

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

International Union of Operating Engineers,)	
Local 399, AFL-CIO, <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 16-cv-2395
)	
v.)	Judge Matthew F. Kennelly
)	Magistrate Judge Susan E. Cox
Village of Lincolnshire, Illinois, <i>et al.</i> ,)	
)	
Defendants.)	

PLAINTIFF UNIONS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs International Union of Operating Engineers, Local 399, AFL-CIO, *et al.* (“Unions”), pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, move for Summary Judgment against Defendants Village of Lincolnshire, *et al.*, on the ground that there are no genuine issues of material fact and the Unions are entitled to judgment as a matter of law. This Motion is based on the pleadings to date, certifications, and documents produced in discovery, as well as the Unions’ Brief in Support of Summary Judgment.

WHEREFORE, for all the above-stated reasons, Plaintiffs International Union of Operating Engineers, Local 399, AFL-CIO, *et al.*, respectfully request the Court to enter summary judgment in their favor and against Defendants.

Dated: June 3, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on June 3, 2016, he electronically filed the foregoing ***Motion for Summary Judgment*** with the Clerk of Court using the CM/CM/ECF system, which sent notification to the following:

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