

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)
CARPENTERS PENSION FUND and its)
Trustees, et al.,)

Plaintiffs,)

v.)

LAMP INCORPORATED, an Illinois)
corporation,)

Defendant.)

Case No. 09 C 1591

Judge Conlon

Magistrate Nolan

MOTION TO PROVE UP DAMAGES AND FOR FINAL JUDGMENT

Plaintiffs, the CHICAGO REGIONAL COUNCIL OF CARPENTERS PENSION FUND, ET AL. (collectively "Trust Funds"), by their attorney Kevin P. McJessey, hereby move this Court to allow Trust Funds to prove up damages and for entry of final judgment against LAMP INCORPORATED, an Illinois corporation ("Defendant"). In support of their motion, Trust Funds state as follows:

COMPLAINT

1. The Trust Funds filed a complaint against the Defendant under ERISA to compel Defendant to produce books and records to allow Plaintiffs to conduct an audit of Defendant's fringe benefit contributions to the Trust Funds. The Trust Funds sought unpaid contributions, interest and liquidated damages, attorneys' fees and costs and auditors' fees owed by Defendant pursuant to the terms of a collective bargaining agreement and applicable trust agreements.

DEFENDANT DEFAULTED

2. Steven Lamp, Registered Agent, was served with a copy of the summons and complaint and the proof of service has been filed with the United States Clerk of Court. On May 12, 2009, a default judgment was entered against Defendant for its failure to answer or appear.

3. On May 19, 2009, Defendant was served with a copy of the Court's default order via U.S. Mail. At the time and thereafter, despite the default judgment, the parties were attempting to reach an agreement on the amount due.

4. As of September 2009, the Trust Funds' correspondences to the Defendant had gone unanswered. Then, after the Trust Funds noticed a motion for entry of judgment for February 18, 2010, Defendant produced additional records requiring the Trust Funds to withdraw their motion and file this new motion seeking reduced damages.

5. This Court should allow the Trust Funds to prove up damages and enter final judgment against Defendant.

6. The Trust Funds now move this Court to enter a final judgment. The amount owed by Defendant is \$18,056.86 which includes \$5,668.46 in unpaid contributions, \$940.35 in interest, \$1,133.69 in liquidated damages, \$6,716.75 in auditors' fees, and \$3,597.61 in attorneys' fees as follows:

A. \$5,668.46 in unpaid contributions pursuant to the audit; *see* Decl. of J. Libby, ¶6, Exhibit A; Decl. of C. Kogut, ¶3, Exhibit B;

B. \$6,716.75 for auditor's fees incurred by the Trust Funds to complete the audit of Defendant's books and records; *see* Decl. of J. Libby, ¶6, Exhibit A; Decl. of C. Kogut, ¶2, Exhibit B;

C. \$940.35 in interest under ERISA on the amount that is due; *see* 29 U.S.C. § 1132(g)(2)(B); 29 U.S.C. § 1132(g)(2)(C); Decl. of J. Libby, ¶7, Exhibit A;

D. \$1,133.69 in liquidated damages; *see* Decl. of J. Libby, ¶7, Exhibit A; and

E. \$3,597.61 in reasonable attorneys' fees and costs the Trust Funds incurred in this action pursuant to 29 U.S.C. § 1132(g)(1) and/or § 1132(g)(2)(D); *see* McJessey Decl., ¶4, Exhibit C).

7. On March 4, 2010, the Trust Funds' counsel received a partial payment from Defendant in the amount of \$5,668.46, which the Trust Funds will apply to the judgment.

WHEREFORE, Plaintiffs the Chicago Regional Council of Carpenters' Fund et al. hereby move this Court to enter final judgment in their favor and against Defendant LAMP INCORPORATED in the amount of \$18,056.86 as follows:

- A. \$5,668.46 in unpaid contributions pursuant to the audit;
- B. \$6,716.75 for auditor's fees of incurred by the Trust Funds to complete the audit of Defendants' books and records;
- C. \$940.35 in interest under ERISA on the amount that is due;
- D. \$1,133.69 in liquidated damages;
- E. \$3,597.61 in reasonable attorneys' fees and costs the Trust Funds incurred in this action pursuant to 29 U.S.C. § 1132(g)(1) and/or § 1132(g)(2)(D);
- F. reasonable attorney' fees and costs incurred by the Trust Funds in enforcing this order; and
- G. such other relief as this Court deems appropriate.

CHICAGO REGIONAL COUNCIL OF CARPENTERS
PENSION FUND et al.

By: s/ Kevin P. McJessey
One of their attorneys

Kevin P. McJessey
MCJESSEY, CHING & THOMPSON, LLC
3759 North Ravenswood, Suite 231
Chicago, Illinois 60613
(773) 880-1260
(773) 880-1265 (facsimile)
mcjessy@MCandT.com

CERTIFICATE OF SERVICE

I, Kevin P. McJessy, an attorney, certify that I caused the foregoing **Motion to Prove Up Damages and for Final Judgment** to be served upon

Steven Lamp, Registered Agent
Lamp Incorporated
460 N. Grove Avenue
Elgin, IL 60120

via U.S. Mail, postage prepaid, deposited in the United States Mail Depository located at 3759 N. Ravenswood, Chicago, Illinois, 60613 on March 31, 2010.

s/ Kevin P. McJessy
Kevin P. McJessy

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Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND and its)	
Trustees, et al.,)	
)	Case No. 09 C 1591
Plaintiffs,)	
v.)	Judge Conlon
)	
LAMP INCORPORATED, an Illinois)	Magistrate Nolan
corporation,)	
)	
Defendant.)	

DECLARATION OF JOHN LIBBY

I, John Libby, hereby declare, under penalty of perjury pursuant to the laws of the United States, as follows:

1. I am the Supervisor, Audits & Collections for the Chicago Regional Council of Carpenters Pension Fund ("Pension Fund"), the Chicago Regional Council of Carpenters Welfare Fund ("Welfare Fund"), the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program ("Trainee Fund") and the Labor/Management Union Carpentry Cooperation Promotion Fund ("Labor/Management Fund") (collectively "the Trust Funds").
2. As part of my duties, I am responsible for supervising and enforcing contributions for medical, pension and other benefits due from numerous employers pursuant to Collective Bargaining Agreements between the employers and the Trust Funds and pursuant to the Trust Agreements.
3. On June 1, 1976, LAMP INCORPORATED ("Defendant") and the Chicago and Northeast Illinois District Council of Carpenters entered into the Collective Bargaining Agreement pursuant to which Defendant agreed to make contributions to the Trust Funds.

4. Defendant agreed to submit to a periodic audit of its books and records in order to verify the accuracy of the contributions reported and paid to the Trust Funds.

5. Defendant produced books and records to Legacy Professionals LLP (“Legacy”), an auditing firm engaged by the Trust Funds, to conduct an audit of Defendant’s fringe benefit contributions.

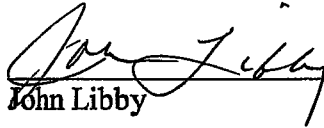
6. Copies of the adjusted audit reports prepared by Legacy and revised by the Trust Funds based on additional records produced by Defendant are attached as Exhibit A-1 (Account No. 50028) and Exhibit A-2 (Account No. 2345). According to the adjusted audit reports and based on the records produced by Defendant to Legacy and the Trust Funds, Defendant owes \$5,668.46 in unpaid contributions, consisting of \$3,812.20 for Account No. 50028 and \$1,856.26 for Account No. 2345.

