

**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 limited liability company.)	Magistrate Judge Cole
)	
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 e t al

s/ Caitlin B. Pyrcce

One of the attorneys for Plaintiffs

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