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

IRON WORKERS' MID-AMERICA PENSION PLAN, *et al*.,	)))	
Plaintiffs,	))	CIVIL ACTION
vs.	))	NO. 13 C 3454
GLASS MANAGEMENT SERVICES, INC., an Illinois corporation, d/b/a U.S. ARCHITECTURAL GLASS & METAL,	))))	JUDGE JOHN W. DARRAH
Defendant.	))	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against

Defendant, GLASS MANAGEMENT SERVICES, INC., an Illinois corporation, d/b/a U.S.

ARCHITECTURAL GLASS & METAL, in the total amount of $16,776.26, plus Plaintiffs' court

costs and reasonable attorneys' fees in the amount of $1,080.50.

On May 16, 2013, the Summons and Complaint was served on the Registered Agent 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

June 6, 2013. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request

entry of default and judgment.

/s/   Patrick N. Ryan

CERTIFICATE OF SERVICE

        The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) 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 participants on or before the hour of 5:00 p.m. this 24th day of July 2013:

Mr. Richard W. Kuhn, Registered Agent
Glass Management Services, Inc.
552 S. Washington Street, #100
Naperville, IL   60540

Mr. Todd A. Miller
Allocco, Miller & Cahill, P.C.
3409 N. Paulina St.
Chicago, IL 60657

/s/   Patrick N. Ryan

Patrick N. Ryan
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