

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 4291
	)	
LAKESIDE RACK INSTALLERS, INC.,	)	JUDGE MANISH S. SHAH
a Michigan corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LAKESIDE RACK INSTALLERS, INC., a Michigan corporation, in the total amount of \$99,945.42, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$4,436.24.

On June 13, 2017, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Jules Palms) at the registered office of record (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 5, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

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

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 216-2573  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) 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:

Legalcorp Solutions, Inc., Registered Agent for  
Lakeside Rack Installers, Inc.  
13854 Lakeside Circle  
Sterling Heights, MI 48313-1316

Mr. Michael Karas, President  
Lakeside Rack Installers, Inc.  
526 W. 14th Street, Suite 144  
Traverse City, MI 49684

/s/ Patrick N. Ryan

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 216-2573  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)