

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

ADOLFO BAUTISTA HERRERA,

Plaintiff,

v.

GRAND SPORTS ARENA, LLC, D/B/A
CHICAGO MUSTANGS PRO, MASL
SOCCER, LLC D/B/A MAJOR ARENA
SOCCER LEAGUE AND/OR MASL
SOCCER PRO, XOCHITL MEZA, and
ARMANDO GAMBOA, individually,

Defendants.

Case No. 17-CV-00452

Judge: Robert M. Dow, Jr.

Magistrate Judge: M. David Weisman

PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT

Plaintiff, Adolfo Bautista Herrera (“Bautista”), by and through his attorneys, Caffarelli & Associates, Ltd., moves this Honorable Court for entry of judgment against Defendants Grand Sports Arena, LLC, d/b/a Chicago Mustangs Pro, Xochitl Meza, individually, and Armando Gamboa, individually, pursuant to the Acceptance of Offer of Judgment filed on March 9, 2018, D.E. 54. In support of his motion, Plaintiff states as follows:

1. On March 5, 2018, Defendants Grand Sports Arena, LLC, d/b/a Chicago Mustangs Pro (“GSA”), Xochitl Meza (“Meza”), individually, and Armando Gamboa (“Gamboa”), individually, served Plaintiff with an Offer of Judgment pursuant to Rule 68 of the Federal Rules of Civil Procedure, attached hereto as Exhibit A.

2. On March 9, 2018, Plaintiff accepted the Offer of Judgment and pursuant to Rule 68(a) of the Federal Rules of Civil Procedure accepted in writing and filed the Acceptance of Offer of Judgment, D.E. 54.

3. Pursuant to Rule 68(a), Plaintiff moves the Court to enter judgment in the amount of \$37,600 jointly and severally against Defendants GSA, Meza, and Gamboa. Plaintiff also

moves the Court for leave to file a petition for attorneys' fees, costs, and interest pursuant to the Offer of Judgment and the Illinois Wage Payment and Collection Act, 820 ILCS 115/14(a) ("In a civil action, such employee shall also recover costs and all reasonable attorney's fees.").

WHEREFORE, Plaintiff, Adolfo Bautista Herrera, respectfully requests that this Honorable Court enter judgment against Defendants Grand Sports Arena, LLC, d/b/a Chicago Mustangs Pro, Xochitl Meza, individually, and Armando Gamboa, individually, jointly and severally, in the amount of \$37,600, as well as an Order granting leave to file a petition for attorneys' fees, costs, and prejudgment interest pursuant to the Offer of Judgment and Illinois Wage Payment and Collection Act,

Dated: March 22, 2018

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Respectfully submitted,
ADOLFO BAUTISTA HERRERA

By: /s/ Alejandro Caffarelli
One of Plaintiff's attorneys

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the attached, **Plaintiff's Motion for Entry of Judgment**, to be served upon the party below by electronically filing with the Clerk of the U.S. District Court of the Northern District of Illinois on March 22, 2018.

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/s/ Alejandro Caffarelli
Attorney for Plaintiff