Exhibit B

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF ILLINOIS EASTERN DIVISION

BRIDGE STRUCTURAL AND REINFORCING IRON WORKERS)
LOCAL # 1,) Case No. 09 CV 3357
Plaintiffs,) Judge Kennelly
-V-)
LONNIE DANTZLER, individually and d/b/a)
D and B CONSTRUCTION.)
)
Defendant.)
NOTICE OF MO	OTION .

TO: Raymond Sanguinetti
111 East Wacker Drive, Suite #2600
Chicago, IL 60601

PLEASE TAKE NOTICE, that on 9:30 a.m., January 26, 2010 on or as soon thereafter ad counsel can be heard I shall appear before the Honorable Judge Matthew F. Kennelly or any judge who may be sitting in his stead in courtroom 2103, Dirkson Federal Building, 219 South Building, Street, Chicago, IL 60604, and present the attached Motion to Suspend Briefing Schedule, a copy of which was previously served upon you.

CERTIFICATE OF SERVICE

I, William E. Jamison, Jr., an attorney, state that on this 8th day of January 2010, he served this notice to the above addressee via the courts electronic notification system

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF ILLINOIS EASTERN DIVISION

BRIDGE STRUCTURAL AND REINFORCING IRON WORKERS LOCAL # 1,)) Case No. 09 CV 3357
Plaintiffs,	Judge Kennelly
-V -)
LONNIE DANTZLER, individually and d/b/a) ·
D and B CONSTRUCTION.)
)
Defendant.)

DEFENDANT'S MOTION TO SUSPEND BRIEFING SCHEDULE

- 1. That LONNIE DANTZLER d/b/a **D & B CONSTRUCTION**., (hereafter referred to collectively as "D&B"), is a small minority sole proprietorship owned and controlled by LONNIE DANTZLER.
- 2. The D&B is engaged in the business of construction contracting, concrete, and rebar and serves as general and subcontractor on various projects in the Chicago Area. D&B's contracts consist of small private contracts and some state and local projects.
- 3. That on December 26, 2006, D&B by and through Lonnie Dantzler agreed and executed a Compliance Agreement whereby D&B agreed to be bound by the terms of the Collective Bargaining Agreement with Bridge, Structural and Reinforcing Iron Workers Local Union No. 1.
- That the court entered a briefing schedule on plaintiff's Motion for Summary Judgment on October 1, 2009, which was amended on December 29, 2009, which provided Defendant's Response to be filed on by January 8, 2010.

- 5. That the parties have agreed to settle the matter, bringing the matter to final resolution.
- 6. The Agreement provides that the Defendant will produce a "bond" in the amount of \$50,000.00 within 14 days and pay to plaintiff the sum of Five Thousand (\$5,000.00) within ninety (90) days. Should defendant fail to procure a bond within fourteen days (14), defendant agrees to a consent judgment in the amount of \$50,000.00.

WHEREFORE, Defendant prays that this honorable court enter an order suspending the current briefing schedule and setting the matter for dismissal or judgment.

William E. Jamison, Jr.

Attorney for Defendant

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