

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

PEERLESS INDUSTRIES, INC,)	
)	
Plaintiff,)	
)	Case No. 1:11-cv-1768
vs.)	
)	Hon. Joan H. Lefkow
CRIMSON AV, LLC,)	
)	Magistrate Judge Susan E. Cox
Defendant.)	
)	

MOTION FOR ENTRY OF SATISFACTION OF JUDGMENT

Comes now the Defendant/Judgment Debtor, Crimson AV, LLC (“Crimson”), through counsel Miles Sukovic of Sukovic Law Group, a Professional Corporation and Peter Ryndak of Johnson & Bell, Ltd., and moves this Court to enter a satisfaction of judgment in the above titled action. In support thereof, Crimson states as follows:

1. On or about November 27, 2018, this Court granted a final judgment (Dkt. No. 798) in favor of Plaintiff and against Crimson in the amount of \$51,419.19, inclusive of pre-judgment interest.
2. On August 7, 2020, Crimson, through counsel, paid to Plaintiff’s counsel the full judgment amount by issuing check No. 7169 in the amount of \$51,419.19 (**See Exhibit A**) satisfying the judgment in full.
3. On August 25, 2020, Crimson, through counsel, paid \$2,328.27 in post-judgment interest by issuing to Plaintiff check No. 7188 in the amount of \$2,324.51 and cash in the amount of \$3.76, (**See Exhibit B**) satisfying the post judgment interest in full.
4. On September 22, 2020, Crimson’s counsel emailed Plaintiff’s counsel asking him to file a statement of satisfaction of the judgment executed and acknowledged either by the

Plaintiff, or by a legal representative or assignee of the Plaintiff pursuant to the District Court of the Northern District of Illinois' L.R.58.1. (See Exhibit C) Plaintiff's counsel did not respond.

5. On November 4, 2020, Crimson's counsel again asked Plaintiff to file an executed statement of satisfaction of the judgment. Plaintiff's counsel responded that he would get back to Crimson's counsel. (See Exhibit D) However, Plaintiff's counsel has not responded.

6. To date, Plaintiff has ignored Crimson's requests to enter and file an executed statement of satisfaction of the judgment pursuant to NDIL L.R.58.1.

7. Crimson has shown that it has satisfied the judgment in full, and the Plaintiff has failed to file a Notice of Satisfaction.

WHEREFORE, the Defendant/Judgment Debtor, Crimson AV, LLC, now moves the Court to order entry of Satisfaction of Judgment that the judgment be vacated pursuant to F.R.C.P. 60(b)(5) and that this action be dismissed with prejudice.

Dated: June 3, 2021

Respectfully submitted,

/s/ Peter R. Ryndak
One of the attorneys for Crimson AV LLC

Peter Ryndak
JOHNSON & BELL, LTD.
33 W. Monroe St., Suite 2700
Chicago, Illinois 60603
(312) 372-0770
ryndakp@jbltd.com

M. Miles Sukovic
Sukovic Law Group, a PC
6 Gloucester Court
Lincolnshire, Illinois 60069
(312) 810-5123
msukovic@sukoviclawgroup.com

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2021, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties of record.

/s/ Peter R. Ryndak