

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

| | | |
|---------------------------------------|---|---------------------------|
| FOX VALLEY LABORERS HEALTH AND |) | |
| WELFARE FUND, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | CIVIL ACTION |
| |) | |
| v. |) | NO. 17 C 8388 |
| |) | |
| BROWN R CARTAGE COMPANY, an Illinois |) | JUDGE VIRGINIA M. KENDALL |
| corporation, d/b/a TRAFFIC SOLUTIONS, |) | |
| and d/b/a BROWN R CARTAGE 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, BROWN R CARTAGE COMPANY, an Illinois corporation, d/b/a TRAFFIC SOLUTIONS, and d/b/a BROWN R CARTAGE CO., in the total amount of \$142,013.03, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,877.00.

On December 9, 2017, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on January 2, 2018. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Catherine M. Chapman

Catherine M. Chapman
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6204026
Telephone: (312) 216-2565
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com

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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 participant on or before the hour of 5:00 p.m. this 10th day of January 2018:

Mr. Jorge Bonilla, Registered Agent/President
Brown R Cartage Company
551 Tollgate Road, Suite C
Elgin, IL 60123-9357

Mr. Jorge Bonilla, Registered Agent/President
Brown R Cartage Company
9N760 Old Millcourt
Elgin, IL 60124-8318

/s/ Catherine M. Chapman _____

Catherine M. Chapman
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6204026
Telephone: (312) 216-2565
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com