

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

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 10 C 5845
vs.)	
)	JUDGE SHARON JOHNSON COLEMAN
TOP NOTCH CONSTRUCTION AND)	
DRYWALL, INC., an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, TOP NOTCH CONSTRUCTION AND DRYWALL, INC., an Illinois corporation, in the total amount of \$702.11, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$2,831.25.

On September 25, 2010, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her, personally, at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on October 18, 2010. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Beverly P. Alfon

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 March 2011:

Ms. Margarita Beltran, Registered Agent/President
Top Notch Construction and Drywall, Inc.
1510 N. Harding Avenue, Apt. 2
Chicago, IL 60651

/s/ Beverly P. Alfon

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