

audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$70,802.08. (See Affidavit of Deborah L. French).

3. Additionally, the amount of \$25,108.11 is due for liquidated damages. (French Aff. Par. 5). Plaintiffs' auditing firm of Bansley and Kiener, L.L.P. charged Plaintiffs a total of \$1,275.00 to perform the audit examination and complete the report (French Aff. Par. 7).

4. Pursuant to the Trust Agreements, a liquidated damages surcharge has been assessed against the Defendant in the amount of one and one-half (1.5%) percent of the total contributions untimely received, compounded monthly at one and one-half (1.5%) percent, for the period accrued through June 30, 2015, in the total amount of \$780.43.

5. In addition, Plaintiffs' firm has expended the total amount of \$6,311.25 in attorneys' fees and \$1,179.00 in costs, for a total of \$7,490.25, 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 \$105,455.87.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$105,455.87.

/s/ Cecilia M. Scanlon

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he 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 20th day of August 2015:

Mr. Steven Lockhart, President
A2Z Flooring by Lockhart, Inc.
2825 Balsam Court
Rockford, IL 61109

/s/ Cecilia M. Scanlon

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