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,)
)
Plaintiff,)
v.)
)
JOSEPH MINAGLIA,)
)
Defendant.)

Case No. 11 C 6604 Judge Pallmeyer

Magistrate Judge Nolan

MOTION FOR ENTRY OF FINAL JUDGMENT

Plaintiff Administrative District Council 1 of Illinois of the International Union of Bricklayers and Allied Craftworkers, AFL-CIO (the "Union"), through its attorneys, respectfully moves for entry of final judgment against Joseph Minaglia, in the form attached or otherwise. In support, the Union states that (1) the Court has already granted the Union's motion for judgment on the pleadings, (2) there does not appear to be any prospect of any agreed settlement, (3) Mr. Minaglia appears to have violated or attempted to violate the requirements of the arbitration award by performing or seeking to perform bargaining unit work in further violation of the labor contract, and (4) it is now appropriate to bring this matter to a conclusion through entry of judgment. In further support of this motion, the Union relies on the attached detailed statement in support of motion for entry of judgment and exhibits.

Respectfully submitted,

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/s/ Barry M. Bennett

Attorney for Administrative District Council 1 of the International Union of Bricklayers and Allied Craftworkers