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

OF CARPENTERS PENSION FUND, CHICAGO )	
, or	
REGIONAL COUNCIL OF CARPENTERS WELFARE )	
FUND, CHICAGO REGIONAL COUNCIL OF )	
CARPENTERS APPRENTICE & TRAINEE FUND )	
)	
Plaintiffs, Case No. o	8 C 359
)	
) Judge Vald	lez
v. )	
)	
LONGSHORE / DALY INC.	
)	
Defendant. )	

## AGREED MOTION FOR ENTRY OF JUDGMENT

The parties, by its respective attorneys, Daniel P. McAnally and Thomas S. Moore, move this Honorable Court to enter an Agreed Judgment Order in favor of the plaintiffs and against the defendant and in support state:

- 1. This is an ERISA trust fund case for outstanding contributions.
- 2. The parties agree that a judgment should be entered in favor of the plaintiffs and against the defendant as follows:

	TOTAL	\$181,518.99
d)	Attorney Fees and Costs	\$7,908.25
c)	Liquidated Damages (11/06 - 01/08)	\$40,696.84
b)	Interest on ERISA Contributions (10/07 - 01/08)	\$5,382.06
a)	ERISA Contributions (10/07 - 01/08)	\$127,531.84

WHEREFORE, the parties request that their motion be granted in favor of the plaintiffs and against the defendant in the amount of \$181,518.99.

Respectively submitted,

s/ DANIEL P. McANALLY

Attorney for the Trustees of the Chicago Regional Council of Carpenters Pension Fund, et al.

Attorney for Plaintiffs Whitfield McGann & Ketterman 111 E. Wacker Drive Suite 2600 Chicago, IL 60601 312/251-9700 Attorney No. 6205288