

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

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 17 C 3753
	)	
FENCE CONNECTION, INC.,	)	JUDGE MANISH S. SHAH
an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on August 2, 2017, request this Court enter judgment against Defendant, FENCE CONNECTION, INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On August 2, 2017, this Court entered default against Defendant.
2. On November 3, 2015 and March 17, 2016, Plaintiffs' auditors conducted an audit of the Defendant's payroll books and records for the time period April 1, 2014 through December 31, 2015.
3. On or about November 29, 2016, the auditors revised the audit report. The revised audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$15,976.85. (See Affidavit of Joseph J. Burke).
4. Additionally, the amount of \$5,670.32 is due for liquidated damages. (Burke Aff. Par. 6). Plaintiffs' auditing firm of Legacy Professionals, LLP charged Plaintiffs \$3,070.76 to

perform the audit examination, complete the report and revise the audit findings. (Burke Aff. Par. 7).

5. In addition, the amount of \$195.47 is due for liquidated damages for Defendant's untimely payment of the fringe benefit contributions due for the month of March 2017. (Burke Aff. Par. 8).

6. Plaintiffs' firm has expended \$485.00 in costs and \$1,425.00 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

7. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$26,823.40.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$26,823.40.

/s/ Patrick N. Ryan \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he 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 10th day of August 2017:

Mr. Juan Escobar, Registered Agent/President  
Fence Connection, Inc.  
970 Villa Street  
Elgin, IL 60120

/s/ Patrick N. Ryan

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