7. Summaries of the revised and updated interest and liquidated damages that have accrued since the date when the contributions were due are attached hereto as Exhibit A-3 (Account No. 50028) and Exhibit A-4 (Account No. 2345). Defendant owes \$940.35 in unpaid accrued interest (\$650.26 for Account No. 50028) and \$290.09 for Account No. 2345) and \$1,133.69 in unpaid accrued liquidated damages (\$762.44 for Account No. 50028 and \$371.25 for Account No. 2345).

8. Because Defendant failed to comply with the terms of the Collective Bargaining Agreement and related Trust Agreements, the Trust Funds have had to employ the services of McJessey, Ching & Thompson, LLC. As a result, the Trust Funds incurred additional audit fees and attorneys’ fees and costs.

9. I have personal knowledge of the matters stated in this affidavit and could testify truthfully to them.

FURTHER DECLARANT SAYETH NOT.

 3/30/10
John Libby

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Exhibit A-1

Monthly Detail Report

Account Number: 50028 **Audit Period:** July 1, 2006 to December 31, 2007
Employer: Lamp, Inc. **Month:** July 2006
Address: 460 N. Grove Ave. **Page #:** 3
Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *							Total Hour Difference	Benefit Hour Difference				
					W/E 2-Jul	W/E 9-Jul	W/E 16-Jul	W/E 23-Jul	W/E 30-Jul	Total Hours	Capped Hours						
3	Floor Covering Masters	CD4G	0.00	0.00	0.00	0.00	0.00	14.00	0.00	14.00	14.00	0.00	14.00				
Total											0.00	0.00	14.00	0.00	14.00	0.00	14.00

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 50028 **Audit Period:** July 1, 2006 to December 31, 2007
Employer: Lamp, Inc. **Month:** August 2006
 460 N. Grove Ave.
 Elgin, IL 60121
Phone: 847-741-7220 **Page #:** 4

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *				Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference					
					W/E 6-Aug	W/E 13-Aug	W/E 20-Aug	W/E 27-Aug									
3	Floor Covering Masters	CD4G	0.00	0.00	0.00	7.25	0.00	0.00	7.25	7.25	0.00	7.25					
Total											0.00	7.25	0.00	0.00	7.25	0.00	7.25

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 50028 Audit Period: July, 2006 To December, 2007
 Employer: Lamp, Inc. Month: November, 2006
 Address: 460 N. Grove Avenue Page #: 5
 Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 5-Nov	W/E 12-Nov	W/E 19-Nov	W/E 26-Nov	W/E 3-Dec			
[REDACTED]	Burke, Jeffrey T	P 9 G	198.00	198.00	40.00	38.00	40.00	32.00	40.00	190.00	(8.00)	(8.00)
[REDACTED]	Carlson, Kevin I	P 9 G	176.00	176.00	40.00	40.00	40.00	8.00	40.00	168.00	(8.00)	(8.00)
[REDACTED]	Farrell, Michael	P 9 G	170.00	170.00	34.00	32.00	40.00	24.00	32.00	162.00	(8.00)	(8.00)
[REDACTED]	Fraas, Daniel M	P 9 G	149.00	149.00	40.00	40.00	27.00	2.00	32.00	141.00	(8.00)	(8.00)
[REDACTED]	Graf, Kurt L	P 9 G	158.50	158.50	32.00	29.50	40.00	24.00	25.00	150.50	(8.00)	(8.00)
[REDACTED]	Harris, Ron E	P 9 G	132.50	132.50	16.00	0.00	36.50	32.00	40.00	124.50	(8.00)	(8.00)
6	Paul Reilly Co	CD 3 G	0.00	0.00	0.00	135.00	0.00	0.00	0.00	135.00	0.00	135.00
9	Richter Awning Inc	CD 3 G	0.00	0.00	0.00	0.00	0.00	0.00	63.00	63.00	0.00	63.00
[REDACTED]	Werfling, Stephen	P 9 G	216.00	216.00	50.00	42.00	42.00	34.00	40.00	208.00	(8.00)	(8.00)
Total				252.00	356.50	265.50	156.00	312.00	1,342.00	(56.00)	142.00	

Total Items Listed in this Period: 9.00

Monthly Detail Report

Account Number: 50028 **Audit Period:** July 1, 2006 to December 31, 2007
Employer: Lamp, Inc. **Month:** December 2006
Address: 460 N. Grove Ave. **Page #:** 6
Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *				Capped Hours	Total Hour Difference	Benefit Hour Difference	
					W/E 10-Dec	W/E 17-Dec	W/E 24-Dec	W/E 31-Dec				Total Hours
9	Richter Awning, Inc.	CD3G	0.00	0.00	0.00	0.00	4.75	4.75	4.75		4.75	
Total												
										0.00	0.00	4.75

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 50028 **Audit Period:** July 1, 2006 to December 31, 2007
Employer: Lamp, Inc. **Month:** March 2007
Address: 460 N. Grove Ave. **Page #:** 7
Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *				Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference					
					W/E 4-Mar	W/E 11-Mar	W/E 18-Mar	W/E 25-Mar					W/E 1-Apr				
9	Richter Awning, Inc.	CD3G	0.00	0.00	0.00	63.00	0.00	0.00	0.00	63.00	0.00	63.00					
Total											0.00	63.00	0.00	0.00	63.00	0.00	63.00

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 50028 Audit Period: July 1, 2006 to December 31, 2007
 Employer: Lamp, Inc. Month: July 2007
 Address: 460 N. Grove Ave. Page #: 8
 Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	Actual Hours Per Week				Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 8-Jul	W/E 15-Jul	W/E 22-Jul	W/E 29-Jul				
	Row, Adam P.	P1G	80.00	80.00	32.00	40.00	40.00	40.00	152.00	152.00	72.00	72.00
Total			80.00	80.00	32.00	40.00	40.00	40.00	152.00	152.00	72.00	72.00

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 50028 **Audit Period:** July 1, 2006 to December 31, 2007
Employer: Lamp, Inc. **Month:** August 2007
 460 N. Grove Ave.
 Elgin, IL 60121
Phone: 847-741-7220 **Page #:** 9

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 5-Aug	W/E 12-Aug	W/E 19-Aug	W/E 26-Aug	W/E 2-Sep				
10	Russ's Drywall, Inc.	GD3G	0.00	0.00	0.00	0.00	144.25	0.00	144.25	0.00	144.25	0.00	144.25
Total			0.00	0.00	0.00	144.25	0.00	144.25	0.00	144.25	0.00	144.25	

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 50028 Audit Period: July 1, 2006 to December 31, 2007
 Employer: Lamp, Inc. Month: December 2007
 Address: 460 N. Grove Ave. Page #: 10
 Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 9-Dec	W/E 16-Dec	W/E 23-Dec	W/E 30-Dec	W/E				
	Carlson, Kevin J.	P1G	145.00	145.00	40.00	37.00	40.00	32.00		149.00	149.00	4.00	4.00
Total			145.00	145.00	40.00	37.00	40.00	32.00	0.00	149.00	149.00	4.00	4.00

Total Items Listed in this Period: 1.00

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Exhibit A-2

Liquidated Damages Schedule

Account Number: 2345	Audit Period: July 1, 2006 to December 31, 2007
Employer: Lamp, Inc.	Contact: Steve Lamp
Address: 460 N. Grove Ave. Elgin, IL 60121	Title: Secretary/Treasurer
Phone: 847-741-7220	Page: 2 of 7

