

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

CENTRAL LABORERS PENSION)	
FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 17 C 8313
)	
MERRYMAN EXCAVATION, INC.,)	JUDGE AMY J. ST. EVE
an Illinois corporation, a/k/a)	
MERRYMAN CO.,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, MERRYMAN EXCAVATION, INC., an Illinois corporation, a/k/a MERRYMAN CO., in the total amount of \$11,821.74, plus Plaintiffs’ court costs and reasonable attorneys’ fees in the amount of \$2,786.25.

On November 27, 2017, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant’s answer was due on December 18, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon _____

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) 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 participant on or before the hour of 5:00 p.m. this 21st day of March 2018:

Mr. Patrick H. Merryman, Registered Agent/President
Merryman Excavation, Inc.
1501 Lamb Road
Woodstock, IL 60098

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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