

BEFORE THE LABOR AND INDUSTRIAL RELATIONS COMMISSION  
STATE OF MISSOURI

In the Matter of:

Objection No. 122-237

To the Occupational Title of "Electrician (Outside-Line Construction/Lineman)"

**MOTION TO INTERVENE**

COME NOW Intervenors, Sheet Metal Workers Local No. 36 and Sheet Metal Workers Local No. 2, and as grounds for their intervention, state as follows:

1. Intervenors, Sheet Metal Workers Local No. 36 and Sheet Metal Workers Local No. 2 ("Sheet Metal Workers"), are unincorporated associations representing members who perform work in the construction trades and specifically under the Occupational Title of "Sheet Metal Worker" throughout the State of Missouri of the type covered by Section 290.210 RSMo., et seq. (the "Missouri Prevailing Wage Law"). These individual Union members perform work of the type at issue in this Objection on a regular basis. Through well-established precedent, the Objectors have historically been permitted to represent the interests of their members before the Labor and Industrial Relations Commission, as have other unincorporated associations, on matters of Objections to proposed Annual Wage Orders. Therefore, Intervenors are interested parties pursuant to §290.210 RSMo., *et seq.*

WHEREFORE, Intervenors respectfully request authority and permission to intervene in this matter.

**FILED**

MAY 11 2012

LABOR AND INDUSTRIAL  
RELATIONS COMMISSION

Respectfully Submitted,

BARTLEY GOFFSTEIN, L.L.C.



Jeffrey E. Hartnett, No. 27481

Ronald C. Gladney, No. 28160

James R. Kimmey, No. 51148

4399 Laclede Ave.

St. Louis, MO 63108

(314) 531-1054

(314) 531-1131

Attorneys For Intervenor

**CERTIFICATE OF SERVICE**

THE UNDERSIGNED hereby certifies that the foregoing "Motion To Intervene" was served on Michael E. Amash, Esq., Blake & Uhlig, P.A., 753 Stave Ave., Suite 475, Kansas City, KS 66101, by placing same, postage pre-paid in the U.S. Mails, on this 11 day of May, 2012.



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**MOTION TO INTERVENE**

COMES NOW Intervenor Plumbers and Pipe Fitters Local Union 562, and as grounds for its intervention, states as follows:

1. Intervenor, Plumbers and Pipe Fitters Local Union 562 ("Local No. 562"), is an unincorporated association representing members who perform work in the construction trades and specifically under the Occupational Titles of "Plumber" and "Pipe Fitter" throughout the Eastern half of the State of Missouri of the type covered by Section 290.210 RSMo., et seq. (the "Missouri Prevailing Wage Law"). These individual Union members perform work of the type at issue in this Objection on a regular basis. Through well-established precedent, the Objector has historically been permitted to represent the interests of its members before the Labor and Industrial Relations Commission, as have other unincorporated associations, on matters of Objections to proposed Annual Wage Orders. Therefore, Intervenor is an interested party pursuant to §290.210 RSMo., *et seq.*

WHEREFORE, Intervenor respectfully requests authority and permission to intervene in this matter.

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**MOTION TO INTERVENE**

COMES NOW Intervenor International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, Local No. 396, and as grounds for its intervention, states as follows:

1. Intervenor, Intervenor International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, Local No. 396 ("Local No. 396"), is an unincorporated association representing members who perform work in the construction trades and specifically under the Occupational Title of "Ironworker" throughout the Eastern half of the State of Missouri of the type covered by Section 290.210 RSMo., et seq. (the "Missouri Prevailing Wage Law"). These individual Union members perform work of the type at issue in this Objection on a regular basis. Through well-established precedent, the Objector has historically been permitted to represent the interests of its members before the Labor and Industrial Relations Commission, as have other unincorporated associations, on matters of Objections to proposed Annual Wage Orders. Therefore, Intervenor is an interested party pursuant to §290.210 RSMo., et seq.

WHEREFORE, Intervenor respectfully requests authority and permission to intervene in this matter.

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