

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

TERRENCE J. HANCOCK, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 08 C 5464
	)	
CCH TRUCKING, L.L.C., an Illinois	)	JUDGE ELAINE E. BUCKLO
limited liability company,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on January 16, 2009, request this Court enter judgment against Defendant, CCH TRUCKING, L.L.C., an Illinois limited liability company. In support of that Motion, Plaintiffs state:

1. On January 16, 2009, this Court granted Plaintiffs’ oral motion for entry of default against Defendant and set this matter for prove-up on January 30, 2009.
2. On September 24, 2008, Plaintiffs filed the instant litigation against Defendant to recover delinquent fringe benefit contribution reports, contributions, liquidated damages, interest, attorneys’ fees and costs for the time period May 2008 forward.
3. Defendant has submitted monthly contribution reports to the Plaintiffs identifying employees of the Defendant who performed work covered by the collective bargaining agreement, and the number of hours worked by or paid to those employees for the months of May 2008 through October 2008. The payment of the fringe benefit contributions due thereon was untimely submitted. Pursuant to the Trust Agreements, a liquidated damages surcharge has been assessed against the

Defendant in the amount of twenty (20%) percent of all contributions due which were paid late, for the above-stated months, in the total amount of \$1,010.87 (See Affidavit of Terrence J. Hancock).

4. In addition, Plaintiffs' firm has incurred costs of \$435.00 and \$2,411.25 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$3,857.12.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$3,857.12.

/s/ Beverly P. Alfon \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) 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 23rd day of January 2009:

Mr. George P. Korbakes, Registered Agent  
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Mr. Kevin Mulrenin  
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/s/ Beverly P. Alfon

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