

EXHIBIT C

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

TRUSTEES of the CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS PENSION FUND,)	
CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS WELFARE FUND, and CHICAGO)	CASE NO. 09CV1697
REGIONAL COUNCIL OF CARPENTERS)	
APPRENTICE & TRAINEE PROGRAM FUND,)	
)	JUDGE DOW
Plaintiffs,)	
vs.)	
)	
LAPORTA CONSTRUCTION SERVICE CO., INC.,)	
)	
Defendant.)	

DECLARATION OF AMY ELIZABETH PALUCH EPTON

Pursuant to 28 U.S.C. § 1746, I, Amy Elizabeth Paluch Epton, do declare under penalty of perjury that the following is true and correct:

1. I am an associate in the law firm of Whitfield, McGann & Ketterman and one of the attorneys for Plaintiffs in the above captioned matter. I am licensed to practice law in the State of Illinois and for the United States District Court for the Northern District of Illinois. I make this Declaration in support of Plaintiffs' Motion for Default Judgment.

2. I have personal knowledge of the facts stated herein and am competent to give testimony as recited herein and from my own personal knowledge.

3. The Collective Bargaining Agreement and the Trust Agreements under which this action is based provide for the payment of liquidated damages, audit fees and attorneys' fees and costs incurred for failure of a signatory contractor to pay contributions in accordance with those Agreements.

4. I, Amy Elizabeth Paluch Epton, have devoted 7.95 hours in connection with the above-captioned case at the rate of \$ 185.00 per hour. My total billings are \$ 1,423.24.

5. In addition, the filing fee was \$350.00; audit fees in the amount of \$1,246.20; fee for attempted service of process via Special Process Server was \$55.00 (non-service), and the fee for Affidavit of Compliance for Service on Secretary of State was \$10.00. These costs total \$1,661.20.

6. I certify that the attached detailed attorney fees and costs totaling \$ 3,084.44 were necessary and reasonable.

7. Notice of this Motion for Default was given to Defendant by mailing a copy of the same to Daniel J. LaPorta, Registered Agent, 6 Trent Court, Bolingbrook, Illinois 60490.

Dated: May 28, 2009

/s/ Amy Elizabeth Paluch Epton

Amy Elizabeth Paluch Epton
Attorney for the Plaintiffs
Whitfield, McGann & Ketterman
111 E. Wacker Drive, Suite 2600
Chicago, IL 60601
(312) 251-9700, Fax (312) 251-9701
#6278817
Attorney No. 6290051

Selection Criteria

Slip.Date Earliest - 5/20/2009
Slip.Classification Open
Case (hand select) Include: CTF-A./N7976/23102

Rate Info - identifies rate source and level

Slip ID	ATTORNEY	Units	Rate	Slip Value	
Dates and Time	Activity	DNB Time	Rate Info		
Posting Status	Case	Est. Time	Bill Status		
Description	Reference	Variance			
374066	TIME	AEPE	1.50	185.00	277.50
3/16/2009	Billable	0.00	T@7		
Billed	G:75801 4/1/2009	CTF-A./N7976/23102	0.00		
Reviewed file. Lexis searches for registered agent, officers, related companies, pending lawsuits, UCC filings.					
374125	TIME	AEPE	2.00	185.00	370.00
3/17/2009	Billable	0.00	T@7		
Billed	G:75801 4/1/2009	CTF-A./N7976/23102	0.00		
Drafted a Complaint.					
374231	TIME	AEPE	1.00	185.00	185.00
3/18/2009	Billable	0.00	T@7		
Billed	G:75801 4/1/2009	CTF-A./N7976/23102	0.00		
Prepare correspondence to legal process server Scott Forrest Stern & Associates, Inc. regarding service of the summons and complaint on the defendant; prepare correspondence to James Rosemeyer, ERISA Contributions Manager, Chicago District Council of Carpenters' Trust Funds regarding the filling of the complaint; enclose copy of the summons and complaint; docket follow-up dates for service.					
374903	TIME	AEPE	0.25	185.00	46.25
3/31/2009	Billable	0.00	T@7		
Billed	G:75801 4/1/2009	CTF-A./N7976/23102	0.00		
Reviewed filing. Updated status for judicial assignment.					
375274	EXP	CPW	1	350.00	350.00
4/7/2009	\$DC				
Billed	G:76069 5/1/2009	CTF-A./N7976/23102			
FILING FEE (3/18/09)					
375966	TIME	AEPE	0.50	185.00	92.50
4/20/2009	Billable	0.00	T@7		
Billed	G:76069 5/1/2009	CTF-A./N7976/23102	0.00		
Reviewed process servers remarks for failed					

