

**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,

Plaintiffs,

vs.

MCL CARPENTRY CONTRACTORS,
LLC, an Illinois limited liability company,

Defendant.

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)
) District Judge: Philip G. Reinhard

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) Magistrate Judge: P. Michael Mahoney

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) Case No: 11 C 50096
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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. MCL CARPENTRY CONTRACTORS, LLC, 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 50096, that it failed to pay contributions and is liable for additional liquidated damages. MCL CARPENTRY CONTRACTORS, LLC acknowledges owing \$8,524.03 in unpaid contributions and liquidated damages.

3. MCL CARPENTRY CONTRACTORS, LLC 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. MCL CARPENTRY CONTRACTORS, LLC acknowledges owing \$3,578.15 in attorney's fees, which it admits are fair and reasonable under the circumstances.

3. MCL CARPENTRY CONTRACTORS, LLC therefore consents to judgment against it and in favor of the Funds in the total amount of \$12,102.18.

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/ Joel M. Huotari

Joel M. Huotari
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CERTIFICATE OF LAWYER

The undersigned hereby certifies that on December 20, 2011, 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:

Todd Abraham Miller
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/s/ Joel M. Huotari

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