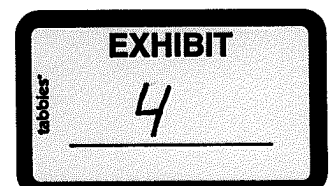


**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES of the PLUMBERS)	
LOCAL UNION NO. 93 U.A.;)	
BOARD OF TRUSTEES of the PLUMBERS)	CIVIL ACTION
LOCAL UNION NO. 93 U.A. RETIREMENT)	
ACCOUNT FUND;)	
BOARD OF TRUSTEES of the PLUMBERS)	NO: 08 CV 3672
LOCAL UNION NO. 93 U.A. PENSION FUND;)	
BOARD OF TRUSTEES of the PLUMBERS)	
LOCAL UNION NO. 93 U.A. HEALTH AND)	JUDGE: LEFKOW
WELFARE FUND;)	
BOARD OF TRUSTEES of the JOINT)	
APPRENTICESHIP COMMITTEE FUND of the)	MAGISTRATE
PLUMBING & HEATING INDUSTRY OF LAKE)	JUDGE: SCHENKIER
AND McHENRY COUNTIES; and)	
The INDUSTRY ADVANCEMENT FUND;)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MANNION PLUMBING, INC.,)	
an Illinois Corporation,)	
)	
Defendant.)	
)	

**AFFIDAVIT OF WILLIAM P. CALLINAN
IN SUPPORT OF ATTORNEY'S FEES AND COSTS**

I, William P. Callinan, hold the title of Associate Attorney at the law firm of Johnson & Krol, LLC. Being first duly sworn, on oath deposes and states that to the best of my knowledge, the following is an accurate statement as to the attorney's fees and costs the Plaintiffs have incurred in the above-captioned matter:



Selection Criteria

Refe.Selection Include: Mannion Plumbing

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity	Client Reference	Units DNB Time	Rate Rate Info	Slip Value
						Est. Time Variance	Bill Status	
27131	2/11/2008	TIME		JEM	JEM	0.17	210.00	35.70
	Billed	G:11602	2/20/2008	tc	93 TF	0.00	T@1	
	Telephone conf. re: collection referral.			Mannion Plumbing		0.00		
27134	2/12/2008	TIME		JEM	JEM	0.50	210.00	105.00
	Billed	G:11602	2/20/2008	Research	93 TF	0.00	T@1	
	Search: IL SOS Corp.; Draft demand letter to contractor.			Mannion Plumbing		0.00		
27567	2/27/2008	TIME		JEM	JEM	0.33	210.00	69.30
	Billed	G:11637	3/18/2008	Review	93 TF	0.00	T@1	
	Review correspondence from contractor; Conf. w/Jenn.			Mannion Plumbing		0.00		
27576	2/28/2008	TIME		JEM	JEM	0.17	210.00	35.70
	Billed	G:11637	3/18/2008	tc	93 TF	0.00	T@1	
	Telephone conf. w/contractor.			Mannion Plumbing		0.00		
28062	3/13/2008	TIME		JLS	JLS	0.75	185.00	138.75
	Billed	G:11637	3/18/2008	Draft	93 TF	0.00	T@1	
	Draft settlement agreement; Calculated delinquencies			Mannion Plumbing		0.00		
28068	3/14/2008	TIME		JLS	JLS	0.50	185.00	92.50
	Billed	G:11637	3/18/2008	Continue	93 TF	0.00	T@1	
	Continue drafting settlement and security agreement.			Mannion Plumbing		0.00		
28411	3/18/2008	TIME		JLS	JLS	0.75	185.00	138.75
	Billed	G:11676	4/18/2008	Edit	93 TF	0.00	T@1	
	Edits to settlement & security agreement; Factor in attorney fees.			Mannion Plumbing		0.00		
28248	3/19/2008	TIME		JEM	JEM	0.83	210.00	174.30
	Billed	G:11676	4/18/2008	Review	93 TF	0.00	T@1	
	Review settlement agreement for Jenn; Review Security Agreement for JLS; Review amortization schedule; Conf. w/Jenn.			Mannion Plumbing		0.00		

