

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

LABORERS' PENSION FUND and
LABORERS' WELFARE FUND OF THE
HEALTH AND WELFARE DEPARTMENT
OF THE CONSTRUCTION AND GENERAL
LABORERS' DISTRICT COUNCIL OF
CHICAGO AND VICINITY, JAMES S.
JORGENSEN, Administrator of the Funds,

Plaintiffs,

v.

WILL COUNTY RECYCLING, INC.,

Defendants.

Case No. 08 C 3586

Judge Manning

AFFIDAVIT OF KAREN I. ENGELHARDT

STATE OF ILLINOIS
COUNTY OF COOK

Karen I. Engelhardt being first duly sworn on oath, deposes and states as follows:

1. I am an attorney and a shareholder at the law firm of Allison, Slutsky & Kennedy, P.C., counsel for plaintiffs Laborers' Pension Fund and Laborers' Welfare Fund of the Health and Welfare Department of the Construction and General Laborers' District Council of Chicago and Vicinity (the "Laborers' Funds") in the action against Will County Recycling, Inc. This affidavit is submitted to document attorneys' fees and costs incurred by the Laborers' Funds for work performed in connection with obtaining contributions owed for the period from May 22, 2008 to the present.

2. This firm bills the Laborers Funds on an hourly basis for services rendered to the Funds, at a rate of \$175.00 per hour for shareholders, \$150.00 per hour for associates, and \$75.00 per hour for clerks/paralegals. In this cause records kept for legal work on this matter were kept

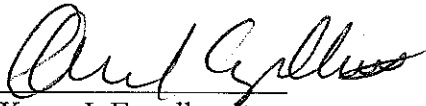
Exhibit C

contemporaneously and are attached hereto as Exhibit 1.

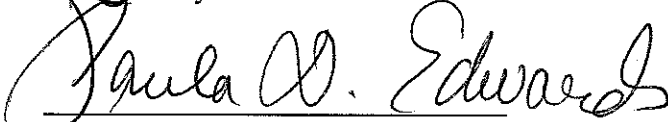
3. Exhibit 1 hereto sets forth the time expended from May 22, 2008 through November 5, 2008, by the firm's attorneys and paralegals in this matter. As set forth in that Exhibit, the Laborers' Funds have incurred legal fees to my firm in this matter in the amount of \$1,690.00.

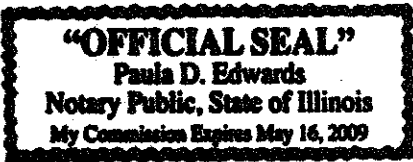
4. In addition, the Laborers Funds have incurred the following costs in the prosecution of this matter totaling \$420.00, which include \$350.00 in filing fees and \$70.00 in service fees.

FURTHER AFFIANT SAYETH NOT.

  
Karen I. Engelhardt

Subscribed and sworn to before me  
this 5th day of November 2008.

  
NOTARY PUBLIC



Selection Criteria

Slip Classification Open  
 Clie.Selection Include: Labrs P&W 1  
 Refe.Selection Include: Will County Recycling  
 Slip.Date 5/22/2008 - 11/5/2008

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
154378	TIME			K. Engelhardt	0.10	175.00	17.50
	5/22/2008			Legal Services	0.00	C@1	
	Billed	G:14688	6/11/2008	Labrs P&W 1	0.00		
	Call w/ J. Gilleran			Will County Re	0.00		
154448	TIME			K. Engelhardt	0.10	175.00	17.50
	5/23/2008			Legal Services	0.00	C@1	
	Billed	G:14688	6/11/2008	Labrs P&W 1	0.00		
	Reports to Trustees			Will County Re	0.00		
155741	TIME			K. Engelhardt	0.10	175.00	17.50
	6/19/2008			Legal Services	0.00	C@1	
	Billed	G:14729	7/22/2008	Labrs P&W 1	0.00		
	Call w/ J. Mashos			Will County Re	0.00		
156036	TIME			Andre Smith	1.00	75.00	75.00
	6/19/2008			Legal Services	0.00	C@3	
	Billed	G:14729	7/22/2008	Labrs P&W 1	0.00		
	Prepare Case: Sumons, appearance, civil cover sheet, exhibit labels and scan documents			Will County Re	0.00		
155759	TIME			K. Engelhardt	0.60	175.00	105.00
	6/20/2008			Legal Services	0.00	C@1	
	Billed	G:14729	7/22/2008	Labrs P&W 1	0.00		
	Call w/ J.Gilleran; draft complaint			Will County Re	0.00		
156483	TIME			K. Engelhardt	0.50	175.00	87.50
	7/1/2008			Legal Services	0.00	C@1	
	Billed	G:14746	8/13/2008	Labrs P&W 1	0.00		
	Letter to Connolly, Ayala			Will County Re	0.00		
157106	TIME			Josiah Groff	1.30	150.00	195.00
	7/15/2008			Legal Services	0.00	C@2	
	Billed	G:14746	8/13/2008	Labrs P&W 1	0.00		
	Review file; prepare affidavit of compliance; letter to C. Bretz			Will County Re	0.00		
157134	TIME			Josiah Groff	0.40	150.00	60.00
	7/18/2008			Legal Services	0.00	C@2	
	Billed	G:14746	8/13/2008	Labrs P&W 1	0.00		

