

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

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 15 C 3058
	)	
CHRISTOPHER KRALL, d/b/a H-H	)	JUDGE MILTON I. SHADUR
IRONWORKS, LLC,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on May 27, 2015, request this Court enter judgment against Defendant, CHRISTOPHER KRALL, d/b/a H-H IRONWORKS, LLC. In support of that Motion, Plaintiffs state:

1. On May 27, 2015, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for October 2014 forward. The Court also entered an order that judgment would be entered after Plaintiffs determined the amount due and owing from Defendant.

2. In early September 2015, Defendant submitted its monthly fringe benefit contribution reports for October 2014 through August 2015. The contribution reports show that the Defendant is delinquent in contributions to the Funds for October 2014 through January 2015 and March 2015 through August 2015 in the amount of \$62,128.37. (See Affidavit of Joseph J. Burke).

3. Additionally, the amount of \$9,236.77 is due for liquidated damages for the time period May 2014 through January 2015 and March 2015 through August 2015. (Burke Aff. Paras. 3(b) and 4).

4. In addition, Plaintiffs' firm has expended \$556.00 for costs and \$2,390.25 in attorneys' fees 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 \$74,311.39.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$74,311.39.

/s/ Patrick N. Ryan

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 30th day of November 2015:

Mr. Christopher Krall  
H-H Ironworks, LLC  
124 Zapata Lane  
Minooka, IL 60447

/s/ Patrick N. Ryan \_\_\_\_\_

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