

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

FREDERICK J. GREDE, not individually but as)	
Liquidation Trustee of the Sentinel Liquidation)	
Trust,)	
)	Honorable Rebecca R. Pallmeyer
Plaintiff,)	
v.)	
)	Case No. 09-cv-00130
COUNTRY HEDGING, INC.,)	
)	
Defendant.)	

**COUNTRY HEDGING, INC.’S MOTION FOR ENTRY OF JUDGMENT ON
COUNTS I THROUGH V OF THE TRUSTEE’S SECOND AMENDED COMPLAINT**

Defendant, Country Hedging, Inc. (“Country Hedging”),¹ respectfully submits this Motion for Entry of Judgment on Counts I through V of the Trustee’s Second Amended Complaint. Specifically, Country Hedging seeks an Order from the Court: (1) entering judgment in Country Hedging’s favor and against the Trustee on Counts I through V of the Trustee’s Second Amended Complaint; (2) directing the Trustee to pay Country Hedging its pro rata share of the SEG 1 Reserve, the Section 7.20(b) Disputed Claims Reserve, and the SEG 3/4 Reserve within seven days of this Court’s entry of judgment on Count III; and (3) granting all other just relief.

A Memorandum of Law has been submitted herewith.

Accordingly, in view of the arguments in the accompanying memorandum, Country Hedging respectfully requests that the Court GRANT its Motion for Entry of Judgment on Counts I through V of the Trustee’s Second Amended Complaint.

¹ In 2012 (years after this lawsuit was filed), Country Hedging, Inc. changed its name to CHS Hedging, Inc., and subsequently changed it to CHS Hedging, LLC in 2014.

Dated: October 13, 2017

Respectfully submitted,

COUNTRY HEDGING, INC.

By: /s/ Nathan F. Coco

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CERTIFICATE OF SERVICE

I, Nathan F. Coco, an attorney, hereby certify that on October 13, 2017, I electronically filed the foregoing COUNTRY HEDGING, INC.S MOTION FOR ENTRY OF JUDGMENT ON COUNTS I, II, IV and V with the Clerk of the Court using the CM/ECF system, which caused the same to be served on all counsel of record via ECF filing.

By: /s/ Nathan F. Coco
One of its attorneys