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

MASONRY INSTITUTE, BRICKLAYERS)
LOCAL 21 PENSION FUND, DISTRICT)
COUNCIL TRAINING CENTER FUND,)
AND BRICKLAYERS AND STONE)
MASONS OF ILLINOIS DISTRICT COUN-)
CIL NO. 1 B.A.C. ANNUITY TRUST FUND,)
)
Plaintiffs,) No. 08 C 1234
v.)
) Judge Gottschall
STONE USA, INC., an Illinois Corporation,)
-) Mag. Judge Schenkier
Defendant.)

MOTION FOR DEFAULT JUDGMENT

NOW COME the Plaintiffs and move this Honorable Court to enter a default judgment on behalf of the Plaintiffs and against Defendant on the grounds that the Defendant has failed to answer or otherwise defend the complaint of the Plaintiffs, a copy of which is attached as "Exhibit A." Defendant was served on March 3, 2008, as more fully stated on the Affidavit of Service, a copy of which is attached as Exhibit "B."

WHEREFORE, Plaintiffs request the following relief:

1. That default be entered against the Defendant herein, STONE USA, INC., an Illinois Corporation, and that the complaint filed herein be taken as confessed.

2. That an order be entered forthwith against the Defendant and in favor of Plaintiffs for production of books and records for the period September 1, 2006, through February 29, 2007, and to pay to Plaintiffs the amount found due and owing in accordance with the applicable provisions of its collective bargaining agreement, and for attorneys' fees in the amount of \$1,170.00 and court costs in the amount of \$358.00.

3. That interest and/or liquidated damages be assessed against the Defendant as provided in the Collective Bargaining Agreement and the applicable provisions of the Pension Reform Act.

4. That the Defendant be ordered to comply with and perform according to the terms and conditions of its collective bargaining agreement with Local 21.

5. That the Court reserves jurisdiction with respect to any supplemental proceedings to be instituted by the Plaintiffs to enforce the judgment entered herein.

6. For such other and further relief as the Court may deem just and proper, including reasonable attorney's fees and court costs which are sustained.

/s/ Robert B. Greenberg Asher, Gittler, Greenfield & D'Alba, Ltd. 200 West Jackson Boulevard Suite 1900 Chicago, Illinois 60606 (312) 263-1500 IL ARDC#: 01047558

Dated: March 25, 2008