

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

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 15 C 8337
)	
MAJOR HEATING & COOLING, INC.,)	JUDGE ANDREA R. WOOD
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on January 14, 2016, request this Court enter judgment against Defendant, MAJOR HEATING & COOLING, INC., an Illinois corporation. In support of this Motion, Plaintiffs state:

1. On January 14, 2016, this Court entered default against Defendant and granted Plaintiffs’ request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for October 2015 forward. The Court also entered an order that judgment would be entered after Defendant submitted the required contribution reports.

2. On January 13, 2016, the Plaintiff Funds received Defendant’s contribution reports for October and November 2015. On February 1, 2016, the Plaintiff Funds received Defendant’s contribution report for December 2015. Defendant previously submitted its report for June 2015 and contributions remain due and owing for June 2015. The contribution reports show that the Defendant is delinquent in contributions to the Funds in the amount of \$1,712.62. (See Affidavit of Scott P. Wille).

3. Additionally, the amount of \$1,277.72 is due for liquidated damages for the months of July 2015 through December 2015. (Wille Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended \$600.00 in costs and \$1,338.45 in attorneys' fees, for a total of \$1,938.45, in this matter. (See Affidavit of Catherine M. Chapman).

5. Accordingly, Plaintiffs request entry of judgment in the total amount of \$4,928.79.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$4,928.79.

/s/ Cecilia M. Scanlon

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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 participant on or before the hour of 5:00 p.m. this 10th day of February 2016:

Mr. Karl Beiermeister, Registered Agent/President
Major Heating & Cooling, Inc.
32W760 Rochefort Lane
Wayne, IL 60184

/s/ Cecilia M. Scanlon

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