

4. An audit was performed for the period of July 2006 through March 2008 and it was discovered that the Defendant owes contributions in the amount of \$5,927.75 for the months of September 2006 through June 2007. **(Exhibit B, Affidavit of John Libby)**

5. The Defendant owes interest on the unpaid ERISA contributions in the amount of \$937.96 pursuant to the Trust Agreements and 29 U.S.C. §1132(g)(2)(B). **(Exhibit B)**

6. The Defendant owes liquidated damages on the unpaid ERISA contributions in the amount of \$1,185.55 for the period September 2006 through June 2007 pursuant to the Collective Bargaining Agreements, the Trust Agreements and 29 U.S.C. §1132(g)(2)(C)(ii). **(Exhibit B)**

7. The Defendant owes the sum of \$3,084.44 for necessary and reasonable attorney fees and costs, which are collectible under the terms of the Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). **(Exhibit C, Affidavit of Amy Elizabeth Paluch Epton)**

WHEREFORE, Plaintiffs pray that their motion for entry of Order of Judgment be granted in the amount of \$11,135.70.

Respectively submitted,

s/ Amy Elizabeth Paluch Epton
Attorney for the Trustees of the Chicago Regional
Council of Carpenters Pension Fund, et al.

Attorney for Plaintiffs
Amy Elizabeth Paluch Epton (6278817)
Whitfield, McGann & Ketterman
111 E. Wacker Drive, Suite 2600
Chicago, IL 60601
(312) 251-9700 Fax (312) 251-9701