

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Western Division

J&J SPORTS PRODUCTIONS, INC.,)
Plaintiff,)
v.)
HILDA ARGUETA, DANIEL ARGUETA and)
JOHN ARGUETA, indiv. and d/b/a)
CHARLIE'S RESTAURANT AND BAR INC.)
d/b/a CHARLIE'S RESTAURANT AND BAR)
and CHARLIE'S RESTAURANT AND BAR)
INC. d/b/a CHARLIE'S RESTAURANT AND)
BAR,)
Defendants.)

Case No. 2012-cv-50226

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., and respectfully requests that this Court Reinstate this matter against Defendants, HILDA ARGUETA, DANIEL ARGUETA and JOHN ARGUETA, indiv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, and in support thereof, states as follows:

1. That on March 27, 2013, this matter was dismissed without prejudice by this Honorable Court.
2. That a Settlement Agreement was entered into by both parties wherein which the Defendants would pay a total of \$5,000.00 to the Plaintiff. Payments in the amount of \$200.00 were to be made on or before the 15th of each month beginning on February 15, 2013 and continuing through January 15, 2014. See attached Exhibit A.
3. As of the filing of this motion, Defendant has paid Plaintiff a total of \$400.00 towards the \$5,000.00 settlement which was made in May of 2013.
4. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$4,600.00 plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00).

See attached Affidavit Exhibit B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, HILDA ARGUETA, DANIEL ARGUETA and JOHN ARGUETA, indiv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, and enter an Order for Judgment in the amount of Four Thousand Six Hundred and 00/100 (\$4,600.00) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Eight Thousand Two Hundred and 00/100 (\$8,200.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

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 January 22, 2014, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

Zane D. Smith
ZANE D. SMITH & ASSOCIATES, LTD.
415 North LaSalle Street - Suite 501
Chicago, Illinois 60654
(312) 245-0031
(312) 245-0022 - Fax