

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

CENTRAL LABORERS PENSION )		
FUND, <i>et al.</i> , )	)	
	)	
Plaintiffs, )	)	CIVIL ACTION
	)	
vs. )	)	NO. 10 C 5957
	)	
GLENN REHBEIN EXCAVATING,) )	)	JUDGE SUZANNE B. CONLON
INC., a Minnesota corporation, )	)	
	)	
Defendant. )	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on October 29, 2010 (a copy of the Minute Order entered October 29, 2010 is attached hereto) request this Court enter judgment against Defendant, GLENN REHBEIN EXCAVATING, INC., a Minnesota corporation. In support of that Motion, Plaintiffs state:

1. On October 29, 2010, this Court entered default against Defendant.
2. Defendant has submitted its monthly contribution report to the Plaintiffs identifying employees of the Defendant who performed work covered by the collective bargaining agreement, and the number of hours worked by or paid to those employees for the month of June 2009. Said monthly contribution report establishes that Defendant owes the Plaintiffs \$2,404.65 in contributions and \$240.47 in liquidated damages, for a total of \$2,645.12. (See Affidavit of Roger Shoup ¶4(b))
3. Defendant has submitted monthly contribution reports to the Plaintiffs identifying employees of the Defendant who performed work covered by the collective bargaining agreement, and the number of hours worked by or paid to those employees for the months of May 2009 and

June 2009. However, Defendant shorted the contributions due for those months and accordingly owes the Plaintiffs \$2,415.42 in shorted contributions. (Shoup Aff. ¶4(c))

4. In addition, Plaintiffs' firm has expended \$360.00 in costs and \$545.00 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman)

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$5,965.54.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$5,965.54.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon  
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**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 participants on or before the hour of 5:00 p.m. this 2nd day of November 2010:

Illinois Secretary of State  
Department of Business Services  
Attn: File #6659-1409  
Springfield, IL 62756

Glenn Rehbein Excavating, Inc.  
4522 Belmont Avenue  
Chicago, IL 60641

/s/ Cecilia M. Scanlon \_\_\_\_\_

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