

I.D. 06184818

File No.: 3900-375

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

**INNOVATIVE SPORTS MANAGEMENT, INC.)
d/b/a INTEGRATED SPORTS MEDIA, INC.,)**

Plaintiff,

v.

No. 2012-cv-7774

**EWA A. CIEPIASZUK, indiv. and d/b/a)
SHORTSTOP, INC. d/b/a JESSE'S SHORTSTOP)
INN and SHORTSTOP, INC. d/b/a JESSE'S)
SHORTSTOP INN,)**

Defendants.

**PLAINTIFF'S AMENDED MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, INNOVATIVE SPORTS MANAGEMENT, INC. d/b/a INTEGRATED SPORTS MEDIA, INC., and respectfully requests that this Court Reinstate this matter against Defendants, EWA A. CIEPIASZUK, indiv. and d/b/a SHORTSTOP, INC. d/b/a JESSE'S SHORTSTOP INN and SHORTSTOP, INC. d/b/a JESSE'S SHORTSTOP INN, and in support thereof, states as follows:

1. That on January 29, 2013, this matter was dismissed without prejudice by this Honorable Court, with leave to reinstate on or before September 30, 2013.
2. That a Settlement Agreement was entered into by both parties wherein which the Defendant would pay a total of \$5,000.00 to the Plaintiff. Payments in the amount of \$500.00 were to be made on or before the 1st of each month beginning on December 1, 2012 and continuing through September 1, 2013. See attached Exhibit A.
3. As of the filing of this motion, Defendant has paid Plaintiff a total of \$2,500.00 towards the \$5,000.00 settlement. Additionally, Defendant has not made a payments since May of 2013.
5. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$2,500.00 plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00). See attached Affidavit Exhibit B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, INNOVATIVE SPORTS MANAGEMENT, INC. d/b/a INTEGRATED SPORTS MEDIA, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, EWA A. CIEPIASZUK, indiv. and d/b/a SHORTSTOPO, INC. d/b/a JESSE'S SHORTSTOP INN and SHORTSTOP, INC. d/b/a JESSE'S SHORTSTOP INN, and enter an Order for Judgment in the amount of Two Thousand Five Hundred and 00/100 (\$2,500.00) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Six Thousand and 00/100 (\$6,100.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on September 25, 2013, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

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