

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 4768
)	
MORCOM CONSTRUCTION)	JUDGE SHARON JOHNSON COLEMAN
COMPANY, an Illinois 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, MORCOM CONSTRUCTION COMPANY, an Illinois corporation, in the total amount of \$210,624.96, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,104.00.

On June 27, 2017, a Notice of a Lawsuit and Request to Waive Service of a Summons and Waiver of the Service of Summons forms were served on Defendant's counsel. On July 14, 2017, Defendant's counsel executed the Waiver of the Service of Summons form. Pursuant to the Waiver form, Defendant's answer or motion under Rule 12 was due within 60 days from June 27, 2017, or by August 28, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan _____

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m., this 2nd day of October 2017, he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Patrick N. Ryan _____

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