

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

CENTRAL LABORERS PENSION FUND,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 12 C 7949
)	
MNM CONSTRUCTION, INC.,)	JUDGE SAMUEL DER-YEGHAIYAN
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on November 6, 2012, request this Court enter judgment against Defendant, MNM CONSTRUCTION, INC. In support of that Motion, Plaintiffs state:

1. On November 6, 2012, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. Plaintiffs' auditors conducted the audit on January 3, 2013. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$16,257.48. (See Affidavit of Roger Shoup).

3. Additionally, the amount of \$1,625.75 is due for liquidated damages. (Shoup Aff. Par. 5). Plaintiffs' auditing firm of Romolo & Associates charged Plaintiffs \$1,145.40 to perform the audit examination and complete the report (Shoup Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended the amount of \$435.00 in costs and \$1,136.25 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$20,599.88.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$20,599.88.

/s/ Cecilia M. Scanlon

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 19th day of March 2013:

Mr. Michael D. Cash, Registered Agent/Secretary
MNM Construction, Inc.
6524 W. 41st Street
Stickney, IL 60402

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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