

Defendant, the Secretary of Housing and Urban Development (“HUD”), respectfully requests that the Court order the Clerk of the Court to pay to the United States Department of Justice, 10 West Market, Suite 2100, Indianapolis, IN 46204, the funds in the approximate amount of \$22,241.28 that were in excess from the Sheriff’s sale held on February 17, 2023, (as reported in the Clerk Return filed on March 9, 2023) as total just compensation in the matter of this foreclosure action. HUD has a demand against the property by virtue of having second lien priority. (See June 10, 2021, Summary and Default Judgment Entry and Decree of Foreclosure at ¶B.) HUD is entitled to such sum by reason of a subordinate mortgage recorded against the defendant, Helen L. Chandler, on November 13, 2014, as Instrument No. A201400110194. (The United States of America refers the Court its Answer and Exhibits filed on October 17, 2019.)

WHEREFORE, Defendant, the Secretary of Housing and Urban Development, prays that the Court order the Clerk of the Court to pay to the United States Department of Justice the excess funds in the approximate amount of \$22,241.28 from the sale held on February 17, 2023, as total just compensation in the matter of this foreclosure action.

Respectfully submitted,

ZACHARY A. MYERS  
United States Attorney

By: Keith W. Lerch  
Keith W. Lerch, 10010-49  
Special Assistant United States Attorney

**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of the foregoing **MOTION TO DISTRIBUTE FUNDS**, upon the parties listed below by electronic service, via the Indiana E-Filing System, on this 14th day of March 2023:

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