

**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 3040
T & T CUSTOMS, INC.)
an Illinois corporation,)
Defendant.)
Magistrate Judge Cox
Judge Gettelman

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 Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on April 24, 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 T & T CUSTOMS, INC., an Illinois corporation on May 9, 2017 and a copy of the proof of service was filed with the court on May 16, 2017.
3. Defendant is now in default as to Count I of the Complaint and as supported by the attached Affidavits the sums due are:

| | |
|--------------------|----------------|
| \$6,164.82 | Pension |
| \$5,372.04 | |
| \$1,250.00 | Attorneys fees |
| <u>\$459.00</u> | Court costs |
| \$13,245.86 | |

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, T & T CUSTOMS, 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 \$13,245.86.

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

s/John J. Toomey
ARNOLD AND KADJAN, LLP
35 E. Wacker Drive, Suite 600
Chicago, IL 60601
Telephone No.: (312) 236-0415
Facsimile No.: (312) 341-0438
Dated: June 9, 2017