

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
Telephone: (312) 216-2565
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com
I:\Fvcwj\RNR Trucking\motion-judgment.cmc.df.wpd

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