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Adam P. Segal, Esq. 1 Nevada Bar No. 6120 2 Aaron B. Fricke, Esq. Nevada Bar No. 11129 3 BROWNSTEIN HYATT FARBER SCHRECK, LLP 100 N. City Parkway, Suite 1600 4 Las Vegas, Nevada 89106 Telephone: (702) 382-2101 5 Facsimile: (702) 382-8135 6 Attorneys for Plaintiffs 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 TRUSTEES OF THE ELECTRICAL CASE NO. **WORKERS HEALTH AND WELFARE** 11 TRUST; TRUSTEES OF THE **ELECTRICAL WORKERS PENSION** TRUST; AND TRUSTEES OF THE LAS 12 **VEGAS ELECTRICAL JOINT** 13 APPRENTICESHIP AND TRAINING TRUST FUND, STIPULATED/CONSENT JUDGMENT 14 Plaintiffs. 15 VS. 16 CASINO SIGNS & GRAPHIC, INC., d/b/a 17 CASINO LIGHTING & SIGN, a Nevada 18 corporation, 19 Defendant. 20 21 CASINO SIGNS & GRAPHIC, INC., d/b/a CASINO LIGHTING & SIGN, a Nevada 22 corporation ("Employer"), hereby stipulates and consents to entry of judgment in favor of 23 Plaintiffs, Trustees of the Electrical Workers Health and Welfare Trust; Trustees of the Electrical 24 Workers Pension Trust; and Trustees of the Las Vegas Electrical Joint Apprenticeship and 25 Training Trust Fund (collectively the "IBEW Joint Trust Funds"), and against Employer in the 26 total sum of \$296,433 for delinquent employee benefit contributions, liquidated damages, and

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related costs and fees owed under the Employee Retirement Income Security Act of 1974 ("ERISA").

The parties have stipulated and therefore the Court finds:

- Employer is signatory to and bound by the terms of a collective bargaining I. agreement ("CBA") with the International Brotherhood of Electrical Workers, Local No. 357 ("Union"), in which Employer agreed to abide by the trust agreements establishing the respective IBEW Joint Trust Funds and any amendments thereto ("Trust Agreements").
- 2. Under the CBA and the Trust Agreements, Employer is obligated to pay employee benefit contributions to the IBEW Joint Trust Funds on behalf of Employer's bargaining unit employees represented by the Union.
- Based on remittance reports prepared and submitted by Employer for the months 3. of January 2011 through March 2011, Employer owes the IBEW Joint Trust Funds \$239,939 in unpaid employee benefit contributions, past interest of \$6,756 (through April 5, 2011), liquidated damages of \$47,988, administrative fees of \$750, and past attorney's fees of \$1,000, for a total of \$296,433.
- In addition, in the event this judgment must be executed, the IBEW Joint Trust 4. Funds will incur additional fees and costs determined by the parties to be at least \$5,000, which are therefore included herein.

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1	5. This Stipulated/Consent Judgment is entered into by and between Employer an	
2	the IBEW Joint Trust Funds for employee benefit contributions and related costs and fees owed to	
3	the IBEW Joint Trust Funds by ERISA.	
4 5	July 26, 2011.	April7_, 2011.
6	BROWNSTEIN HYATT FARBER SCHRECK, LLP	CASINO SIGNS & GRAPHIC, INC., d/b/a CASINO LIGHTING & SIGN, a Nevada corporation
7 8	Adam P. Segal, Esq.	Moule Johnson
9	Nevada Bar No. 6120	Mark Johnson President and Director
10	Aaron B. Fricke, Esq. Nevada Bar No. 11129	3665 West Diablo Drive
11	100 N. City Parkway, Suite 1600	Las Vegas, Nevada 89118 Telephone: 702-739-6789
12	Las Vegas, Nevada 89106 Telephone: (702) 382-2101	Facsimile: 702-739-9618
	Facsimile: (702) 382-8135	For Casino Signs & Graphics, Inc., d/b/a Casino
13 14	Attorneys for the IBEW Joint Trust Funds	Lighting & Sign, a Nevada corporation
15	JUDGMENT	
16		
17	Judgment is hereby entered against Casino Signs & Graphics, Inc., d/b/a Casino Lighting	
18	& Sign, a Nevada corporation, and in favor of the IBEW Joint Trust Funds in the amount of	
19	\$296,433.	
20	Dated this <u>17th</u> day of July	,2012
21		
22		great )
23	U.S. DISTRICT COURT JUDGE	
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