Reporting Period	Contributions Due	Compounding Periods	Calculating Percentage	Total Liquidated Damages Owed
January 2007	(232.00)	31	20.00%	
April 2007	1,547.88	28	20.00%	309.58
August 2007	189.75	24	20.00%	37.95
September 2007	350.63	23	20.00%	70.13
December 2007	0.00	20	20.00%	
Total Discrepancies				
	\$ 1,856.26		Total Damages this Schedule	371.26
			20% of Discrepancies	371.26
Assessed Damages				
	\$1,856.26			\$371.26

Monthly Detail Report

Account Number: 2345 Audit Period: July, 2006 through December, 2007
 Employer: Lamp, Inc. Month: January 2007
 Address: 460 N. Grove Ave. Page #: 3 of 7
 Phone: Egin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 7-Jan	W/E 14-Jan	W/E 21-Jan	W/E 28-Jan	W/E				
	Jareckyj, Michael	P9	71.50	71.50	32.00	31.50	0.00	0.00	0.00		63.50	(8.00)	(8.00)
	Mertel, Cary W.	P9	40.00	40.00	32.00	0.00	0.00	0.00	0.00		32.00	(8.00)	(8.00)
Total					64.00	31.50	0.00	0.00	0.00	0.00	95.50	(16.00)	(16.00)

Total Items Listed in this Period: 2.00

Monthly Detail Report

Account Number: 2345 **Audit Period:** July, 2006 through December, 2007
Employer: Lamp, Inc. **Month:** April 2007
Address: 460 N. Grove Ave. **Page #:** 4 of 7
Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *				Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 8-Apr	W/E 15-Apr	W/E 22-Apr	W/E 29-Apr				
3	R.J. Riteway Door...	CD3	0.00	0.00	0.00	106.75	0.00	0.00	0.00	106.75	0.00	106.75
Total			0.00	0.00	106.75	0.00	0.00	0.00	0.00	106.75	0.00	106.75

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 2345 Audit Period: July, 2006 through December, 2007
 Employer: Lamp, Inc. Month: August 2007
 Address: 460 N. Grove Ave. Page #: 5 of 7
 Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *				Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 5-Aug	W/E 12-Aug	W/E 19-Aug	W/E 26-Aug			
3	R.J. Riteway Door Co.	CD3	0.00	0.00	0.00	11.50	0.00	0.00	11.50	0.00	11.50
Total			0.00	0.00	11.50	0.00	0.00	0.00	11.50	0.00	11.50

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 2345 Audit Period: July, 2006 through December, 2007
 Employer: Lamp, Inc. Month: September 2007
 Address: 460 N. Grove Ave. Page #: 6 of 7
 Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *							Total Hour Difference	Benefit Hour Difference	
					W/E 9-Sep	W/E 16-Sep	W/E 23-Sep	W/E 30-Sep	W/E	Total Hours	Capped Hours			
3	R.J. Riteway Door...	CD3	0.00	0.00	21.25	0.00	0.00	0.00	0.00	0.00	21.25	21.25	0.00	21.25
			Total		21.25	0.00	0.00	0.00	0.00	0.00	21.25	21.25	0.00	21.25

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 2345 **Audit Period:** July, 2006 through December, 2007
Employer: Lamp, Inc. **Month:** December, 2007
Address: 460 N. Grove Ave. **Page #:** 7 of 7
Phone: Elgin, IL 60121

Reference Number	Employee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *							Capped Hours	Total Hour Difference	Benefit Hour Difference
					W/E 1-Jan	W/E 8-Jan	W/E 15-Jan	W/E 22-Jan	W/E 29-Jan	Total Hours				
	Sargent, Raymond	P9	37.00	37.00	0.00	0.00	0.00	29.00		29.00	175.00	(8.00)	(8.00)	
	Soderlund, Derek	P1	132.00	132.00	39.00	37.00	40.00	24.00		140.00	175.00	8.00	8.00	
Total					39.00	37.00	40.00	53.00	0.00	169.00		0.00	0.00	

Total Items Listed in this Period: 2.00

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Exhibit A-3

Summary of Contributions, Liquidated Damages & Interest Due
 For The Reporting Period(s) Specified Below
 Computed Through February 17, 2010

Employer Information

File Number 50028
 Name LAMP INC
 Address PO BOX 865
 City, State ELGIN, IL. 60121-0086
 Telephone

Page Number 1 of 3
 Reference Number: 10-28
 Date Printed: 02/16/2010

Reporting Period	Delinquent Contributions	Liquidated Damages (1)	Interest (1)	Total Due
July, 2006	\$ 111.44	\$ 99.95	\$ 26.91	\$ 238.30
August, 2006	57.71	50.14	13.45	121.30
November, 2006	1,130.32	889.80	236.03	2,256.15
December, 2006	37.81	28.77	7.59	74.17
March, 2007	501.48	342.95	88.90	933.33
July, 2007	645.12	378.38	94.38	1,117.88
August, 2007	1,292.48	727.77	179.09	2,199.34
December, 2007	35.84	16.94	3.91	56.69
Grand Total (3)	\$ 3,812.20	\$ 762.44	\$ 650.26	\$ 5,224.90

(1) See Attached Computation

(3) Total Damages Capped at 20.00% in Accordance With ERISA Limitation
 Total Amount Due : \$ 5,224.90 If Paid by February 17, 2010

Computation of Liquidated Damages
 For The Reporting Period(s) Specified Below
 Computed Through February 17, 2010

Employer Information

File Number 50028
 Name LAMP INC
 Address PO BOX 865
 City, State ELGIN, IL. 60121-0086
 Telephone

Page Number 2 of 3
 Reference Number: 10-28
 Date Computed: 02/16/2010

Reporting Period	Contributions Due	Computation Base	Compounding Periods	Computed Damages (2)	Total (3) Damages For Reporting Period
July, 2006	\$ 111.44	\$ 111.44	43	\$ 99.95	\$ 99.95
August, 2006	57.71	57.71	42	50.14	50.14
November, 2006	1,130.32	1,130.32	39	889.80	889.80
December, 2006	37.81	37.81	38	28.77	28.77
March, 2007	501.48	501.48	35	342.95	342.95
July, 2007	645.12	645.12	31	378.38	378.38
August, 2007	1,292.48	1,292.48	30	727.77	727.77
December, 2007	35.84	35.84	26	16.94	16.94
Total (3)	\$ 3,812.20				\$ 762.44

(2) 1.50% Compounded per Month (or portion thereof)

(3) Total Damages Capped at 20.00% in Accordance With ERISA Limitation

Computation of Interest
 For The Reporting Period(s) Specified Below
 Computed Through February 17, 2010

Employer Information

File Number 50028
 Name LAMP INC
 Address PO BOX 865
 City, State ELGIN, IL. 60121-0086
 Telephone

Page Number 3 of 3
 Reference Number: 10-28
 Date Computed: 02/16/2010

Reporting Period	Contributions Due	Computation Base	Delinquent Period From	Delinquent Period To	Days	Computed Interest (3)	Total Interest For Reporting Period
July, 2006	\$ 111.44	\$ 111.44	08/21/2006 -	02/17/2010	1,277	\$ 26.91	\$ 26.91
August, 2006	57.71	57.71	09/21/2006 -	02/17/2010	1,246	13.45	13.45
November, 2006	1,130.32	1,130.32	12/21/2006 -	02/17/2010	1,155	236.03	236.03
December, 2006	37.81	37.81	01/21/2007 -	02/17/2010	1,124	7.59	7.59
March, 2007	501.48	501.48	04/21/2007 -	02/17/2010	1,034	88.90	88.90
July, 2007	645.12	645.12	08/21/2007 -	02/17/2010	912	94.38	94.38
August, 2007	1,292.48	1,292.48	09/21/2007 -	02/17/2010	881	179.09	179.09
December, 2007	35.84	35.84	01/21/2008 -	02/17/2010	759	3.91	3.91
Total	\$ 3,812.20						\$ 650.26

