

**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	)	
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

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**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