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

FOX VALLEY CONSTRUCTION)
WORKERS FRINGE BENEFIT FUNDS,)
et al.,)
) CIVIL ACTION
Plaintiffs,)
) NO. 10 C 0949
vs.)
) JUDGE MATTHEW F. KENNELLY
G.C.C., INC., an Illinois corporation,)
)
Defendant.)

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on July 27, 2010, request this Court enter judgment against Defendant, G.C.C., INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On July 27, 2010, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. Plaintiffs' auditors completed that audit on or about June 28, 2010. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$1,332.72. (See Affidavit of Deborah L. French).

Additionally, the amount of \$133.28 is due for liquidated damages. (French Aff. Par.
Plaintiffs' auditing firm of Levinson Simon Hein & Bilkey, P.C. charged Plaintiffs \$619.75 to perform the audit examination and complete the report (French Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended \$498.00 in costs and \$3,851.25 in reasonable attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$6,435.00.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$6,435.00.

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231 Bar No.: 6237001 Telephone: (312) 236-4316 Facsimile: (312) 236-0241 E-Mail: jdunitz.geiringer@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) 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 8th day of December 2010:

Mr. James M. Gerardy, Registered Agent/President G.C.C., Inc. 4632 Offner Road Monee, IL 60449

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231 Bar No.: 6237001 Telephone: (312) 236-4316 Facsimile: (312) 236-0241 E-Mail: jdunitz.geiringer@baumsigman.com

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