

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

TRUSTEES OF THE SUBURBAN TEAMSTERS))	
OF NORTHERN ILLINOIS WELFARE AND))	
PENSION FUNDS,))	
)	
Plaintiffs,))	
)	No. 2012 C 7192
v.))	
)	Judge Darrah
)	
DONALD BLACKMON, Individually and d/b/a))	
D.L.B. TRUCKING, INC.,))	
an Illinois corporation not in good standing,))	Magistrate Judge Soat Brown
)	
Defendant.))	

**AMENDED MOTION FOR ENTRY OF DEFAULT AND ORDER
COMPELLING PRODUCTION OF RECORDS**

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to the provisions of Rule 55(a)(2) of the Federal Rules of Civil Procedure, moves this Court to enter an Order of Default Judgment against Defendant, DONALD BLACKMON, Individually and d/b/a D.L.B. TRUCKING., INC., an Illinois corporation not in good standing:

1. Suit was filed on September 10, 2012 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service was made upon the Defendant, DONALD BLACKMON, Individually and d/b/a D.L.B. TRUCKING, INC., an Illinois corporation not in good standing on September 17, 2012 and a copy of the proof of service was filed with the court on September 19, 2012.
3. Defendant's time to plead ran October 10, 2012 and no Answer has been made on its behalf.

5. Plaintiffs' Complaint seeks an audit of the books and records of DONALD BLACKMON, Individually and d/b/a D.L.B. TRUCKING, INC., an Illinois corporation not in good standing, for the period October, 2011 through the present time.

6. Production of these books and records is necessary to enable Plaintiffs to prove up a judgment in an amount certain.

WHEREFORE, Plaintiffs, pursuant to the provisions of Rule 55(a)(2) of the Federal Rules of Civil Procedure, move this Court to:

A. Enter an Order of Default against Defendant, DONALD BLACKMON, Individually and d/b/a D.L.B. TRUCKING, INC., an Illinois corporation not in good standing.

B. Order Defendant to produce its books and records to Plaintiffs' accountant, within 21 days, to perform an audit for the period October, 2011 through the present time.

C. Grant Plaintiffs any other relief deemed equitable and just under the circumstances.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

s/John J. Toomey
ARNOLD AND KADJAN
203 N. LaSalle Street, Suite 1650
Chicago, IL 60601
Telephone No.: (312) 236-0415
Facsimile No.: (312) 341-0438
Dated: October 17, 2012