

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IBEW LOCAL NO. 150 WELFARE FUND,)	
IBEW LOCAL NO. 150 PENSION FUND,)	
IBEW LOCAL NO. 150 SUPPLEMENTAL)	
PENSION FUND,)	
NATIONAL ELECTRICAL BENEFIT FUND,)	
LAKE COUNTY ELECTRICAL JOINT)	
APPRENTICESHIP & TRUST FUND,)	Case No. 12 CV 05207
IBEW LOCAL NO. 150 VACATION FUND,)	
NECA-IBEW NATIONAL LABOR-)	Judge: James B. Zagel
MANAGEMENT COOPERATION FUND,)	
IBEW LOCAL NO. 150 ADMINISTRATIVE)	Magistrate Judge: Nan R. Nolan
MAINTENANCE FUND, and)	
IBEW LOCAL NO. 150 WORKING)	
ASSESSMENT FUND,)	
)	
Plaintiffs,)	
)	
Vs)	
)	
AUTOMATION & NETWORK SOLUTIONS,)	
INC., an Illinois Corporation,)	
)	
Defendant)	

MOTION FOR DEFAULT AND JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, JOHN F. ETZKORN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter Judgment in a Sum Certain in favor of Plaintiffs and against Defendant, AUTOMATION & NETWORK SOLUTIONS, INC., an Illinois Corporation, (“ANSI”), in the amount of \$20,009.34.

In support of their motion, thereof, Plaintiffs state as follows:

1. This case was filed on June 29, 2012.
2. Defendant ANSI, an Illinois corporation, was served on July 15, 2012 c/o Victoria

Rexfor, President and has not appeared or answered within the time allowed by law.

3. Pursuant to the Affidavit of Richard J. Wolf, Fund Auditor, attached hereto, delinquent contributions are due in the amount of \$19,170.84 based on an audit of the books and records of ANSI.

4. Pursuant to the Affidavit of John F. Etzkorn, attached hereto, the Plaintiffs have incurred \$838.50 in reasonable attorneys' fees and costs in the course of prosecuting this action, and such fees and costs are required to be paid by Defendant pursuant to the applicable trust agreements and pursuant to ERISA at 29 U.S.C. Section 1132(g)(2).

WHEREFORE, Plaintiffs request this Court for relief as follows:

A. Enter judgment in favor of Plaintiffs and against Defendant ANSI, in the sum of \$20,009.34 consisting of \$19,170.84 amount due under an audit for the period from July 1, 2008 through October 31, 2011, and \$838.50 in attorneys' fees and costs.

B. This Court grants such other relief as it deems equitable and just under the circumstances.

IBEW LOCAL NO. 150 WELFARE FUND et al,

By: s/ John F. Etzkorn
One of their Attorneys

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