

**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,)	Case No. 09 C 6833
)	
Plaintiff,)	Judge Kocoras
v.)	
)	
ANCHOR MASONRY, INC.,)	
)	
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 Anchor Masonry, Inc. (“Company”), 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 Company enforcing an arbitration award that requires it to provide the Union with a \$15,000.00 bond in the required form, or to pay \$15,000.00 to the Union to serve as a cash bond; to cease all work within the geographic and craft jurisdiction of the Union, regardless of the name or business form under which it performs such work, until it provides the bond or cash bond; and to reimburse the Union’s legal fees and costs in enforcing the arbitration award.

3. The Company realizes it is barred by the statute of limitations from challenging the arbitration award or resisting the Union's suit to enforce the award; and therefore its attorney, Michael W. Duffee, Esq. has authorized the Union to state that the Company 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 Anchor Masonry, Inc., 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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