

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

JONAS DANILIAUSKAS,

Plaintiff,

v.

RELIANCE STANDARD LIFE
INSURANCE COMPANY,

Defendant.

Case No. 1:16-cv-09278

*Hon. Charles R. Norgle, Sr.
Mag. Judge Susan E. Cox*

**DEFENDANT'S MOTION FOR JUDGMENT
PURSUANT TO F.R. CIV. P. 52**

Defendant Reliance Standard Life Insurance Company (“Reliance Standard”), by its undersigned counsel, moves this Honorable Court, pursuant to Rule 52 of the Federal Rules of Civil Procedure, to enter judgment in favor of Reliance Standard and against Plaintiff Jonas Daniliauskas (“Plaintiff”) for the reasons set forth in its supporting Memorandum of Law filed contemporaneously herewith.

WHEREFORE, Reliance Standard respectfully requests that this Court enter an order granting Judgment in its favor, and awarding Reliance Standard such other and further relief as the Court deems just and equitable, including an award of their reasonable attorneys fees and costs pursuant to 29 U.S.C. §1132(g).

Respectfully Submitted,

**RELIANCE STANDARD LIFE INSURANCE
COMPANY, Defendant**

By: /s/ Edna S. Kersting
One of Its Attorneys

Edna S. Kersting
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

55 West Monroe Street, Suite 3800
Chicago, Illinois 60603
(312) 704-0550
(312) 704-1522

PROOF OF SERVICE

I hereby certify that on June 9, 2017, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operations of the Court's electronic filing systems to all parties indicated on the electronic filing receipt. All other parties will be served by Regular U.S. Mail. Parties may access this filing through the Court's System.

/s/ Edna S. Kersting

Edna S. Kersting