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Commercial Banking, Collections and Bankruptcy

The newsletter of the Illinois State Bar Association's Section on Commercial Banking, Collections and Bankruptcy

When defense is offense: Burdens of proof in mortgage foreclosure trials

BY MICHAEL G. CORTINA

Mortgage foreclosure cases rarely go to trial. If a trial involving a mortgage foreclosure does occur, it is usually because there is a counterclaim or affirmative defense, or both, that requires some findings of fact. Even in these situations, however, summary judgment or other dispositive motion routinely dispatch such pleadings thereby obviating the need

Continued on next page

Sheriff sale purchasers keep the property despite void judgment of foreclosure and sale

BY ROBERT HANDLEY AND GRZEGORZ (GREG) CZUBERNAT

U.S. Bank N.A. v. Rahman, 2016 IL App (2) 150040

Facts

On September 29, 2009, U.S. Bank filed its complaint to foreclose a mortgage against Defendant, Syeda Nazia Rahman (Rahman) and others with an interest in the property, on a residential property

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(Notice to librarians: *The following issues were published in Volume 60 of this newsletter during the fiscal year ending June 30, 2016: October, No. 1; December, No. 2; February, No. 3; March, NO. 4; May, No. 5).*

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When defense is offense

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for a trial. Because of the small amount of mortgage foreclosure trials, most judges and attorneys are unsure as to what is needed in order to make a prima facie case for the plaintiff/mortgagee. Is it required that proof of service of the so-called "grace period notice" dictated by 735 ILCS 5/15-1502.5(c) be offered into evidence? Does the mortgagee have to prove the existence of all of the junior liens on the subject property since they were all named defendants? Does evidence of all payments made on the mortgage need to be offered? There are several statutorily required steps that a mortgagee must take in order to properly foreclose a mortgage under the Illinois Mortgage Foreclosure Law ("IMFL"), but how many, if any, of those steps must be proven in a foreclosure trial? Perhaps surprisingly, proving a mortgagee's case in a mortgage foreclosure requires only the introduction into evidence of the note and mortgage. Once these two documents are admitted into evidence, the burden shifts to the mortgagor to prove payment or any other affirmative defenses that she may have.

Case law

The most cited case regarding this subject is *Rago v. Cosmopolitan Nat. Bk.,* 89 Ill. App. 2d 12 (1st Dist. 1967). In Rago, the plaintiff sought to foreclose on a junior mortgage, and the defendant claimed the affirmative defense of "lack of consideration." *Rago* states that the plaintiff:

> … affirmatively established her prima facie right to foreclosure of the mortgage. The long established rule … is that the mere possession and production into evidence by the holder of a note and trust deed, the execution and default in the performance of which is established, entitles that holder to a prima facie basis for recovery thereon, unless and until, the defendant interposes and establishes a defense.

Rago, at 19.

Rago, however, is not entirely on-point because it was decided in 1967—prior to the IMFL - and applied the Uniform Commercial Code to its holding. Regardless, it is still cited to in foreclosure cases and considered "good law."

The case of *Farm Credit Bk. of St. Louis v. Biethman,* 262 Ill. App. 3d 614 (5th Dist. 1994) is instructive on the topic, and is additionally helpful because it was decided after the IMFL was codified in 1987. Biethman is something of a convoluted case involving multiple parties, claims, and insurance companies. Of interest to this particular topic, however, is where the court discussed burdens of proof in foreclosures. The court stated:

> … Biethman pleaded the affirmative defense of lack of consideration and payment of the mortgage. In order for [the mortgagee] United Fire to establish a prima facie case of foreclosure, it was required only to introduce the deed of trust and promissory note, at which time the burden of proof shifted to Biethman to prove his affirmative defense.

Biethman, at 622, citing *Foreman Tr. and Sav. Bk. v. Cohn*, 342 Ill. 280 (1930).

