

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

NATASHA MOORE,

Plaintiff,

v.

BERKELEY-HUGHES & ASSOCIATES,
LLC,

Defendant.

1:15-cv-03536

Honorable Joan H. Lefkow

MOTION FOR ENTRY OF JUDGMENT

NOW COMES the Plaintiff, NATASHA MOORE (“Plaintiff”), by and through her attorneys, SULAIMAN LAW GROUP, LTD., submits this Motion for Entry of Judgment pursuant to Rule 58 of the Federal Rules of Civil Procedure against the Defendant, BERKELEY-HUGHES & ASSOCIATES, LLC (“Defendant”), and in support thereof, stating as follows:

1. Plaintiff brought this lawsuit against Defendant for damages stemming from violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, et seq. (“FDCPA”) and the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/2 (“ICFA”). The lawsuit seeks statutory and actual damages.

2. On May 7, 2015, Defendant was served with a copy of the summons and complaint through its registered agent, Cedric Clark, at 6557 Derby Lane, NW Concord, North Carolina. [Dkt. 6].

3. Defendant’s answer to Plaintiff’s complaint was due on or before May 28, 2015. [Id.].

4. Defendant failed to answer the complaint.

5. On July 1, 2015, this Honorable Court granted Plaintiff's oral motion for default. [Dkt. 8].

6. Plaintiff's counsel has made numerous attempts to reach out to Defendant to inform it of the entry of default by placing phone calls to the number listed on Defendant's website and sending emails to the email address listed on Defendant's website.

7. Defendant has not responded to any of Plaintiff's counsel's communications.

8. Pursuant to Rule 58, Plaintiff seeks entry of a judgment against Defendant in the amount of \$1,000.00 in statutory damages pursuant to the FDCPA, §1692k(a)(2)(a).

9. The Plaintiff has filed a Motion for Attorney's Fees and Costs simultaneously with this Motion and requests that this Honorable Court award Plaintiff her attorney's fees and costs in the amount of \$3,812.50 pursuant to the FDCPA, §1692k(a)(3).

WHEREFORE, Plaintiff NATASHA MOORE prays for an entry of Judgment against Defendant BERKELEY-HUGHES & ASSOCIATES, LLC in the amount of \$1,000.00 in statutory damages pursuant to the FDCPA and award Plaintiff her Attorney's Fees and Costs in the sum of \$3,812.50 as set forth in detail in her Motion for Attorney's Fees and Costs.

Dated: September 24, 2015

Respectfully Submitted,

/s/ Mohammed O. Badwan,
Mohammed O. Badwan, Esq. ARDC #6299011
Counsel for Plaintiff
Sulaiman Law Group, LTD
900 Jorie Blvd, Ste 150
Oak Brook, IL 60523
Phone (630)575-8181
Fax: (630)575-8188

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2015, I caused copies of Plaintiff's **Motion for Entry of Judgment** to be filed pursuant to the Federal Rules of Civil Procedure and Local Rules with the Clerk of the United States District Court, Northern District of Illinois, using the CM/ECF system. Copies will be served by overnight priority mail by depositing copies of the same, at 900 Jorie Blvd., Oak Brook, Illinois 60523, with proper postage pre-paid, upon the following:

Berkeley-Hughes and Associates, LLC
ATTN: Cedric Clark, Registered Agent
6557 Derby Lane
NW Concord, NC 28025

/s/ Mohammed O. Badwan
Mohammed O. Badwan, Esq. ARDC #6299011
Counsel for Plaintiff
Sulaiman Law Group, LTD
900 Jorie Blvd, Ste 150
Oak Brook, IL 60523
Phone (630)575-8181
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