

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

TRUSTEES OF THE CHICAGO PAINTERS AND )  
DECORATORS PENSION FUND, et al, )  
Plaintiffs, ) No. 17 C 4603  
vs. ) Judge Bucklo  
G&P CONSTRUCTION SERVICES, LLC, an Illinois ) Magistrate Judge Cole  
limited liability company. )  
Defendant. )

**PLAINTIFFS' MOTION FOR JUDGMENT IN A SUM CERTAIN**

Plaintiffs, by and through their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, CAITLIN B. PYRCE and ARNOLD AND KADJAN, LLP, move this Court to enter judgment in favor of Plaintiffs and against the Defendant G&P CONSTRUCTION SERVICES, LLC in a sum certain. In support of their Motion, the Plaintiffs state as follows:

1. This is an action to recover delinquent fringe benefit fund contributions.
2. The Defendant, G&P CONSTRUCTION SERVICES, LLC was served with the Summons and Compliant through service on the Illinois Secretary of State on August 2, 2017.
3. The Court defaulted the Defendant by its order dated October 25, 2017.
4. According to the Affidavit of Richard Wolf, attached hereto as Exhibit 1, the Defendant, G&P, owes \$108,624.73 to Plaintiffs, based upon the findings of a fringe benefit fund contribution compliance audit for the period from November 18, 2015 through September 30, 2017, consisting of \$93,630.64 for contributions, \$14,004.09 in liquidated damages, and \$1,260.00 in audit costs.

WHEREFORE, Plaintiffs pray that this Court grant the following relief:

A. That judgment be entered in favor of Plaintiffs and against the Defendant, G&P in the amount of \$108,624.73, which is being sent via the Court's system.

Respectfully submitted,

TRUSTEES OF THE CHICAGO PAINTERS et al

s/ Caitlin B. Pyrce

One of the attorneys for Plaintiffs

DONALD D. SCHWARTZ  
JAMES R. ANDERSON  
CAITLIN B. PYRCE  
ARNOLD AND KADJAN LLP  
35 E. Wacker Drive, Suite 600  
Chicago, Illinois 60601  
(312)236-0415