

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 5367
vs.)	
)	JUDGE ROBERT M. DOW, JR.
ALCA, INC., an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on August 22, 2012, request this Court enter judgment against Defendant, ALCA, INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On August 22, 2012, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to submit its monthly fringe benefit contribution reports for March 2012 forward. The Court also entered an order that judgment would be entered after Plaintiffs determined the amount due and owing from Defendant.

2. On or about September 16, 2012, Plaintiffs received Defendant's monthly fringe benefit contribution reports for March 2012 through July 2012. Plaintiffs previously received Defendant's monthly fringe benefit contribution reports for December 2011 and January 2012. The reports show that the Defendant is delinquent in contributions to the Funds in the amount of \$3,632.90. (See Affidavit of Deborah L. French).

3. The amount of \$162.19 is due for liquidated damages. (French Aff. Par. 5).

4. 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 September 30, 2012, in the total amount of \$1,873.84.

5. In addition, Plaintiffs' firm has expended \$435.00 in costs and \$1,335.50 in attorneys' fees in this matter, for a total of \$1,747.50. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$7,438.93.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$7,438.93.

/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 10th day of October 2012:

Mr. Bruno A. Pasquinelli, Registered Agent
ALCA, Inc.
535 Plainfield Road, Suite B
Willowbrook, IL 60527

/s/ Cecilia M. Scanlon

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