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Exhibit A-4

Summary of Contributions, Liquidated Damages & Interest Due
 For The Reporting Period(s) Specified Below
 Computed Through February 17, 2010

Employer Information

File Number 2345
 Name LAMP INC
 Address 460 N GROVE AV
 City, State ELGIN, IL. 60121-0086
 Telephone

Page Number 1 of 3
 Reference Number: 10-29
 Date Printed: 02/16/2010

Reporting Period	Delinquent Contributions	Liquidated Damages (1)	Interest (1)	Total Due
January, 2007	\$ (232.00)		\$ (44.67)	\$ (276.67)
April, 2007	1,547.88	\$ 1,020.05	262.49	2,830.42
August, 2007	189.75	106.84	26.29	322.88
September, 2007	350.63	189.33	45.98	585.94
Grand Total (3)	\$ 1,856.26	\$ 371.25	\$ 290.09	\$ 2,517.60

(1) See Attached Computation

(3) Total Damages Capped at 20.00% in Accordance With ERISA Limitation
 Total Amount Due : \$ 2,517.60 If Paid by February 17, 2010

Computation of Liquidated Damages
For The Reporting Period(s) Specified Below
Computed Through February 17, 2010

Employer Information

File Number 2345
Name LAMP INC
Address 460 N GROVE AV
City, State ELGIN, IL. 60121-0086
Telephone

Page Number 2 of 3
Reference Number: 10-29
Date Computed: 02/16/2010

Reporting Period	Contributions Due	Computation Base	Compounding Periods	Computed Damages (2)	Total (3) Damages For Reporting Period
January, 2007	\$ (232.00)	\$ (232.00)	37		\$ 0.00
April, 2007	1,547.88	1,547.88	34	\$ 1,020.05	1,020.05
August, 2007	189.75	189.75	30	106.84	106.84
September, 2007	350.63	350.63	29	189.33	189.33
Total (3)	\$ 1,856.26				\$ 371.25

(2) 1.50% Compounded per Month (or portion thereof)

(3) Total Damages Capped at 20.00% in Accordance With ERISA Limitation

Computation of Interest
 For The Reporting Period(s) Specified Below
 Computed Through February 17, 2010

Employer Information

File Number 2345
 Name LAMP INC
 Address 460 N GROVE AV
 City, State ELGIN, IL. 60121-0086
 Telephone

Page Number 3 of 3
 Reference Number: 10-29
 Date Computed: 02/16/2010

Reporting Period	Contributions Due	Computation Base	Delinquent Period			Computed Interest (3)	Total Interest For Reporting Period
			From	To	Days		
January, 2007	\$ (232.00)	\$ (232.00)	02/21/2007	02/17/2010	1,093	\$ (44.67)	\$ (44.67)
April, 2007	1,547.88	1,547.88	05/21/2007	02/17/2010	1,004	262.49	262.49
August, 2007	189.75	189.75	09/21/2007	02/17/2010	881	26.29	26.29
September, 2007	350.63	350.63	10/21/2007	02/17/2010	851	45.98	45.98
Total	\$ 1,856.26						\$ 290.09

09 CV 1591

Exhibit B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND and its)	
Trustees, et al.,)	
)	Case No. 09 C 1591
Plaintiffs,)	
v.)	Judge Conlon
)	
LAMP INCORPORATED, an Illinois)	Magistrate Nolan
corporation,)	
)	
Defendant.)	

DECLARATION OF CHRIS KOGUT

I, Chris Kogut, hereby declare, under penalty of perjury pursuant to the laws of the United States, as follows:

1. I am a manager for the Certified Public Accounting firm of Legacy Professionals LLC ("Legacy"). I am familiar with the billings to the Chicago Regional Council of Carpenters Pension Fund ("Pension Fund"), the Chicago Regional Council of Carpenters Welfare Fund ("Welfare Fund"), the Chicago and Northeast Illinois Regional Council of Carpenters Apprentice and Trainee Program ("Trainee Fund"), and the Labor/Management Union Carpentry Cooperation Promotion Fund ("Labor/Management Fund") (collectively "the Trust Funds"), including fees and expenses incurred in connection with auditing the books and records of signatory companies.

2. In connection with efforts to obtain and conduct an audit of the books and records of LAMP INCORPORATED ("Defendant"), the Trust Funds incurred \$6716.75 in fees and expenses through January 15, 2010. These efforts were comprised of consultations with the Trust Funds, communications with the Defendant's representative, review and analysis of the Defendant's books and records, creation and revision of the audit report, and follow-up

communications with the Trust Funds and its representatives. Legacy's rate for all of its auditors was \$67.00 per hour.

3. The final audit report prepared by Legacy based on records produced by Defendant is attached as Exhibit B-2.

4. An itemized breakdown of the fees and costs to the Trust Funds in this matter along with identifies of the auditors who performed the work are attached as Exhibit B-1.

5. The auditors who conducted the audit and prepared and reviewed the audit report in this matter—along with their qualifications and experience—were:

(a) Ben Yackley, who is a Senior Auditor and who has worked as an auditor for almost three years.

6. The hourly fees and the expenses charged to the Trust Funds in this matter are consistent with Legacy's regular charges for services to the Trust Funds on similar matters. The hourly fees and expenses are consistent with the charges by Legacy to other similar clients and these fees are consistent with the charges in the industry for the similar kind of work.

7. I have personal knowledge of the matters stated in this declaration and could testify competently to them.

FURTHER AFFIANT SAYETH NOT.



Chris Kogut

Date: 1/18/10
Time: 14:05:43

Legacy Professionals LLP
Job Detail Inquiry
Client: 9425 Chgo RC Carp PRA
Job....: PR1623 lamp, Inc.