Another case, which cites favorably to *Biethman, is PNC v. Zubel,* --- Ill. App. 3d ---, 24 N.E.2d 869 (1st Dist. 2014). *Zubel* was a foreclosure case that was decided on summary judgment, rather than trial, but it still quoted *Biethman* for the authority that a mortgagee establishes a prima facie case for foreclosure with the introduction of the mortgage and note. *Zubel*, at 874-75. With these cases, there is authority pre-IMFL and post -IMFL that states that a plaintiff in a mortgage foreclosure case need only to present the note and mortgage in court in order to prove its prima facie case.

Rago, Biethman and *Zubel* are all in complete agreement that a plaintiff in

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a mortgage foreclosure case needs only to admit into evidence the note and the mortgage. Because of the sparse amount of foreclosure trials, there are even fewer appellate decisions regarding the subject, making three appellate court decisions on the topic fairly conclusive; despite this, arguments are sometimes raised in opposition.

The IMFL

Some may argue that the IMFL requires more than just the note and mortgage in order to prove a prima facie case. The argument cites to 735 ILCS 5/15-1506(a) of the IMFL which states, "Evidence. In the trial of a foreclosure, the evidence to support the allegations of the complaint shall be taken in open court," and then lists two exceptions to this requirement. The argument is that this section of the IMFL requires proof of the allegations in the complaint, so if it is alleged in the complaint and then denied by the mortgagor, the mortgagee must prove that allegation as part of the mortgagee's prima facie case. While this argument may seem to make sense at first blush, it is fatally flawed because it fails to take into account the fact that the IMFL is a statute in derogation of the common law.

In construing statutes in derogation of the common law, courts may not presume that an innovation thereon was intended further than the innovation which the statute specifies or clearly implies. *Gallagher v. Union Square Condominium Homeowner's Assoc.*, 397 Ill. App. 3d 1037, 1043 (2d Dist. 2010). Illinois courts have limited all manner of statutes in derogation of the common law to their express language, in order to effect the least—rather than the most—change in the common law. *Adams v. Northern Illinois Gas Co.,* 211 Ill.2d 32, 69 (2004). Therefore, any legislative intent to abrogate the common law must be clearly and plainly expressed, and courts will not presume such an intent from ambiguous language. *Tomczak v. Planetsphere, Inc.*, 315 Ill. App. 3d 1033, 1038 (1st Dist. 2000). Finally, a statute that appears to be in derogation of the common law will be strictly construed in favor of the person sought to be subjected to the statute's operation. Id.

The express language of 15-1506(a) of the IMFL merely states that the evidence to support the allegations of the complaint must be taken in open court. It does not state what that particular evidence is, nor what is required to make a prima facie case, nor does it state that a prima facie case is anything other than what the common law dictates. Further, the IMFL does not state that proof of the allegations of the complaint must be taken in open court, only that evidence to support the allegations of the complaint must be so demonstrated. Further, the IMFL statement in 15-1506(a) subjects only the mortgagee to its dictates, and must therefore be strictly construed in favor of the mortgagee. See *Tomczak*, at 1038. At best, the language in 15-1506(a) is ambiguous, and because it must be construed in favor of the mortgagee, the only logical reading of it is that the proof that is required to make a prima facie case must be taken in open court. If a trial occurs, that proof has not changed from the common law, and is still the admission of the note and mortgage into evidence—nothing more. 15-1506(a) simply requires that the mortgage and note be offered into evidence in open court.

If the IMFL were intended to change the elements of proof of a mortgage foreclosure, it would have so stated. It would have been simple enough for the legislature to insert into the IMFL exactly what was required for the plaintiff to prove its case if the legislature had intended to change the common law. The legislature could have specifically stated that all of the elements in the form foreclosure complaint shown in 735 ILCS 5/15-1504 must be proven in order for a plaintiff to make its prima facie case, but they did no such thing. Because the legislature did not change the elements of a prima facie case in the IMFL, the common law requirement of producing the note and mortgage for a mortgagee to make its case remains the law.

