

Funds. Plaintiffs and Defendants entered into an Agreed Order of Dismissal on September 30, 2013. (Exhibit C – Agreed Order of Dismissal; Exhibit F – Sworn Declaration of John Libby)

6. The Defendant breached Paragraph 1 of the agreed Order of Dismissal by failing to maintain the agreed upon monthly installment payments to the Plaintiffs. The Defendant owes the Plaintiffs \$182,885.50 of the Agreed Order of Dismissal. (Exhibit F – Sworn Declaration of John Libby)

7. Paragraph 3 of the Agreed Order of Dismissal provides Plaintiffs’ the right to seek entry of a judgment if Paragraph 1 is breached. (Exhibit C – Agreed Order of Dismissal)

8. Paragraph 3 of the Agreed Order of Dismissal provides Plaintiffs’ the right to seek any additional attorney’s fees and cost expended in enforcing the Agreed Order of Dismissal if Paragraph 1 or Paragraph 2 is breached. The Plaintiffs have incurred an additional \$3,027.50 in attorney fees and costs since the entering of the Agreed Order of Dismissal. (Exhibit C – Agreed Order of Dismissal; Exhibit D – Sworn Declaration of David Whitfield; Exhibit E – Detailed Billing of Whitfield McGann & Ketterman)

WHEREFORE, Plaintiffs pray:

- a) That a judgment is entered against the Defendant in the amount of \$185,913.00.
- b) The Defendant be ordered to submit payment of \$185,913.00 to the Plaintiffs.
- i) That Plaintiffs have such other and further relief as by the Court may be deemed just and equitable all at the Defendant's costs pursuant to 29 U.S.C. §1132(g)(2)(E).

By: /s/ David Whitfield
Attorney for Plaintiffs

David Whitfield
Whitfield McGann & Ketterman
111 East Wacker Drive, Suite 2600
Chicago, IL 60601
T: (312) 251-9700 F: (312) 251-9701
Firm File Number N9574