

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

TERRENCE J. HANCOCK, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 11 C 7363
)	
J & T SERVICES, INC.,)	JUDGE JOAN H. LEFKOW
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on December 13, 2011, request this Court enter judgment against Defendant, J & T SERVICES, INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On December 13, 2011, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. Plaintiffs' auditors completed that audit on April 18, 2012. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$7,102.81. (See Affidavit of Terrence J. Hancock).

3. Additionally, the amount of \$1,420.57 is due for liquidated damages and \$737.89 is due for interest. (Hancock Aff. Pars. 11, 12). Plaintiffs' auditing firm of Legacy Professionals, LLP charged Plaintiffs \$1,635.60 to perform the audit examination and complete the report (Hancock Aff. Par. 13).

4. In addition, Plaintiffs' firm has expended the total amount of \$2,303.75 in attorneys' fees and \$605.00 in costs in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$13,805.62.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$13,805.62.

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) 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 24th day of May 2012:

Mr. Tom Alberto, Registered Agent/President
J & T Services, Inc.
33W644 White Thorne Road
Wayne, IL 60184-2228

/s/ Jennifer L. Dunitz-Geiringer _____

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