

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

TRUSTEES OF THE SUBURBAN TEAMSTERS	)	
OF NORTHERN ILLINOIS PENSION FUND	)	
AND WELFARE FUNDS,	)	
	)	
Plaintiff,	)	
	)	No. 07 C 5979
v.	)	
	)	Judge Leinenweber
	)	
E & R HAULING, INC.	)	Magistrate Judge Cox
an Illinois corporation, and	)	
GERALDINE EGIZIO, Individually,	)	
	)	
Defendants.	)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on October 23, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon E & R HAULING, INC., on October 29, 2007 and a copy of the proof of service was filed with the court on November 6, 2007.
3. On December 5, 2007, Geraldine Egizio, Individually and as President of E & R Hauling, Inc. entered into an installment note for \$6,874.35 (Exhibit "A"). No installment payments have been made. There remains a balance due the Plaintiff Funds of \$6,874.35.

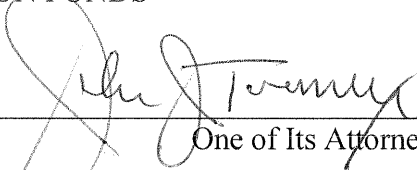
4. Defendants are now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$6,874.35 Pension and Welfare  
\$1,202.50 Attorneys fees  
\$457.00 Court costs  
\$8,533.85

WHEREFORE, Plaintiff prays for the entry of judgment, jointly and severally, against Defendant, E & R HAULING, INC. and GERALDINE EGIZIO, Individually and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$8,533.85.

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS WELFARE AND  
PENSION FUNDS

By:

  
\_\_\_\_\_  
One of Its Attorneys

JOHN J. TOOMEY  
ARNOLD AND KADJAN  
19 W. Jackson Boulevard  
Chicago, Illinois 60604  
(312) 236-0415