

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

CHICAGO AREA JOINT WELFARE)	
COMMITTEE FOR THE POINTING,)	
CLEANING AND CAULKING)	
INDUSTRY, LOCAL 52, <i>et al.</i> ,)	CIVIL ACTION
)	
Plaintiffs,)	NO. 11 C 1655
)	
v.)	JUDGE HARRY D. LEINENWEBER
)	
PENDLETON INDUSTRIES, INC.,)	
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on May 11, 2011, request this Court enter judgment against Defendant, PENDLETON INDUSTRIES, INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On May 11, 2011, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for the time period November 2010 forward. The Court also entered an order that judgment would be entered after the Plaintiffs determined the total amount due and owing from Defendant.

2. On June 20, 2011, Plaintiff Funds received Defendant's monthly fringe benefit contribution reports for November 2010 through May 2011 indicating no amounts due.

3. However, in or around November 2010, Defendant submitted its monthly fringe benefit contribution reports for June 2010 through October 2010. After application of a partial payment in the amount of \$5,000.00, the reports submitted indicate Defendant remains delinquent in contributions to the Funds in the amount of \$71,925.12. (See Affidavit of Terry Rocco).

4. Additionally, the amount of \$11,987.52 is due for liquidated damages. (Rocco Aff. Par. 5).

5. In addition, Plaintiffs' firm has expended the amount of \$435.00 in costs and \$2,434.50 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$74,794.62.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$74,794.62.

/s/ Cecilia M. Scanlon _____

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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 29th day of June 2011:

Mr. Angelo A. Caruso, Registered Agent
Pendleton Industries, Inc.
1606 W. Lexington Drive
Arlington Heights, IL 60004

/s/ Cecilia M. Scanlon _____

Cecilia M. Scanlon
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