

EXHIBIT C

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

JAMES T. SULLIVAN, etc., et al.,)	
)	
Plaintiffs,)	No. 08 C 5907
)	
v.)	Judge David H. Coar
)	
THOMAS BUELL d/b/a)	Magistrate Judge Morton Denlow
CROSS PLUMBING COMPANY,)	
)	
Defendant.)	

AFFIDAVIT CONCERNING ATTORNEYS’ FEES AND COSTS

DOUGLAS A. LINDSAY states that if he were called to testify in the captioned case he would testify as follows:

1. I am an adult and competent.
2. The information contained in this Affidavit is based on my personal knowledge, the business records of LEWIS, OVERBECK & FURMAN, LLP (Firm), and review of public records.
3. During the course of this litigation, Douglas A. Lindsay, a partner in Firm, rendered 2.7 hours of legal services to Plaintiffs at a rate of \$300.00 per hour, for a total of \$810.00.
4. During the course of this litigation, Brian T. Bedinghaus, an associate in Firm, rendered 1.5 hours of legal services to Plaintiffs, at a rate of \$170.00 per hour, for a total of \$255.00.
5. During the course of this litigation, Robert C. Parizek, a paralegal in the Firm, rendered 3.8 hours of legal services to Plaintiffs, at a rate of \$85.00 per hour, for a total of \$323.00.
6. The legal professionals’ fees incurred by Plaintiffs in this matter total \$1,388.00.
7. Plaintiffs have also incurred \$350.00 in court filing fees, \$70.00 for service of process fees, \$60.00 for computerized docketing charges, \$13.64 in postage charges, and \$47.52 in photocopy

charges for total costs of \$541.16.

8. The total amount due Plaintiffs for legal fees and costs is \$1,929.16.

9. Attached hereto as Attachment C-1 are true and correct copies of itemized time records and expense records made and kept in the ordinary course of Firm's business.

10. I have over thirty-two years of ERISA and LMRA litigation experience. I have been admitted to practice by the following courts: Illinois Supreme Court (1976); United States District Court for the Northern District of Illinois (General Bar, 1976; Trial Bar, 1982); United States District Court for the Eastern District of Wisconsin (1985); United States District Court for the Northern District of Indiana (1990); United States District Court for the Central District of Illinois (1994); United States Court of Appeals for the 7th Circuit (1982); the United States Supreme Court (1999).

11. Brian T. Bedinghaus has been admitted to practice by the following courts: Illinois Supreme Court (2005); United States District Court for the Northern District of Illinois (2007); United States District Court for the Northern District of Indiana (2008).

12. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

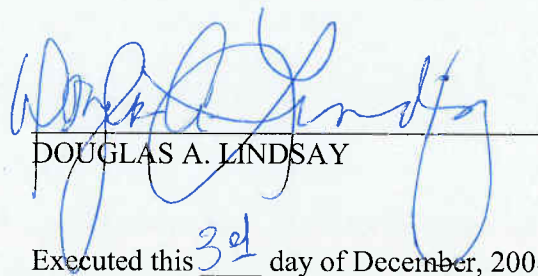

DOUGLAS A. LINDSAY
Executed this 3rd day of December, 2008.

EXHIBIT C-1

Lewis, Overbeck & Furman, LLP

Time And Expense Details

Report ID: OT2025 - 25205

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Date [09/30/2008 - 12/02/2008]

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Client	Client Reporting Name	Matter	Matter Reporting Name	Billing Timekeeper
65100	Plumbers 130 Litigation	01124	4750 Cross Plumbing	Lindsay, Douglas A.

Unbilled Time

Date	Timekeeper	Hours Worked	Hours To Bill	Rate	Amount	Task	Activity	Narrative
10/9/2008	DAL	0.70	0.70	300.00	\$210.00			Receive, review and file collective bargaining agreement signature page; review file; corporate data research; draft lawsuit papers; memo to paralegal
10/10/2008	RCP	1.00	1.00	85.00	\$85.00			Prepared lawsuit papers
10/13/2008	RCP	0.40	0.40	85.00	\$34.00			Prepared lawsuit papers
10/13/2008	DAL	0.40	0.40	300.00	\$120.00			Review draft lawsuit papers and conference with paralegal regarding revisions; telephone conference with Funds' Field Representative
10/14/2008	RCP	1.00	1.00	85.00	\$85.00			Prepared lawsuit papers
10/14/2008	DAL	0.30	0.30	300.00	\$90.00			Review and revise draft lawsuit papers and work with paralegal to finalize papers for filing
10/15/2008	DAL	0.50	0.50	300.00	\$150.00			E-file lawsuit papers; email from court clerk; email to all concerned
10/16/2008	DAL	0.20	0.20	300.00	\$60.00			E-notices from court; conferences with paralegal regarding file organization and service of process
10/20/2008	RCP	0.20	0.20	85.00	\$17.00			Worked on courtesy copy
10/21/2008	RCP	0.50	0.50	85.00	\$42.50			Worked on courtesy copy; worked on service of process; organized file
10/22/2008	DAL	0.10	0.10	300.00	\$30.00			Statutory notice letter to Secretary of Labor & Secretary of Treasury
10/29/2008	RCP	0.10	0.10	85.00	\$8.50			Processed invoice
11/3/2008	RCP	0.10	0.10	85.00	\$8.50			Organized file
11/6/2008	RCP	0.50	0.50	85.00	\$42.50			Processed vendor invoice; organized file; E-Filed court document
11/6/2008	DAL	0.10	0.10	300.00	\$30.00			E-notice from court
11/12/2008	BTB	0.60	0.60	170.00	\$102.00			Prepared amended attorney appearances and e-filed same
11/12/2008	DAL	0.10	0.10	300.00	\$30.00			E-notice from court
11/24/2008	DAL	0.30	0.30	300.00	\$90.00			Review file; check case status via e-docket; email to all concerned regarding motion for judgment
11/24/2008	BTB	0.10	0.10	170.00	\$17.00			Email from Douglas A. Lindsay regarding case assignment
12/1/2008	BTB	0.80	0.80	170.00	\$136.00			Reviewed file; prepared motion for entry of judgment and supporting documents

Unbilled Time

Totals		8.00	8.00		\$1,388.00
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Unbilled Expenses

Date	Amount	Exp Code	Narrative
9/30/2008	\$4.80	COPY	Photocopy Charges
9/30/2008	\$1.44	COPY	Photocopy Charges
10/29/2008	\$350.00	MISC	Northern District of Illinois - Filing Lawsuit papers

Lewis, Overbeck & Furman, LLP

Time And Expense Details

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Unbilled Expenses

Date	Amount	Exp Code	Narrative
10/31/2008	\$13.64	POST	Postage Charges
10/31/2008	\$41.28	COPY	Photocopy Charges
10/31/2008	\$60.00	DOCK	DM 2000, Computerized Docket and Case Watch Protection Service
11/6/2008	\$70.00	MISC	Constable Services - Service of Process

Unbilled Expenses

Totals \$541.16

	Hours Worked	Hours To Bill	Fee Amount	Expense Amount	Total Amount
Report Totals	8.00	8.00	\$1,388.00	\$541.16	\$1,929.16

*** End Of Report ***