

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

RIVERDALE PLATING AND HEAT
TREATING, LLC,

Plaintiff,

v.

ANDRE CORPORATION

Defendant.

Case No. 2015 cv 3255

Judge Gary Feinerman

AGREED MOTION FOR ENTRY OF JUDGMENT

NOW COMES Plaintiff Riverdale Plating and Heat Treating, LLC (“Riverdale”), by and through its attorneys, and by agreement with Defendant Andre Corporation (“AC”) (collectively, the “Parties”), for its Agreed Motion for Entry of Judgment, and in further support thereof, Riverdale states as follows:

1. On January 6, 2016, Riverdale filed its First Amended Complaint alleging breach of contract (Count I), account stated (Count II), unjust enrichment (Count III), violation of the Indiana Uniform Fraudulent Transfer Act (Count IV), and unlawful corporate distribution (Count V).

2. On or about July 22, 2016, Count III, Count IV, and Count V of the First Amended Complaint were dismissed by Order of the Court.

3. On or about December 7, 2016, the Parties entered into a Confidential Settlement Agreement and Release (the “Settlement Agreement”).

4. Pursuant to the Settlement Agreement entered into December 7, 2016, a stipulated judgment on Count I and Count II shall be entered against AC in the amount of \$132,244.90. A copy of the proposed judgment is attached hereto as Exhibit A.

WHEREFORE, Riverdale respectfully requests that the proposed Agreed Judgment in Favor of Riverdale Plating and Heat Treating, LLC and Against Andre Corporation be entered by this Court and for such other relief as this Court deems reasonable and just.

Respectfully submitted,

By: /s/ Thomas J. Hayes

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