

Exhibit C

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

CENTRAL STATES, SOUTHEAST AND)	
SOUTHWEST AREAS PENSION FUND,)	
and HOWARD McDOUGALL, trustee,)	
)	Case No. 09 C 1112
Plaintiffs,)	
)	District Judge Joan Humphrey Lefkow
v.)	
)	Magistrate Judge Susan E. Cox
AMERICAL, LLC, a Michigan limited)	
liability company,)	
)	
Defendant.)	

AFFIDAVIT OF LAURA B. BACON

State of Illinois)	
)	SS:
County of Cook)	

I, Laura B. Bacon, having been fully sworn upon my oath, depose and state as follows:

1. I am an attorney employed by Plaintiff Central States, Southeast and Southwest Areas Pension Fund (the "Pension Fund").
2. I was admitted to the bar of the State of Illinois in 2006 and to the bar of the United States District Court for the Northern District of Illinois in 2007.
3. I have personal knowledge with respect to the matters set forth in this Affidavit and am familiar with the above-captioned litigation.
4. Pursuant to the parties' Settlement Agreement entered into pursuant to this case, the Plaintiffs are entitled to attorneys' fees and costs incurred by the Pension Fund

to enforce the Agreement.

5. I have reviewed the Pension Fund's billing records and have determined that the work performed in connection with enforcing the Settlement Agreement entered into by the parties to this case was performed by myself ("LBB").


6. Copies of the billing records generated in this matter and reflecting the work performed are attached hereto as Exhibit 1.

7. I believe that a reasonable rate per hour for the aforementioned legal services is \$170.00 for work performed by myself.

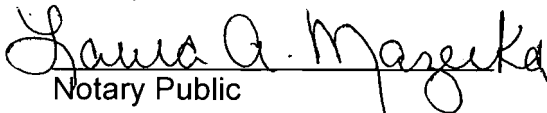
8. On that basis, the total amount of legal fees incurred in this matter is \$1,802.00 (10.60 hours x \$170.00 per hour).

9. I believe that the aforementioned attorney's fees were necessarily incurred and are reasonable in amount.

FURTHER AFFIANT SAYETH NAUGHT


Laura B. Bacon

Subscribed and sworn to before me,
a Notary Public of the State of Illinois,
this 31st day of August 2009.


Notary Public

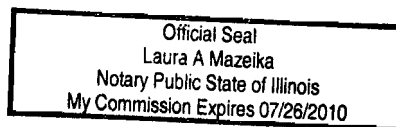


Exhibit 1

**Central States Funds
9377 West Higgins Road
Rosemont, Illinois 60018**

August 31, 2009

**Amercal, LLC II
09110045
CON**

Description of Services

			<u>Hours</u>	<u>Amount</u>
5/29/2009	LBB	Email correspondence with employer regarding late payment.	0.50	85.00
6/1/2009	LBB	Email correspondence with employer regarding payment.	0.50	85.00
6/2/2009	LBB	Email correspondence with Latanya Gray and employer regarding late payments.	0.30	51.00
6/8/2009	LBB	Follow up with Latanya regarding payment plan.	0.30	51.00
6/26/2009	LBB	Follow up with employer and LaTanya regarding payments.	0.70	119.00
6/29/2009	LBB	Email correspondence with employer regarding status; email to Latanya regarding same.	0.50	85.00
7/7/2009	LBB	Email correspondence with LaTanya regarding final payment; email to employer regarding same.	0.30	51.00
7/14/2009	LBB	Email correspondence with LaTanya regarding status.	0.20	34.00
7/21/2009	LBB	Follow up with LaTanya regarding status.	0.50	85.00

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			<u>Hours</u>	<u>Amount</u>
8/10/2009	LBB	Call to opposing counsel regarding delinquency; email to LaTanya regarding same.	0.30	51.00
8/12/2009	LBB	Phone conference with opposing counsel regarding delinquency; draft email regarding same.	1.00	170.00
8/13/2009	LBB	Review email from opposing counsel; review file.	1.00	170.00
8/14/2009	LBB	Phone conference with opposing counsel regarding delinquency; draft email to Juan Beaton and LaTanya Gray regarding same.	1.00	170.00
8/17/2009	LBB	Phone conference with Juan Beaton regarding delinquency; review file.	0.50	85.00
8/20/2009	LBB	Conference with Albert M. Madden regarding delinquency.	0.50	85.00
8/25/2009	LBB	Draft motion to reinstate case.	1.00	170.00
8/31/2009	LBB	Finalize and file Motion for Reinstatement and Judgment.	1.50	255.00
Total Fees			10.60	\$1,802.00