

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

FOX VALLEY CONSTRUCTION	)	
WORKERS FRINGE BENEFIT FUNDS,	)	
<i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 10 C 1781
vs.	)	
	)	JUDGE JOHN W. DARRAH
SUND MASONRY, INC., an Illinois corp.,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, SUND MASONRY, INC., an Illinois corp., in the total amount of \$78,695.72, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$2,923.75.

On April 2, 2010, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Deborah Sund, the corporation’s secretary) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on April 23, 2010. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

**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 24th day of March 2011:

Mr. Earl A. Sund, Registered Agent  
Sund Masonry, Inc.  
116 Birch Lane  
Cary, IL 60013

/s/ Patrick N. Ryan

Patrick N. Ryan  
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