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

UNITE HERE HEALTH, et al.,	)	
Plaintiffs,	) CIVIL ACTION	
VS.	) NO. 12 C 6015	
THE PITTSBURGH ATHLETIC ASSOCIATION,	) JUDGE HARRY D. LEINENWEB	ER
Defendant.	)	

## MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, THE PITTSBURGH ATHLETIC ASSOCIATION, in the total amount of \$139,641.88, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$991.25.

On August 31, 2012, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to employee, Emma Mangis) at the company's place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on September 21, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

## **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 <u>28th</u> day of <u>September 2012</u>:

The Pittsburgh Athletic Association 4215 5th Avenue Pittsburgh, PA 15213-3546

/s/ Laura M. Finnegan

Laura M. Finnegan Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

Bar No.: 6210637

Telephone: (312) 236-4316 Facsimile: (312) 236-0241

E-Mail: lmfinnegan@baumsigman.com

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