## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

BOOST WORLDWIDE, INC.,

Plaintiff,

ν.

HALSTEAD QUICK MART & CELLULAR, INC.

Defendant.

Civil Action

Case No.: 1:13-CV-00077

NOTICE OF MOTION

Judge: Honorable Ruben Castillo

To:

Halstead Quick Mart & Cellular Inc.

12201 S. Halstead Street Chicago, Illinois 60628

PLEASE TAKE NOTICE that on June 18th, 2013, at 9:45 am, or as soon thereafter as counsel may be heard, plaintiff Boost Worldwide, Inc. ("plaintiff") will appear before the Honorable Ruben Castillo of the United States District Court for the Northern District of Illinois, located at 219 South Dearborn Street, Chicago, Illinois 60604 - Court Room 2141 and move for an entry of default judgment pursuant to Fed. R. Civ. P. 55(b)(2) against defendant Halstead Quick Mart & Cellular Inc. in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, plaintiff will rely upon its complaint herein, filed on January 4, 2013, and the documents annexed thereto; the certification of Rob O'Neill executed on May 21, 2013; and the certification of Marc D. Youngelson, Esq., executed on May 29, 2013 and the documents annexed thereto; and the proposed form of order submitted herewith.

Dated:  $\frac{6/c0}{}$ , 2013

Robert B. Talan, Esq.

Talan & Ktsanes 223 W. Jackson

Suite 512

Chicago, IL 60606

Attorneys for Boost Worldwide, Inc.

## **CERTIFICATION OF SERVICE**

I hereby certify that a true and correct copy of plaintiff's motion for a default judgment has been served upon the following by first class mail and certified mail:

Halstead Quick Mart & Cellular Inc. 12201 S. Halstead Street

Chicago, Illinois 60628

Date: [/10/13

Robert B. Talan, Esq.

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Attorneys for Boost Worldwide, Inc.