

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

TRUSTEES of the CHICAGO REGIONAL	)	
COUNCIL OF CARPENTERS PENSION FUND,	)	
CHICAGO REGIONAL COUNCIL OF	)	
CARPENTERS WELFARE FUND, and CHICAGO	)	
REGIONAL COUNCIL OF CARPENTERS	)	CASE NO. 09CV141
APPRENTICE & TRAINEE PROGRAM FUND	)	
	)	JUDGE KOCORAS
Plaintiffs,	)	
	)	
v.	)	
	)	
COMMERCIAL WOODWORKER INSTALLER, LLC	)	
	)	
Defendant.	)	

**MOTION FOR REINSTATEMENT AND FOR 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 March 30, 2009, this case was dismissed with leave to reinstate pursuant to the settlement of the parties. **(Exhibit A, Agreed Order of Dismissal)**
3. By the terms of the Agreed Order of Dismissal, Exhibit A, the Defendant was to pay \$28,374.84 to the Plaintiffs in two installments on or by April 20, 2009. If the Defendant defaulted on the payments, the Plaintiffs retained the right to reinstate the case and enter judgment for the balance owed on the unpaid amount. **(Exhibit A)**
4. The Defendant has defaulted on the payment obligations set forth in the Agreed Order of Dismissal. The second and final payment was due on or before April 20, 2009. The Defendant failed to make the second payment of \$14,187.42 on or by the due date of April 20, 2009, and as of the date of this motion has still not tendered said payment.
5. As a result of the Defendant’s default, the Defendant owes to the Plaintiffs the sum of \$14,187.42.

WHEREFORE, Plaintiffs pray that this case be reinstated and that judgment be entered against the Defendant in the amount of \$14,187.42.

Respectfully submitted,

/s/ David P. Lichtman  
Attorney for the Plaintiffs

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