

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

ChrisKen Group LLC and CK Property Management LLC,)	
)	No. 16-cv-08251
)	
Plaintiffs,)	Hon. William T. Hart
)	
v.)	Magistrate Judge Sidney I.
)	Schenkier
HAS Capital LLC, Stephen A. Wheeler, Eric R. Decator LLC, Eric R. Decator, BMO)	
Harris Bank NA, and Konstantino Apostolou,)	
)	
Defendants.)	
)	

**DEFENDANTS HAS CAPITAL LLC, STEPHEN A. WHEELER, ERIC R. DECATOR
LLC, AND ERIC R. DECATOR’S MOTION TO DISMISS COMPLAINT**

Defendants HAS Capital LLC, Stephen A. Wheeler, Eric R. Decator LLC, and Eric R. Decator (hereinafter “Defendants”), by and through their undersigned attorneys, hereby move this Honorable Court to dismiss Plaintiffs’ Complaint in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(6). In support thereof, Defendants submit herewith a memorandum.

WHEREFORE, Defendants respectfully request that this Court:

- a) Dismiss the Complaint in its entirety with prejudice; and
- b) Grant whatever other relief this Court deems just and fair, including costs, fees, and expenses.

Dated: October 17, 2016

Respectfully submitted,

By: /s/ Jeffrey R. Kulwin
Counsel for Defendants

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