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

CENTERPOINT ENERGY SERVICES, INC.,)	
Disingiff)	
Plaintiff,)	
v.)	
)	No. 1:10-cv-02121
WR PROPERTY MANAGEMENT, LLC,)	
CAMEEL HALIM, HODA HALIM, THE)	Judge Virginia M. Kendall
CAMEEL HALIM LIVING TRUST DATED)	Magistrate Judge Daniel G. Martin
OCTOBER 24, 1996, and THE HODA)	
HALIM LIVING TRUST DATED)	
OCTOBER 24, 1996,)	
)	
Defendants.)	

CES' MOTION FOR ENTRY OF FINAL JUDGMENT

Centerpoint Energy Services ("CES"), pursuant to Federal Rule of Civil

Procedure 58(d), moves the Court to enter Final Judgment against WR Property Management,

LLC ("WR"), Cameel Halim, and Hoda Halim. In support thereof, CES states as follows:

- 1. CES' Complaint in this case sought recovery against Cameel and Hoda Halim and WR for an unpaid judgment entered by the Circuit Court of Cook County against the Halims' company, Wilmette Real Estate & Management LLC, in the amount of \$1,678,449.16.
- 2. On November 10, 2011, this Court granted CES' motion for summary judgment against Cameel and Hoda Halim on Count I for fraudulent transfer and against WR on Count II for successor liability. (Doc. No. 116.) The court also awarded CES its attorneys' fees, costs, and interest, which were referred to Magistrate Judge Denlow for resolution. (*Id.*, p. 23; Doc. No. 77.)
- 3. On August 30, 2012, Magistrate Judge Denlow issued a Report and Recommendation awarding CES \$2,597,323.30, reflecting the amount of the state court judgment, interest through August 12, 2012 (and accruing at \$413.86 per diem until final

judgment is entered by the District Judge), attorneys' fees through August 12, 2012, and costs and expenses through August 12, 2012.

> 4. On March 25, 2013, this Court overruled the Halims' and WR's

objections, and adopted the Report and Recommendation in its entirety, except for a reduction of

\$413.86 in the interest owed.

5. From August 13, 2012 until April 1, 2013, an additional \$95,601.66 in

interest has accrued on the amounts owed to CES (231 days X \$413.86 interest per diem).

6. Accordingly, as of April 1, 2013, the total amount owed by the Halims and

WR to CES is \$2,692,511.10 (\$2,597,323.30 - \$413.86 + \$95,601.66). A proposed Final

Judgment is attached hereto as Exhibit A.

WHEREFORE, CES respectfully requests that the Court enter Final Judgment in

favor of CES and against WR Property Management, LLC, Cameel Halim, and Hoda Halim

jointly and severally in the amount of \$2,692,511.10, and grant such other and further relief as

justice may require.

Dated: March 26, 2013

Respectfully submitted,

/s/ Anand C. Mathew

One of the attorneys for CES

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¹ CES has incurred additional attorneys' fees and costs since August 12, 2012. Nevertheless, to expedite entry of a final judgment, CES is willing to waive those fees and costs. However, CES reserves the right to seek additional fees and costs subsequent to the entry of Final Judgment, including those incurred for any further post-judgment motions or appeal.

CERTIFICATE OF SERVICE

I, Anand C. Mathew, an attorney, hereby certify that on March 26, 2013, I electronically filed the foregoing using the Court's CM/ECF system, which will automatically send electronic notification of such filing to all attorneys on record in this matter.

/s/ Anand C. Mathew