

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

1 Adam P. Segal, Esq.
Nevada Bar No. 6120
2 Clark V. Vellis, Esq.
Nevada Bar No. 5533
3 Bryce C. Loveland, Esq.
Nevada Bar No. 10132
4 BROWNSTEIN HYATT FARBER SCHRECK, LLP
5 100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
6 Telephone: (702) 382-2101
Facsimile: (702) 382-8135
7 Email: asegal@bhfs.com
8 Email: cvellis@bhfs.com
Email: bcloveland@bhfs.com

9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 TRUSTEES OF THE ELECTRICAL
13 WORKERS HEALTH AND WELFARE
14 TRUST; TRUSTEES OF THE
15 ELECTRICAL WORKERS PENSION
16 TRUST; AND TRUSTEES OF THE LAS
VEGAS ELECTRICAL JOINT
APPRENTICESHIP AND TRAINING
TRUST FUND,

Case No. 2:12-cv-00812-MMD-PAL

STIPULATED/CONSENT JUDGMENT

17 Plaintiffs,

18 vs.

19 WILLIAMS BROTHER, INC., a Nevada
20 corporation,

21 Defendant.

22 Williams Brother, Inc. ("Williams"), hereby stipulates and consents to entry of judgment
23 in favor of Plaintiffs, Trustees of the Electrical Workers Health and Welfare Trust, Trustees of the
24 Electrical Workers Pension Trust, and Trustees of the Las Vegas Electrical Joint Apprenticeship
25 and Training Trust Fund (collective "Trust Funds"), and against Williams in the total sum of
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1 \$32,785 for delinquent employee benefit contributions and related costs and fees owed under the
2 Employee Retirement Income Security Act of 1974 ("ERISA").

3 The parties have stipulated and therefore the Court finds:

4 1. Williams is signatory to and bound by the terms of a collective bargaining
5 agreement ("CBA") with the International Brotherhood of Electrical Workers Local No. 357
6 ("Union"), in which Williams agreed to abide by the trust agreements establishing the respective
7 Trust Funds and any amendments thereto ("Trust Agreements").

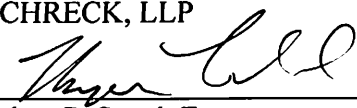
8 2. Under the CBA and the Trust Agreements, Williams is obligated to pay employee
9 benefit contributions to the Trust Funds on behalf of Williams's bargaining unit employees
10 represented by the Union.

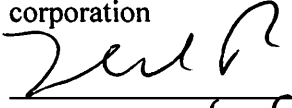
11 3. Based on a contract compliance review ("Audit") for the period of September 1,
12 2009, through May 31, 2012, Williams owes the Trust Funds \$32,785, which includes employee
13 benefit contributions, liquidated damages, interest, audit fees, and attorney's fees to date.

14 4. This Stipulated/Consent Judgment is entered into by and between Williams and the
15 Trust Funds for employee benefit contributions and related costs and fees owed to the Trust Funds
16 by ERISA.

17
18
19 Dated: ^{December} ~~November~~ 14, 2012

Dated: ^{Dec.} ~~November~~ 11, 2012

20 BROWNSTEIN HYATT FARBER
21 SCHRECK, LLP
22 
23 Adam P. Segal, Esq.
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25 Bryce C. Loveland, Esq.
26 100 North City Parkway, Suite 1600
27 Las Vegas, Nevada 89106-4614
28 Attorneys for Plaintiffs

WILLIAMS BROTHER, INC., a Nevada
corporation

Name: Michael Poeh
Title: President
Telephone: _____
Facsimile: _____

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JUDGMENT

Judgment is hereby entered against Williams Brother, Inc., a Nevada corporation and in favor of the Trustees of the Electrical Workers Health and Welfare Trust, Trustees of the Electrical Workers Pension Trust, and Trustees of the Las Vegas Electrical Joint Apprenticeship and Training Trust Fund in the amount of \$32,785.

Dated this 12th day of February, 2013.



U.S. DISTRICT COURT JUDGE

1 STATE OF NEVADA)
2 COUNTY OF CLARK) SS.


3 MICHAEL PECK, being first duly sworn, deposes and says:

4 That he/~~she~~ is the Pres. of Williams Brother, Inc., a Nevada corporation, and is
5 duly authorized to execute this document; that he/she has read the foregoing Stipulated/Consent
6 Judgment and knows the contents thereof; that the same is true of his/her own knowledge, except
7 for those matters therein stated on information and belief, and as to those matters he/she believes
8 them to be true.

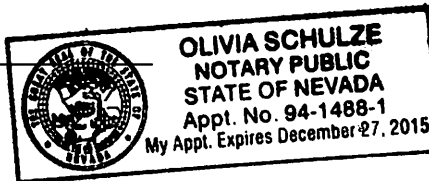
9 
10 _____
11 Affiant

12 Subscribed and Sworn to before me

13 this 14th day of Dec., 2012.

14 
15 - Notary Public -

16 My commission expires:



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