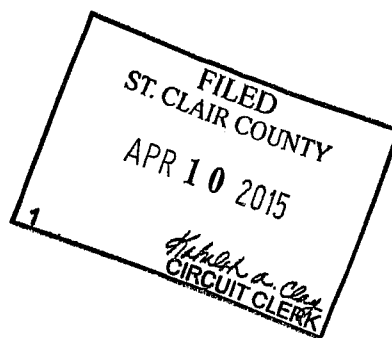


IN THE CIRCUIT COURT OF THE 20TH JUDICIAL CIRCUIT

ST. CLAIR COUNTY, ILLINOIS

Illinois AFL-CIO, et al., )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Bruce Rauner, Governor of the State of Illinois; )  
 Tom Tyrrell, Acting Director of the Illinois )  
 Department of Central Management Services; )  
 Illinois Department of Central Management )  
 Services; Leo Schmitz, Director of the Illinois )  
 State Police; and the Illinois State Police, )  
 )  
 Defendants. )

Case No. 15-CH-171



**AGREED ORDER**

This cause having come before the Court and the Court being duly advised in the premises and the parties being in agreement; It is hereby ordered:

1. Defendants will remit fair share fees and dues pending the resolution of this case. In exchange, Plaintiffs will not seek a TRO or Preliminary Injunction based upon the allegations in the Verified Complaint.
2. Defendants agree to transmit the correct payroll information to the Comptroller regarding gross earnings and appropriate fair share and dues deductions for employees covered by the collective bargaining agreements between Plaintiff Unions and the State.
3. Defendants will remit any fair share dues that were left in agency operating budgets pursuant to the Barclay Memorandum of March 17, 2015.
4. The parties waive any defense to the enforcement of the collective bargaining

agreements in this matter based on the failure to fully exhaust the grievance and arbitration procedures of their agreements under Section 16 of the Illinois Public Labor Relations Act, 5 ILCS 315/16. In the interests of clarity, the Defendants do not waive any other defense or claim. Plaintiffs agree to withdraw their current grievances without prejudice or precedent.

5. As set forth below, the parties agree to expedite resolution of claims in this litigation.

6. The parties agree to the following expedited schedule for the filing of responsive pleadings and dispositive motions.

a) Defendants will file an answer to the Verified Complaint by April 24, 2015;

b) The parties disagree about whether discovery is needed to resolve the issues in this case. Thus, Plaintiffs reserve the right to object to any and all discovery on all appropriate grounds, including relevance, privilege, abuse, or that the discovery imposes an undue burden and they reserve the right to seek a protective order if appropriate. The parties agree to meet and confer regarding discovery issues. This agreement does not indicate whether discovery is allowed or prohibited.

c) The parties will file dispositive motions by June 5, 2015;

d) The parties will respond to the dispositive motions by July 2, 2015;

e) Replies, if any, by July 17, 2015;

f) After the filing of responsive pleadings, the parties will appear before the Court in July 2015 to set a date for hearing on the dispositive motions.

SO ORDERED.

Dated: \_\_\_\_\_

4/10/15



\_\_\_\_\_  
Judge

---

Prepared by:

Matthew R. Ford (ARDC #6292833)  
BARTLIT BECK HERMAN PALENCHAR & SCOTT LLP  
54 W. Hubbard Street, Suite 300  
Chicago, Illinois 60654  
Phone: 312-494-4400  
Email: [matthew.ford@bartlit-beck.com](mailto:matthew.ford@bartlit-beck.com)

Stephen A. Yokich, Esq.  
ARDC No. 6181707  
Cornfield and Feldman LLP  
25 East Washington Street, Suite 1400  
Chicago, Illinois 60602-1803  
Phone: 312-236-7800  
Email: [syokich@cornfieldandfeldman.com](mailto:syokich@cornfieldandfeldman.com)