

also remitted full payment of the fringe benefit contributions due thereon. (See Affidavit of Joseph J. Burke).

3. Due to the untimely payment of the fringe benefit contributions due from Defendants for the period January 2018 through July 2018, Plaintiff Funds assessed liquidated damages in the total amount of \$502.56. (Burke Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended the amount of \$446.00 in costs and the amount of \$1,314.00 in attorneys' fees, for a total of \$1,760.00. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment against Defendants in the total amount of \$2,262.56.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment against Defendants in the amount of \$2,262.56.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com

I:\MIDJ\Security Fence\#27989\motion-judgment.pnr.df.wpd

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of 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 5th day of September 2018:

Mr. Jeffrey H. Cole, Registered Agent
Security Fence Co., Inc.
2022 S. Griswold
Peoria, IL 61605-3003

Mr. Jeffrey H. Cole
2022 S. Griswold
Peoria, IL 61605-3003

/s/ Patrick N. Ryan _____

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com