

3. Due to Defendant's untimely submission of contribution reports for May 2016 through February 2017 and the payment of the fringe benefit contributions due thereon, Plaintiffs have assessed liquidated damages for the stated time period in the amount of ten (10%) percent of all contributions due and untimely paid in the amount of \$4,552.97. (Schell Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended \$770.00 in costs and \$2,528.75 in attorneys' fees, for a total of \$3,298.75, in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$7,851.72.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$7,851.72.

/s/ Cecilia M. Scanlon

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m., this 28th day of June 2017, she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Mr. Timothy J. Somen
Somen Law Firm, LLC
1620 W. Colonial Parkway
Inverness, IL 60067
tim@somenlawfirm.com

I hereby certify 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 28th day of June 2017:

Ms. Jo Slavich, Registered Agent/President
J & B Mechanical, Inc.
128 W. Pratt Boulevard
Schaumburg, IL 60172-5011

/s/ Cecilia M. Scanlon

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