

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

CHICAGO AREA JOINT WELFARE	)	
COMMITTEE FOR THE POINTING,	)	
CLEANING AND CAULKING	)	
INDUSTRY, LOCAL 52, <i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 12 C 8415
v.	)	
	)	JUDGE SAMUEL DER-YEGHIAYAN
G. G.'S TUCKPOINTING, INC.,	)	
a dissolved Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 18, 2013, request this Court enter judgment against Defendant, G. G.'S TUCKPOINTING, INC., a dissolved Illinois corporation. In support of that Motion, Plaintiffs state:

1. On June 18, 2013, this Court entered default against Defendant and set this matter for prove-up on July 23, 2013.

2. Plaintiffs' accountants conducted an Independent Accountant's review of Defendant's payroll records for the period January 1, 2009 through December 30, 2012. Based on the report prepared by Plaintiffs' accountants, Plaintiffs have determined that Defendant underpaid contributions for that period totaling \$30,486.97, and therefore also owes liquidated damages of \$5,524.64 and interest of \$1,910.42 on such unpaid contributions. (See Affidavit of Terry Rocco).

3. Defendant further owes Plaintiffs liquidated damages and interest for contributions reported and paid late for the months of April through November 2012, in the amounts of \$21,055.36 and \$706.47, respectively (Rocco Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended \$435.00 in costs and \$4,371.75 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 \$64,490.61.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$64,490.61.

/s/ Patrick N. Ryan \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he 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 15th day of July 2013:

Mr. Jesus Garibay, President  
G. G.'s Tuckpointing, Inc.  
48 Pulaski Road  
Calumet City, IL 60409

Mr. Pedro Cervantes  
Tristan & Cervantes  
30 West Monroe, Suite 630  
Chicago, IL 60603

/s/ Patrick N. Ryan \_\_\_\_\_

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