

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

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 17 C 6700
)	
J & B MECHANICAL, INC.,)	JUDGE SAMUEL DER-YEGHIAYAN
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, J & B MECHANICAL, INC., an Illinois corporation, in the total amount of \$21,580.67, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,630.25.

On October 2, 2017, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to the Illinois Secretary of State, Department of Business Services) (a copy of the Summons and Affidavit of Compliance for Service on Secretary of State is attached hereto). Therefore, Defendant's answer was due on October 23, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) 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 participants on or before the hour of 5:00 p.m. this 21st day of November 2017:

Ms. Jo Slavich, Registered Agent
J & B Mechanical, Inc.
128 West Pratt Boulevard
Schaumburg, IL 60172

Jesse White
Secretary of State
Department of Business Services
Attn: File #59393251
Springfield, IL 62756

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6288574
Telephone: (312) 216-2577
Facsimile: (312) 236-0241
E-Mail: cscanlon@baumsigman.com