

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

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 08 C 3126
)	
K & V STEEL ERECTORS, L.L.C.,)	JUDGE CHARLES P. KOCORAS
an Iowa limited liability company,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, K & V STEEL ERECTORS, L.L.C., an Iowa limited liability company, in the total amount of \$63,738.55, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,284.33.

On June 8, 2008, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 28, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan _____

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 30th day of September 2008:

Ms. Vicki A. Bogar, Registered Agent
K & V Steel Erectors, L.L.C.
8620 99th Avenue West
Taylor Ridge, IL 61284

Mr. Keith Bogar
3407 - 78th Avenue W, Suite A
Rock Island, IL 61202

/s/ Patrick N. Ryan

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