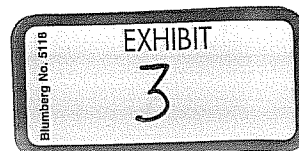


**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES of the PIPE FITTERS)	
RETIREMENT FUND, LOCAL 597;)	
BOARD OF TRUSTEES of the PIPE FITTERS)	CIVIL ACTION
WELFARE FUND, LOCAL 597;)	
BOARD OF TRUSTEES of the PIPE FITTERS)	
TRAINING FUND, LOCAL 597; the)	NO.: 09-CV-2581
BOARD OF TRUSTEES of the CHICAGO AREA)	
MECHANICAL CONTRACTING INDUSTRY)	
IMPROVEMENT TRUST;)	JUDGE: PALLMEYER
THE PIPE FITTERS' ASSOCIATION,)	
LOCAL 597 U.A.; BOARD OF TRUSTEES)	
of the PIPE FITTERS' INDIVIDUAL)	MAGISTRATE
ACCOUNT and 401(K) PLAN; and)	JUDGE: MASON
BOARD OF TRUSTEES of the PIPE FITTING)	
COUNCIL OF GREATER CHICAGO,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
WAGNER HEATING AND VENTILATING CO.)	
an Illinois Corporation.)	
)	
Defendant.)	

AFFIDAVIT OF GREG WATSON

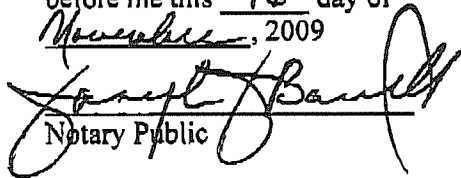
I, Gregory J. Watson, hold the title of Collection Coordinator for the PIPE FITTERS' RETIREMENT FUND, LOCAL 597, the PIPE FITTERS WELFARE FUND, LOCAL 597, the PIPE FITTERS' TRAINING FUND, LOCAL 597, the CHICAGO AREA MECHANICAL CONTRACTING INDUSTRY IMPROVEMENT TRUST, the PIPE FITTERS' INDIVIDUAL ACCOUNT and 401(K) PLAN, the PIPE FITTING COUNCIL OF GREATER CHICAGO ("TRUST FUNDS") and the PIPE FITTERS ASSOCIATION, LOCAL 597 U.A. ("UNION"). Being first duly sworn, on oath state that to the best of my knowledge the following is an accurate statement as to the Defendant's delinquency and the costs that the TRUST FUNDS and



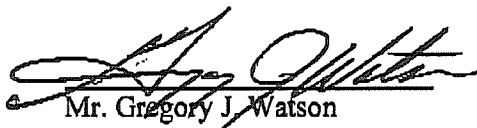
UNION have incurred in the above-captioned matter:

1. WAGNER HEATING AND VENTILATING CO., ("WAGNER") currently owes the TRUST FUNDS \$3,811.95 in unpaid contributions for the month of October of 2008.
2. WAGNER currently owes the TRUST FUNDS liquidated damages in the amount of \$2,813.37 and interest in the amount of \$434.80.
3. WAGNER owes the TRUST FUNDS \$4,569.50 in reasonable attorney's fees pursuant to the terms of the Collective Bargaining Agreement, Trust Agreements and 29 U.S.C. § 1132(g)(2)(D).
4. The known total aggregate amount currently owed to Plaintiffs by Defendant WAGNER is \$11,629.62.

Subscribed and sworn
before me this 16 day of
November, 2009


Notary Public

Further, the affiant saith not.


Mr. Gregory J. Watson

