg, IL 60173)
 Garnishee.)

Case Number: 13 MR 1617

Emergency Motion
Chicago Audio Video Design Corporation's
Adverse Claim to Garnishment Summons

NOW COMES the adverse claimant, Chicago Audio Video Design Corporation ("CAVD"), by and through its attorneys, Lavelle Law, Ltd., and for its Adverse Claim to the Garnishment Summons of Jeffrey Epstein and L.S.J., LLC directed towards the CAVD' American Chartered Bank account states and alleges as follows:

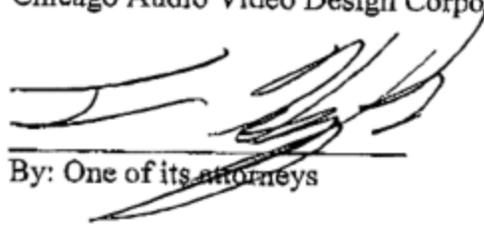
1. Plaintiff has a judgment against Nick Lambros and AVLK, LLC d/b/a Sound X and does not have a judgment claim against Chicago Audio Video Design Corporation d/b/a Sound X.
2. Plaintiff brought a Non-Wage Garnishment Summons preceding against Nick Lambros and AVLK, LLC d/b/a Sound X to American Chartered Bank the Third Party Garnishee, which is in possession of Account Number XXX1374 an account belonging to the CAVD ("CAVD Acct # 1374").
3. Adverse claimant, CAVD added the Defendant/Judgment Debtor, Nick Lambros, as an authorized signer to their CAVD Acct # 1374 as a convenience for the CAVD.
4. American Chartered Bank in response to Plaintiff's Garnishment Summons has frozen the account CAVD Acct #1374.

- 5. The CAVD Acct #1374 is only titled in Chicago Audio Video Design Corporation d/b/a Sound X name alone and is not and never was property of either Nick Lambros or AVLC, LLC d/b/a Sound X.
- 6. Chicago Audio Video Design Corporation obtained the assumed name Sound X from the Illinois Secretary of State on August 27, 2010 (See Group Exhibit A). Upon information and belief AVLC, LLC use of the assumed name Sound X in Illinois was revoked on or about January 9, 2009 (See Exhibit B).
- 7. The CAVD Acct #1374 does not belonging to either Judgment Debtor. Therefore, the funds should be released immediately to the CAVD.

WHEREFORE, the adverse claimant, Chicago Audio Video Design Corporation respectfully requests the following relief:

- A. That this Court enters an order releasing the funds in the CAVD Acct # 1374 to the CAVD;
- B. That this Court award Chicago Audio Video Design Corporation their bank charges incurred because of the plaintiff's citation;
- C. That this Court award Chicago Audio Video Design Corporation their reasonable attorneys' fees and litigation expenses; and
- D. That this Court award any other relief this Court deems just and proper.

Respectfully Submitted,
Chicago Audio Video Design Corporation d/b/a Sound X



By: One of its attorneys

Timothy M. Hughes
Lavelle Law, Ltd. 27743
501 West Colfax St.
Palatine, Illinois 60067



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JESSE WHITE
 SECRETARY OF STATE



CORPORATION FILE DETAIL REPORT

Entity Name	CHICAGO AUDIO VIDEO DESIGN CORPORATION	File Number	01812512
Status	ACTIVE		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	09/05/2001	State	ILLINOIS
Agent Name	SUSAN L DAWSON	Agent Change Date	04/20/2012
Agent Street Address	3701 ALGONQUIN RD STE 300	President Name & Address	JOHN BRANSKY 360 W NORTHWEST HWY BARRINGTON IL 60010
Agent City	ROLLING MEADOWS	Secretary Name & Address	SAME
Agent Zip	60008	Duration Date	PERPETUAL
Annual Report Filing Date	08/12/2013	For Year	2013
Assumed Name	INACTIVE - AURORA SYSTEMS INACTIVE - CHICAGO AUDIO VIDEO DESIGN ACTIVE - SOUND X		
Old Corp Name	08/27/2010 - NORTHERN SKY SATELLITE CORPORATION		

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EXHIBIT A

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SECRETARY OF STATE



LLC FILE DETAIL REPORT

Entity Name	AVLC, LLC	File Number	01572644
Status	REVOKED	On	01/09/2009
Entity Type	LLC	Type of LLC	Foreign
File Date	07/20/2005	Jurisdiction	FL
Agent Name	MYRON N. GOLDSTEIN	Agent Change Date	07/20/2005
Agent Street Address	776 FRONTAGE RD., STE. 103	Principal Office	3063 S.E. QUANSET CIRCLE STUART, FL 34997
Agent City	NORTHFIELD	Management Type	MGR View
Agent Zip	60093	Duration	PERPETUAL
Annual Report Filing Date	00/00/0000	For Year	2008
Assumed Name	INACTIVE - SOUND X		
Series Name	NOT AUTHORIZED TO ESTABLISH SERIES		

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EXHIBIT B

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

Jeffrey Epstein and L.S.J., LLC)
 Plaintiffs,)
 v.)
 Nick Lambros and AVLC, LLC d/b/a)
 Sound X)
 Defendants)
 and)
 American Chartered Bank, 1199 E. Higgins)
 Road, Schaumburg, IL 60173)
 Garnishee.)

Case Number: 13 MR 1617

Affidavit of John Bransky

I, John Bransky, being first duly sworn on oath depose and state as follows:

1. I am of legal age and each of the statements herein is true and correct and known to me of my own personal knowledge. If called as a witness, I could and would competently testify thereto.
2. I am the President and Secretary of Chicago Audio Video Design Corporation d/b/a Sound X ("CAVD").
3. CAVD is the co-owner of a checking account at American Chartered Bank account #: XXX1374.
4. The above American Chartered Bank account was opened only in the name of CAVD and has never had any other party on title to the account at any time.
5. Nick Lambros is an authorized signer on the CAVD American Chartered Bank account XXX1374, however he is not nor never was on title to that or any CAVD bank account.
6. Nick Lambros is not a shareholder of CAVD and is only an employee of CAVD.
7. On or about August 27, 2010, CAVD's application to the Illinois Secretary of State for an assumed name "Sound X" was granted.
8. The garnishment summons served on American Chartered Bank has frozen our account XXX1374 with \$11,930.80, which frozen funds has created a hardship on CAVD in

being able to meet its current accounts payables and payroll, as well as, the impact with vendors on accounts payable checks outstanding.

9. The frozen CAVD funds at American Chartered Bank need to be released immediately in order for CAVD to continue to be able to meet its current accounts payables and payroll obligations.

10. CADV was not a part to the above captioned lawsuit as upon information and belief it involved one of our employees and a Florida LLC.

11. Further Affiant sayeth not.

John Bransky

Subscribed and sworn to before me
on April 8, 2014

Notary Public

Document prepared by:
Timothy M. Hughes
Lavelle Law, Ltd.
501 West Colfax St.
Palatine, Illinois 60067
[REDACTED]

Attorney Number: 27743