BLM325

***** Employee ***** No. Name	WIP Date	Serv. Code	Description	Total Hours	Standard Charge	N C
1029 J Kemperas	7/14/08	40411	Quality Control Rev	1.50	315.00	
1787 C Wilcher	6/16/08	40412	Technical Review	2.00	230.00	
1827 B Yackley	4/30/08	40712	Review invoices etc	2.50	225.00	
1827 B Yackley	4/08/08	40708	Review CD's/register	2.50	225.00	
1827 B Yackley	5/28/08	40803	Prep report/CD's	2.00	180.00	
1827 B Yackley	4/25/08	40712	Review invoices etc	2.00	180.00	
1827 B Yackley	4/23/08	40712	Review invoices etc	2.00	180.00	
1827 B Yackley	3/27/08	40708	Review CD's/register	2.00	180.00	
1827 B Yackley	3/26/08	40706	Verify reported hrs	1.75	157.50	
1827 B Yackley	5/02/08	40712	Review invoices etc	1.50	135.00	
1827 B Yackley	6/16/08	40807	Post review adjust	1.25	112.50	
1827 B Yackley	6/23/08	40807	Post review adjust	1.50	105.00	
1029 J Kemperas	7/16/08	40411	Quality Control Rev	1.00	90.00	
1827 B Yackley	6/10/08	40803	Prep report/CD's	1.00	90.00	
1827 B Yackley	6/10/08	40801	Prep work papers	1.00	90.00	
1827 B Yackley	5/28/08	40801	Prep work papers	1.00	90.00	
1827 B Yackley	5/19/08	40701	Review prev records	1.00	90.00	
1827 B Yackley	5/19/08	40801	Prep work papers	1.00	90.00	
1827 B Yackley	4/07/08	40708	Review CD's/register	1.00	90.00	
1827 B Yackley	3/28/08	40708	Review CD's/register	1.00	90.00	
1827 B Yackley	3/28/08	40706	Verify reported hrs	1.00	90.00	
1827 B Yackley	3/27/08	40706	Verify reported hrs	.75	86.25	
1787 C Wilcher	6/24/08	40412	Technical Review	.75	67.50	
1827 B Yackley	3/26/08	40704	Classify employees	.50	57.50	
1787 C Wilcher	6/27/08	40412	Technical Review	.25	52.50	
1029 J Kemperas	7/11/08	40411	Quality Control Rev	.25	52.50	
1029 J Kemperas	2/26/08	40311	Initial file prep	.25	52.50	
1029 J Kemperas	2/25/08	40311	Initial file prep	.50	45.00	
1827 B Yackley	7/16/08	40807	Post review adjust	.50	45.00	
1827 B Yackley	6/11/08	40801	Prep work papers	.50	45.00	
1827 B Yackley	6/10/08	40805	Prep remarks	.50	45.00	
1827 B Yackley	6/10/08	40802	Prep report/payroll	.50	45.00	
1827 B Yackley	6/09/08	40805	Prep remarks	.50	45.00	
1827 B Yackley	6/09/08	40803	Prep report/CD's	.50	45.00	
1827 B Yackley	6/09/08	40802	Prep report/payroll	.50	45.00	
1827 B Yackley	5/09/08	40801	Prep work papers	.50	45.00	
1827 B Yackley	5/28/08	40802	Prep report/payroll	.50	45.00	
1827 B Yackley	4/30/08	40803	Prep report/CD's	.50	45.00	
1827 B Yackley	5/01/08	40712	Review invoices etc	.50	45.00	
1827 B Yackley	4/09/08	40708	Review CD's/register	.50	45.00	
1827 B Yackley	3/28/08	40715	Review 1099's, 1096	.50	45.00	
1827 B Yackley	3/28/08	40711	Review bank stmts	.50	45.00	
1827 B Yackley	3/26/08	40703	Reconcile wages	.50	45.00	
1827 B Yackley	2/20/08	40312	Database inquiry	.25	25.00	
1833 M Conversa	2/22/08	99910	Auto - Local Ml Yackley	.25	16.16	
199 C Expenses	4/04/08	40805	Prep remarks	.25	22.50	
1827 B Yackley	6/11/08	40803	Prep report/CD's	.25	22.50	
1827 B Yackley	6/11/08	40802	Prep report/payroll	.25	22.50	
1827 B Yackley	5/14/08	40702	Consult-employer	.25	22.50	
1827 B Yackley	5/02/08	40702	Consult-employer	.25	22.50	
1827 B Yackley	3/31/08	40805	Prep remarks	.25	22.50	
1827 B Yackley	3/28/08	40710	Review gen ledger	.25	22.50	

Date: 1/18/10
Time: 14:05:43

Legacy Professionals LLP
Job Detail Inquiry
Client: 9425 Chgo RC Carp PEA
Job...: PR1623 lamp, Inc.

BLM125

***** Employee Name	*****	WIP Date	Serv. Code	Description	Total Hours	Standard Charge	N	C
1827 B Yackley		3/28/08	40702	Consult-employer	.25	22.50		
1827 B Yackley		3/27/08	40702	Consult-employer	.25	22.50		
1827 B Yackley		3/27/08	40801	Prep work papers	.25	22.50		
1827 B Yackley		3/28/08	40716	review Tax Return	.25	22.50		
1827 B Yackley		3/28/08	40714	Exit meeting	.25	22.50		
1827 B Yackley		3/28/08	40713	call office - field	.25	22.50		
1827 B Yackley		3/27/08	40718	Review Gen ledger	.25	22.50		
1827 B Yackley		3/26/08	40705	Rev CR's other funds	.25	22.50		
1827 B Yackley		3/26/08	40702	Consult-employer	.25	22.50		
1827 B Yackley		3/26/08	40701	Review prov records	.25	22.50		
1827 B Yackley		3/25/08	40316	consult in-house	.25	22.50		
1827 B Yackley		3/14/08	40317	prep/mail confirm	.25	22.50		
1827 B Yackley		3/13/08	40313	calls to employer	.25	22.50		
1827 B Yackley		3/05/08	40313	calls to employer	.25	22.50		
1827 B Yackley		2/21/08	40311	Initial file prep	.25	22.50		
1846 A Hull		2/21/08	40404	Report Processing	.25	16.75		
781 J McCord		4/04/08	99910	Auto - Local MI Yackley		8.08		
199 C Expenses		7/02/08	99912	Local-Parking-T Wilcher		3.00		
199 C Expenses								
					49.00			
						4847.74		

49 hours
x 67 P/hr

3283.00

Date: 1/18/10
Time: 14:05:34

Legacy Professionals LLP
Job Detail Inquiry

Client: 9425 Chgo RC Carp PRA
Job...: PRI623 Lamp, Inc.

***** Employee *****
No. Name

1845 A Derrick

WTF
Date

9/24/08

Serv.
Code Description

40810 Post audit con-fund
Emailed invoices for Ben to the fund.

Total
Hours

1.00

Standard
Charge

90.00

90.00

1.00

~~\$~~ 67.00

Date: 1/19/10
Time: 14:05:19

Legacy Professionals LLP
Job Detail Inquiry

Client: 9425 Chgo RC Carp PRA
Job....: PR1601 Lamp, Inc.

