

hereto). Therefore, Defendant's answer was due on February 6, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default, partial judgment and an order directing Defendant to turn over monthly fringe benefit contribution reports.

/s/ Jennifer L. Dunitz-Geiringer

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/s/ Jennifer L. Dunitz-Geiringer

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 23rd day of February 2012:

Mr. Terrence J. McKenna, Registered Agent
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Franks Gerkin & McKenna, PC
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PO Box 5
Marengo, IL 60152

/s/ Jennifer L. Dunitz-Geiringer

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