

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

CAROLE CHENEY,)	
)	
Plaintiff,)	
)	
v.)	No. 1:13-cv-4269
)	
STANDARD INSURANCE)	Hon. Robert W. Gettleman
COMPANY and LONG TERM)	
DISABILITY INSURANCE,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR ENTRY OF JUDGMENT

Plaintiff, CAROLE CHENEY, by her attorneys, hereby moves this Court for the entry of judgment in her favor and against Defendant, STANDARD INSURANCE COMPANY pursuant to the parties’ prior stipulation on the record to submit this matter for a “trial on the papers” pursuant to Fed. R. Civ. P. 52(a) and following remand from the United States Court of Appeals for the Seventh Circuit (Docket No. 74). In support thereof, Plaintiff hereby submits Memoranda of Law (Docket Nos. 90; 99) and Proposed Findings of Fact (Docket No. 23), which together establish by a preponderance of the evidence that Plaintiff is entitled to an award of benefits under the long-term disability policy.

WHEREFORE, Plaintiff prays that the Court enter judgment in her favor and against Defendant, and award her all benefits due to date, prejudgment interest, attorneys’ fees pursuant to 29 U.S.C. § 1132(g), and her costs of suit.

June 2, 2017

Respectfully Submitted,

/s/ Mark D. DeBofsky

One of the Plaintiff's Attorneys

Mark D. DeBofsky
William T. Reynolds
DeBofsky, Sherman & Casciari, PC
200 West Madison Street, Suite 2670
Chicago, Illinois 60606
Voice (312) 561-4040
Fax (312) 929-0309
mdebofsky@debofsky.com
wreynolds@debofsky.com

CERTIFICATE OF SERVICE

Mark D. DeBofsky, the undersigned attorney, certifies that he served a copy of the foregoing upon the Clerk of Court and all counsel of record by CM/ECF, on June 2, 2017.

/s/ Mark D. DeBofsky _____
Mark D. DeBofsky
Attorney for Plaintiff