

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 2357
vs.	)	
	)	JUDGE MATTHEW F. KENNELLY
TWINS DRYWALL, 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, TWINS DRYWALL, INC., an Illinois corporation, in the total amount of \$3,235.54, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$840.00.

On April 16, 2011, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Amado Guerrero, the corporation's President) at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 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 18th day of May 2011:

Ms. Linda Guerrero, Registered Agent/Secretary  
Twins Drywall, Inc.  
14309 McKinley  
Posen, IL 60469

/s/ Patrick N. Ryan

Patrick N. Ryan  
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