

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

LOCAL 705 INTERNATIONAL BROTHER-)	
HOOD OF TEAMSTERS PENSION FUND,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 10 C 7820
)	
NATIONAL PLUMBING SUPPLY CO.,)	JUDGE SAMUEL DER-YEGHIAYAN
a dissolved Illinois corporation, a/k/a, d/b/a,)	
NATIONAL PLUMBING SUPPLY, NATIONAL)	
PLUMBING AND HEATING SUPPLY CO.,)	
and/or NATIONAL P. H. SUPPLY CO.,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on March 30, 2011, request this Court enter judgment against Defendant, NATIONAL PLUMBING SUPPLY CO., a dissolved Illinois corporation, a/k/a d/b/a NATIONAL PLUMBING SUPPLY, NATIONAL PLUMBING AND HEATING SUPPLY CO., and/or NATIONAL P. H. SUPPLY CO. For the reasons set forth in Plaintiffs’ Memorandum in Support, which is submitted herewith, Plaintiffs respectfully request entry of judgment for \$361,136.39, which includes amounts due for unpaid contributions of \$46,929.00, liquidated damages on the contributions of \$4,692.90, interest of \$13,346.90, and audit costs of \$1,257.42; and for the assessed withdrawal liability in the amount of \$228,562.20, liquidated damages on the withdrawal liability of \$45,712.44, and interest of \$16,481.53; plus court costs and attorneys’ fees incurred in this matter in the amount of \$4,154.00.

Respectfully submitted,

/s/ Patrick N. Ryan

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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 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 participant on or before the hour of 5:00 p.m. this 8th day of June 2011:

Mr. Robert W. Higgason, President
National Plumbing Supply Co.
27341 N. Primrose Lane
Mundelein, IL 60060-5010

Mr. Steven H. Elizer
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/s/ Patrick N. Ryan

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