

**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 6945
)	
Plaintiff,)	Judge Kennelly
v.)	
)	
CHARLES PETERSON, 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 move this Court for entry of judgment, in the form attached or otherwise, against Defendant C.J.P. Masonry, Inc. (“CJP”), 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 arbitration award requires CJP to provide the Union with a \$30,000.00 bond in the required form, or to pay the Union \$30,000.00 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 fees and costs the Union has incurred in this suit.
3. CJP recognizes the Union is entitled to judgment as requested; and therefore its attorney, Burr E. Anderson, Esq., has authorized the Union’s lawyer to state that CJP 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 C.J.P. 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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