Conclusion

Despite the scant amount of published decisions on the topic, the only Illinois decisions pertaining to the proof required in mortgage foreclosure cases state that the mortgagee merely needs to offer the note and mortgage into evidence in order to prove its prima facie case. The Illinois Mortgage Foreclosure Law did not change this common law principle, and simply requires that evidence needed to support a foreclosure complaint be presented in open court. Mortgage foreclosure trials, therefore, will be primarily conducted by the mortgagor who needs to prove payments, affirmative defenses, or possibly her counterclaims. ■

Sheriff sale purchasers keep the property

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located in Hinsdale, Illinois. Among the various summonses issued by U.S. Bank, two were addressed to Rahman. The first summons had a Hinsdale, Illinois address and the second had a Hanover Park, Illinois address.

An employee of ProVest LLC, a special process server hired by U.S. Bank's attorneys, asserted that she served Rahman at the Hanover Park address and also in Bartlett, Illinois. It is important to note that the Villages of Hinsdale, Hanover Park, and Bartlett each have portions in both Cook and DuPage Counties. The property that was being foreclosed on is located in DuPage County. After an Order of default and the entry of a Judgment of Foreclosure and Sale, the property was sold at a sheriff's sale on January 26, 2012. More than two years later, on September 4, 2014, Rahman filed a petition to quash service and vacate the judgment, among other petitions.

Procedural history

The trial court vacated the foreclosure judgment, the sheriff's sale, and the order approving the sale. Citing 735 ILCS 5/2-202(a), the court concluded that service in Cook County must be made by the Cook County Sheriff, unless the court appoints a special process server. This statute applies to service in Cook County as opposed to cases filed in Cook County. 735 ILCS 5/2-202(a) also applies to cases pending outside of Cook County if defendant is served in Cook County. Therefore, in this case, the trial court concluded that the service was improper because it was served by an unauthorized process server in Cook County.

Next, the trial court addressed the applicability of the standing order issued pursuant to Cook County General Administrative Order #2007-03. The scope of this Administrative Order, which permits law firms to obtain a standing order for the appointment of a special process server, is very limited. U.S. Bank's attorneys had an order appointing ProVest LLC as their special process server pursuant to the Administrative Order. However, the trial court concluded that the order issued pursuant to GAO 2007-03 only applies to cases filed in Cook County, and then only foreclosure cases filed in chancery division. This case originated in DuPage County and therefore the GAO was inapplicable. The trial court then referenced *Sarkissian v. Chicago Board of Education*, 776 N.E.2d 195 (2002) which requires strict compliance with service of process laws.

However, what appeared to be a victory for the defendant was snatched away. Citing 735 ILCS 5/2-1401(e), the trial court stated that "where an underlying judgment is void but the lack of jurisdiction did not affirmatively appear on the record when the judgment was entered, the subsequent vacation of the judgment does not affect any right, title, or interest in any real property acquired by third parties." Here, the lack the of jurisdiction did not affirmatively appear on the record because outside materials were required to determine whether the two addresses where the defendant was served were actually located in Cook or DuPage counties.

Appellate court analysis

The Appellate court agreed that the service was improper and consequently the trial court lacked personal jurisdiction over the defendant. Therefore, the judgment was void. The court also affirmed the trial court's determination that 735 ILCS 5/2-1401(e) protected the rights of the buyers who purchased the property via sheriff's sale.

The defendant argued that the trial court's lack of jurisdiction was apparent on the face of the record, and that the buyers who purchased the property via sheriff's sale were therefore not bona fide purchasers. However, the appellate court concluded that "it was impossible to determine in which county service occurred from the face of the affidavits [of service]." As previously noted, both Hanover Park and Bartlett, the two municipalities where the defendant was actually served, are in both Cook and DuPage counties. The Appellate court also rejected the defendant's argument that summonses on their faces indicated that service took place outside of DuPage County.

