

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

CHICAGO AREA JOINT WELFARE	)	
COMMITTEE FOR THE POINTING,	)	
CLEANING AND CAULKING	)	
INDUSTRY, LOCAL 52, <i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 14 C 9049
v.	)	
	)	JUDGE MANISH S. SHAH
SUAVE'S TUCKPOINTING CORPORA-	)	
TION, an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on March 12, 2015, request this Court enter judgment against Defendant, SUAVE'S TUCKPOINTING CORPORATION, an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On March 12, 2015, this Court entered default against Defendant and granted Plaintiffs' request for an order directing the Defendant to submit its monthly fringe benefit contribution reports for the time period January 2014 forward and for entry of judgment after Plaintiffs determined the amounts due and owing from Defendant.

2. Plaintiffs' auditors previously conducted an audit of the Defendant's payroll books and records for the time period January 1, 2009 through May 31, 2012. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$51,603.45. (See Affidavit of Terry Rocco).

3. Additionally, the amount of \$10,320.70 is due for liquidated damages and \$6,359.67 is due for interest. (Rocco Aff. Par. 7).

4. Defendant submitted a monthly fringe benefit contribution report for October 2011, and made partial payments, but still owes contributions of \$2,055.66 plus liquidated damages of \$411.14 and interest of \$228.26.

5. Plaintiffs' firm has expended \$655.00 in costs and \$1,081.50 in attorneys' fees 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 \$72,715.38.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$72,715.38.

/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 participant on or before the hour of 5:00 p.m. this 2nd day of April 2015:

Romelia Razon, Registered Agent  
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