

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Asbestos Workers Local 24 Medical Fund et al. v. East Coast
Insulation, Inc.

Asbestos Workers Local 24 Medical Fund · No. Civil No. 25-16-BAH; 1:25-cv-00016 · Decided April 13, 2026

SUMMARY

The United States District Court for the District of Maryland partially grants plaintiffs’ motion for default judgment in an ERISA and LMRA action concerning delinquent employee-benefit contributions. The court establishes liability against East Coast Insulation, Inc. for contributions to the Medical Fund and Pension Fund, but denies default judgment as to the Apprenticeship Fund because plaintiffs did not sufficiently establish that defendant was bound to the relevant agreement. The court denies monetary and injunctive relief without prejudice for lack of adequate supporting documentation, permits supplementation on damages, and defers attorney’s-fee resolution.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Brendan A. Hurson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 13, 2026
DOCKET	Civil No. 25-16-BAH; 1:25-cv-00016
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs sought default judgment under ERISA and the LMRA for allegedly unpaid employee-benefit contributions, interest, liquidated damages, injunctive relief, and attorney's fees after Defendant failed to respond to the complaint.
STANDARD OF REVIEW	The court applied Federal Rule of Civil Procedure 55 and exercised its discretion in determining whether default judgment was appropriate. Well-pleaded liability allegations were accepted as true, but damages were independently determined and had to be supported by competent evidence; relief could not exceed or differ in kind from that demanded in the pleadings.
PRECEDENTIAL VALUE	unpublished district-court memorandum opinion; nonprecedential

PARTIES

Asbestos Workers Local 24 Medical Fund, Asbestos Workers Local 24 Pension Fund, Asbestos Workers Local 24 Apprenticeship Fund, Andrew Tomlinson, Scott Grant, Brian B. Cavey, Julio Caicedo, Robert Ciancaglini, Jason Brown, John Hastings, Sean McLaughlin, John Adkins, Benjamin Grant, Steve Lane v. East Coast Insulation, Inc.

TOPICS

default judgment

erisa

employee benefits

civil procedure

injunctions

PRACTICE AREAS

ERISA

employee benefits

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QUESTIONS PRESENTED

1. Whether default judgment was appropriate after Defendant failed to respond.
2. Whether the well-pleaded allegations established Defendant's liability under ERISA and the LMRA for delinquent Pension Fund and Medical Fund contributions.
3. Whether the record established Defendant's liability for Apprenticeship Fund contributions.
4. Whether Plaintiffs submitted competent evidence sufficient to establish the amount of damages.
5. Whether Plaintiffs were entitled at that stage to injunctive relief and attorney's fees.

HOLDINGS

1. Default judgment was appropriate in part because Defendant was properly served, failed to file a responsive pleading, and did not respond to the motion for default judgment; however, default did not automatically establish entitlement to all requested relief.
2. Plaintiffs established Defendant's liability under ERISA and the LMRA for delinquent contributions to the Pension Fund and Medical Fund.
3. Plaintiffs did not establish Defendant's liability for Apprenticeship Fund contributions because they did not provide sufficient evidence that Defendant was bound by the 2022 Joint Trade Agreement imposing that obligation.
4. Plaintiffs did not establish the requested monetary damages because the declaration and record lacked sufficient detail concerning employee hours and other evidence necessary to verify the calculations.
5. The court denied injunctive relief without prejudice because the damages and underlying record were insufficient, and deferred resolution of attorney's fees.

KEY QUOTATIONS

“When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.” (Legal

Standard)

“Without more, the Court has no competent evidence to review in support of the requested amount and cannot verify Plaintiff[s’] calculation.” (Analysis § III.B)

FACTUAL BACKGROUND

The Funds alleged that East Coast Insulation was obligated under collective bargaining and participation agreements to make hourly contributions to the Pension Fund, Medical Fund, and Apprenticeship Fund. Defendant allegedly underpaid or paid late contributions from July through November 2023 and failed to submit remittance reports or contributions from December 2023 through October 2024. The Participation Agreement expressly required contributions to the Pension Fund and Medical Fund, but the court found insufficient evidence that Defendant was bound by the 2022 Joint Trade Agreement's separate Apprenticeship Fund obligations. Plaintiffs submitted a declaration asserting damages, but it did not identify employee hours or otherwise provide enough detail to verify the claimed amounts.

