

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

IRON WORKERS' MID-AMERICA	)	
SUPPLEMENTAL MONTHLY	)	
ANNUITY (SMA) FUND, <i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 21 C 5786
vs.	)	
	)	JUDGE MANISH S. SHAH
THE ROSS GROUP, INC.,	)	
an Indiana corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, THE ROSS GROUP, INC., an Indiana corporation, in the total amount of \$18,768.70, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,384.00.

On November 18, 2021, the Alias Summons and Complaint was served on the corporation's President, Ross N. Pangere (by tendering a copy of said documents to him personally) at the corporate address of record (a copy of the Alias Summons and Affidavit for Return of Service is attached hereto). Therefore, Defendant's answer was due on December 9, 2021. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/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](mailto:pryan@baumsigman.com)

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he 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 7th day of January 2022:

Mr. Ross Pangere, President  
The Ross Group, Inc.  
5901 Carlson Avenue  
Portage, IN 46368-1309

/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  
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