

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

THE HOTEL EMPLOYEES AND RESTAURANT)	
EMPLOYEES INTERNATIONAL UNION WELFARE)	
FUND, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 10 C 6224
vs.)	
)	JUDGE BLANCHE M. MANNING
DA ECIB USA, INC., a New York corporation, d/b/a)	
BICE RISTORANTE, and ROBERTO RUGGERI,)	
an individual,)	
)	
Defendants.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendants, DA ECIB USA, INC., an New York corporation, d/b/a BICE RISTORANTE, and ROBERTO RUGGERI, an individual, in the total amount of \$129,240.17, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$2,667.50.

On October 26, 2010, the Summons and Complaint was served on Defendant, DA ECIB USA, INC. (by tendering a copy of said documents to Jesselie Moneva, Managing Agent) at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on November 16, 2010.

On October 26, 2010, the Summons and Complaint was served on Defendant, ROBERTO RUGGERI (by tendering a copy of said documents to Jesselie Moneva) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on November 16, 2010.

As Defendants have failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan _____

Laura M. Finnegan
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) 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 24th day of November 2010:

DA ECIB USA, Inc.
c/o Roberto Ruggeri
16 East 52nd Street, Suite 1201
New York, NY 10022

Mr. Roberto Ruggeri
16 East 52nd Street, Suite 1201
New York, NY 10022

Ms. Kathryn Nelson
Jaffe & Berlin, LLC
111 W. Washington Street, Suite 1401
Chicago, IL 60602

/s/ Laura M. Finnegan

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