

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 2623
vs.	)	
	)	JUDGE BLANCHE M. MANNING
KTEL 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, KTEL CONSTRUCTION, INC., an Illinois corporation, in the total amount of \$26,733.01, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$988.25.

On April 22, 2011, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 13, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default.

/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 16th day of June 2011:

Mr. Mark C. Johnson, Registered Agent  
Ktel Construction, Inc.  
321 W. State Street, Suite 1200  
Rockford, IL 61101

/s/ Patrick N. Ryan \_\_\_\_\_

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 236-4316  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)

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