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

TERRENCE J. HANCOCK, et al.,)	
Plaintiffs,) CIVIL ACTION	
vs.) NO. 09 C 4112	
LEEWAY WRECKING, INC., an Illinois corporation,) JUDGE ROBERT W. G	ETTLEMAN
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LEEWAY WRECKING, INC., an Illinois corporation, in the total amount of \$2,114.34, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$803.75.

On July 9, 2009, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Lance Minor) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 29, 2009. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

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 18th day of August 2009:

Mr. Douglas M. Belofsky, Registered Agent Leeway Wrecking, Inc. Belofsky & Belofsky, PC 33 N. Dearborn Street, Suite 2330 Chicago, IL 60602

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon Attorney for the Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

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