

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

LOCAL 705 INTERNATIONAL BROTHERHOOD OF TEAMSTERS HEALTH AND WELFARE FUND, et al.,)	
)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	
RONALD M. GRAJEWSKI,)	NO. 09 C 2755
)	
Defendant.)	JUDGE MILTON I. SHADUR
)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, LOCAL 705 INTERNATIONAL BROTHERHOOD OF TEAMSTERS HEALTH AND WELFARE FUND, *et al.*, by their attorneys, and move for entry of judgment by default against Defendant, RONALD M. GRAJEWSKI, in the total amount of \$15,423.87, plus Plaintiffs' costs of action.

On May 18, 2009, the Summons and Complaint was served on the Defendant by tendering a copy of said documents to him personally, at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 8, 2009. Since Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55.

/s/ Catherine M. Chapman _____

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) 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 15th day of June 2009:

Mr. Ronald M. Grajewski
5024 W. 122nd Street, #2A
Alsip, IL 60803

/s/ Catherine M. Chapman _____

Catherine M. Chapman
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com