

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN AUDIO VISUAL CO. d/b/a
ABSOLUTE PRODUCTION SERVICES,

Plaintiff,

v.

PAULA A. ROUILLARD and MARKETING
GROUP WEST,

Defendants.

No. 07 C 4948

Judge Coar
Magistrate Judge Keys

**MOTION FOR JUDGMENT AND AWARD OF DAMAGES
AGAINST DEFENDANT MARKETING GROUP WEST**

Plaintiff American Audio Visual Co. d/b/a Absolute Production Services (“APS”), through its attorneys Miller, Canfield, Paddock & Stone, PLC, moves this honorable court for an order of judgment and damage award in its favor and against defendant Marketing Group West (“MGW”). In support of its motion, APS states as follows:

1. On March 21, 2008, MGW was added as a defendant in this lawsuit. (Complaint, Ex. 1).
2. APS’s Complaint prays for damages stemming from a former employee taking APS’s client’s business and bringing it to MGW.
3. On March 24, 2008, APS served MGW with a Waiver of Service and Notice of Lawsuit.
4. In April 2008, Philip L. Ginsburg, an attorney representing MGW, telephoned counsel for APS requesting a settlement demand.
5. The parties exchanged various e-mails, but to no avail.

CERTIFICATE OF SERVICE

The undersigned certifies that on September 26, 2008 a copy of the foregoing Motion for Judgment and Award of Damages Against Defendant Marketing Group West was filed electronically using the CM/ECF system. Notice of this filing will be served upon:

Marketing Group West
2010 Crow Canyon Place
Suite 100
San Ramon, CA 94583

by Federal Express on the 26th day of October, 2008, and upon:

Paula Rouillard
4010 West Carol Avenue
Phoenix, AZ 85051

by placing a true and correct copy thereof in a sealed envelope addressed as aforesaid, with postage prepaid, and depositing same in the United States mail box located at 225 West Washington Street, Chicago, Illinois at or before 5:00 p.m. on the 26th day of September, 2008.

s/Cara M. Houck