

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

JAMES M. SWEENEY, et al.,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
vs.)	
)	NO. 10 C 3321
GLEN WRIGHT, d/b/a GLEN WRIGHT`)	
EXCAVATING, a/k/a GLEN WRIGHT)	JUDGE HARRY D. LEINENWEBER
CONSTRUCTION, a/k/a GLEN WRIGHT)	
EARTHMOVING,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, GLEN WRIGHT, d/b/a GLEN WRIGHT EXCAVATING, a/k/a GLEN WRIGHT CONSTRUCTION, a/k/a GLEN WRIGHT EARTHMOVING, in the total amount of \$179,806.76, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$833.25.

On June 9, 2010, the Summons and Complaint was served on the Defendant by substitute service (by tendering a copy of said documents to Myrna Wright, Mother) at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 30, 2010. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Jennifer L. Dunitz-Geiringer _____

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 3rd day of August 2010:

Mr. Glen Wright
27625 S. Gougar Road
Manhattan, IL 60442

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer
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