

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

FREDY VAZQUEZ,
SVETLANA ECKHOFF and
JONATAN VAZQUEZ on behalf of
themselves and all other employees
similarly situated, known and unknown,

Plaintiffs,

v.

ICOSIUM KAFE, LTD., a dissolved
Illinois corporation,
BELKACEM ELMETENNANI,
individually, and
NERINGA PUKELIS, individually,

Defendants.

No. 11 CV 415

Judge Feinerman

Magistrate Judge Cole

AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT

By and through their attorneys, the plaintiffs state as follows.

1. The parties participated in a settlement conference conducted by Magistrate Judge Cole and were able to reach an agreement.

2. The parties' settlement agreement has now been reduced to a confidential, written settlement agreement, which has been fully executed by the parties as of August 27, 2012.

3. Among other things, the terms of the parties' confidential settlement agreement call for the entry of a consent judgment, a copy of which is attached as **Exhibit A** (an additional copy has been submitted to this Court's proposed order inbox).

4. Upon entry of the consent judgment, the captioned case may be dismissed with prejudice and without costs.

WHEREFORE, the plaintiffs pray that this Court will enter the consent judgment attached as **Exhibit A**, and then dismiss the captioned case with prejudice and without costs.

Respectfully submitted,

/s/Paul Luka
One of the Plaintiffs' Attorneys

Roy P. Amatore, Esq.
Paul Luka, Esq.
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EXHIBIT

A

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

FREDY VAZQUEZ,)	
SVETLANA ECKHOFF and)	
JONATAN VAZQUEZ on behalf of themselves)	
and all other employees similarly situated,)	
known and unknown,)	
)	
Plaintiffs,)	No. 11 CV 415
)	
v.)	Judge Feinerman
)	
ICOSIUM KAFE, LTD. , a dissolved Illinois)	Magistrate Judge Cole
corporation, and BELKACEM ELMENTENNAI ,)	
individually)	
)	
Defendants.)	

CONSENT JUDGMENT and DISMISSAL

This case coming before the Court for entry of the Consent Judgment entered into by and between Plaintiffs, Fredy Vazquez, Svetlana Eckhoff and Jonatan Vazquez (collectively, “Plaintiffs”), and Defendants Icosium Kafe, Ltd., and Belkacem Elmentennai (collectively, “Defendants”), with respect to the Complaint filed by Plaintiffs, it is hereby ordered as follows:

1. The entry of Consent Judgment entered into by the Plaintiffs and Defendants is hereby granted.
2. Judgment is entered in favor of the plaintiff, Fredy Vazquez, and against the defendants, Icosium Kafe, Ltd., and Belkacem Elmentennai, and each of them, in the amount of \$13,039.40. Pursuant to the parties’ agreement, the defendants may withhold applicable income and employment taxes from this amount.
3. Judgment is entered in favor of the plaintiff, Jonatan Vazquez, and against the defendants, Icosium Kafe, Ltd., and Belkacem Elmentennai, and each of them, in the

amount of \$5,387.80. Pursuant to the parties' agreement, the defendants may withhold applicable income and employment taxes from this amount.

4. Judgment is entered in favor of the plaintiff, Svetlana Eckhoff, and against the defendants, Ikosium Kafe, Ltd., and Belkacem Elmentennai, and each of them, in the amount of \$301.40. Pursuant to the parties' agreement, the defendants may withhold applicable income and employment taxes from this amount.

5. Judgment is entered in favor of the plaintiff's attorneys, Amatore & Associates, P.C., and against the defendants, Ikosium Kafe, Ltd., and Belkacem Elmentennai, and each of them, in the amount of \$3,271.40, as and for disputed attorneys' fees and costs. The defendants shall not withhold income and employment taxes from this amount, but may issue an IRS Form 1099 to Amatore and Associates, P.C.

6. Pursuant to the parties' agreement, this Consent Judgment may not be enforced for a period of two years from entry hereof.

7. All claims against defendant Neringa Pukelis are hereby dismissed with prejudice with each party to bear his or her own costs and attorneys fees.

DATED: _____, 2012

ENTER,

Hon. Gary Feinerman
United States District Judge

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