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status	Description	Activity	DNB Time	Rate Info	
		Client	Est. Time	Bill Status	
		Reference	Variance		
28431	TIME	JLS	0.67	185.00	123.95
3/20/2008		Edit	0.00	T@1	
Billed	G:11676	4/18/2008 93 TF	0.00		
	Edits to settlement and security agreement; Edit delinquency report; Letter to party with agreement.		0.00		
28457	TIME	JLS	0.33	185.00	61.05
3/21/2008		Edit	0.00	T@1	
Billed	G:11676	4/18/2008 93 TF	0.00		
	Edit security agreement; Draft letter/agreements to party.		0.00		
28200	TIME	JEM	0.33	210.00	69.30
4/4/2008		tc w/contrac	0.00	T@1	
Billed	G:11676	4/18/2008 93 TF	0.00		
	Tel. conf. with contractor		0.00		
29103	TIME	JEM	0.17	210.00	35.70
4/18/2008		tc client	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
	Tel. conf. with fund office.		0.00		
29104	TIME	JEM	0.17	210.00	35.70
4/18/2008		tc w/contrac	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
	telephone conference with contractor		0.00		
29619	TIME	JEM	0.17	210.00	35.70
5/6/2008		Correspondence	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
	Correspondence with Fund Office via email		0.00		
29618	TIME	JEM	0.17	210.00	35.70
5/6/2008		tc w/contrac	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
	Tel. call to contractor		0.00		
29639	TIME	JEM	0.17	210.00	35.70
5/7/2008		tc client	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
	Tel. call to Fund Office		0.00		
29937	TIME	JEM	0.50	210.00	105.00
5/14/2008		letter	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
	Letter to client Re: status of case		0.00		
30308	TIME	JEM	0.17	210.00	35.70
5/22/2008		Conference	0.00	T@1	
Billed	G:11736	6/18/2008 93 TF	0.00		
	Conference with WPC Re: filing suit		0.00		

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
30537	JEM	0.17	210.00	35.70
6/2/2008	Review	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Review Delinquency Report from Fund Office	Mannion Plumbing	0.00		
30539	JEM	0.17	210.00	35.70
6/2/2008	Correspondence	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Correspondence with Fund office Office via e-mail	Mannion Plumbing	0.00		
30569	JEM	0.67	210.00	140.70
6/3/2008	letter	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Letter to contractor; fax to contractor	Mannion Plumbing	0.00		
30568	JEM	0.33	210.00	69.30
6/3/2008	tc w/contrac	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Tel. conf. with contractor	Mannion Plumbing	0.00		
30687	JEM	0.17	210.00	35.70
6/5/2008	Review	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Review correspondence	Mannion Plumbing	0.00		
30674	JEM	1.00	210.00	210.00
6/5/2008	Revise	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Review currentdelinquency;Revisions to Settlement and Security Agreement	Mannion Plumbing	0.00		
30662	JEM	0.17	210.00	35.70
6/5/2008	tc w/contrac	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Tel. conf. with contractor	Mannion Plumbing	0.00		
30691	JEM	0.50	210.00	105.00
6/6/2008	letter	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Letter to contractor Re: personal liability on Settlement Agreement; fax to contractor	Mannion Plumbing	0.00		
30692	JEM	0.67	210.00	140.70
6/6/2008	Prepare	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Prepare and revise Settlement and Security Agreements and Amortization Schedule	Mannion Plumbing	0.00		
30693	JEM	0.33	210.00	69.30
6/6/2008	letter	0.00	T@1	
Billed	G:11736 6/18/2008 93 TF	0.00		
Letter to contractor with Settlement and Security Agreements	Mannion Plumbing	0.00		

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status	Description	Activity Client Reference	DNB Time Est. Time Variance	Rate Info Bill Status	
30701	TIME	JEM	0.33	210.00	69.30
6/6/2008		Correspondence	0.00	T@1	
Billed	G:11736	6/18/2008 93 TF	0.00		
	Correspondence with Fund Office via e-mail; review updated delinquency report		0.00		
30688	TIME	WPC	0.33	185.00	61.05
6/6/2008		Review	0.00	T@1	
Billed	G:11736	6/18/2008 93 TF	0.00		
	Review settlement agreement Conference with JEM		0.00		
31442	TIME	JEM	1.00	210.00	210.00
6/25/2008		Draft	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Draft and prepare Complaint		0.00		
31441	TIME	JEM	0.17	210.00	35.70
6/25/2008		Correspondence	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Correspondence with Fund office via email		0.00		
31529	TIME	JEM	1.00	210.00	210.00
6/26/2008		Prepare	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Prepare Exhibits, Summons, Civil Cover Sheet and Appearances		0.00		
31530	TIME	JEM	0.17	210.00	35.70
6/26/2008		Review	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Review Complaint		0.00		
31501	TIME	JEM	0.33	210.00	69.30
6/26/2008		tc client	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Tel. conf. with fund office x 2		0.00		
31528	TIME	JEM	0.50	210.00	105.00
6/26/2008		filing	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Scan and e-file Complaint with Court		0.00		
31544	TIME	Clerk - JAK	0.33	80.00	26.40
6/27/2008	9:06 AM	Prepare	0.00	T@1	
Billed	G:11780	7/21/2008 93 TF	0.00		
	Prepare summons and complaint for service; draft letter to process server with instructions for service.		0.00		
31875	EXP	J&K	1	60.00	60.00
7/8/2008		Process Service			
Billed	G:11780	7/21/2008 93 TF			
	Process Service Fee to Mannion Plumbing on 7/8/08				