Finally, the Appellate court addressed the defendant's assertion that the buyers who purchased the property at the sheriff's sale were not bona fide purchasers. Whether the buyers were bona fide purchasers mattered because 735 ILCS 5/2-1401(e) has been interpreted to only protect bona fide purchasers for value. Referencing *Bank of New York v. Unknown Heirs & Legatees*, 860 N.E.2d 1113 (2006), the court quoted "[a] purchaser is not a bona fide purchaser if he or she had constructive notice of an outstanding title or right of another party." The Appellate court found that the buyers did not have the required constructive notice because "a simple review of the record would not have revealed a jurisdictional defect."

Conclusion

The "take away" from this case is the reminder that when serving a defendant in Cook County, no matter where the case is pending, service of process must be effectuated by the Cook County Sheriff, unless the court, in the case where the matter is pending, appoints a special process server. Without proper service, in most instances, everything that follows is usually void. In this instance, the plaintiff and purchaser dodged a bullet, thanks to the trial and appellate courts' interpretation and application of 735 ILCS 5/2-1401(e) to these unique facts. ■

Clear and convincing burden of proof required for joint owner to claim ownership of garnished funds

BY KEVIN J. STINE

In *Gataric v. Colak,* 2016 IL App (1st) 151281, issued July 15, 2016, the Illinois Appellate Court held that a joint owner of a bank account seized in a supplementary proceeding must prove by clear and convincing evidence that the non-debtor joint owner is in fact the owner of the funds in the account.

In *Gataric*, the plaintiff/creditor sued the defendant/debtor for unpaid loans and obtained a judgment in the amount of about $300,000. The creditor then filed supplementary proceedings, including a third party citation to discover assets against Chase Bank. In response to the third party citation, Chase indicated that it had two accounts owned by the debtor: a savings account with approximately $1,200, and a joint checking account with Khoury containing approximately $9,400. Chase froze both accounts. Creditor filed a motion requesting that Chase be ordered to turn over the funds contained in both accounts to be applied toward the judgment.

Khoury filed a response to the motion for turnover of funds, claiming that she opened the joint checking account solely in her name in 2010, and that in 2013, she added the debtor as a joint owner for convenience. Khoury indicated that she deposited about $32,000 in the account in March, 2014, to provide the debtor with a short-term loan from the joint account. The debtor then allegedly used the funds in the joint account, and repaid the money into the joint account about a week later. Khoury argued that as of April 1, 2014 (the date the account was frozen), none of the funds in the checking account belonged to the debtor. Khoury attached an affidavit in support of her response, alleging that all of the allegations in her response were true and correct. Creditor did not file any counter affidavits.

The trial court conducted an evidentiary hearing on the motion for turnover of funds, and Khoury and her husband testified at the hearing. After taking the matter under the advisement, the trial court determined that Khoury did not meet her burden of proof to establish that she was the sole owner of the funds, and granted the creditor's motion for turnover. After post-trial motions, Khoury appealed the trial court's order for turnover.

The primary issue on appeal was whether Khoury was required to prove by clear and convincing evidence, or rather, by a preponderance of the evidence, that she was the sole owner of the joint checking account. The Appellate Court determined that in matters involving ownership of a joint bank account, when a garnishee answers that a judgment debtor holds money in a joint bank account, this is sufficient proof to establish a prima facie case for the judgment creditor that the money in the account belongs to the judgment debtor. The burden of proof then shifts on the non-debotr joint account owner to prove what part, if any, of the funds in the joint bank account belong to her. Khoury argued, relying upon 735 ILCS 5/12-711(c), that she must only prove her burden by a preponderance of the evidence. The Appellate Court disagreed and determined that the creation of a statutory joint tenancy carries with it a presumption of donative intent, and that the party claiming that there was no donative intent must prove by clear and convincing evidence that a gift was not intended.

The opinion set forth several relevant factors to consider when determining ownership of a joint account: (1) the exercise of control over the funds; (2) contributions to the account, and whether the contribution by one co-depositor constituted a gift to the others; (3) who paid taxes on the earnings from the account; and (4) the particular purpose for which the account was established.

