

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

MB FINANCIAL BANK, N.A.,)
a national banking association and successor in)
interest to Benchmark Bank,)

Plaintiff,)

v.)

Case No. 1:12-cv-01149

THG RESTAURANT GROUP, LLC, a Georgia)
limited liability company; THG HOLDINGS, LLC,)
a Georgia limited liability company; and)
WOODROW A. HALL, an individual,)

Judge Edmond E. Chang

Defendants.)

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 55**

Pursuant to Federal Rule of Civil Procedure 55, the Plaintiff, MB Financial Bank, N.A., moves for default judgment for the reasons set forth herein and in Plaintiff's Memorandum of Law in Support of its Motion for Default Judgment.

1. The Complaint was served on Defendant THG Restaurant Group, LLC on March 28, 2012. *See* Exhibit 1 to Plaintiff's Memorandum of Law in Support of its Motion for Default Judgment.

2. The Complaint was served on Defendant THG Holdings, LLC on February 27, 2012. *See* Exhibit 2 to Plaintiff's Memorandum of Law in Support of its Motion for Default Judgment.

3. The Complaint was served on Woodrow A. Hall on February 27, 2012. *See* Exhibit 3 to Plaintiff's Memorandum of Law in Support of its Motion for Default Judgment.

4. On May 1, 2012, the Court entered as Order requiring the Defendants to file their answers or other pleadings responsive to Plaintiff's Complaint by May 31, 2012.

5. The Defendants have failed to file any answers or other pleadings responsive to Plaintiff's Complaint.

WHEREFORE, the Plaintiff, MB Financial Bank, N.A., respectfully requests that this Court enter an Order of default judgment in favor of Plaintiff and against Defendants THG Restaurant Group, LLC, THG Holdings, LLC, and Woodrow A. Hall in the amount of \$268,793.45 (Two Hundred Sixty-Eight Thousand, Seven Hundred Ninety-Three and 45/100 Dollars), plus additional interest which has accrued since the filing of this motion and attorneys' fees and costs in the amount of \$5,370.65 (Five Thousand, Three Hundred Seventy and 65/100 Dollars), and for such further relief as this Court deems equitable and just.¹

Respectfully Submitted,

MB FINANCIAL BANK, N.A.

By: /s/ Rebecca S. Carlson
One of its Attorneys

Robert L. Dawidiuk, ARDC #6282717
Megan A. Drefchinski, ARDC #6282782
Rebecca S. Carlson, ARDC #6303013
The Collins Law Firm, P.C.
1770 N. Park Street, Suite 200
Naperville, IL 60563
(630) 527-1595

¹ Plaintiff's Proposed Order is attached hereto and incorporated herein as Exhibit "A."

EXHIBIT A

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limited liability company; THG HOLDINGS, LLC,)
a Georgia limited liability company; and)
WOODROW A. HALL, an individual,)
)
Defendants.)

ORDER

This matter coming to be heard on Plaintiff's Motion for Default Judgment, due notice having been given and the Court being fully advised in the premises, it is hereby ORDERED:

(1) Plaintiff's Motion for Default Judgment against Defendants THG Restaurant Group, LLC, THG Holdings, LLC and Woodrow A. Hall is granted.

(2) Judgment is entered in favor of Plaintiff and against Defendants THG Restaurant Group, LLC, THG Holdings, LLC and Woodrow A. Hall in the amount of \$269,098.04 (Two Hundred Sixty-Nine Thousand, Ninety-Eight and 04/100 Dollars), plus attorneys' fees and costs in the amount of \$5,370.65 (Five Thousand, Three Hundred Seventy and 65/100 Dollars), for a total judgment in the amount of \$274,468.69 (Two Hundred Seventy-Four Thousand, Four Hundred Sixty-Eight and 69/100 Dollars).

(3) The Court reserves and retains jurisdiction of the subject matter of this lawsuit and of the parties hereto for the purpose of enforcing this Order.

Date: _____

ENTERED:

JUDGE