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client	Reference	Units	DNB Time	Est. Time	Variance	Rate	Rate Info	Bill Status	Slip Value
31860	TIME			Clerk - JAK				0.25				80.00			20.00
	7/9/2008		9:42 AM		Court file			0.00					T@1		
	Billed	G:11780		7/21/2008	93 TF			0.00							
			Court Filing; summons returned executed; prepare document for filing.	Mannion Plumbing				0.00							
32562	TIME			WPC				1.00				195.00			195.00
	7/25/2008				Draft			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Review File and Complaint	Mannion Plumbing				0.00							
			Draft Motion for Default Judgment												
32563	TIME			WPC				0.83				195.00			161.85
	7/25/2008				Draft			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Draft Proposed Order for Default Judgment and Draft Notice of Motion for Default Judgment	Mannion Plumbing				0.00							
32637	TIME			JEM				0.33				225.00			74.25
	7/29/2008				Review			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Review Motion for Entry of Default Judgment for WPC	Mannion Plumbing				0.00							
32643	TIME			WPC				0.33				195.00			64.35
	7/29/2008				Revise			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Revisions to Motion and Order	Mannion Plumbing				0.00							
32644	TIME			WPC				0.67				195.00			130.65
	7/29/2008				Scan			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Gather Exhibits	Mannion Plumbing				0.00							
			Scan & e-file Motion, Order and Notice of Motion												
32667	TIME			WPC				0.83				195.00			161.85
	7/29/2008				Review			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Review correspondence from Contractor	Mannion Plumbing				0.00							
			Conference with JEM												
			Draft letter in response to Contractor regarding default judgment												
32725	TIME			WPC				0.17				195.00			33.15
	7/30/2008				Review			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Review correspondence from Court	Mannion Plumbing				0.00							
32732	TIME			JEM				0.17				225.00			38.25
	7/31/2008				Conference			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Conference with WPC	Mannion Plumbing				0.00							
32771	TIME			WPC				0.33				195.00			64.35
	7/31/2008				Conference			0.00					T@1		
	Billed	G:11814		8/19/2008	93 TF			0.00							
			Conference with JEM regarding Motion for Default	Mannion Plumbing				0.00							

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
Telephone conference with Contractor regarding Continuance							
32838	TIME			JEM	0.17	225.00	38.25
	8/4/2008			Conference	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Conference with WPC Re: status of case	Mannion Plumbing	0.00		
32815	TIME			WPC	0.50	195.00	97.50
	8/4/2008			tc	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Telephone conference with Contractor regarding suit	Mannion Plumbing	0.00		
32836	TIME			WPC	0.17	195.00	33.15
	8/4/2008			Conference	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Conference with JEM	Mannion Plumbing	0.00		
32910	TIME			Clerk - JAK	0.33	80.00	26.40
	8/6/2008	11:30 AM		Review	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Review denial of default judgment motion. Email to process server with request for free service.	Mannion Plumbing	0.00		
32935	TIME			WPC	0.50	195.00	97.50
	8/6/2008			Review	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Review correspondence from Court Conference with JEM and JAK regarding Motion for Default and service	Mannion Plumbing	0.00		
33102	TIME			JEM	0.33	225.00	74.25
	8/8/2008			Conference	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Conference with JAK Re: service attempts	Mannion Plumbing	0.00		
33040	TIME			WPC	0.17	195.00	33.15
	8/8/2008			tc	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Telephone conference with Fund office	Mannion Plumbing	0.00		
33202	TIME			WPC	0.17	195.00	33.15
	8/12/2008			tc	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Telephone conference with Contractor	Mannion Plumbing	0.00		
33248	TIME			WPC	0.33	195.00	64.35
	8/13/2008			Review	0.00	T@1	
	Billed	G:11814	8/19/2008	93 TF	0.00		
			Review delinquency calculations Telephone conference with Milara at the fund office Telephone conference with Contractor	Mannion Plumbing	0.00		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client	Reference	Units	DNB Time	Rate	Rate Info	Slip Value
								Est. Time	Variance	Bill Status		
33365	8/18/2008		Court Filing: summons returned executed.	Clerk - JAK	Court file			0.17		80.00	T@1	13.60
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
33709	8/27/2008		Revisions to Default Judgment Motion	WPC	Revise			1.00		195.00	T@1	195.00
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
			Revisions to Default Judgment Order									
33710	8/27/2008		Telephone conference with Fund office regarding missing june and july contributions	WPC	tc			0.17		195.00	T@1	33.15
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
33851	9/2/2008		Draft Notice of Motion	WPC	Revise			0.50		195.00	T@1	97.50
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
			Revisions to Default Judgment									
			Gather Exhibits									
33963	9/4/2008		Scan & e-file Motion for Default Judgment and Exhibits	WPC	Scan			0.67		195.00	T@1	130.65
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
			Scan and e-file Notice of Motion									
33962	9/4/2008		Court Appearance	WPC	Court			1.00		195.00	T@1	195.00
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
34326	9/12/2008		Telephone call with Contractor regarding Default Motion	WPC	tc			0.33		195.00	T@1	64.35
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
			Conference with JEM									
34411	9/15/2008		Tel. conf. with fund office.	JEM	tc client			0.17		225.00	T@1	38.25
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				
34447	9/16/2008		Court Appearance	JEM	Court			2.00		225.00	T@1	450.00
	9:18 AM							0.00				
	Billed	G:11858		93 TF				0.00				
				Mannion Plumbing				0.00				

