IN THE UNITED STATES DISTRICT COURT' NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

STRUCTURAL IRON WORKERS)	
LOCAL UNION NO. 1 PENSION TRUST)	
FUND and STEVE M. BUKOVAC,)	
Administrator of the Fund Disbursement Office)	Case No. 07 CV 4758
)	
Plaintiffs,)	
)	Judge James F. Holderman
V.)	
)	Magistrate Judge Maria Valdez
WINDY CITY IRON WORKS, INC.)	
)	
Defendant.)	

AGREED MOTION FOR ENTRY OF CONFESSION OF JUDGMENT

Plaintiffs, Structural Iron Workers Local Union No. 1 Pension Trust Fund and Steve M. Bukovac, as Administrator of the Pension Fund (collectively õPlaintiffsö), by and through their attorneys, Hogan Marren, Ltd., and Defendant, Windy City Iron Works, Inc. (õDefendantö), by and through its attorneys, Ungaretti & Harris LLP, move this Court to enter judgment in favor of Plaintiffs. In support of this motion, the parties state as follows:

- Defendant has agreed to confess to judgment in favor of Plaintiffs on both counts of Plaintiff¢s Complaint, in the amount of SEVENTY-NINE THOUSAND EIGHTY DOLLARS AND SEVENTY-SEVEN CENTS (\$79,080.77), plus accrued interest in the amount of FIFTEEN THOUSAND TWO HUNDRED AND SEVENTTY-FIVE DOLLARS AND EIGHTY-TWO CENTS (\$15,275.82), and TWELVE THOUSAND AND FIVE HUNDRED AND SIXTY-FOUR DOLLARS AND THIRTY-NINE CENTS (\$12,564.39) in attorney¢s fees and costs expended by Plaintiffs.
- 2. Defendant agrees to accept the entry of said judgment. (A copy of the proposed Stipulation of Confession of Judgment is attached hereto as Exhibit õA.ö)

WHEREFORE, for the foregoing reasons, Plaintiffs Structural Iron Workers Local Union No. 1 Pension Trust Fund and Steve M. Bukovac, as Administrator of the Pension Fund, and Defendant, Windy City Iron Works, Inc., respectfully request that this Court grant their motion for confession of judgment and enter an order:

Awarding to Plaintiffs the total amount of ONE HUNDRED SIX THOUSAND NINE HUNDRED AND TWENTY DOLLARS AND NINETY- EIGHT CENTS (\$106,920.98).

Respectfully submitted,

Plaintiffs, Structural Iron Workers Local #1 Pension Trust Fund, et al.

BY: /s/ Evan J. Haim

Patrick E. Deady J. Michael Tecson Evan J. Haim Hogan Marren, Ltd. 180 N. Wacker Drive, Suite 600 Chicago, Illinois 60606 312-946-1800 312-946-9818 (facsimile) Defendant, Windy City Iron Works, Inc.,

BY: /s/ Michael P. McBride_

Jeffrey H. Bergman Michael P. McBride Ungaretti & Harris LLP 3500 Three First National Plaza Chicago, Illinois 60602 312-977-4400 312-944-4405 (facsimile)



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Plaintiffs,)	
)	Judge James F. Holderman
V.)	
)	Magistrate Judge Maria Valdez
WINDY CITY IRON WORKS, INC.)	
)	
Defendant.)	

STIPULATION OF CONFESSION OF JUDGMENT

Plaintiffs, STRUCTURAL IRON WORKERS LOCAL UNION NO. 1 PENSION TRUST FUND, and STEVE M. BUKOVAC, as Administrator of the Fund Disbursement Office, by and through their attorneys, Hogan Marren, Ltd., and Defendant, Windy City Iron Works, Inc., by and through its attorneys, Ungaretti & Harris LLP, hereby file this Stipulation of Confession of Judgment, requesting that the Court enter judgment in favor of Plaintiffs in the total amount of ONE HUNDRED SIX THOUSAND NINE HUNDRED AND TWENTY DOLLARS AND NINETY-EIGHT CENTS (\$106,920.98), which includes all accrued interest and attorney@s fees and costs.

Respectfully submitted,

Plaintiffs, Structural Iron Workers Local #1

Pension Trust Fund, et al.

BY: /s/ Evan J. Haim

Patrick E. Deady J. Michael Tecson Evan J. Haim

Hogan Marren, Ltd.

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Defendant, Windy City Iron Works, Inc.,

BY: /s/ Michael P. McBride

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