

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

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 09 C 4276
)	
HIGH-TECH MECHANICAL, INC.,)	JUDGE AMY J. ST. EVE
a dissolved Illinois corporation, and)	
THOMAS BLANCHETTE, an individual,)	
)	
Defendants.)	

MOTION FOR ENTRY OF JUDGMENT AGAINST DEFENDANTS

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on September 3, 2009, request this Court enter judgment against Defendants, HIGH-TECH MECHANICAL, INC., a dissolved Illinois corporation, and THOMAS BLANCHETTE, an individual. In support of that Motion, Plaintiffs state:

1. On September 3, 2009, this Court entered default against Defendants and granted Plaintiffs’ request for an order directing Defendant, High-Tech Mechanical, Inc., to turn over its monthly fringe benefit contribution reports for April 2009 through the present date. The Court also entered an order that judgment would be entered after the Defendant submitted the required contribution reports.

2. On September 19, 2009, Defendant, High-Tech Mechanical, Inc., submitted its monthly fringe benefit contribution reports for May 2009 through August 2009. On May 30, 2009, Defendant previously submitted its monthly fringe benefit contribution report for April 2009. The

contribution reports show that the Defendant is delinquent in contributions to the Funds in the amount of \$36,789.32. (See Affidavit of Scott P. Wille)

3. Additionally, the amount of \$3,678.93 is due for liquidated damages. (Wille Aff. Par. 4(b)).

4. Further, on May 6, 2009, Defendants, High-Tech Mechanical, Inc., and Thomas Blanchette, in his individual capacity, entered into a Promissory Note for the repayment of contributions and liquidated damages in the total amount of \$51,079.60, payable in four (4) equal monthly installments of \$12,769.90 each, incurred for the months of January 2009 through March 2009. Pursuant to the terms of the Promissory Note, Thomas Blanchette guaranteed the obligations of High-Tech Mechanical, Inc. to the extent of the principal amount due on the Note. In addition, Thomas Blanchette, individually and on behalf of High-Tech Mechanical, Inc., agreed that the Note did not alter the obligations of High-Tech Mechanical, Inc. to timely submit current reports and contributions due the Plaintiff Funds. High-Tech Mechanical, Inc. and Thomas Blanchette agreed that failure to submit current reports and contributions due to the Funds would constitute default under the terms of the Note. As of the date of filing the instant motion, Defendants have not submitted any monthly installment payments. (Wille Aff. Par. 5).

5. In addition, Plaintiffs' firm has expended the total amount of \$2,476.25 in attorneys' fees and \$913.40 in costs, for a total of \$3,389.65, in this matter. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents attached hereto, Plaintiffs request entry of judgment against Defendants, HIGH-TECH MECHANICAL, INC. and THOMAS BLANCHETTE, in the total amount of \$94,937.50.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment against Defendants, HIGH-TECH MECHANICAL, INC. and THOMAS BLANCHETTE, in the amount of \$94,937.50.

/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
Bar No.: 6204026
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com

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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 Against Defendants) 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 participants on or before the hour of 5:00 p.m. this 1st day of October 2009:

Mr. Leonard R. Chaplinski, Jr., Registered Agent
High-Tech Mechanical, Inc.
296 S. Kinzie Avenue
Bradley, IL 60915

Mr. Leonard R. Chaplinski, Jr., Registered Agent
High-Tech Mechanical, Inc.
1072 Flamingo Lane
Bradley, IL 60915

Mr. Thomas Blanchette
5043 N. Pin Oak Turn
Bourbonnais, IL 60914

/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
Bar No.: 6204026
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com