

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

CENTRAL LABORERS' PENSION FUND,	)	
<i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 15 C 3626
	)	
ELITE SEAMLESS GUTTERS, INC., an Illinois	)	JUDGE CHARLES R. NORGLER, SR.
corporation, f/k/a ELITE CONSTRUCTION OF	)	
IL., INC.,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ELITE SEAMLESS GUTTERS, INC., an Illinois corporation, f/k/a ELITE CONSTRUCTION OF IL., INC., in the total amount of \$1,895.48, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$833.00.

On April 29, 2015, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 20, 2015. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon \_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she 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 17th day of June 2015:

Mr. John French, Registered Agent/President  
Elite Seamless Gutters, Inc.  
1606 26th Street  
Peru, IL 61354

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon  
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