PROCEDURAL HISTORY

Plaintiffs filed the complaint on January 2, 2025, and served Defendant on January 11, 2025. After Defendant failed to plead or otherwise defend, the Clerk entered default. Plaintiffs later moved for default judgment. The court granted default judgment in part as to liability for contributions to the Medical Fund and Pension Fund, denied liability as to the Apprenticeship Fund, denied monetary and injunctive relief without prejudice for lack of competent damages evidence, deferred attorney's fees, and allowed Plaintiffs thirty days to supplement the damages record.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Plaintiffs' Medical Fund and Pension Fund, and their trustees, may supplement the damages record within thirty days. The court will then consider monetary and injunctive relief; attorney's-fee resolution is deferred.

CASES CITED

- United States v. Schaffer Equip. Co., 11 F.3d 450, 453 (4th Cir. 1993)
- S.L.C. v. Lawbaugh, 359 F. Supp. 2d 418, 421-22 (D. Md. 2005)
- Jackson v. Beech, 636 F.2d 836 (D.C. Cir. 1980)
- Choice Hotels Int'l, Inc. v. Jai Shree Navdurga, LLC, Civ. No. DKC-11-2893, 2012 WL 5995248, at *1 (D. Md. Nov. 29, 2012)
- Choice Hotels Int'l, Inc. v. Austin Area Hospitality, Inc., Civ. No. TDC-15-0516, 2015 WL 6123523, at *1 (D. Md. Oct. 14, 2015)
- Ryan v. Homecomings Fin. Network, 253 F.3d 778, 780-81 (4th Cir. 2001)

- Balt. Line Handling Co. v. Brophy, 771 F. Supp. 2d 531, 543-44 (D. Md. 2011)
- Harris v. Blue Ridge Health Servs., Inc., 388 F. Supp. 3d 633, 637-38 (M.D.N.C. 2019)
- Md. State Firemen's Ass'n v. Chaves, 166 F.R.D. 353, 354 (D. Md. 1996)
- Agora Fin., LLC v. Samler, 725 F. Supp. 2d 491, 494 (D. Md. 2010)
- Monge v. Portofino Ristorante, 751 F. Supp. 2d 789, 795 (D. Md. 2010)
- Brown v. Am. Institutes For Rsch., 487 F. Supp. 2d 613, 617 (D. Md. 2007)
- Mommaerts v. Hartford Life & Accident Ins. Co., 472 F.3d 967, 968 (7th Cir. 2007)
- Trs. of Plumbers & Gasfitters Loc. 5 Ret. Sav. Fund v. Magothy Mech. LLC, Civ. No. TDC-25-01249, 2025 WL 3711726, at *4 (D. Md. Dec. 22, 2025)
- Int'l Painters & Allied Trades Indus. Pension Fund v. 3 R Painting & Contracting Co., Civ. No. RDB-12-272, 2013 WL 424694, at *6-7 (D. Md. Jan. 31, 2013)
- Int'l Painters & Allied Trades Indus. Pension Fund v. Watters Painting, Inc., Civ. No. JRR-22-2571, 2023 WL 4759289, at *3 (D. Md. July 26, 2023), report and recommendation adopted, No. 1:22-CV-02571-JRR, 2023 WL 12120445 (D. Md. Aug. 14, 2023)
- Abanda v. OurBloc LLC, Civ. No. BAH-23-1071, 2024 WL 3995139, at *6 (D. Md. Aug. 29, 2024)
- Educ. Credit Mgmt. Corp. v. Optimum Welding, 285 F.R.D. 371, 374 (D. Md. 2012)
- Oceanic Trading Corp. v. Vessel Diana, 423 F.2d 1, 4-5 (2d Cir. 1970)
- Nat'l Elec. Ben. Fund v. Landers Enters., LLC, Civ. No. PWG-14-0140, 2014 WL 3510227, at *7 (D. Md. July 11, 2014)
- Trs. of Washington Area Carpenters' Pension & Ret. Fund v. Mergentime Corp., 743 F. Supp. 422, 428 (D. Md. 1990)
- Phillips v. Brink's Co., 632 F. Supp. 2d 563, 575 (W.D. Va. 2009)
- Su v. iProcess Online, Inc., Civ. No. BAH-24-61, 2024 WL 4932657, at *5-6 (D. Md. Dec. 2, 2024)
- Clancy v. Skyline Grill, LLC, Civ. No. ELH-12-1598, 2012 WL 5409733, at *5 (D. Md. Nov. 5, 2012)
- Nat'l Elec. Benefit Fund v. Wire to Water Elec. of New York, Inc., Civ. No. TDC-19-3003, 2020 WL 1933625, at *4 (D. Md. Apr. 21, 2020)