

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

UNITE HERE HEALTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
vs.	)	
	)	NO. 15 C 1259
ARBAH HOTEL CORP., d/b/a MEADOW-	)	
LANDS VIEW HOTEL, f/k/a DAYS INN	)	JUDGE THOMAS M. DURKIN
HOTEL-NORTH BERGEN,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ARBAH HOTEL CORP., d/b/a MEADOWLANDS VIEW HOTEL, f/k/a DAYS INN HOTEL-NORTH BERGEN, in the total amount of \$191,727.68, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$4,535.00.

On February 20, 2015, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to Jane Smith (refused full name), who was authorized to accept service on behalf of Anthony Torres, Managing Agent) at the hotel’s place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on March 13, 2015. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that (s)he electronically filed the foregoing document (Motion) 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 7th day of May 2015:

Arbah Hotel Corp., d/b/a Meadowlands View Hotel,  
f/k/a Days Inn Hotel - North Bergen  
2750 Tonnelle Avenue  
North Bergen, NJ 07047-2228

/s/ Laura M. Finnegan

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