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

CENTRAL LABORERS' PENSION	N FUND,	)
et al.,		
	Plaintiffs,	) CIVIL ACTION
VS.		) NO. 18 C 2033
VIRIDIAN ENTERPRISES, INC., an Illinois corporation,		) JUDGE SHARON JOHNSON COLEMAN
	Defendant.	)

## **MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, VIRIDIAN ENTERPRISES, INC., an Illinois corporation, in the total amount of \$1,228.04, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,056.25.

On April 3, 2018, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Kirsten Moisio) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 24, 2018. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/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

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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 <u>5th</u> day of <u>September 2018</u>:

Mr. Ernest Estela, Registered Agent/President Viridian Enterprises, Inc. 3810 W. Addison Street Chicago, IL 60618

/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

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