

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

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 08 C 6454
vs.)	
)	JUDGE MILTON I. SHADUR
APCSC, LLC, an Illinois 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, APCSC, LLC, an Illinois limited liability company, in the total amount of \$32,148.36, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$9,256.25.

On November 13, 2008, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to Courtney Hightower, Receptionist, at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 3, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Jennifer L. Dunitz-Geiringer

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and 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 9th day of July 2009:

APCSC, LLC
c/o National Registered Agents, Inc.,
n/k/a Premier Corporate Services, Inc.
200 W. Adams Street, Suite 2007
Chicago, IL 60606

Mr. Robert H. Brown
Laner Muchin Dombrow
Becker Levin & Tominberg, Ltd.
515 N. State Street, 28th Floor
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/s/ Jennifer L. Dunitz-Geiringer

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