

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

<b>ILLINOIS DISTRICT COUNCIL NO. 1</b>	)	
<b>OF THE INTERNATIONAL UNION</b>	)	
<b>OF BRICKLAYERS AND ALLIED</b>	)	
<b>CRAFTWORKERS, AFL-CIO,</b>	)	
	)	<b>Case No. 08 C 3833</b>
<b>Plaintiff,</b>	)	
	)	<b>Judge Manning</b>
<b>v.</b>	)	
	)	<b>Magistrate Judge Schenkier</b>
<b>JULIAN MASONRY CORP., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**UNION’S AGREED MOTION FOR  
ENTRY OF FINAL JUDGMENT ORDER**

Plaintiff Illinois District Council No. 1 of the International Union of Bricklayers and Allied Craftworkers, AFL-CIO (“Union”), respectfully moves this Court to enter the attached, proposed Judgment Order. In support, the Union states as follows:

1. This matter involves a suit to enforce a labor arbitration award, with jurisdiction based on 29 U.S.C. §185.
2. The Court has entered a series of orders finding in the Union’s favor on the underlying issue of enforcement of the award, and has entered subsequent orders regarding legal fees and costs.
3. Discussions and negotiations between the parties have resulted in agreement on the appropriate figures and the additional details, which are reflected in the attached, proposed Judgment Order.
4. Joseph Berglund, Esq., attorney for the defendants, has authorized the Union’s lawyer to state that he agrees on behalf of his clients to the form of this Judgment Order, and

joins in the request that the Court enter this Judgment Order to bring this matter to a close.

WHEREFORE, the Union respectfully asks that its motion be granted, and that the Court enter the attached proposed Judgment Order.

Respectfully submitted,

/s/ Barry M. Bennett  
Attorney for  
Illinois District Council No. 1  
of the International Union of Bricklayers  
and Allied Craftworkers, AFL-CIO

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