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status	Description	Activity	DNB Time	Rate Info	
		Client	Est. Time	Bill Status	
		Reference	Variance		
34476	TIME	WPC	0.33	195.00	64.35
	9/17/2008	Conference	0.00	T@1	
	WIP	93 TF	0.00		
	Conference with JEM regarding Contractor	Mannion Plumbing	0.00		
34533	TIME	JEM	0.17	225.00	38.25
	9/18/2008	Conference	0.00	T@1	
	WIP	93 TF	0.00		
	Conference with WPC	Mannion Plumbing	0.00		
34619	TIME	WPC	0.17	195.00	33.15
	9/19/2008	tc	0.00	T@1	
	WIP	93 TF	0.00		
	Telephone conference with Contractor regarding stipulated judgment	Mannion Plumbing	0.00		
34817	TIME	WPC	0.17	195.00	33.15
	9/25/2008	tc	0.00	T@1	
	WIP	93 TF	0.00		
	Telephone conference with Contractor regarding Default Judgment Motion	Mannion Plumbing	0.00		
34979	TIME	WPC	0.17	195.00	33.15
	9/30/2008	tc	0.00	T@1	
	WIP	93 TF	0.00		
	Telephone conference with Contractor regarding Default Motion	Mannion Plumbing	0.00		
35778	TIME	WPC	0.33	195.00	64.35
	10/21/2008	Update	0.00	T@1	
	WIP	93 TF	0.00		
	Updates to proposed order for Default Judgment	Mannion Plumbing	0.00		
35779	TIME	WPC	1.00	195.00	195.00
	10/21/2008	Court	0.00	T@1	
	WIP	93 TF	0.00		
	Court Appearance for Default Motion	Mannion Plumbing	0.00		
35975	TIME	Clerk - JAK	0.17	80.00	13.60
	10/28/2008 9:41 AM	Draft	0.00	T@1	
	WIP	93 TF	0.00		
	Draft email to process server with instructions for service of default order.	Mannion Plumbing	0.00		
36079	TIME	Clerk - JAK	0.17	80.00	13.60
	10/30/2008	Calculate	0.00	T@1	
	WIP	93 TF	0.00		
	Calculate: due date for Mannion to respond to order served on her and calendar information.	Mannion Plumbing	0.00		
36248	TIME	WPC	0.17	195.00	33.15
	11/4/2008	Receipt	0.00	T@1	
	WIP	93 TF	0.00		
	Receipt and review correspondence from Fund office Conference with JEM	Mannion Plumbing	0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
36241	TIME	JEM	0.17	225.00	38.25
11/4/2008		Review	0.00	T@1	
WIP		93 TF	0.00		
Review correspondence from fund office		Mannion Plumbing	0.00		
36327	TIME	WPC	0.33	195.00	64.35
11/6/2008		tc	0.00	T@1	
WIP		93 TF	0.00		
Telephone conference with Milan regarding delinquencies of Contractor		Mannion Plumbing	0.00		
Fax contributions reports to Fund office					
Grand Total					
		Billable	32.13		6407.00
		Unbillable	0.00		0.00
		Total	32.13		6407.00

Total Attorneys' Fees to Date = \$6,407.00

GRAND TOTAL = \$6,407.00

Further, the affiant saith not.

Subscribed and sworn
Before me this 9th day of
November, 2008.

Nancy Gonzalez
Notary Public

William P. Callinan
Mr. William P. Callinan

