

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

MISCELLANEOUS WAREHOUSEMEN'S)
LOCAL 781 HEALTH & WELFARE FUND,)
Plaintiff,) CIVIL ACTION
vs.) NO. 17 C 2932
M AND M GLASS SERVICE, INC.,) JUDGE MATTHEW F. KENNELLY
an Illinois corporation,)
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COMES Plaintiff, by its attorneys, and move for entry of judgment by default against Defendant, M AND M GLASS SERVICE, INC., an Illinois corporation, in the total amount of \$30,232.73, plus Plaintiff's court costs and reasonable attorneys' fees in the amount of \$1,069.00.

On May 3, 2017, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Lynne Putz) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 24, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and 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 26th day of May 2017:

Mr. John H. Putz, Registered Agent/President
M and M Glass Service, Inc.
4047 W. 147th Street
Midlothian, IL 60445

/s/ Patrick N. Ryan

Patrick N. Ryan
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