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

OF NORTHERN ILLINOIS WELFARE AND)	
PENSION FUNDS,)	
Plaintiffs,)	
,)	Case No.: 2010 C 6844
v.)	Judga Chanan Jahnsan Calamar
)	Judge Sharon Johnson Colemar
GREER EXCAVATING, INC.)	Magistrate Judge Gilbert
an Illinois corporation)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its
attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move
for judgment in sum certain as stated in this Complaint and the supporting Affidavits
attached hereto. In support of its Motion, Plaintiffs state as follows:

- 1. Suit was filed on October 25, 2010 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
- 2. Service upon GREER EXCAVATING, INC., an Illinois corporation was made on the Defendant on November 11, 2010, and a copy of the proof of service was filed with the court on November 17, 2010.
- 3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$13,979.28 Pension \$18,638.10 Welfare \$925.00 Attorneys fees \$438.00 Court costs \$33,980.38

WHEREFORE, Plaintiff prays for:

1. Entry of judgment against Defendant, GREER EXCAVATING, INC., an Illinois corporation, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$33,980.38

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS

s/John J. Toomey ARNOLD AND KADJAN 19 W. Jackson Blvd., Suite 300 Chicago, IL 60604 Telephone No.: (312) 236-0415 Facsimile No.: (312) 341-0438

Dated: December 3, 2010