

**STATE OF ILLINOIS
DEPARTMENT OF LABOR**

In the Matter of:

Electrical Contractors' Association of City
Of Chicago and McWilliams Electric
Company

Objectors,

Chicago Journeymen Plumbers Local 130,
UA; Donald Finn, a member of the
International Brotherhood of Electrical
Workers, Local Union No. 134, AFL-CIO,
and the International Brotherhood of
Electrical Workers, Local Union No. 134,
AFL-CIO; Eastern Illinois Chapter of the
National Electrical Contractors
Association; Northeastern Illinois Chapter
of the National Electrical Contractors
Association & Homestead Electrical
Construction, LLC; John Ahlgrim, a
member and Director of Contract
Negotiations for the International Union
of Operating Engineers, Local 150,
AFL-CIO and the International Union of
Operating Engineers, Local 150,
AFL-CIO; Martin Flanagan, a member of
the Laborers' International Union of
North America Local 1 and the
Construction and General Laborers'
District Council of Chicago and Vicinity;
Mechanical Contractors Association of
Chicago & Illinois & Dahme Mechanical
Industries, Inc.; Piping Industry Council
of Rockford Area Incorporated & Miller
Engineering Company; Mechanical
Contractors Association, Eastern Iowa
/Western Illinois; Plumbing Contractors
Association of Greater Chicago & Terry
Plumbing; Sheet Metal and Air
Conditioning Contractors' National
Association of Greater Chicago, Westside
Mechanical Group, Inc. & Admiral
Heating & Ventilating, Inc.;

State File No.: 2027-H-CC08-2369

Chief Administrative Law Judge
Moshe M. Liberman

Petitioners,	)
	)
v.	)
	)
Jane R. Flanagan, Director of the Illinois	)
Department of Labor, The Illinois	)
Department of Labor,	)
	)
Respondents.	)

OBJECTORS’ MOTION FOR CONTINUANCE
UNOPPOSED BY THE ILLINOIS DEPARTMENT OF LABOR
AND THE DIRECTOR OF THE ILLINOIS DEPARTMENT OF LABOR

Objectors, the Electrical Contractors’ Association of the City of Chicago (“ECA”) and McWilliams Electric Company (“McWilliams”) (together, “Objectors”), by their attorneys, move for a continuance of approximately ninety (90) days of the hearing currently set for September 29, 2026. The Respondents do not oppose this Motion. In support, Objectors state as follows:

1. On August 14, 2026, Objectors filed written objections to the Department’s Cook County prevailing wage determination published on July 15, 2026. The objections were filed under Sections 4 and 9 of the Prevailing Wage Act, 820 ILCS 130/4 and 130/9 (the “Act”).

2. A pre-hearing conference was held on September 3, 2026, during which time the Objectors and Respondents agreed to a continuance of the September 25, 2026 hearing date in order to continue to explore dispute resolution. Since that time, the parties have engaged in ongoing discussions regarding a potential resolution.

3. Objectors respectfully request that proceedings be continued for an additional ninety (90) days (or such other date thereafter in consideration of the holiday season and the convenience of the Administrative Law Judge and the parties).

4. Good cause exists for the requested continuance. The additional time would allow the parties to continue to confer regarding the issues raised in the objections, including whether those issues may be narrowed, stipulated, or resolved without a contested hearing.

5. Counsel for Objectors conferred with counsel for Respondents, Stephanie Barton, via email on September 23, 2026. Respondents do not oppose the relief requested in this motion.

6. This motion is made in good faith and not for purposes of delay. Objectors do not believe any party would be prejudiced by the requested continuance.

WHEREFORE, Objectors respectfully request that the Administrative Law Judge grant this Motion for Continuance; continue proceedings set for September 29, 2026 for a period of ninety (90) days (or to another date thereafter convenient to the Administrative Law Judge and the parties in view of the holiday season); adjust any related pre-hearing deadlines accordingly; and grant such other relief as the Administrative Law Judge deems appropriate.

Dated: September 24, 2026

Respectfully submitted,

THE ELECTRICAL CONTRACTORS'
ASSOCIATION OF THE CITY OF CHICAGO and
McWILLIAMS ELECTRIC COMPANY

By: /s/ Caitlin Manganelli
One of Their Attorneys

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Attorneys for Objectors

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on September 24, 2026, she caused a copy of the foregoing Objectors' Motion for Continuance to be filed with the Illinois Department of Labor and served by electronic mail on the following:

Honorable Moshe M. Liberman Chief Administrative Law Judge Illinois Department of Labor Dol.hearings@illinois.gov	Jane Flanagan Director of the Illinois Department of Labor Illinois Department of Labor Jane.Flanagan@illinois.gov
Via Email: For Respondents: Stephanie Barton, Esq. Deputy Counsel Stephanie.Barton@illinois.gov Sean Imbrugia, Esq. Staff Attorney Sean.Imbrugia@Illinois.gov Illinois Department of Labor	Via Email: For Objectors: Brian Stolzenbach bstolzenbach@seyfarth.com Joshua Ditelberg jditelberg@seyfarth.com Caitlin Manganelli cmanganelli@seyfarth.com Seyfarth Shaw LLP
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/s/ Caitlin E. Manganelli
Caitlin E. Manganelli