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: Iain D. Johnston
vs.) Case No: 18-50175
TRADEMARK FLOORING, INC.,)
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. Trademark Flooring, 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. 18-50175, that it failed to pay contributions and is liable for additional liquidated damages. Trademark Flooring, Inc. acknowledges owing \$393,728.69 in unpaid contributions and liquidated damages.
- 3. Trademark Flooring, Inc. therefore consents to judgment against it and in favor of the Funds in the total amount of \$393,728.69.

WHEREFORE, the parties move that the attached Consent Judgment be entered at

this time.

THE CONSTRUCTION INDUSTRY RETIREMENT FUND OF ROCKFORD, ILLINOIS and THE CONSTRUCTION INDUSTRY WELFARE FUND OF ROCKFORD, ILLINOIS, Plaintiffs

By: WilliamsMcCarthyLLP

/s/ Troy E. Haggestad

Troy E. Haggestad (#06229384) Joel M. Huotari (#6289792) WilliamsMcCarthyLLP 120 W. State Street, Suite 400 P.O. Box 219 Rockford, IL 61105-0219 815/987-8900 thaggestad@wilmac.com

CERTIFICATE OF LAWYER

The undersigned hereby certifies that on August 27, 2018, 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:

Trademark Flooring, Inc. c/o George Hampilos 308 W. State Street, Ste. 210 Rockford, IL 61101

/s/ Troy E. Haggestad

Troy E. Haggestad
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