In this case, after determining that the proper burden of proof was clear and convincing evidence, the Appellate Court further determined that because there was not an adequate record on appeal it was required to accept the findings of the trial court and affirm its decision. Accordingly, it is particularly important in supplementary proceedings to either put hearings on the record, or alternatively, to make a bystander's report in any appeal under Supreme Court Rule 323(c). Without a complete record on appeal, the Appellate Court must presume the trial court heard adequate evidence to support its decision, and affirm the trial court's judgment. ■

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Thursday, 09/08/16- Webinar—Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Thursday, 09/08/16- Webcast—Monetizing Intellectual Property. Presented by IP. 12:30 p.m. – 2:15 p.m.

Friday, 09-09-2016- Webcast—Telemedicine: Diagnosing the Legal Problems. Presented by Health Care. 9:00 a.m. – 11:00 a.m.

Wednesday, 09/14/16- Webcast—Hot Topic: Union Dues/Fair Share—Friedrichs v. California Teachers Association. Presented by Labor and Employment. 10:00 a.m. – 12:00 p.m.

Wednesday, 09-14-16—Webinar—2016 Military Law Overview. Presented by Military Affairs. 12:00 p.m. – 1:15 p.m. (maybe later).

Thursday, 09/15/16- CRO—Family Law Table Clinic Series (Series 1). Presented by Family Law. 8:30 am – 3:10 pm. Vid: NONE THESE WILL NOT BE RECORDED OR ARCHIVED.

Friday, 09-16-06- CRO and Live Webcast—The Fear Factor: How Good Lawyers Get Into (and avoid) Bad Ethical Trouble. Master Series Presented by the ISBA—WILL NOT BE RECORDED OR ARCHIVED. 9:00 a.m. – 12:15 p.m.

Wednesday, 09-21-16—Webcast—Restorative Practice in Illinois: Practical and Creative Alternatives to Resolve Civil and Criminal Matters. Presented by Human Rights. Part 1- 10:00 a.m. – 12:00 p.m. Part 2- 1:00 p.m. – 3:00 p.m.

Thursday, 09-22-16- Webcast—Family Law Changes and Mediation Practice. Presented by Women and the Law. 11:00 a.m. – 12:00 p.m.

Thursday, 09/22/16- CRO and Webcast—Recent Developments in E-Discovery in Litigation. Presented by Antitrust. 1:00- 5:15 pm.

Thursday, 09/22/16- Webinar—Introduction to Boolean (Keyword) Searches for Lawyers. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Monday, 09/26/16- Friday, 09/30/16—CRO—40 Hour Mediation/Arbitration Training Master Series. Presented by the ISBA. 8:30 am – 5:45 pm each day. MASTER SERIES WILL NOT BE ARCHIVED.

Friday, 09-30-16—DoubleTree Springfield—Solo and Small Firm Practice Institute Series. A Balancing Act: Technology and Practice Management Solutions. Presented by GP, SSF. 8:00 a.m. – 5:10 p.m.

October

Wednesday, 10-05-16—CRO—Cybersecurity: Protecting Your Clients and Your Firm. Presented by Business Advice and Financial Planning; co-sponsored by IP (tentative). 9:00 a.m. – 5:00 p.m.

Thursday, 10/06/16- Webinar—Introduction to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Thursday, 10-06-16—Webcast—Nuts and Bolts of EEOC Practice. Presented by Labor and Employment. 11:00 a.m. – 12:30 p.m.

Monday, 10-10-16—CRO and Fairview Heights, Four Points Sheraton—What You Need to Know to Practice before the IWCC. Presented by Workers Compensation. 9:00 a.m. – 4:00 p.m.

Thursday, 10/13/16- Webinar—Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Thursday, 10-13-16—IPHCA, Springfield—Open Meetings Act: Conducting the Public's Business Properly. Presented by Government Lawyers. 12:30 – 4:00 p.m. This program will not be recorded and put in the archives.

