

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

ADMINISTRATIVE DISTRICT)	
COUNCIL 1 OF ILLINOIS OF THE)	
INTERNATIONAL UNION OF)	
BRICKLAYERS AND ALLIED)	
CRAFTWORKERS, AFL-CIO,)	No. 09 C 2302
)	
Plaintiff,)	Judge Andersen
)	
v.)	Magistrate Judge Cox
)	
HAGGLUND MASONRY, INC., et al.)	
)	
Defendants.)	

PLAINTIFF’S AGREED MOTION FOR ENTRY OF JUDGMENT

Plaintiff Administrative District Council 1 of Illinois of the International Union of Bricklayers and Allied Craftworkers, AFL-CIO (“Union”), respectfully moves this Court for entry of judgment, in the form attached or otherwise, against Defendants Hagglund Masonry, Inc., and Arne Hagglund (together, “Defendants”), and in support states as follows:

1. This matter is a suit to enforce a labor arbitration award, with jurisdiction based on 29 U.S.C. §185.
2. The complaint seeks judgment against the Defendants, jointly and severally, for the damages assessed in the arbitration award, interest on those damages as provided in the arbitration award, and legal fees and costs incurred in the suit as also provided by the arbitration award; and the proposed judgment order provides for that relief.
3. Defendants recognize they are barred by the statute of limitations from challenging the arbitration award or resisting the Union’s suit to enforce the award; and therefore

Defendants' attorney, Joel D. Groenewold, Esq. has authorized the Union to state that the Defendants agree to this motion and to entry of judgment as requested.

WHEREFORE, the Union respectfully asks that its motion be granted and that judgment be entered in its favor and against Defendants Hagglund Masonry, Inc., and Arne Hagglund, in the form attached or otherwise.

Respectfully submitted,

/s/ Barry M. Bennett

Attorney for
Administrative District Council 1 of Illinois
of the International Union of Bricklayers
and Allied Craftworkers, AFL-CIO

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