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 3504	
)	
Plaintiff,) Judge St. Eve	
)	
v.) Magistrate Judge C	ole
)	
LARRY SCALETTA, individually and)	
d/b/a L.S.M.,)	
)	
Defendant.)	

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 Defendant Larry Scaletta, 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 Mr. Scaletta 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. Mr. Scaletta recognizes he is barred by the statute of limitations from challenging the arbitration award or resisting the Union's suit to enforce the award; and therefore his

attorney, Edgar P. Petti, Esq. has authorized the Union to state that Mr. Scaletta agrees 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 Defendant Larry Scaletta, 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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