

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

SUSAN NEACE,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:09-cv03907
)	Judge Harry D. Leinenwber
ALLEN LEWIS & ASSOCIATES,)	
)	
Defendant.)	

PLAINTIFF’S MOTION TO ENTER JUDGMENT

NOW COMES Plaintiff, SUSAN NEACE (“Plaintiff”), through her attorneys, KROHN & MOSS, LTD., and hereby moves this Honorable Court to enter judgment against Defendant, ALLEN LEWIS & ASSOCIATES (“Defendant”), for failure to comply with the terms of the agreement. In support thereof, Plaintiff states as follows:

1. The parties reached a settlement in this matter on October 6, 2009.
2. As a result of Defendant’s failure to comply with the terms of the settlement, Plaintiff filed a Motion to Enforce on December 9, 2009. [DE. 18].
3. On January 21, 2010, this Honorable Court granted Plaintiff’s motion, order Defendant to comply with the terms of the settlement within 30 days, or be held in contempt of court, and awarded Plaintiff an additional \$150.00 in sanctions. [DE. 23].
4. As of the date of filing this motion, Defendant has failed to comply with the terms of the settlement agreement.
5. Accordingly, Plaintiff seeks to enter Judgment against Defendant in the settlement amount, plus \$150.00 in sanctions.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment against Defendant and in favor of Plaintiff.

RESPECTFULLY SUBMITTED,

By: /s/ Adam T. Hill
Adam T. Hill
KROHN & MOSS, LTD.
Attorney for Plaintiff
120 W. Madison St., 10th Fl
Chicago, Illinois 60602
(312) 578-9428

CERTIFICATE OF SERVICE

I, Adam T. Hill, hereby certify that on January 22, 2010, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification to all parties of record, and I sent a copy of same to the following via US Mail:

Mr. Richard R. Kuritz
200 E. Forsyth St.
Jacksonville, FL 32202

By: /s/ Adam T. Hill
Adam T. Hill