

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 3063
vs.)	
)	JUDGE JOHN J. THARP, JR.
ASHLAUR CONSTRUCTION)	
COMPANY, INC., an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ASHLAUR CONSTRUCTION COMPANY, INC., an Illinois corporation, in the total amount of \$3,818.43, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$940.00.

On June 4, 2012, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to the Illinois Secretary of State because the corporation’s registered agent could not, with reasonable diligence, be found at the registered office of record in Illinois) (a copy of the Affidavit of Compliance for Service on Secretary of State is attached hereto). Therefore, Defendant’s answer was due on June 25, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Jennifer L. Dunitz-Geiringer

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and 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 participants on or before the hour of 5:00 p.m. this 18th day of July 2012:

Jesse White
Secretary of State
Department of Business Services
Attn: File #6121-069-5
Springfield, IL 62756

Ashlaur Construction Company, Inc.
509 E. 75th Street
Chicago, IL 60619

Mr. Zollie R. Carradine, President/Secretary
Ashlaur Construction Company, Inc.
2095 Parkview Drive
South Holland, IL 60473-3785

/s/ Jennifer L. Dunitz-Geiringer _____

Jennifer L. Dunitz-Geiringer
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6237001
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: jdunitz.geiringer@baumsigman.com