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

Trustees of the Chicago Regional Council	)
Of Carpenters Pension Fund, etc., <i>et al</i> ,	)
	)
Plaintiffs,	)
	)
- $VS$ $-$	) 08 CV 5689
	) Judge Manning
Consolidated Workforce, Inc.,	) Magistrate Judge
	) Schenkier
Defendant.	)

## AGREED MOTION FOR REINSTATEMENT AND FOR CONSENT JUDGMENT

Plaintiffs, by its attorney, David P. Lichtman, move this Honorable Court to reinstate this case and enter judgment and in support state:

- 1. This is an ERISA trust fund case for delinquent contributions.
- 2. On June 4, 2009, this case was dismissed with leave to reinstate.
- 3. The parties have agreed that the Defendant will turnover the sum of \$33,707.44 to the Plaintiffs and to the entry of judgment against the Defendant and in favor of the Plaintiffs in the amount of \$76,875.24.

WHEREFORE, the parties pray that this case be reinstated and that the attached proposed consent judgment (Exhibit A) be entered against the Defendant in the amount of \$76,875.24.

Respectfully submitted,

/s/ David P. Lichtman
Attorney for the Plaintiffs

David P. Lichtman Attorney No. 6290051 Whitfield McGann & Ketterman 111 E. Wacker Drive Suite 2600 Chicago, IL 60601 (312) 251-9700 Fax (312) 251-9701