

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

THE CONSTRUCTION INDUSTRY	)	
RETIREMENT FUND OF ROCKFORD,	)	
ILLINOIS and THE CONSTRUCTION	)	
INDUSTRY WELFARE FUND OF	)	
ROCKFORD, ILLINOIS,	)	District Judge: Frederick J. Kapala
	)	
Plaintiffs,	)	Magistrate Judge: P. Michael Mahoney
	)	
vs.	)	Case No: 11 C 50268
	)	
GRIMM HEATING & AIR	)	
CONDITIONING, INC., an Illinois	)	
corporation,	)	
	)	
Defendant.	)	

**AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT**

1. This Court has personal jurisdiction over the parties to this suit and subject matter jurisdiction over the claims asserted.

2. Grimm Heating & Air Conditioning, Inc., acknowledges that under the terms of the Collective Bargaining Agreements and Trust Agreements referenced in the Complaint filed against it by The Construction Industry Retirement Fund of Rockford, Illinois, and The Construction Welfare Fund of Rockford, Illinois (“the Funds”) in Case No. 11 C 50268, that it failed to pay contributions and is liable for additional liquidated damages. Grimm Heating & Air Conditioning, Inc. acknowledges owing \$110,605.11 in unpaid contributions and liquidated damages.

3. Grimm Heating & Air Conditioning, Inc. also acknowledges that under the terms of the Collective Bargaining Agreements and Trust Agreements referenced in the Complaint,

it is responsible for the Funds attorney's fees incurred in pursuit of its unpaid contributions. Grimm Heating & Air Conditioning, Inc. acknowledges owing \$3,724.05 in attorney's fees, which it admits are fair and reasonable under the circumstances.

3. Grimm Heating & Air Conditioning, Inc. therefore consents to judgment against it and in favor of the Funds in the total amount of \$114,329.16.

WHEREFORE, plaintiff moves that the attached Consent Judgment be entered at this time.

THE CONSTRUCTION INDUSTRY RETIREMENT  
FUND OF ROCKFORD, ILLINOIS, Plaintiff

By: WilliamsMcCarthy LLP

/s/ Troy E. Haggstad

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**CERTIFICATE OF LAWYER**

The undersigned hereby certifies that on February 23, 2012, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Gregory A. Hunziker  
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/s/ Troy E. Haggstad

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