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

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RNS SERVICING, LLC, an Illinois Limited	§	
Liability Company,	§	
	§	
Plaintiff,	§	
v.	§	Case No. 17-CV-108
	§	
SPIRIT CONSTRUCTION SERVICES,	§	Honorable Edmond E. Chang
INC., a Delaware Corporation, STEVEN	§	
VAN DEN HEUVEL, a citizen of the State	§	
of Wisconsin, and SHARAD TAK, a citizen	§	
of the State of Florida,	§	
	§	
Defendants.	§	

## AFFIDAVIT OF ROBERT M. ROMASHKO IN SUPPORT OF DEFENDANTS' <u>MOTION FOR SUMMARY JUDGMENT</u>

STATE OF ILLINOIS	)
	) ss
COUNTY OF COOK	)

Robert M. Romashko, being first duly sworn, on oath, deposes and states as follows:

- 1. I am an adult resident of the State of Illinois, licensed to practice law by and in good standing with the State Bar of Illinois.
- 2. I am one of the attorneys for Defendant Spirit Construction Services, Inc. and Steven Van Den Heuvel in the above-captioned case.
- 3. Attached hereto as **Exhibit 1** is a true and correct copy of the First Amended Complaint (ECF No. 31), filed September 25, 2017 in this case.
- 4. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant excerpts of the transcript of the deposition of Steve Van Den Heuvel taken on December 18, 2018 in this case.

- 5. Attached hereto as **Exhibit 3** is a true and correct copy of the Declaration of Sharad K. Tak (ECF No. 41), filed November 27, 2017 in this case.
- 6. Attached hereto as **Exhibit 4** is a true and correct copy of the relevant excerpts of the transcript of the deposition of Marc Langs taken on December 18, 2018 in this case.
- 7. Attached hereto as **Exhibit 5** is a true and correct copy of relevant excerpts of the transcript of the deposition of Steven Van Den Heuvel, in IFC Credit Corp. v. Tissue Products Tech. Corp. et al., No. 07-C-4351 (N.D. Ill., April 8, 2008).
- 8. Attached hereto as **Exhibit 6** is a true and correct copy of the Affidavit of Marc Langs, IFC Credit Corp. et al. v. Tissue Products Tech. Corp. et al., No. 07-C-4351 (N.D. Ill. June 18, 2008), ECF No. 54-11.
- 9. Attached hereto as <u>Exhibit 7</u> is a true and correct copy of IFC Credit Corporation's Motion for Summary Judgment, IFC Credit Corp. et al. v. Tissue Products Tech. Corp. et al., No. 07-C-4351 (N.D. Ill., June 18, 2008), ECF No. 51.
- 10. Attached hereto as **Exhibit 8** is a true and correct copy of IFC Credit Corporation's Motion to Strike Certain of the Denials by Defendants to IFC Credit Corporation's Rule 56.1 Statement for Failure to Conform to Rule 56 of the Local Rules of the U.S. District Court for the Northern District of Illinois, IFC Credit Corp. et al. v. Tissue Products Tech. Corp. et al., No. 07-C-4351 (N.D. Ill., October 8, 2008), ECF No. 82.
- 11. Attached hereto as **Exhibit 9** is a true and correct copy of the Memorandum Opinion and Order, IFC Credit Corp. et al. v. Tissue Products Tech. Corp. et al., No. 07-C-4351 (N.D. Ill., March 31, 2009), ECF No. 101.

- 12. Attached hereto as **Exhibit 10** is a true and correct copy of First Interim Report of David P. Liebowitz, Chapter 7 Trustee, In re: IFC Credit Corporation, No. 09-27094 (Bankr. N.D. Ill., December 29, 2009), ECF No. 471.
- 13. Attached hereto as **Exhibit 11** is a true and correct copy of RNS Servicing, LLC, Rebecca Elli, and Steve Csar's Response to Trustee's Motion for Leave to Conduct a Rule 2004 Exam, Case No. 09-27094 (Bankr. N.D. Ill., November 15, 2017), ECF No. 1776.
- 14. Attached hereto as Exhibit 12 is a true and correct copy of relevant excerpts of the transcript of the deposition of Sharad K. Tak taken on September 21, 2017 in this case.
- 15. I offer this affidavit in support of Defendants' Motion for Summary Judgment against Plaintiff RNS SERVICING, LLC's Amended Complaint.

Robert Romashko

Subscribed and sworn before me this 18th day of March, 2019.

Notary Public, State of Illinois

My commission expires: 19/11

"OFFICIAL SEAL"

MARIA E. ROSILES

NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES OCT. 11, 2022