

4. The Defendant owes liquidated damages on the unpaid ERISA contributions in the amount of \$6,519.90 pursuant to the Collective Bargaining Agreements, the Trust Agreements and 29 U.S.C. §1132(g)(2)(C)(ii). (Exhibit B)

5. The Defendants owe \$1,229.00 for necessary and reasonable audit fees, (Exhibit B), \$3,315.00 for necessary and reasonable attorney fees and costs of \$400.00 which are collectible under the terms of the Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). (Exhibit C, affidavit of Daniel P. McAnally)

WHEREFORE, Plaintiffs pray that their motion for entry of judgment be granted in the amount of \$31,824.19.

Respectively submitted,

/s/ Daniel P. McAnally
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