

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

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 11 C 7364
)	
EVOTECH STAINLESS PROFESSIONALS,)	JUDGE GEORGE W. LINDBERG
INC., a dissolved Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on December 5, 2011, request this Court enter judgment against Defendant, EVOTECH STAINLESS PROFESSIONALS, INC., a dissolved Illinois corporation. In support of that Motion, Plaintiffs state:

1. On December 5, 2011, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for July 2011 forward. The Court also scheduled a prove-up hearing for January 11, 2012.

2. On December 2, 2011, Plaintiffs' counsel received a facsimile from Defendant with Defendant's monthly fringe benefit contribution reports for July 2011 through October 2011. The contribution reports show that the Defendant is delinquent in contributions to the Funds in the amount of \$18,992.77, which includes contribution shortages of \$537.45 due for August 2009 and \$19.69 due for May 2010. (See Affidavit of Scott P. Wille).

3. Additionally, the amount of \$2,848.93 is due for liquidated damages for the time period February 2011 through October 2011. (Wille Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended the amount of \$435.00 in costs and \$1,032.75 in attorneys' fees 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 \$23,309.45.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$23,309.45.

/s/ Patrick N. Ryan _____

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of 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 1st day of February 2012:

Ms. Anna M. Romero, Registered Agent/President
Evotech Stainless Professionals, Inc.
4N849 White Pine Lane
St. Charles, IL 60175

/s/ Patrick N. Ryan

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