

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Western Division

JOE HAND PROMOTIONS, INC.,)
)
Plaintiff,)
v.)
)
TIMOTHY JOSEPH GALVIN, indiv. and d/b/a)
VIDEO WONDERS, INC. d/b/a COOL MUSIC)
STOP BAR & GRILL, and VIDEO WONDERS,)
INC. d/b/a COOL MUSIC STOP BAR &)
GRILL,)
)
Defendants.)

Case No. 2011-cv-50123

PLAINTIFF'S MOTION FOR DEFAULT AGAINST DEFENDANT,
VIDEO WONDERS, INC. AND MOTION TO STRIKE DEFENDANT,
TIMOTHY JOSEPH GALVIN'S ANSWER

NOW COMES the Plaintiff, JOE HAND PROMOTIONS, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court enter an Order for Default against Defendant, VIDEO WONDERS, INC. d/b/a COOL MUSIC STOP BAR & GRILL, and to Strike Defendant, Timothy Joseph Galvin's Answer to Plaintiffs Complaint, and in support thereof, states as follows:

1. On April 27, 2011, the Complaint in this matter was filed with the United States District Court, Northern District of Illinois.
2. On May 9, 2011, the Summons and Complaint was served upon Defendant, Video Wonders, Inc. See attached Exhibit A.
3. That on June 6, 2011, Defendant, Timothy Joseph Galvin filed his answer to Plaintiffs Complaint, however, failed to state his defense for each claim presented in Plaintiffs Complaint. See attached Exhibit B.
4. Pursuant to Illinois Rule 8(b) of Civil Procedure, in responding to a pleading, a party must state in short and plain terms its defenses to each claim asserted against it and admit or

deny the allegations asserted against it by the opposing party.

5. Additionally, as of the filing of this Motion, Defendant Video Wonders, Inc. has failed to file an answer or appearance in this matter.

6. Defendant, Timothy Anthony Galvin's Answer to Plaintiffs Complaint failed to comply with Illinois Rule 8(b) and therefore should be stricken.

WHEREFORE, the Plaintiff, JOE HAND PROMOTIONS, INC., respectfully prays this Honorable Court for the entry of an Order of Default against VIDEO WONDERS, INC. d/b/a COOL MUSIC STOP BAR & GRILL, and to Strike Defendant, Timothy Joseph Galvin's Answer to Plaintiffs Complaint, and for such other relief as this Court deems just and right.

//s/Andre Ordeanu
Andre Ordeanu

Andre Ordeanu
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CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on August 22, 2011, using the CM/ECF system as well as sent to Defendant by Regular and Certified Mail to the address as listed on the Notice of Motion. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

//s/ Andre Ordeanu
Andre Ordeanu

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