

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

CARPENTERS PENSION FUND OF)
ILLINOIS, *et al.*,)

Plaintiffs,)

vs.)

DAVID KURTZ, individually and d/b/a)
LANGELAND CONSTRUCTION CO.,)
a/k/a W.C. LANGELAND & CO., INC.,)

KIMBERLY KURTZ, individually and)
d/b/a LANGELAND CONSTRUCTION)
CO., a/k/a W.C. LANGELAND & CO.,)
INC.,)

Defendants.)

CIVIL ACTION

NO. 14 C 7019

JUDGE JOAN B. GOTTSCHALL

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on December 2, 2014, request this Court enter judgment against Defendants, David Kurtz, individually and d/b/a Langeland Construction Co., a/k/a W.C. Langeland & Co., Inc. and Kimberly Kurtz, individually and d/b/a Langeland Construction Co., a/k/a W.C. Langeland & Co., Inc. In support of that Motion, Plaintiffs state:

1. On December 2, 2014, this Court entered default against Defendants and granted Plaintiffs' request for an order directing an audit of the Defendants' payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. On or about December 17, 2015, Plaintiffs' auditors issued the completed audit report. The audit findings showed that the Defendants were not delinquent in contributions to the Funds. (See Affidavit of Deborah L. French).

3. Plaintiffs' auditing firm of Bansley and Kiener, L.L.P. charged Plaintiffs \$767.70 to perform the audit examination and complete the report (French Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended the total amount of \$3,558.75 in attorneys' fees and \$645.00 in court costs, for a total of \$4,203.75, in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$4,971.45.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$4,971.45.

/s/ Patrick N. Ryan _____

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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 participants on or before the hour of 5:00 p.m. this 29th day of December 2015:

Mr. David Kurtz
202 Heritage
Minooka, IL 60447

Ms. Kimberly Kurtz
202 Heritage
Minooka, IL 60447

/s/ Patrick N. Ryan

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