

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

FOX VALLEY CONSTRUCTION)	
WORKERS FRINGE BENEFIT FUNDS,)	
<i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 09 C 3038
vs.)	
)	JUDGE ROBERT M. DOW, JR.
G. M. RANDA, INC., an Illinois)	
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, G. M. RANDA, INC., an Illinois corporation, in the total amount of \$24,564.37, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$8,515.00.

On May 21, 2009, the Summons and Complaint was served on the Registered Agent 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 10, 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 2nd day of December 2010:

Mr. Greg Randa
G. M. Randa, Inc.
499 Waubensee Circle
Oswego, IL 60543

/s/ Jennifer L. Dunitz-Geiringer

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