

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

CENTRAL LABORERS' PENSION FUND,	)	
<i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 17 C 00017
vs.	)	
	)	JUDGE EDMOND E. CHANG
ELITE SEAMLESS GUTTERS, INC., an Illinois	)	
corporation, f/k/a ELITE CONSTRUCTION OF	)	
IL., INC.,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on February 15, 2017, request this Court enter judgment against Defendant, ELITE SEAMLESS GUTTERS, INC., an Illinois corporation, f/k/a ELITE CONSTRUCTION OF IL., INC. In support of that Motion, Plaintiffs state:

1. On June 16, 1998, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records for the time period May 1, 2013 through December 31, 2016. The Court also entered an order that judgment would be entered after the completion of the audit.

2. On April 6, 2017, Plaintiffs' auditors completed the audit. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$340.29. (See Affidavit of Jeanne Raabe).

3. Additionally, the amount of \$30.94 is due for liquidated damages. (Raabe Aff. Par. 7). Plaintiffs' auditing firm of Romolo & Associates charged Plaintiffs \$1,003.85 to perform the audit examination and complete the report. Plaintiff Funds, however, charged Defendant 25% of the audit cost, or \$250.96 (Raabe Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended the amount of \$600.00 for costs and \$1,350.00 in attorneys' fees 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 \$2,541.25.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$2,541.25.

/s/ Cecilia M. Scanlon

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 22nd day of June 2017:

Mr. John French, Registered Agent/President  
Elite Seamless Gutters, Inc.  
1606 26th Street  
Peru, IL 61354

/s/ Cecilia M. Scanlon  
\_\_\_\_\_

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