

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

TERRENCE J. HANCOCK, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 09 C 1877
)	
D ANDERSON CONTRACTING, INC.,)	JUDGE JAMES B. ZAGEL
a dissolved Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 25, 2009, request this Court enter judgment against Defendant, D ANDERSON CONTRACTING, INC., a dissolved Illinois corporation. In support of that Motion, Plaintiffs state:

1. On June 25, 2009, this Court entered default against Defendant and granted Plaintiffs’ motion for an order directing Defendant to turn over its monthly fringe benefit contribution report for July 2009. The Court retained jurisdiction to enforce the June 25, 2009 order and enter judgment.

2. On November 16, 2009, Plaintiffs’ counsel received Defendant’s monthly fringe benefit contribution reports for July 2009 through October 2009, via facsimile. The contribution reports show that the Defendant is delinquent in contributions to the Welfare Fund in the amount of \$702.00 and to the Pension Fund in the amount of \$566.80. (See Affidavit of Terrence J. Hancock).

3. Additionally, the amount of \$140.00 is due for liquidated damages to the Welfare Fund and \$113.36 is due for liquidated damages to the Pension Fund. (Hancock Aff. Par. 5).

4. In addition, Plaintiffs have incurred costs totaling \$435.00 and reasonable attorneys' fees totaling \$3,257.50. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$5,215.06.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$5,215.06.

/s/ Beverly P. Alfon _____

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have served the above-referenced document by facsimile to the following non-CM/ECF participants on or before the hour of 4:00 p.m. this 12th day of March 2010:

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/s/ Beverly P. Alfon

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