



6. The Defendant failed to submit \$32,397.42 in contributions for the time period of February, March, April and May 2011. **(Exhibit B)**

7. By failing to pay the contributions due to the trust fund in a timely manner, the Defendant owes liquidated damages and interest. At the present time, the Defendant owes interest in the amount of \$1,781.86 and liquidated damages in the amount of \$3,239.74. **(Exhibit B)**

8. The Defendant owes the sum of \$2,105.00 for necessary and reasonable attorneys' fees and costs which are collectable under the terms of the Collective Bargaining Agreements, Trust Agreements, and Federal law. **(Exhibit C)**

WHEREFORE, Plaintiffs move for Judgment by Default in the amount of \$39,524.02.

By: /s/ Michael J. McGuire  
Michael J. McGuire

Michael J. McGuire  
ARDC#: 6290180  
Attorney for Plaintiffs  
2 North LaSalle Street, Suite 1650  
Chicago, IL 60602  
312/263-2343