

EXHIBIT B

**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 5934
Plaintiffs,)	
)	Judge Blanche M. Manning
v.)	
)	Magistrate Judge Mason
INDUSTRIAL TRANSMISSION)	
EQUIPMENT, INC., an Indiana corporation,)	
)	
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 Plaintiffs Central States, Southeast and Southwest Areas Pension Fund ("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. I have reviewed the Pension Fund's billing records and have determined that the work performed in connection with this case was performed by myself ("LBB"), George O. Hansen ("GOH"), senior paralegal, and Albert M. Madden ("AMM"), supervising attorney.

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

6. I believe that a reasonable rate per hour for the aforementioned legal services is \$170.00 for work performed by myself. I believe that a reasonable rate per hour for the aforementioned services performed by George O. Hansen is \$140.00 and that a reasonable rate per hour for the aforementioned services performed by Albert M. Madden is \$300.00.


7. On that basis, the total amount of legal fees incurred in this matter is \$1,522.00 (7.6 hours x \$170 per hour for myself, 1.0 hour x \$140 per hour for George O. Hansen, and 0.3 hours x \$300 per hour for Albert M. Madden).

8. The Pension Fund has also incurred costs in the amount of \$520.00 in connection with this litigation.

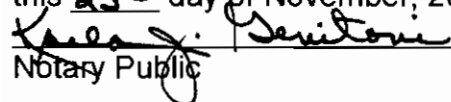
9. Consequently, the total amount of attorney's fees and costs owed is \$2,042.00.

10. I believe that the aforementioned court costs and 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 25th day of November, 2009.


Notary Public

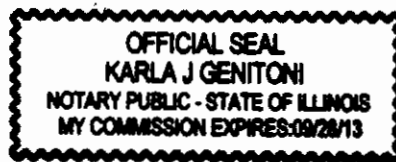


EXHIBIT 1

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

November 25, 2009

**Industrial Transmission II
09111000
CON**

Description of Services

			<u>Hours</u>	<u>Amount</u>
9/16/2009	LBB	Review file; email correspondence with Leda Doherty regarding delinquency; letter voice mail for employer regarding same.	0.50	85.00
9/17/2009	LBB	Left voice mail for Paula Poisel regarding delinquency; review file.	0.20	34.00
9/18/2009	LBB	Left message for Paula Poisel; review file.	0.20	34.00
9/23/2009	LBB	Finalize and file complaint.	1.00	170.00
	AMM	Review Complaint.	0.30	90.00
9/24/2009	LBB	Email correspondence regarding new complaint and appearances.	0.50	85.00
	GOH	Conference with Laura B. Bacon; conference with Action Detective Agency.	1.00	140.00
10/7/2009	LBB	Left voice mail for employer regarding payment; left voice mail for Leda regarding delinquency; review file.	0.50	85.00
10/9/2009	LBB	Left voice mail for Paula Poisel regarding payment; review file.	0.30	51.00
10/13/2009	LBB	Draft letter to employer regarding delinquency.	0.30	51.00

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			<u>Hours</u>	<u>Amount</u>
10/21/2009	LBB	Phone conference with Paula Poisel regarding delinquency.	0.20	34.00
11/3/2009	LBB	Email to Leda Doherty regarding status.	0.20	34.00
11/4/2009	LBB	Review file; draft letter to employer regarding delinquency.	0.70	119.00
11/25/2009	LBB	Draft materials for prove up motion.	3.00	510.00
Total Fees			8.90	\$1,522.00

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Expenses

		<u>Amount</u>
9/23/2009	Complaint filed.	350.00
9/28/2009	Service of summons and complaint.	170.00
Total Expenses		<hr/> \$520.00 <hr/>
Total amount of this bill		<hr/> \$2,042.00 <hr/> <hr/>