

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

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS WELFARE AND)
PENSION FUNDS,)
Plaintiffs,)
v.) No. 2017 C 3006
DAN JAUREGUI TRUCKING, INC.,) Judge Sharon Johnson Coleman
an Illinois corporation,) Magistrate Finnegan
Defendant.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Motion and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on April 21, 2017 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service was made upon DAN JAUREGUI TRUCKING, INC., an Illinois corporation on May 8, 2017.
3. Defendant is now in default on the Complaint and as supported by the attached Affidavits the sums due are:

\$45,493.67 Welfare
\$38,054.10 Pension
\$7,437.50 Attorneys fees
\$916.95 Court costs
\$91,902.22

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, DAN JAUREGUI TRUCKING, INC. an Illinois corporation, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION AND WELFARE FUNDS in the amount of \$91,902.22.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION AND
WELFARE FUNDS

s/John J. Toomey
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Dated: February 8, 2018