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

IRON WORKERS' MID-AMERICA PENSION PLAN, et al.,)	
TENSION TENN, et al.,)	
Plaintiffs,)	CIVIL ACTION
VS.)	NO. 12 C 3387
AMERICAN STEELWORKS, INC.,)	JUDGE JOHN Z. LEE
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, AMERICAN STEELWORKS, INC., an Illinois corporation, in the total amount of \$20,123.66, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,971.00.

On May 14, 2012, the Summons and Complaint was served on the Corporation's President, Lori Parker-Psencik, (by tendering a copy of said documents to Edypa Wileczek) at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 4, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/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) 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 11th day of July 2012:

Lori Parker-Psencik, Registered Agent/President American Steel Works, Inc. 1985 Anson Drive Melrose Park, IL 60160 Daniel C. McCabe McCabe Miller, LLC 212 W. Kinzie Street, Suite 400 Chicago, IL 60654

/s/ Patrick N. Ryan

Patrick N. Ryan Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

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