

**FILED**

**OCT 18 2016**  
CLERK OF CIRCUIT COURT #11  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

WILLIAM TENNISON, individually, et al. )  
and on behalf of all others similarly situated, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
MARION BASS SECURITIES )  
CORPORATION, et al. )  
 )  
Defendants. )

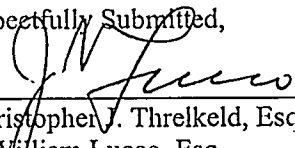
Case No. 01-L-000457

**PLAINTIFF'S MOTION FOR LEAVE TO FILE  
FOURTH AMENDED CLASS ACTION COMPLAINT**

Plaintiff William Tennison, with the consent of Defendant Wells Fargo Bank, N.A., hereby requests leave of this Court to file the Fourth Amended Class Action Complaint (attached hereto as Ex. A). The purpose of this amended Complaint is to effectuate the settlement memorialized in the Class Action Settlement Agreement dated October 17, 2016 (the "Agreement") by broadening the group of persons entitled to receive benefits under the Agreement and who constitute the Settlement Class as defined therein.

DATED: October 17, 2016

Respectfully Submitted,



Christopher J. Threlkeld, Esq.  
J. William Lucco, Esq.  
LUCCO, BROWN, THRELKELD & DAWSON, LLP  
P.O. Box 539  
Edwardsville, IL 62025

Fred Thompson, III, Esq.  
William S. Norton, Esq.  
MOTLEY RICE, LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29465

*Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was sent via U.S. postage prepaid, on October 18, 2016 to the following:

David Wells, Esq.  
Catherine A. Schroeder, Esq.  
Mark A. Beatty, Esq.  
Thompson Coburn LLP  
One US Bank Plaza  
St. Louis, MO 63101  
**Attorneys for Defendant  
Wells Fargo Bank**

*Thomas O. Kelly, III*  
Patrick J. McLaughlin, Esq.  
Dorsey & Whitney, LLP  
50 South Sixth Street, Suite 1500  
Minneapolis, MN 55402-1493  
**Attorneys for Defendant Wells Fargo Bank  
Wisconsin National Association, successor to  
Norwest Bank**

Christopher J. Threlkeld, Esq.  
J. William Lucco, Esq.  
Lucco, Brown, Threlkeld & Dawson, LLP  
224 St. Louis Ave.  
P.O. Box 539  
Edwardsville, IL 62025  
**Attorneys for Plaintiffs**

The undersigned hereby further certifies that the following Defendants were not served with a copy of the foregoing due to prior service copies being returned to the undersigned:

P.J. Maxwell  
17941 Burhnam Avenue  
Lansing, IL 60438  
**Defendant P.J. Maxwell**

Mr. Larry Banks  
2350 Bernice Road, Suite B  
Lansing, IL 60438  
**Defendant Larry D. Banks**

Robert S. Luce, Esq.  
2350 Bernice Road, Suite B  
Lansing, IL 60438  
**Defendant Robert S. Luce**

Mr. Greg Banks  
2350 Bernice Road, Suite B  
Lansing, IL 60438  
**Defendant Greg Banks**

Mr. Reynold Banks  
2350 Bernice Road, Suite B  
Lansing, IL 60438  
**Defendant Reynold Banks**

Ms. Faith Houston Qualls  
705 North Huston Avenue  
Chicago, IL 60624  
**Defendant Faith Houston Qualls**

Ms. Grace R. LaRocca  
20850 Crowley Street  
St. Clair, MI 48081  
**Defendant Grace R. LaRocca**

Mr. James J. Carroll  
674 East Gartner Road  
Naperville, IL 60540  
**Defendant James J. Carroll**

Emmett J. Marshall, III, Esq.  
Law Offices of Emmett J. Marshall III  
& Associates  
10 W. 35<sup>th</sup> Street, Suite 9C3-1

Mr. Avery Davis  
12004 South Yale Avenue  
Chicago, IL 60628  
**Defendant Avery Davis**

Chicago, IL 60601  
**Attorney for Defendants Fred D.  
Hasselbring, Emmett J. Marshall III and  
Darlene D. Cannan**

Ronald Kutrieb  
3 Hay Street  
Newbury, MA 01951-1612  
**Defendant Ronald Kutrieb**

Catherine A. Schroeder