

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

| | | |
|-----------------------------------|---|----------------------------|
| IRON WORKERS' MID-AMERICA |) | |
| PENSION PLAN, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | CIVIL ACTION |
| |) | |
| vs. |) | NO. 09 C 4282 |
| |) | |
| MCK SERVICES, INC., an Illinois |) | JUDGE REBECCA R. PALLMEYER |
| corporation, and CHRISTINE KRAFT, |) | |
| an individual, |) | |
| |) | |
| Defendants. |) | |

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, MCK SERVICES, INC., an Illinois corporation, in the total amount of \$506,773.85, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,814.08, for a total of \$510,587.93. Further, Plaintiffs move for the entry of judgment by default against Defendant, CHRISTINE KRAFT, an individual, in the total amount of \$65,901.35.

On July 20, 2009, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, MCK SERVICES, INC.'s answer was due on August 10, 2009.

Further, on July 20, 2009, the Summons and Complaint was served on Defendant, CHRISTINE KRAFT, by tendering a copy of said documents to her personally at her residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, CHRISTINE KRAFT's answer was due on August 10, 2009.

As Defendants have failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he 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 participants on or before the hour of 5:00 p.m. this 18th day of August 2009:

Ms. Christine F. Kraft, Registered Agent
MCK Services, Inc.
5293 W. Beaver Road
Freeport, IL 61032-8510

Ms. Christine F. Kraft
5293 W. Beaver Road
Freeport, IL 61032-8510

Ms. Christine F. Kraft, Registered Agent
MCK Services, Inc.
575 North Henderson Road
Freeport, IL 61032

/s/ Patrick N. Ryan _____

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