

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

UNITE HERE HEALTH,)	
)	
MATTHEW WALKER, as fiduciary of)	
UNITE HERE HEALTH,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 15 C 7201
vs.)	
)	JUDGE JOHN R. BLAKEY
THE DESMOND 433 CORP., d/b/a)	
DESMOND’S TAVERN,)	
)	
HUBERT CONNELLY, an individual,)	
)	
Defendants.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on October 26, 2015, request this Court enter judgment against Defendants, THE DESMOND 433 CORP., d/b/a DESMOND’S TAVERN and HUBERT CONNELLY, an individual. In support of that Motion, Plaintiffs state:

1. On October 26, 2015, this Court entered default against Defendants and set this matter for prove-up on November 16, 2015.

2. Defendants remitted monthly fringe benefit contribution reports for the work months of April 2015 through September 2015 but failed to remit all contributions in the amount of \$31,527.15, interest of \$403.12 and liquidated damages of \$6,773.96. (See Affidavit of Dean Dailey).

3. Defendants have, by failing to timely submit the monthly fringe benefit contribution report for the work month of October 2015, concealed from the Fund the number of hours for which contributions are due and, based upon a review of the Defendants' reporting history, calculate a reasonable estimate of the contributions owed to the Fund for October 2015 is \$6,513.40. (Dailey Aff. ¶5(c)).

4. In addition, Plaintiffs' firm has expended \$650.00 in costs and the total amount of \$875.00 in attorneys' fees in this matter. (See Affidavit of Laura M. Finnegan).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$46,742.63.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$46,742.63.

/s/ Laura M. Finnegan

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she 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 participants on or before the hour of 5:00 p.m. this 9th day of November 2015:

The Desmond 433 Corp., d/b/a Desmond's Tavern
c/o Hubert Connelly
433 Park Avenue South
New York, NY 10016

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New York, NY 10016

/s/ Laura M. Finnegan

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