

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

CARPENTERS PENSION FUND OF)	
ILLINOIS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 13 C 575
)	
GROOMS & COMPANY)	JUDGE EDMOND E. CHANG
CONSTRUCTION, INC.,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, GROOMS & COMPANY CONSTRUCTION, INC., in the total amount of \$16,204.56, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$4,903.07.

On February 11, 2013, the Alias Summons and Complaint was served on the Defendant’s President, Rodney Grooms, by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on March 4, 2013. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Catherine M. Chapman

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m., this 22nd day of April 2013, she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Scott Wormsley
Bradshaw, Fowler, Proctor & Fairgrave, P.C.
801 Grand Avenue, Suite 3700
Des Moines, IA 50309-8004
wormsley.scott@bradshawlaw.com

/s/ Catherine M. Chapman _____

Catherine M. Chapman
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6204026
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com

James P. Moody
Attorney for Plaintiffs
CAVANAGH & O'HARA
407 East Adams Street
PO Box 5043
Springfield, IL 62705
Telephone: (217) 544-1771
Facsimile: (217) 544-9894
E-Mail: jim@cavanagh-ohara.com