

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

FOX VALLEY & VICINITY CONSTRUCTION)	
WORKERS PENSION FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 11 C 3500
)	
D. L. ANDERSON COMPANY, INC.,)	JUDGE GARY FEINERMAN
a dissolved 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, D. L. ANDERSON COMPANY, INC., a dissolved Illinois corporation, in the total amount of \$4,360.35, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$903.00.

On June 3, 2011, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Mary Porcar) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on June 24, 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 14th day of July 2011:

Mr. Daniel J. Quigley, Registered Agent
D. L. Anderson Company, Inc.
1234 N. Cedar Road
New Lenox, IL 60451

/s/ Patrick N. Ryan

Patrick N. Ryan
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