

No 21-6627

Supreme Court, U.S.
FILED

NOV 04 2021

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IN THE
Supreme Court of the United States

Balitha Stella Greenfield
Jozette Pepper Greenfield,

PETITIONERS,

V.

Vanessa Munoz

RESPONDENT.

PETITION FOR A WRIT OF CERTIORARI

Comes now petitioners Jozette Pepper Greenfield and Balitha Stella Greenfield, and petitions

this court for a writ of certiorari Rules 10-14 to issue to the supreme courts of illinois case# 127303. This court rules on Judicial Discretion.

A copy of the orders from the supreme court of illinois, and motion to reconsider the order from the supreme court of illinois denying petition for leave to appeal, entered on November 3rd, 2021 (Appendices E).

Petitioner Balitha Stella Greenfield was the Beneficiary of trust#7623 and owner of two land Lots at address known as 821 N. Menard ave Chicago, Illinois 60651 When trust dissolved bank sold.

The north ½ lot 32 and all of lot 33 in Lewis and Barnes subdivision of block 13 in Salibury's subdivision of east ½ of the southeast ¼ of section 5, township 39 north range 13, east of the third principal meridian in Cook County, ill

Both petitioners Jozette and Balitha, resided at the address since 1972 childhood home, in 1998

The city of Chicago had the property demolished.

In 1999 petitioner Jozette Pepper Greenfield and John Dear purchased the vacant lots.

John Dear transferred title to petitioner Jozette, Petitioner Jozette who placed the Land Title in trust for protection with the cosmopolitan bank and land trust department (Appendices C).

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Petitioner Jozette Filed a Federal Land patent with the cook county recorder deeds 118 N. Clark ste#120 Chicago,il 60602.

(Appendices D) line #9 of the Title search,petitioner Jozette had to take the original title owner Jeremiah Price from the 1800's,and run a article in the paper filing it with the cook county bulletin desk locate in room# 802 in the daley courthouse chicago,il 60651.(Appendices D)

line#9 of the title search. Petitioner Jozette separated both lots each having its own new pin#16-05-428-0000(still vacant land)petitioner Jozette is paying taxes as of 2021

pin#(16-05-428-0000(house on it) paid all her taxes on vacant lots,

and conveyed her sister petitioner Balitha Stella Greenfield on assignment while title was in trust on June 29th,2004 (Appendices B).

the petitioner Jozette Pepper Greenfield,built a house on one of the lots and satisfaction of

The mortgage was filed in Cook county on March 18,2003 by mortgage company Long beach.

Jozette kept the trust#7623 bifurcated from the dwelling,allowing conveyance to Balitha

(petitioner) on June 29th 2004 (Appendices B).This case is simple,Balitha didn't convey title at

all to anyone. She is the owner of the Land known as 821 N.Menard. Balitha has 20yrs to come

back and request the courts to reverse the unlawful judgement entered on 29th of June

2009. a lien should have been placed not a on the dwelling,not a

judgement for possession in a foreclosure.this case should be granted a writs of certiorari,

based on judicial discretion. (This is not res judicata)

(Appendices A), when petitioner Balitha Stella became owner of trus#7623 on June 29th, 2004

(Appendices B). No debt was owed.

The Title clearly shows Balitha Stella Greenfield is the correct owner of Both Land Lots, never conveying her title to anyone else.

Chicago Title was the first person brought into court, and Chicago Title apologized to the Petitioners Jozette and Balitha Greenfield for this mistake. Chicago title took immediate Responsibility. (respondent Vanessa Munoz is reliable for what happens with this case) Officers from Chicago title told respondent Vanessa Munoz to complete her Title insurance claim with them and return the property at once, respondent Vanessa Munoz refuses to comply.

CONCLUSION

The lower courts are erroneous, the appellate court first district did not review this case instead they cut and paste order from circuit court.

the title shows the Land was placed in trust and the assignment has petitioner Balitha Estella Greenfield as the sole beneficiary, until the bank cosmopolitan dissolved in 2006, then Petitioner became Owner of the title to Land, no mortgage was owed at the time of transfer of title. (petitioner Balitha was not part of the mortgage).

In the lower courts under Quiet title case, the judge didn't allow this case to be proven. Petitioners asked and pleaded for an extension of time to get the copy of the title Search, covid 19 closed and slowed down all government offices, which is now attached to this writ of certiorari, the motion to amend the complaint was denied.

(All litigation filed by petitioner Jozette was a lack of knowing how to prove that a foreclosure was the wrong legal process, petition has now proven this to this court. petitioner was pro se and still is, petitioner has finally proven this case.

This case was ruled without prejudice which allows a higher court to review. The respondent's counsel has insulted the petitioners, by calling them serial litigation filers. Then claim petitioner Jozette lost interest in the property, well petitioner Jozette never lost interest at all. Petitioner was granted possession back from the first foreclosure in 2003.

The lower courts ruled in petitioners favor, dismissing the foreclosure in 2003 with prejudice.

The lower courts allowed a 2nd foreclosure to be filed in 2007 and allowed this case to move forward without looking into the case.

Foreclosure was not the proper legal process to collect a debt owed by petitioner Jozette which actually was no longer a debt.

Balitha was not part of the mortgage.

petitioner Balitha owns the land.

A Concise Statement of the grounds on which invoked 14.1(e)
The petitioner's had possession of the home and land at the time of the 2nd illegal foreclosure was filed in 2007.

This is when the same law firm got a judgement in 2009 and took possession of the Land which is owned by petitioner Balitha Stella Greenfield.

Petitioner Balitha never abandoned the land, or conveyed the title to respondent Vannesa Munoz. (petitioner Balitha Stella Greenfield has always had interest in getting her land returned).

Concise statement of the case 14.1(cg)
The title search was not ready for the amended complaint in the Quiet title case (COVID 19 shut down the title company's office. The judge ruling was a "ridiculous order" and she never tried to appoint petitioner's counsel nor mentioned in her order COVID 19 closing the title office, was the reason for the delay to attach the title as an exhibit before filing an amended complaint. The petitioners had to wait on the title search to amend their complaint.

(Appendices E). The title search shows facts as Appendices to prove this case.

Petitioners are asking this court to return the Land and grant petitioner to collect past lot fees due, totaling \$25,000 plus possession immediately from respondent Vanessa Munoz.

The question Presented for review - Rule 14.1(a)
Chicago title will correct title with order from this court, because the burden of proof is proven by the title search attached.

The reasons relied on for the allowance of the writ Rule 10.1(b)
This Land should have never been taken and petitioners are within the statute of limitations. Petitioner Jozette has never and will never represent Balitha as counsel.

This petition for writ certiorari should be granted in favor of Petitioners, it should be so ordered.



Respectfully Submitted,

prose Jozette P. Greenfield
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