

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

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 12 C 0207
vs.)	
)	JUDGE ELAINE E. BUCKLO
PRAIRIE STATE GROUP, INC.,)	
a Delaware corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on March 20, 2012, request this Court enter judgment against Defendant, PRAIRIE STATE GROUP, INC., a Delaware corporation. In support of that Motion, Plaintiffs state:

1. On March 20, 2012, 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 May 2011 within 14 days of the entry of said Order. The Court also entered an order that judgment would be entered after Defendant submitted its report and Plaintiffs determined all amounts due from Defendant.

2. On or about March 30, 2012, Plaintiffs received Defendant's fringe benefit contribution report for May 2011 indicating "no work."

3. On February 14, 2011, Plaintiffs' auditors completed an audit of Defendant's payroll books and records for the time period May 1, 2007 through December 31, 2010. The audit findings

show that the Defendant is delinquent in contributions to the Funds in the amount of \$7,797.63. (See Affidavit of Deborah L. French).

4. Additionally, the amount of \$1,711.92 is due for liquidated damages. (French Aff. Par. 6). Plaintiffs' auditing firm of Bansley and Kiener, L.L.P. charged Plaintiffs \$1,230.00 to perform the audit examination and complete the report (French Aff. Par. 7).

5. Pursuant to the Trust Agreements, a liquidated damages surcharge has been assessed against the Defendant in the amount of one and one-half (1.5%) percent of the total contributions untimely received, compounded monthly at one and one-half (1.5%) percent, for the period accrued through March 31, 2012, in the total amount of \$555.37.

6. In addition, Plaintiffs' firm has expended \$435.00 in costs and \$595.00 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

7. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$12,324.92.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$12,324.92.

/s/ Cecilia M. Scanlon _____

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she 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 24th day of April 2012:

Mr. Jason Kozlowski, Registered Agent/President
Prairie State Group, Inc.
4590 Mackinac Street
Lake in the Hills, IL 60156

/s/ Cecilia M. Scanlon

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