

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

TERRENCE J. HANCOCK, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 09 C 0993
)	
L.G.E. TRANSPORT, INC., an Illinois)	CHIEF JUDGE JAMES F. HOLDERMAN
corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, L.G.E. TRANSPORT, INC., an Illinois corporation, in the total amount of \$30,451.20, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,225.00.

On February 20, 2009, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on March 12, 2009. 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 10th day of September 2009:

Mr. George Vasen, Jr., Registered Agent
L.G.E. Transport, Inc.
1304 Pennwood Court, Suite A2
Schaumburg, IL 60193

/s/ Jennifer L. Dunitz-Geiringer _____

Jennifer L. Dunitz-Geiringer
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