

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

TRUSTEES OF THE CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS PENSION FUND,)	
TRUSTEES OF THE CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS WELFARE FUND,)	
TRUSTEES OF THE CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS SUPPLEMENTAL)	
RETIREMENT FUND, and TRUSTEES OF THE)	
CHICAGO REGIONAL COUNCIL OF CARPENTERS)	
APPRENTICE TRAINING FUND,)	
)	Case 15 cv 7523
Plaintiffs,)	
v.)	Judge Dow
)	
CELTIC FLOOR COVERING, INC.,)	
)	
Defendant.)	

AGREED MOTION FOR AGREED JUDGMENT ORDER

Plaintiffs, TRUSTEES of the CHICAGO REGIONAL COUNCIL of CARPENTERS PENSION FUND, et al., by their attorney, David Whitfield, move this court to enter an agreed judgment order in the sum of \$941,450.33. In support, Plaintiffs state as follows:

1. The Parties have jointly agreed to an agreed judgment order in the sum of \$941,450.33, representing amounts in ERISA contributions, interest on ERISA contributions, liquidated damages, dues, audit fees/costs, and reasonable attorney fees/costs. (See **Exhibit A, Agreed Judgment Order**)

WHEREFORE, Plaintiffs pray that their motion for agreed judgment order is entered in the amount of \$941,450.33.

Respectfully submitted,
By: /s/ David Whitfield

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