

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

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 13 C 6383
)	
CONSOLIDATED STEEL AND SUPPLY)	JUDGE CHARLES R. NORGLER, SR.
CO., a Delaware corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, CONSOLIDATED STEEL AND SUPPLY CO., a Delaware corporation, in the total amount of \$19,019.21, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$4,876.75.

On October 8, 2013, the Alias Summons and Complaint was served on the President by tendering a copy of said documents to him personally at his residence (a copy of the Alias Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on October 29, 2013. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) 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 13th day of January 2014:

Mr. Stephen L. Straus, President
Consolidated Steel and Supply Co.
295 Auburn Avenue
Winnetka, IL 60093-0360

/s/ Patrick N, Ryan _____

Patrick N. Ryan
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