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

TRUSTEES OF THE AUTOMOBILE)	
MECHANICS INDUSTRY WELFARE)	
AND PENSION FUNDS OF THE)	
AUTOMOBILE MECHANICS AND)	
AEROSPACE WORKERS AFL-CIO)	
LOCAL 701,)	No. 10 CV 5052
)	
Plaintiffs,)	Judge Bucklo
)	
V.)	Magistrate Finnegan
)	
CARMICHAEL LEASING CO. INC., an)	
Illinois corporation doing business as)	
CARMICHAEL NATIONALEASE,)	
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

Plaintiffs, by their attorneys, DONALD D. SCHWARTZ, ANDREW S. PIGOTT, and ARNOLD & KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter a Judgment in favor of Plaintiffs and against Defendant, Carmichael Leasing Co., Inc.

In support thereof, Plaintiffs state:

- 1. This case was filed on August 11, 2010.
- 2. Plaintiffs served Defendant with Summons and the Complaint on September 10, 2010.
- 3. This Court found Defendant to be in default on October 8, 2010.
- 4. Per the affidavit of Paul Neumann, comptroller of Automobile Mechanics and Aerospace AFL-CIO Local 701's Welfare and Pension Funds, Defendant owes the Automobile Mechanics Industry Welfare and Pension Funds \$4,064.00.00 in delinquent fringe benefit contributions. (Exhibit A).
- 5. Per the affidavit of Donald Schwartz, attorney for Plaintiffs, Plaintiffs have incurred \$975.00 in legal fees and costs in this suit. (Exhibit B).

WHEREFORE, Plaintiffs pray for:

- A. Entry of Judgment in the amount of \$5,039.00.
- B. Any other relief this Court deems just and equitable.

Respectfully submitted,

TRUSTEES OF THE AUTOMOBILE MECHANICS INDUSTRY WELFARE AND PENSION FUNDS OF THE AUTOMOBILE MECHANICS AND AEROSPACE WORKERS AFL-CIO LOCAL 701

By : /s Andrew S. Pigott
One of their attorneys

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