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
			service. Arranged for reservice.				
376396	4/21/2009	EXP	Billed SECRETARY of STATE- FILING FEE	CPW \$SOS CTF-A./N7976/23102	1	10.00	10.00
376141	4/21/2009	TIME	Billed Reviewed Docket: The Court's review of the complaint indicates that it is appropriate to give this ERISA case expedited treatment. The parties are authorized to proceed with all discovery. Discovery to be completed by 7/17/09. Plaintiff to make a disclosure pursuant to Fed.R.Civ.P. 26(a)(1) by 5/19/09. Parties to file a joint status report by 5/26/09. Status hearing set for 6/2/09 at 9:00a.m. Plaintiff should notify all other parties of the court's order. Downloaded documents to file. Diaried dates for compliance.	AEPE Billable CTF-A./N7976/23102	0.25 0.00 0.00 0.00	185.00 T@7	46.25
376161	4/21/2009	TIME	Billed Completed the forms necessary for certificate of service of the summons on the secretary of state. Drafted a letter requesting notification when it is ready. Diaried for default when that is done.	AEPE Billable CTF-A./N7976/23102	1.00 0.00 0.00 0.00	185.00 T@7	185.00
376341	4/24/2009	TIME	Billed Telephone call from the Secretary of State's office, requesting changes in the Affidavit. Drafted a letter commemorating those changes.	AEPE Billable CTF-A./N7976/23102	0.75 0.00 0.00 0.00	185.00 T@7	138.75
376663	4/28/2009	TIME	Billed Review Scott Forrest Legal process server Scott Forrest Stern & Associates, Inc. & Associates, Inc.'s report on service of the Summons and Complaint; review process server remarks regarding details of service of process, review affidavit of service for legality, memo to clerk regarding filing of affidavit in Federal court, docket follow up	AEPE Billable CTF-A./N7976/23102	0.50 0.00 0.00 0.00	185.00 T@7	92.50

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
	dates for Answer due date.						
376803	EXP			CPW	1	5.49	5.49
	4/28/2009			\$CERT.			
	Billed	G:76069	5/1/2009	CTF-A./N7976/23102			
	CERTIFIED MAIL						
377730	TIME			DPM	0.20	195.00	39.00
	5/8/2009			Billable	0.00	T@7	
	WIP			CTF-A./N7976/23102	0.00		
	Review the prior attorney fees and status of the last quarterly litigation status report; review attorney fees through 04/30/09 review case for current status; calculate amounts collected, total and since the last quarter; update the report for the May 2009 quarterly trustees' meeting: La Porta Construction Service Company, Inc. - 23102.				0.00		
Grand Total							
				Billable	7.95		1838.24
				Unbillable	0.00		0.00
				Total	7.95		1838.24

- 350 fil fee
 - 55.00 process
 - 10.00 sec
 state
 1423.24

STERN PROCESS & INVESTIGATION, LLC

Tax ID 04-3801615

205 W. RANDOLPH ST 730

CHICAGO, IL, 60606

Phone (312)-853-2150

Fax (312)-853-3119

Customer

WHITFIELD, MCGANN & KETTERMAN

111 E WACKER DRIVE 2600

CHICAGO, IL, 60601

Phone: (312)-251-9700 Fax: (312)-251-9701

Invoice# 221254

Date Of Invoice: 4/15/2009

Plaintiff: Trustees of the Chicago Regional Council of Carpenters Pension Fund, et al.

Court CaseID: 09CV1697

Firm# N7976 AEPE

Case Returned Date: 4/22/09

County: UNITED STATES DISTRICT COURT

Process Server: MICHAEL P. FEEHAN

ProcessType: SUMMONS AND COMPLAINT

Defendant:#1 LaPorta Construction Service Co., Inc.				Type Of Service: NON-SERVICE	
Person Served:				Date Of Service: 4/14/2009	Time: 8:50 PM
Sex	Age	Height	Build	Hair Color	Race

Defendant:#2				Type Of Service:	
Person Served:				Date Of Service:	Time:
Sex	Age	Height	Build	Hair Color	Race

Location 6 Trent Court , Bolingbrook, IL, 60490

Type Of Premise: SINGLE FAMILY HOME

Delivery Charge	\$0.00	Rush	\$0.00
Bad Address	\$0.00	Filing	\$0.00
No Contact	\$55.00	Investigation	\$0.00
Database/Skip	\$0.00	Advanced fees	\$0.00

Total: \$55.00

Date Received

Check No

Amount Received

\$0.00

Balance Due

\$55.00

INFORMATION DEEMED RELIABLE BUT NOT GUARANTEED**PAYABLE UPON RECEIPT, 2% PER MONTH**