

3. Accordingly, Plaintiffs have calculated the amount of contributions due and owing from Defendant for the months of September 2012 through June 2013, based on 117 hours per month, to be \$29,226.68.

4. Additionally, the amount of \$2,922.67 is due for liquidated damages. (Wille Aff. Par. 5).

5. In addition, Plaintiffs' firm has expended \$400.00 in costs and \$1,921.00 in reasonable attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$34,470.35.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$34,470.35.

/s/ 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 12th day of August 2013:

Mr. Steven A. Klem, Registered Agent
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/s/ Cecilia M. Scanlon _____

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