

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
McLEAN COUNTY, ILLINOIS**

JULIE CROWE,)	
)	
Plaintiff,)	Case No. 12 MR 45
)	
v.)	Judge Foley
)	
CITY OF BLOOMINGTON, a municipal)	
corporation,)	
)	
Defendant.)	
)	

PLAINTIFF'S UNOPPOSED MOTION FOR AN AWARD OF COSTS

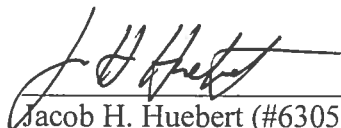
Plaintiff Julie Crowe, through her attorneys, the Liberty Justice Center, moves this Court for an award of costs. In support of her motion, Plaintiff states:

1. On August 28, 2013, this Court issued an order granting Plaintiff's motion for summary judgment on all counts stated in her complaint.
2. Under 735 ILCS 5/5-110, where judgment is entered on a plaintiff's behalf upon a motion, the plaintiff is entitled to recover his or her costs.
3. Accordingly, Plaintiff is entitled to recover her costs in bringing this case.
4. Plaintiff's costs include this Court's filing fee of \$231.00 and the McLean County Sheriff's fee of \$65.00 for service of the summons. Receipts for Plaintiff's payment of these fees are attached as Exhibit A.
5. Plaintiff therefore respectfully requests that this Court grant her an award of costs in the amount of \$396.00.
6. Defendant does not oppose this motion and has signed an agreed order awarding Plaintiff her costs, attached as Exhibit B.

Therefore, Plaintiff Julie Crowe respectfully requests that this Court issue an order directing Defendants to pay Plaintiff her costs in the amount of \$396.00.

Dated: September 13, 2013

Respectfully submitted

A handwritten signature in black ink, appearing to read 'J. H. Huebert', is written over a horizontal line.

Jacob H. Huebert (#6305339)
Attorney for Plaintiff

Liberty Justice Center
190 S. LaSalle Street, Ste. 1630
Chicago, Illinois 60603
Telephone (312) 263-7668
Facsimile (312) 263-7702
jhuebert@libertyjusticecenter.org

CERTIFICATE OF SERVICE

On September 13, 2013, I served Plaintiff's Unopposed Motion for an Award of Costs by sending a copy by electronic mail to J. Todd Greenburg at tgreenburg@cityblm.org.



Attorney for Plaintiff

Exhibit A

Receipts for Plaintiff's Costs

**Clerk of The Circuit Court
Eleventh Judicial Circuit
County of McLean
104 W Front St. Bloomington, IL 61701**

RECEIPT VOUCHER



Date Received : 02/28/2012 Batch Id : CIV02282012 Effective Date 02/28/2012

Receipt # : 5512335

Manual Receipt # :

Received From : Gregory Bedell

Source/Ck# or CC Val.#

Amount

Party Name : CROWE, JULIE A

CHECK 5533

\$ 231.00

Case Number : 2012MR000045

New Party Balance : \$.00


Total Paid :

\$ 231.00

Account Name	Starting Balance	Amount Paid	Ending Balance
Civil Circuit Clerk	\$ 160.00	\$ 160.00	\$.00
Law Library	\$ 10.00	\$ 10.00	\$.00
Civil Court Automation Fee	\$ 5.00	\$ 5.00	\$.00
Civil Court System Fee	\$ 5.00	\$ 5.00	\$.00
Civil Court Security Fee	\$ 25.00	\$ 25.00	\$.00
Civil Document Storage Fee	\$ 5.00	\$ 5.00	\$.00
Mandatory Arbitration Fee	\$ 8.00	\$ 8.00	\$.00
Children's Waiting Room Fee	\$ 5.00	\$ 5.00	\$.00
Neutral Site Custody Exchange Program	\$ 8.00	\$ 8.00	\$.00
Totals:	\$ 231.00	\$ 231.00	\$.00

C m C

To Sheriff of McLean County

To Sheriff's Fee in Case			
Julie Crowe			
vs			
City of Bloomington			
12 MR45			
Service		50	00
Mileage	RECEIVED  PAID	1	00
Return	EE 2 8 2012 CK # 5530	14	00
McLEAY CO Sheriff's Dept.		64	00
Total			

NOTE Resolution passed at the December 1918 meeting of the Board of Supervisors of McLean County

That except in cases where leave has been granted to prosecute as a poor person, or where otherwise ordered by the Court from which process is issued, the sheriff be instructed to require the payment of fees earned for service or process in civil cases before returning such process to the Court from which said process is issued, and that the sheriff be further instructed to avail himself of all legal means to collect the fees due him in all civil cases.

Stamps not accepted as cash

Exhibit B

Proposed Agreed Order

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF McLEAN**

JULIE CROWE,

Plaintiff,

v.

CITY OF BLOOMINGTON, a Municipal
Corporation,

Defendant.

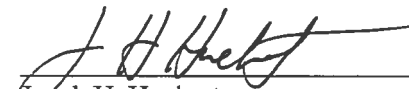
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AGREED ORDER


This matter came before the Court on Plaintiff's Unopposed Motion for an Award of Costs. After considering Plaintiff's motion, the Court finds and orders as follows:

1. Plaintiff is the prevailing party in this matter and is entitled to an award of reasonable costs pursuant to 735 ILCS 5/5-110.
2. Plaintiff incurred costs totaling \$396.00 for filing this action and serving the summons upon Defendant City of Bloomington.
3. The parties have agreed that Plaintiff is entitled to an award of costs in that amount, as acknowledged by their signatures here.
3. Accordingly, Defendant City of Bloomington is ordered to pay Plaintiff \$396.00, payable to her attorneys, the Liberty Justice Center, which incurred these costs on her behalf, within 30 days of entry of this Order.

SO ORDERED.



Jacob H. Huebert
Attorney for Plaintiff



J. Todd Greenburg
Attorney for Defendant

Entered: _____

Circuit Judge