11/5/2008  
12:00 PM

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Slip Listing

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
		Mail out affidavit of compliance; receive affidavit of service from JAS	Will County Re	0.00	
157295	TIME	K. Engelhardt	0.10	175.00	17.50
7/23/2008		Legal Services	0.00	C@1	
Billed	G:14746	8/13/2008	Labrs P&W 1	0.00	
Email w/ D. Ayala		Will County Re	0.00		
158037	TIME	Josiah Groff	0.10	150.00	15.00
8/12/2008		Legal Services	0.00	C@2	
Billed	G:14764	9/11/2008	Labrs P&W 1	0.00	
Call w/C. Bretz		Will County Re	0.00		
158422	TIME	Josiah Groff	1.00	150.00	150.00
8/21/2008		Legal Services	0.00	C@2	
Billed	G:14764	9/11/2008	Labrs P&W 1	0.00	
Work on motion to compel		Will County Re	0.00		
159013	TIME	Josiah Groff	1.30	150.00	195.00
9/4/2008		Legal Services	0.00	C@2	
Billed	G:14793	10/10/2008	Labrs P&W 1	0.00	
Court appearance		Will County Re	0.00		
159029	TIME	Josiah Groff	0.10	150.00	15.00
9/5/2008		Legal Services	0.00	C@2	
Billed	G:14793	10/10/2008	Labrs P&W 1	0.00	
update reports		Will County Re	0.00		
159288	TIME	K. Engelhardt	0.10	175.00	17.50
9/8/2008		Legal Services	0.00	C@1	
Billed	G:14793	10/10/2008	Labrs P&W 1	0.00	
Report to Trustees		Will County Re	0.00		
159071	TIME	Josiah Groff	0.40	150.00	60.00
9/9/2008		Legal Services	0.00	C@2	
Billed	G:14793	10/10/2008	Labrs P&W 1	0.00	
Review court order; search for service address in old file; conf. w/KIE re service		Will County Re	0.00		
159112	TIME	Josiah Groff	0.30	150.00	45.00
9/10/2008		Legal Services	0.00	C@2	
Billed	G:14793	10/10/2008	Labrs P&W 1	0.00	
Call and fax from CIS; letter to Phil		Will County Re	0.00		
159311	TIME	Josiah Groff	0.20	150.00	30.00
9/15/2008		Legal Services	0.00	C@2	
Billed	G:14793	10/10/2008	Labrs P&W 1	0.00	
Call w/P. Ducar; review file from previous case for audit		Will County Re	0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time	Rate Rate Info	Slip Value
						Est. Time	Bill Status	
						Variance		
159344	TIME			Josiah Groff		0.60	150.00	90.00
	9/16/2008			Legal Services		0.00	C@2	
	Billed	G:14793	10/10/2008	Labrs P&W 1		0.00		
	Call w/J. Mashos; call w/Levinson; letters to Levinson and R. Pruim			Will County Re		0.00		
159367	TIME			Josiah Groff		0.10	150.00	15.00
	9/17/2008			Legal Services		0.00	C@2	
	Billed	G:14793	10/10/2008	Labrs P&W 1		0.00		
	Receive affidavit from P. Ducar			Will County Re		0.00		
159762	TIME			Josiah Groff		0.10	150.00	15.00
	9/18/2008			Legal Services		0.00	C@2	
	Billed	G:14793	10/10/2008	Labrs P&W 1		0.00		
	Call w/R. Pruim			Will County Re		0.00		
160644	TIME			Josiah Groff		0.10	150.00	15.00
	10/1/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Calls w/auditor and court deputy			Will County Re		0.00		
160952	TIME			Josiah Groff		0.10	150.00	15.00
	10/13/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Get copy of complaint for J. Mashos			Will County Re		0.00		
161011	TIME			Josiah Groff		0.10	150.00	15.00
	10/15/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Call w/J. Farmer, LSS auditor			Will County Re		0.00		
161127	TIME			Josiah Groff		0.10	150.00	15.00
	10/20/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Call w/auditor			Will County Re		0.00		
161366	TIME			Josiah Groff		0.10	150.00	15.00
	10/22/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Call w/J. Farmer			Will County Re		0.00		
161389	TIME			Josiah Groff		0.20	150.00	30.00
	10/27/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Calls w/J. Farmer and J. Gilleran			Will County Re		0.00		
161619	TIME			Josiah Groff		0.10	150.00	15.00
	10/29/2008			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Call w/J. Gilleran and court clerk			Will County Re		0.00		

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
161635	TIME	Josiah Groff	1.10	150.00	165.00
10/30/2008		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Prepare motion for damages		Will County Re	0.00		
161894	TIME	Josiah Groff	0.10	150.00	15.00
11/4/2008		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Prepare affidavit for J. Gilleran		Will County Re	0.00		
161896	TIME	Josiah Groff	1.00	150.00	150.00
11/5/2008		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Prepare and file motion for damages		Will County Re	0.00		
<b>Grand Total</b>					
		Billable	11.50		1690.00
		Unbillable	0.00		0.00
		Total	11.50		1690.00