

FILED  
8/27/2024 2:32 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2024CH08067  
Calendar, 15  
29125416

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

THE PEOPLE OF THE STATE OF  
ILLINOIS, *ex rel.* KWAME RAOUL,  
Attorney General of Illinois,

Plaintiff,

vs.

TBJ DRYWALL & TAPING, INC., ANA  
PULIDO and ELISEO PULIDO

Defendants.

Case No. 2024 CH 08067

**PLAINTIFF’S UNOPPOSED MOTION FOR ORDER APPROVING CONSENT  
DECREE**

Plaintiff, the People of the State of Illinois, by Kwame Raoul, Attorney General of Illinois, moves without opposition for an order approving the Consent Decree attached as Exhibit 1 to this Motion, which resolves all claims pleaded in the Complaint attached as Exhibit 2.

1. The Attorney General filed a complaint against TBJ Drywall & Taping, Inc, Eliseo Pulido, and Ana Pulido. (collectively, “Defendants”), alleging that Defendants failed to pay their employees premium overtime wages for time worked in excess of forty hours per week in violation of the Illinois Minimum Wage Law (“IMWL”), 820 ILCS 105/1 *et seq* and misclassified employees as independent contractors in violation of the Employee Classification Act, 820 ILCS 185/1 *et seq*.

2. The parties have now engaged in comprehensive negotiations, culminating in a multi-day mediation and arm’s length bargaining before an experienced mediator. The parties have reached a settlement agreement to resolve all claims. The terms of the settlement are memorialized in the proposed Consent Decree attached as Exhibit 1.

3. Plaintiff requests the Court to approve the proposed Consent Decree attached as Exhibit 1 to this Motion. The Consent Decree provides for Defendants to make a total payment of \$718,000 to a settlement fund to resolve the Attorney General's claims against them. A third-party claims administrator will issue notice to 482 employees listed in Exhibit A to the Consent Decree via mail and email, and the employees will be invited to submit a claim form to receive their apportioned settlement payments. If any employees cannot be located 90 days before April 10, 2028, their shares will be held by the Illinois Department of Labor after the fund closes.

4. The individual settlement payments will be calculated based on the claimant percentages listed in Exhibit A of the Consent Decree. Plaintiff derived these percentages from time and pay records produced by Defendants and obtained from other sources. Each claimant's award will equate to their owed overtime wages dating to January 1, 2018. Additionally, Defendants have agreed to implement rigorous record-keeping practices outlined in the Consent Decree and to submit themselves to auditing by the Attorney General to prevent any future violations of the IMWL and ECA.

5. The settling parties believe they were fully aware and adequately informed of all facts necessary to evaluate the case for settlement and believe the settlement reached in this matter is a good outcome for the affected employees. The parties reached the settlement embodied in this Consent Decree after a multi-day mediation and arm's length bargaining before an experienced mediator, having given due consideration as to the risks, potential damages, costs, time, and resources, the claims and defenses asserted, and the relative strengths in the claims and defenses. The parties believe the terms of the settlement are fair and reasonable.

6. All parties have agreed to the terms of the Consent Decree, as evidenced by their signatures thereon. Entry of the Consent Decree will dispose of the claims raised against

Defendants in the Complaint and all those claims that could have been alleged based on the facts in the Complaint and will most efficiently further the ends of justice in this case. Plaintiff accordingly moves, without opposition, for the Court to approve and enter the Consent Decree.

For these reasons, Plaintiff respectfully requests that the Court enter an order (a) granting Plaintiff leave to file the proposed Complaint instanter and (b) approving and entering the Consent Decree resolving this case.

Respectfully Submitted:

THE PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* KWAME RAOUL,  
Attorney General of Illinois

Dated: August 27, 2024

By: /s/ Jack Cramer  
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