BLM325

***** Employee ***** No. Name	WIP Date	Serv. Code	Description	Total Hours	Standard Charge	N C
1877 C Wilcher	6/13/08	40412	Technical Review	2.25	258.75	
1877 C Wilcher	6/16/08	40412	Technical Review	2.00	230.00	
1827 B Yackley	4/30/08	40712	Review invoices etc	2.50	225.00	
1827 B Yackley	6/08/08	40708	Review CD's/register	2.50	225.00	
1829 J Kemperas	7/11/08	40411	Quality Control Rev	1.00	210.00	
1827 B Yackley	3/27/08	40708	Review CD's/register	2.25	202.50	
1827 B Yackley	4/25/08	40712	Review invoices etc	2.00	180.00	
1827 B Yackley	4/23/08	40712	Review invoices etc	2.00	180.00	
1827 B Yackley	3/26/08	40706	Verify reported hrs	2.00	180.00	
1827 B Yackley	6/16/08	40807	Post review adjust	1.50	135.00	
1827 B Yackley	5/02/08	40712	Review invoices etc	1.50	135.00	
1827 B Yackley	5/23/08	40807	Post review adjust	1.25	112.50	
1029 J Kemperas	5/19/08	40425	Consultation-Inhouse	.50	105.00	
1029 J Kemperas	7/16/08	40411	Quality Control Rev	.50	105.00	
1827 B Yackley	6/10/08	40803	Prep report/CD's	1.00	90.00	
1827 B Yackley	6/10/08	40801	Prep work papers	1.00	90.00	
1827 B Yackley	5/19/08	40701	Review prov records	1.00	90.00	
1827 B Yackley	5/19/08	40801	Prep work papers	1.00	90.00	
1827 B Yackley	4/07/08	40708	Review CD's/register	1.00	90.00	
1827 B Yackley	3/28/08	40708	Review CD's/register	1.00	90.00	
1827 B Yackley	3/28/08	40706	Verify reported hrs	1.00	90.00	
1827 B Yackley	3/27/08	40706	Verify reported hrs	1.00	90.00	
1827 C Wilcher	6/24/08	40412	Technical Review	.75	86.25	
1827 C Wilcher	3/26/08	40704	Classify employees	.75	86.25	
1827 C Wilcher	6/27/08	40412	Technical Review	.50	57.50	
1029 J Kemperas	7/11/08	40411	Quality Control Rev	.25	52.50	
1029 J Kemperas	3/25/08	40425	Consultation-Inhouse	.25	52.50	
1029 J Kemperas	2/28/08	40311	Initial file prep	.25	52.50	
1029 J Kemperas	2/27/08	40311	Initial file prep	.25	52.50	
1029 J Kemperas	2/21/08	40311	Initial file prep	.25	52.50	
1827 B Yackley	7/16/08	40807	Post review adjust	.50	45.00	
1827 B Yackley	6/11/08	40801	Prep work papers	.50	45.00	
1827 B Yackley	6/10/08	40805	Prep remarks	.50	45.00	
1827 B Yackley	6/10/08	40802	Prep report/payroll	.50	45.00	
1827 B Yackley	6/09/08	40805	Prep remarks	.50	45.00	
1827 B Yackley	6/09/08	40803	Prep report/CD's	.50	45.00	
1827 B Yackley	6/09/08	40802	Prep report/payroll	.50	45.00	
1827 B Yackley	6/09/08	40801	Prep work papers	.50	45.00	
1827 B Yackley	5/29/08	40801	Prep work papers	.50	45.00	
1827 B Yackley	4/30/08	40803	Prep report/CD's	.50	45.00	
1827 B Yackley	5/01/08	40712	Review invoices etc	.50	45.00	
1827 B Yackley	4/09/08	40708	Review CD's/register	.50	45.00	
1827 B Yackley	3/28/08	40711	Review bank stmts	.50	45.00	
1827 B Yackley	3/26/08	40703	Reconcile wages	.50	45.00	
199 C Expenses	5/07/08	99910	Auto - Local Mi Yackley	17.17	17.17	
1833 M Conversa	2/22/08	40312	Database inquiry	.25	25.00	
199 C Expenses	4/04/08	99910	Auto - Local Mi Yackley	16.16	16.16	
1827 B Yackley	6/11/08	40805	Prep remarks	.25	22.50	
1827 B Yackley	6/11/08	40803	Prep report/CD's	.25	22.50	
1827 B Yackley	6/11/08	40802	Prep report/payroll	.25	22.50	
1827 B Yackley	5/23/08	40313	Calls to employer	.25	22.50	
1827 B Yackley	5/09/08	40702	Consult-employer	.25	22.50	
1827 B Yackley	4/28/08	40702	Consult-employer	.25	22.50	

Date: 1/18/10
Time: 14:05:19

Legacy Professionals LLP
Job Detail Inquiry

Client: 9425 Chgo RC Carp PRA
Job...: PR1601 Lamp, Inc.

BLM325

Employee No.	Employee Name	WIP Date	Serv. Code	Description	Total Hours	Standard Charge	N	C
1827	B Yackley	4/17/08	40702	Consult-employer	.25	22.50		
1827	B Yackley	3/31/08	40805	Prep remarks	.25	22.50		
1827	B Yackley	3/28/08	40710	Review gen ledger	.25	22.50		
1827	B Yackley	3/28/08	40702	Consult-employer	.25	22.50		
1827	B Yackley	3/27/08	40702	Consult-employer	.25	22.50		
1827	B Yackley	3/27/08	40801	Prep work papers	.25	22.50		
1827	B Yackley	3/28/08	40716	Review Tax Return	.25	22.50		
1827	B Yackley	3/28/08	40715	Review 1099's, 1096	.25	22.50		
1827	B Yackley	3/28/08	40714	Exit meeting	.25	22.50		
1827	B Yackley	3/27/08	40713	call office - field	.25	22.50		
1827	B Yackley	3/27/08	40710	Review gen ledger	.25	22.50		
1827	B Yackley	3/26/08	40705	Rev CR's other Funds	.25	22.50		
1827	B Yackley	3/26/08	40702	Consult-employer	.25	22.50		
1827	B Yackley	3/26/08	40701	Review prov records	.25	22.50		
1827	B Yackley	3/25/08	40311	Initial file prep	.25	22.50		
1827	B Yackley	3/25/08	40313	Calls to employer	.25	22.50		
1827	B Yackley	3/14/08	40313	Calls to employer	.25	22.50		
1827	B Yackley	3/11/08	40313	Calls to employer	.25	22.50		
1827	B Yackley	3/03/08	40313	Calls to employer	.25	22.50		
1843	D Vander Vorst	2/21/08	40311	Initial file prep	.25	16.75		
781	J McCord	2/18/08	40494	Report Processing		8.00		
199	C Expenses	4/04/08	99910	Auto - Local Mi Yackley		3.00		
199	C Expenses	7/02/08	99912	Local-Parking;T Wilcher		3.00		
					49.00	4978.66		

49
x 67

\$ 3283.00

Date: 1/18/10
Time: 14:05:11

Legacy Professionals LLP
Job Detail Inquiry

BLM325

Client: 9425 Chgo RC Carp PBA
Job...: PR1691 Lamp, Inc.

Employee No.	Employee Name	WIP Date	Serv. Code	Description	Total Hours	Standard Charge	N	C
1845	A Derrick	9/24/08	40810	Post audit con-Fund Emailed invoices for Ben to the fund.	1.00	90.00		
1827	B Yackley	9/23/08	40810	Post audit con-Fund	.25	22.50		
					1.25	112.50		

\$ 83.75

09 CV 1591

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND and its)	
Trustees, et al.,)	
)	Case No. 09 C 1591
Plaintiffs,)	
v.)	Judge Conlon
)	
LAMP INCORPORATED, an Illinois)	Magistrate Nolan
corporation,)	
)	
Defendant.)	

DECLARATION OF KEVIN P. MCJESSY

I, Kevin P. McJessy, hereby declare, under penalty of perjury pursuant to the laws of the United States, as follows:

1. I am one of the attorneys representing the Chicago Regional Council of Carpenters Pension Fund ("Pension Fund"), the Chicago Regional Council of Carpenters Welfare Fund ("Welfare Fund"), the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program ("Trainee Fund"), and the Labor/Management Union Carpentry Cooperation Promotion Fund ("Labor/Management Fund") (collectively "the Trust Funds") in the above-captioned lawsuit ("Lawsuit") against LAMP INCORPORATED ("Defendant").

2. I have been licensed to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois since 1995. I am an attorney with McJessy, Ching & Thompson, LLC ("MC&T").

3. As part of my practice, I handle claims under ERISA. I personally represented the Trust Funds in this Lawsuit. I have represented the Trust Funds in this Lawsuit since its inception.

