

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

GUSTAVO CAICEDO)
)
Plaintiff)
)
-vs-)
)
LOREN R. STONE)
)
Defendant)

2009L007761
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09 L Legal Malpractice

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DOROTHY BROOKHUIS
CLERK OF CIRCUIT COURT
LAW DIVISION

COMPLAINT AT LAW FOR LEGAL MALPRACTICE

NOW COMES Gustavo Caicedo by his attorneys Jeffrey Strange and Associates and for his Complaint for legal malpractice against the Defendant, Loren R. Stone, states as follows:

1. Plaintiff, Gustavo Caicedo is an individual residing in Cook County, Illinois.
2. Defendant Loren R. Stone at all relevant times was and is a licensed Illinois attorney practicing in Cook County, Illinois.
3. In February 2006, Plaintiff hired the Defendant Loren R. Stone to handle the sale of his real property at 2727 N. Austin Avenue in Chicago, Illinois, which is legally described as follows:

THE NORTH 24.75 FEET OF LOT 14 IN BLOCK 4 IN TITLEY'S SUBDIVISION OF LOT 1 IN THE CIRCUIT COURT PARTITION OF THE WEST 1/2 OF THE SOUTHEAST 1/4 (EXCEPT THE SOUTH 33 1/3 ACRES THEREOF) AND THE NORTH 1/2 OF THE SOUTHWEST 1/4 (EXCEPT THE SOUTH 33 1/3 ACRES THEREOF) OF SECTION 29, TOWNSHIP 40 NORTH RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS

4. That Defendant was provided a copy of the real estate contract for the

following respects:

a. Failed to draft the deed in conformance with the contract and as a result conveyed Plaintiff's lot to the South along with the lot that was contracted to be conveyed.

b. Failed to review the legal description of the lot to be conveyed and compare the same to the survey of the property to be sold.

c. Failed to follow the directions of his client to convey only 2727 W. Austin.

12. That Plaintiff first discovered the error of Defendant in April of 2009 when he drove past 2725 N. Austin and noticed that a fence had been placed around the property.

13. That Plaintiff then began an inquiry and found that the property had been conveyed by the deed drafted by Loren S. Stone and that it had been subsequently resold to bona fide purchasers for value.

14. That the value of the lot commonly known as 2725 N. Austin at the time of the conveyance was in excess of \$75,000 and therefore Plaintiff has been damaged in that amount.

15. That Plaintiff suffered additional damages because he continued to pay the real estate taxes from the period April 6, 2006 until April of 2009 and paid the following amounts to the Cook County Treasurer's office:

Nov, 2006	\$1,173.57
July 16, 2007	621.47
October 2007	565.82
March 2008	<u>571.97</u>
Total	2,932.83

WHEREFORE Plaintiff prays for judgment in the amount of \$77,932 plus costs
of this action and for such further relief as this court deems just.

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