

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

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 11 C 1318
vs.)	
)	JUDGE RUBEN CASTILLO
THREE IN ONE CONSTRUCTION, INC.,)	
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, THREE IN ONE CONSTRUCTION, INC., an Illinois corporation, in the total amount of \$12,801.87, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$1,067.50. On May 19, 2011, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to the corporation’s President, Miguel A. Topete, Sr., personally) at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on June 9, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he 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 participant on or before the hour of 5:00 p.m. this 29th day of June 2011:

Mr. Miguel A. Topete, Sr., President
Three in One Construction, Inc.
2438 W. Cortland Street, Apt. 1
Chicago, IL 60647-4306

/s/ Patrick N. Ryan _____

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