Citations Versus Non-Wage Garnishments: Which Is Right for Your Collection Case? – Appellate Court Opinion Cites Michael Cortina

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A recent decision, *In re Marriage of Arjmand*, that came down from the Second District Appellate Court of Illinois cited an article authored by Mike Cortina. The article, titled "Citations Versus Non-Wage Garnishments: Which Is Right for Your Collection Case?" was published in 2005 in the Illinois State Bar Association's *Illinois Bar Journal*. In the article Mike discusses the two principal devices for reaching a judgment debtor's assets held by banks and other non-employer third parties, and clarifies garnishments. In the opinion the court denied the plaintiff's motion to quash garnishment proceedings in a divorce case.

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