

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

CHICAGO REGIONAL COUNCIL OF CARPENTERS,)	
)	Case No. 09CV 1063
Plaintiff,)	
)	Judge Andersen
v.)	
)	
CHICAGO INSTALLATION COMPANY LLC d/b/a)	
JOYCE INSTALLATION COMPANY, L.L.C.,)	
)	
Defendant.)	

**MOTION FOR ENTRY OF A SUPPLEMENTAL
JUDGMENT ORDER**

Plaintiffs, by its attorney, Raymond J. Sanguinetti, move this Honorable Court to enter A Supplemental Judgment Order to the Order entered May 4, 2009. In support of this Motion the Plaintiffs state:

1. Plaintiffs filed their complaint on February 19, 2009. A Judgment Order in the amount of \$405.00 was entered in favor of Plaintiff and against the Defendant on May 4, 2009 which represented court costs and service of process. **See Exhibit A.**

2. Per the Order of May 4, 2009, Plaintiff's attorney received Defendant's payroll records for the period of October 2006 through March 31, 2009. The audit revealed amounts due of \$138,833.50 in wages plus \$9,071.42 in dues. **See Affidavit of John Jarger, Exhibit B.**

3. Article 18.7 of the Collective Bargaining Agreement states that this Court has the authority to award reasonable attorney fees and costs to the prevailing party. Plaintiffs are entitled to attorney's fees and costs in the amount of \$3,973.50 (**Exhibit C, affidavit of Raymond J. Sanguinetti**)

WHEREFORE, Plaintiffs pray that their motion for supplemental judgment be granted in the amount of 151,878.42.

Respectively submitted,

s/ RAYMOND J. SANGUINETTI

Attorney for the Trustees
of the Chicago Regional
Council of Carpenters
Pension Fund, et al.

Attorney for Plaintiffs
Whitfield, McGann & Ketterman
111 E. Wacker Drive
Suite 2600
Chicago, IL 60601
312/251-9700
Atty No. 6244798