4. The Trust Funds have incurred \$3,597.61 in fees and expenses to compel Defendant to comply with their obligations under the terms of the Collective Bargaining Agreement and applicable trust agreements. A redacted copy of the billing statement from MC&T from the inception of this lawsuit to the present, redacted to protect privileged communications, is attached as Exhibit C-1.

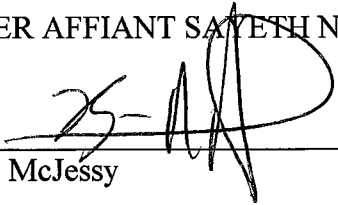
a) **Fees.** The Trust Funds have collectively incurred fees totaling \$3,136.00 for 19.6 hours of attorney services. The hourly rate for attorneys at MC&T is \$160 per hour. The Trust Funds have collectively incurred fees totaling \$108.00 for 1.8 hours of paralegal time. The hourly rate for paralegals at MC&T is \$60 per hour. The Trust Funds incurred these fees in connection with efforts to obtain Defendant's compliance with the terms of the Collective Bargaining Agreement and Trust Agreements.

b) **Costs.** The Trust Funds incurred \$453.61 in expenses for court costs, process server, photocopy, courier and postage charges.

5. The attorneys' fees, paralegal fees and costs charged to the Trust Funds in this matter are consistent with MC&T's regular charges for services to the Trust Funds on similar matters.

6. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.

FURTHER AFFIANT SAYETH NOT.



Kevin P. McJessy

09 C 1591
Exhibit C-1

Date	Received From/Paid To	Chq#	General		Fees	Bld	Trust Activity		Balance
			Entry #	Explanation			Rec#	Rcpts	
1000	Chicago Regional Council of Carpenters 0129-LAMP Lamp, Inc.								
Mar 9/2009	Lawyer: KM 0.10 Hrs X 160.00								
39418	Brief initial review of audit referral as to putative defendant and nature of claim.				16.00	3115			
Mar 13/2009	Lawyer: SK 0.40 Hrs X 160.00								
38997	Filed complaint and related documents electronically with court; prepared email correspondence with judicial Attorney Steve Forrester; compiled and summons for service; prepared email correspondence				241.00	3115			
Mar 13/2009	Lawyer: KM 2.10 Hrs X 160.00								
39489	Reviewed audit referral file; prepared draft complaint; edited and revised attendant documents, appearance, civil cover and summons. Final review of all documents before filing.				336.00	3115			
Mar 19/2009	Lawyer: SK 0.20 Hrs X 160.00								
39070	Reviewed affidavit of service of summons and complaint received from judicial Attorney Seavick. Filed affidavit of service electronically with court.				12.00	3115			
Mar 19/2009	Lawyer: KM 0.10 Hrs X 160.00								
39535	Reviewed return of summons executed.				16.00	3115			
Mar 23/2009	Lawyer: KM 0.20 Hrs X 160.00								
39090	Reviewed ECF court order of Judge Conlon re: status hearing; forward documents to defendant and report; reviewed Judge Conlon's case management procedures; reviewed correspondence to defendant forwarding order and Judge Conlon's case management procedures.				32.00	3115			
Mar 23/2009	Expense Recovery								
39219	Postage Recovery	00148		0.59		3115			
Mar 25/2009	Judicial Attorney Services								
39141	Process server recovery	2804		38.00		3115			
Mar 31/2009	Expense Recovery								
39195	Photocopy Recovery	00147		0.72		3115			
Apr 8/2009	Billing on Invoice 3115								
38799	FEES 486.00 DISBS 59.31			0.00		3115			
Apr 16/2009	Lawyer: KM 0.30 Hrs X 160.00								
40087	Reviewed correspondence from C. Santoro re: [REDACTED]. Reviewed [REDACTED] forwarded by C. Santoro [REDACTED].				48.00	3228			
Apr 23/2009	Capital One Services								
39909	Filing Fee	2821		350.00		3228			
May 6/2009	Lawyer: KM 0.50 Hrs X 160.00								
40793	Reviewed documents from Lamp, Inc. re: responding to audit and addressing 160-hour violation.				80.00	3267			
May 8/2009	Chicago Regional Council of Carpe								
40254	PMT	00709	495.31						
May 8/2009	Billing on Invoice 3228								
40353	FEES 48.00 DISBS 350.00			0.00		3228			
May 12/2009	Lawyer: KM 1.00 Hrs X 160.00								
40859	Appeared in court for status of claim before Judge Conlon; matter continued for status.				160.00	3267			
May 15/2009	Lawyer: KM 0.10 Hrs X 160.00								
40904	Reviewed ECF court order of Judge Conlon re: Lamp defaulted for failure to appear on 5/12/09.				16.00	3267			
May 26/2009	Chicago Regional Council of Carpe								
40570	PMT	00721	398.00						
May 29/2009	Expense Recovery								
40669	Photocopy Recovery	00151		5.16		3267			
Jun 12/2009	Billing on Invoice 3267								

Resp Lawyer: KM

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ALL DATES

Date Entry #	Received From/Paid To Explanation	Chq# Rec#	----- General -----		Fees	Bld ----- Trust Activity -----		Balance
			Rpts	Disbs		Inv#	Acc	
41215	FEES 256.00 DISBS			0.00		3267		
Jul 9/2009 41853	Billing on Invoice 3287			0.00		3287		
Jul 24/2009 42354	Chicago Regional Council of Carpe PMT	00749	261	16				
Aug 5/2009 42840	Billing on Invoice 3346			0.00		3346		
Aug 17/2009 42946	Lawyer: KM 0.50 Hrs X 160.00 Reviewed file materials re: assess preparing prove up after entry of default judgment. Telephone call with C. Santoro re: [REDACTED]				80.00	3453		
Aug 18/2009 43394	Lawyer: KM 0.10 Hrs X 160.00 Prepared correspondence to C. Santoro re: [REDACTED]				16.00	3453		
Aug 19/2009 43549	Lawyer: KM 0.50 Hrs X 160.00 Telephone call with C. Santoro re: [REDACTED] Reviewed correspondence from M. Ravano re: [REDACTED]				80.00	3453		
Sep 22/2009 43584	Billing on Invoice 3453 FEES 176.00			0.00		3453		
Sep 22/2009 44096	Lawyer: KM 1.80 Hrs X 160.00 Telephone call from C. Santoro re: [REDACTED] Reviewed contracts between Lamp and Skasamwood and Lamp and Alagonson re: whether contracts are sufficient to relieve Lamp of subcontracting obligation. Telephone call with C. Santoro re: [REDACTED]				288.00	3558		
Sep 23/2009 44169	Lawyer: KM 0.50 Hrs X 160.00 Telephone call from C. Santoro re: [REDACTED] Reviewed draft letter to Lamp, edited and revised same. Prepared correspondence to C. Santoro re: [REDACTED] Reviewed correspondence from C. Santoro re: [REDACTED]				80.00	3558		
Oct 19/2009 44306	Billing on Invoice 3558 FEES 368.00			0.00		3558		
Oct 21/2009 44949	Lawyer: KM 0.10 Hrs X 160.00 Prepared correspondence to C. Santoro re: [REDACTED]				16.00	3631		
Oct 22/2009 44978	Chicago Regional Council of Carpe PMT	00778	176	00				
Oct 22/2009 44978	Lawyer: KM 0.10 Hrs X 160.00 Lamp has failed to respond to Trust Funds' request for additional documents.				16.00	3631		
Nov 9/2009 44600	Chicago Regional Council of Carpe PMT	00788	368	00				
Nov 24/2009 45678	Lawyer: KM 0.10 Hrs X 160.00 Prepared correspondence to C. Santoro re: [REDACTED]				16.00	3689		
Nov 25/2009 45181	Billing on Invoice 3631 FEES 32.00			0.00		3631		
Dec 21/2009 45801	Billing on Invoice 3689 FEES 16.00			0.00		3689		
Dec 23/2009 46224	Lawyer: ATT 0.40 Hrs X 160.00 Initial drafting of motion to				64.00	3776		

