

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

JOHN MARKS, an individual,)	
)	
Plaintiff,)	
)	Case No. 16-CV-8656
v.)	
)	Hon. Robert Dow Jr.
WORLDWIDE ROBOTIC AUTOMATED)	
PARKING, LLC, and DONALD JAGODA,)	Magistrate Judge Young B. Kim
)	
Defendants.)	
)	

PLAINTIFF’S MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff John Marks moves for entry of a consent judgment in favor of Plaintiff and against Defendants in the sum of \$391,000. In support of his Motion, Plaintiff states as follows:

1. In March 2018, after participating in a settlement conference with Magistrate Judge Young Kim, the parties executed a settlement agreement (“Settlement Agreement”) to resolve the issues raised in Plaintiff’s Complaint.
2. Pursuant to the parties’ Settlement Agreement, in the event that Defendants failed to make any settlement payments required under the Settlement Agreement or otherwise breached the Settlement Agreement, Defendants Worldwide Robotic Automated Parking, LLC and Donald Jagoda agreed to entry of the Consent Judgment attached hereto as “Exhibit A.”
3. On October 1, 2018, Defendants failed to make a settlement payment as required by the parties’ Settlement Agreement.
4. On December 4, 2018, Plaintiff, through his undersigned counsel, notified Defendants’ counsel that Plaintiff intended to seek entry of the Consent Judgment.

WHEREFORE, Plaintiff John Marks respectfully requests that this Court enter the Consent Judgment in the amount of \$391,000 in the form attached hereto as Exhibit "A," and grant such other relief that this Court deems just and proper.

Respectfully submitted,

JOHN MARKS

By: /s/ Maureen B. Schoaf
One of his attorneys

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EXHIBIT A

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FINAL CONSENT JUDGMENT

Pursuant to a settlement agreement between Plaintiff, John Marks, (“Plaintiff”), on the one hand, and Defendants, Donald Jagoda and Worldwide Robotic Automated Parking, LLC, (collectively, “Defendants”), on the other hand, dated March 23, 2018, (the “Settlement Agreement”), and upon due notice to the parties and the Court being fully advised on the premises it is ADJUDGED that judgment is entered in favor of Plaintiff John Marks and against Defendants Donald Jagoda and Worldwide Robotic Automated Parking, LLC in the sum of \$400,000.00 less amounts paid and received under the Settlement Agreement of \$9,000.00. The total judgment amount being \$391,000.00. Jurisdiction of this case is retained to enforce the Final Consent Judgment.

SO ORDERED.

Dated:

Robert M. Dow, Jr.
United States District Judge

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on this 12th day of December 2018, she caused the foregoing **Plaintiff's Motion for Entry of Consent Judgment** to be filed with the Clerk of the United States District Court for the Northern District by filing through the CM/ECF system, which served a copy upon counsel of record.

/s/ Maureen B. Schoaf