Thursday, 10-13-16—CRO and webcast—Limited Scope Representation: When Less is More. Presented by Delivery of Legal Services. 1:00 p.m. – 5:00 p.m.

Wednesday, 10-19-2016—Webcast—Tips for Combating Compassion Fatigue. Presented by Women and the Law. 10 a.m. – 11 a.m.

Wednesday, 10-19-16- CRO and Live Webcast—From Legal Practice to What's Next: The Boomer-Lawyer's Guide to Smooth Career Transition. Presented by Senior Lawyers. 12:00 p.m. to 5:00 p.m.

Thursday, 10/20/16- Webinar—Introduction to Boolean (Keyword) Searches for Lawyers. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Friday, 10/21/16- Galena, Eagle Ridge Resort—Obtaining a Judgement and Collections Issues. Presented by: Commercial Banking, Collections, and Bankruptcy. 8:50 am - 4:30 pm

Wednesday, 10-26-16—Webcast— Federal Rule of Civil Procedure 56—Summary Judgement a Refresher Course. Presented by Federal Civil Practice. 12:00 – 2:00 p.m.

Wednesday, 10-19-16—DoubleTree Bloomington 10-27-16—Holiday Inn, Bloomington—Real Estate Law Update 2016. Presented by Real Estate. 8:15 a.m. – 4:45 p.m.

Friday, 10-28-16—CRO—Solo and Small Firm Practice Institute Series. Title TBD. Presented by GP, SSF. ALL DAY.

November

Wednesday, 11-02-16—Linder Conference Center, Lombard—Real Estate Law Update 2016. Presented by Real Estate. 8:15 a.m. – 4:45 p.m.

Thursday, 11-03-2016—Webcast—Settlement and Severance Agreements: The Non-Pecuniary Terms. Presented by Labor and Employment. 1:00 p.m. – 3:00 p.m.

Thursday, 11/03/16- Webinar— Introduction to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Thursday, 11/10/16- Webinar— Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

Friday, 11-11-16—CRO and live Webcast—Motion Practice from Pretrial through Post Trial. Presented by Civil Practice and Procedure. 8:50 a.m. - 4:00 p.m.

Thursday, 11/17/16- CRO—Family Law Table Clinic Series (Series 2). Presented by Family Law. 8:30 am – 3:10 pm. Vid: NONE THESE WILL NOT BE RECORDED OR ARCHIVED.

Thursday, 11/17/16- Webinar— Introduction to Boolean (Keyword) Searches for Lawyers. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 12:00- 1:00 pm.

December

Thursday, 12-01-2016—Webcast— Written Discovery: Knowing What to Ask for and How to Get It—Part 1. Presented by Labor and Employment. 1:00 p.m. – 3:00 p.m.

February

Monday, 02-13 to Friday, 03-17—CRO—40 Hour Mediation/Arbitration Training. Master Series, presented by the ISBA—WILL NOT BE ARCHIVED. 8:30 -5:45 daily.

March

Thursday, 03-09 and Friday, 03-10—New Orleans—Family Law Conference NOLA 2017. Presented by Family Law. Thursday: 12:00 pm – 5:45 pm; Reception 5:45- 7:00 pm. Friday: 9:00 am – 5:00 pm. NO VIDEO- THIS PROGRAM WILL NOT BE IN THE ARCHIVE

April

Wednesday, 04-19 to Friday, 04-21—Starved Rock State Park—Allerton Conference—Title TBD. Presented by Civil Practice and Procedure. Wednesday: 12:00 p.m. – TBD. Thursday: TBD. Friday: TBD-12:00 p.m. Vid: None—THIS PROGRAM WILL NOT BE IN THE ARCHIVE

June

Friday, 06-02-2016—NIU Conference Center, Naperville—Solo and Small Firm. Title TBD. ALL DAY. ■

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