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Date Entry #	Received From/Paid To Explanation	Chq# Rec#	General		Fees	Trust Activity		Balance
			----- Rcpts	----- Disbs		----- Rcpts	----- Disbs	
	Prove up damages and for entry of final judgment							
Dec 24/2009 45874	Chicago Regional Council of Carpe PMT -	00811	32.00					
Dec 31/2009 45909	Expense Recovery Photocopy Recovery	00176		0.60		3776		
Jan 11/2010 47006	Lawyer: ATT 0.90 Hrs X 160.00 Drafted motion for final judgment and declarations of J. Libby, C. Kogut and K. McJessy.				144.00	3861		
Jan 11/2010 47037	Lawyer: KM 0.40 Hrs X 160.00 Edited and revised motion for judgment and declarations of C. Kogut and K. McJessy.				64.00	3861		
Jan 12/2010 46671	Lawyer: ATT 0.30 Hrs X 160.00 Call and email to C. Kogut re: declaration and auditors' fees.				48.00	3861		
Jan 13/2010 46355	Billing on invoice 3776 FEES 64.00 DISBS 0.60			0.00		3776		
Jan 18/2010 46785	Lawyer: KM 0.20 Hrs X 160.00 Reviewed correspondence from C. Kogut re: declaration in support of motion and time records.				32.00	3861		
Jan 24/2010 46874	Lawyer: KM 0.10 Hrs X 160.00 Prepared correspondence to N. Lagalo re: [REDACTED]				16.00	3861		
Jan 25/2010 46902	Lawyer: KM 0.10 Hrs X 160.00 Reviewed correspondence from N. Lagalo re: [REDACTED]				16.00	3861		
Jan 29/2010 46674	Lawyer: ATT 0.40 Hrs X 160.00 Compiled new liquidated damages and interest and revised declaration of J. Libby and exhibits.				64.00	3861		
Jan 31/2010 46817	Expense Recovery Photocopy Recovery	00178		6.48		3861		
Feb 1/2010 46547	Lawyer: KM 0.20 Hrs X 160.00 Final changes to declaration of J. Libby and reviewed documents attached to his declaration.				32.00	3913		
Feb 1/2010 46553	Lawyer: SK 0.20 Hrs X 60.00 Reviewed and revised declaration of J. Libby and supporting exhibits. Prepared email correspondence to J. Libby [REDACTED]				12.00	3913		
Feb 2/2010 46552	Lawyer: SK 0.20 Hrs X 60.00 Reviewed billing records and completed billing information for K. McJessy supporting declaration.				12.00	3913		
Feb 3/2010 47491	Lawyer: ATT 0.60 Hrs X 160.00 Final draft and scheduling of motion to prove up damages including amending declarations.				96.00	3913		
Feb 3/2010 47834	Lawyer: SK 0.80 Hrs X 60.00 Prepared notice of motion for prove up of damages. Reviewed exhibits to motion and redacted appropriate information per court order. Filed motion and notice electronically with court. Prepared appearance of J. Sopata and filed appearance electronically with court. Prepared correspondence to A. Rone, Judge Conlon's deputy, forwarding courtesy copies of notice and motion.				48.00	3913		
Feb 4/2010 47294	Expense Recovery Postage Recovery	00180		2.41		3913		
Feb 4/2010 47590	Lawyer: KM 0.30 Hrs X 160.00 Final edits to motion for entry of final judgment prior to filing same.				48.00	3913		
Feb 8/2010 47615	Lawyer: KM 0.40 Hrs X 160.00 Telephone call from C. Santoro re: [REDACTED] [REDACTED]. Prepared correspondence to C. Santoro				64.00	3913		

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ALL DATES

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	Balance
	re: [REDACTED]									
Feb 12/2010	Chicago Regional Council of Carpe									
46667	PMT	00839	16.00							
Feb 15/2010	Lawyer: KM 1.40 Hrs X 160.00									
47670	Reviewed correspondence from C. Santoro re: [REDACTED]				224.00	3913				
	[REDACTED]									
	Reviewed contracts from Trust Funds. Prepared correspondence to C. Santoro re: [REDACTED]									
	[REDACTED]									
	[REDACTED]									
Feb 16/2010	Lawyer: KM 0.30 Hrs X 160.00									
47686	Reviewed [REDACTED] re: Santoro				48.00	3913				
Feb 17/2010	Lawyer: KM 1.20 Hrs X 160.00									
47720	Reviewed correspondence from C. Santoro re: [REDACTED]				192.00	3913				
	[REDACTED] Reviewed revised audit reports. Telephone call with S. Lamp re: follow up on audit, adjustments complete. Prepared correspondence to S. Lamp re: demand on audit. Prepared correspondence to C. Santoro re: [REDACTED]									
	[REDACTED]									
Feb 18/2010	Lawyer: ATT 1.70 Hrs X 160.00									
47836	Attended motion to prove up final damages, motion continued by court re 2/23/10				272.00	3913				
Feb 19/2010	Billing on Invoice 3861									
47147	FEES 384.00 DISBS 6.48			0.00		3861				
Feb 24/2010	Lawyer: KM 0.20 Hrs X 160.00									
47758	Appeared before Judge Conlon re: motion for prove up of damages, motion withdrawn to be refiled based on revised audit report				192.00	3913				
Feb 28/2010	Expense Recovery									
47314	Photocopy Recovery	00181		16.56		3913				
Mar 3/2010	Chicago Regional Council of Carpe									
47394	PMT	00848	455.08							
Mar 18/2010	Lawyer: ATT 0.90 Hrs X 160.00									
48082	Revised motion for final judgment based on new amounts due. Drafted declaration of J. Libby.				144.00					
Mar 23/2010	Lawyer: ATT 0.50 Hrs X 160.00									
48083	Final draft of motion for prove up and for entry of final judgment				80.00					
Mar 24/2010	US Messenger & Logistics									
47526	Courier	3090		13.09						
Mar 29/2010	Billing on Invoice 3913									
48067	FEES 1240.00 DISBS 18.97			0.00		3913				

TOTALS	UNBILLED				= TOTAL	BILLED				BALANCES	
	CHE	+	RECOV	+ FEES		DISBS	+ FEES	+ TAX	- RECEIPTS	= A/R	TRUST
PERIOD	13.09		0.00	224.00	237.09	440.52	3020.00	0.00	2201.55	1258.97	0.00
END DATE	13.09		0.00	224.00	237.09	440.52	3020.00	0.00	2201.55	1258.97	0.00

FIRM TOTAL	UNBILLED				= TOTAL	BILLED				BALANCES	
	CHE	+	RECOV	+ FEES		DISBS	+ FEES	+ TAX	- RECEIPTS	= A/R	TRUST
PERIOD	13.09		0.00	224.00	237.09	440.52	3020.00	0.00	2201.55	1258.97	0.00
END DATE	13.09		0.00	224.00	237.09	440.52	3020.00	0.00	2201.55	1258.97	0.00

REPORT SELECTIONS - Client Ledger

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