

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

INTERNATIONAL PAINTERS AND ALLIED)	
TRADES INDUSTRY PENSION FUND)	
)	Civil Action No.
Plaintiff)	05-972 (RBW)
v.)	
)	
ORTEGA CONSTRUCTION METHODS, INC.)	
)	
Defendant)	

MOTION FOR ENTRY OF JUDGMENT BY DEFAULT

Plaintiff, International Painters and Allied Trades Industry Pension Fund, respectfully moves this Court for entry of judgment by default against Ortega Construction Methods, Inc. in the amount of \$26,293.71, and for injunctive relief. On June 24, 2005, Plaintiff filed with the Clerk of the Court a Request to Enter Default against Defendant pursuant to Federal Rule of Civil Procedure 55(a). Default was subsequently entered on or about July 20, 2005.

Accompanying this motion are a supporting memorandum of points and authorities, the Declaration of Thomas C. Montemore (attached as Ex. 1), the Declaration of Shelley R. Goldner (attached as Ex. 2), the Jennings Sigmond attorneys' fees billing statement (attached as Ex. 3),

and a proposed default judgment.

Respectfully submitted,

JENNINGS SIGMOND, P.C.

BY: s/ Shelley R. Goldner

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Date: July 20, 2005