

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

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|-----------------------------------|---|-----------------------------|
| MOORE LANDSCAPES, INC. ET AL, |) | |
| |) | Case No. 09 CV 5489 |
| Plaintiffs, |) | |
| |) | |
| v. |) | MAGISTRATE JUDGE: SCHENKIER |
| |) | |
| UNITED UNION OF ROOFERS, |) | |
| WATERPROOFERS AND ALLIED WORKERS, |) | |
| LOCAL 11 AND LABORERS' |) | |
| INTERNATIONAL UNION OF NORTH |) | |
| AMERICA, LOCAL 4, |) | |
| |) | |
| Defendants. |) | |

DEFENDANT, UNITED UNION OF ROOFERS,
WATERPROOFERS AND ALLIED WORKERS, LOCAL 11
CROSS MOTION FOR JUDGMENT

Defendant, United Union of Roofers, Waterproofers and Allied Workers, Local 11 ("Roofers Union), by and through its attorney, Librado Arreola, with Asher, Gittler, Greenfield and D'Alba, Ltd., presents its Cross Motion for Judgment.

Plaintiffs have requested that the Joint Conference Board (JCB) Arbitration decision of Arbitrator Bierig be vacated.

For the reasons contained in the Memorandum and Response submitted by Defendant Roofers Union, Defendant Roofers Union requests that the Plaintiffs' motion for judgment be denied and that the Roofers Union Cross Motion for judgment be granted and the instant action be dismissed.

Respectfully submitted,

UNITED UNION OF ROOFERS'

/s/ Librado Arreola
Librado Arreola

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