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

FOX VALLEY & VICINITY CONSTRUCTION WORKERS WELFARE FUND, et al.,)
Plaintiffs,) CIVIL ACTION
vs.) NO. 17 C 3384
RNR TRUCKING, INC., an Illinois corporation,) JUDGE THOMAS M. DURKIN
RICK RAMOS, individually,)
Defendants.)

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against Defendant, RNR TRUCKING, INC., an Illinois corporation, on July 31, 2017, request this Court enter judgment against Defendant, RNR TRUCKING, INC. In support of its Motion, Plaintiffs state:

- 1. On July 31, 2017, this Court entered default against Defendant, RNR Trucking, Inc., and granted Plaintiffs' requests for orders directing an audit of the Defendant's payroll books and records for September 2015 through February 2017 and for a wage and welfare bond in the amount of \$25,000. The Court also entered an order that judgment would be entered after the completion of the audit.
- 2. Plaintiffs' auditors completed the audit on August 22, 2017 and found Defendant, RNR Trucking, Inc., to be compliant in its reporting obligations. (See Affidavit of David A. Dorfman).

3. Defendant submitted its monthly fringe benefit contribution report for June 2016

indicating \$3,606.00 in contributions due and owing. Defendant only remitted payment of

\$3,171.48, thereby resulting in an underpayment of \$434.52.

4. Plaintiffs no longer require Defendant, RNR Trucking, Inc., to obtain a wage and

welfare bond in the amount of \$25,000.00.

5. Plaintiffs' firm has expended \$695.00 in costs and \$2,210.50 in attorneys' fees to

obtain compliance with Defendant's audit obligation and payment for contributions due for the

month of June 2016, for a total of \$2,905.50, in this matter. (See Affidavit of Catherine M.

Chapman).

6. Based upon the documents filed herewith, Plaintiffs request entry of judgment in the

total amount of \$3,340.02.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of

\$3,340.02.

/s/ Catherine M. Chapman

Catherine M. Chapman

Attorney for the Plaintiffs

BAUM SIGMAN AUERBACH & NEUMAN, LTD.

200 West Adams Street, Suite 2200

Chicago, IL 60606-5231

Bar No.: 6204026

1 (212) 21

Telephone: (312) 216-2565

Facsimile: (312) 236-0241

E-Mail: cchapman@baumsigman.com

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2

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 28th day of September 2017:

> Mr. Rick Ramos, Registered Agent RNR Trucking, Inc. 3185 S. Hadden Road Mazon, IL 60444-6074

> > /s/ Catherine M. Chapman

Catherine M. Chapman Attorney for the Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

Bar No.: 6204026

Telephone: (312) 216-2565 Facsimile: (312) 236-0241

E-Mail: cchapman@baumsigman.com

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