

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

CENTRAL STATES, SOUTHEAST AND)
SOUTHWEST AREAS PENSION FUND;)
and ARTHUR H. BUNTE, JR., as Trustee,)

Plaintiffs,)

v.)

WINGRA STONE COMPANY,)
a Wisconsin corporation,)

Defendant.)

Case No. 11 C 6263

Honorable Charles P. Kocoras
District Judge

**PARTIES' AGREED MOTION FOR ENTRY OF JUDGMENT
FOR ATTORNEYS' FEES AND COSTS**

Plaintiffs, Central States, Southeast and Southwest Areas Pension Fund and Arthur H. Bunte, Jr., as trustee, by and through their undersigned counsel, hereby move the Court to enter a judgment for attorneys' fees and costs in favor of Plaintiffs and against Defendant Wingra Stone Company. In support of thereof, Plaintiffs state as follows:

1. On February 26, 2013, the Court entered final judgment in favor of Plaintiffs and against Defendant Wingra Stone Company in the amount of \$90,061.87, plus an award of attorneys' fees and costs pursuant to 29 U.S.C. §1132(g)(2)(D).
2. Pursuant to Local Rules 54.1 and 54.3, the parties have consulted on the reasonableness of the attorneys' fees and costs sought by Plaintiffs.
3. Plaintiffs and Defendant have agreed to the entry of a judgment for attorneys' fees and costs against Defendant and in favor of Plaintiffs.

4. A copy of the proposed Judgment For Attorneys' Fees and Costs is attached hereto as Exhibit 1 for the Court's review, and will also be submitted electronically to the Court's e-mail address for proposed orders.

WHEREFORE, Plaintiffs respectfully request that the Court enter the Consent Judgment attached hereto as Exhibit 1.

Respectfully submitted,

/s/ Anthony E. Napoli

Anthony E. Napoli
Attorney for Central States, Southeast
and Southwest Areas Pension Fund
9377 W. Higgins Road, 10th Floor
Rosemont, Illinois 60018-4938
847/518-9800, Ext. 3702
ARDC # 06210910
tnapoli@centralstatesfunds.org

May 3, 2013

Respectfully submitted,

/s/ Robert S. Driscoll

Robert S. Driscoll
Attorney for Defendant
Reinhart Boerner Van Deuren s.c.
1000 North Water Street
Suite 1700
Milwaukee, Wisconsin 53202
(414) 298-8272

CERTIFICATE OF SERVICE

I, Anthony E. Napoli, one of the attorneys for Plaintiffs certify that on May 3, 2013, I caused the foregoing Parties' Agreed Motion For Entry Of Judgment For Attorneys' Fees And Costs to be filed electronically. This filing was served upon all parties indicated on the electronic filing receipt via the Court's electronic filing system.

/s/ Anthony E. Napoli
Anthony E. Napoli
One of Central States' Attorneys