

**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-6919
BOARD OF TRUSTEES of the CHICAGO AREA	)	
MECHANICAL CONTRACTING INDUSTRY	)	
IMPROVEMENT TRUST;	)	JUDGE: ANDERSEN
THE PIPE FITTERS' ASSOCIATION,	)	
LOCAL 597 U.A.; BOARD OF TRUSTEES	)	
of the PIPE FITTERS' INDIVIDUAL	)	MAGISTRATE
ACCOUNT and 401(K) PLAN; and	)	JUDGE: SCHENKIER
BOARD OF TRUSTEES of the PIPE FITTING	)	
COUNCIL OF GREATER CHICAGO;	)	
	)	
Plaintiffs,	)	
vs.	)	
	)	
MONARCH HVAC, INC.,	)	
an Illinois Corporation;	)	
	)	
Defendant.	)	

**AFFIDAVIT OF JEFFREY A. KROL  
IN SUPPORT OF ATTORNEY'S FEES AND COSTS**

I, Jeffrey A. Krol, hold the title of Associate Attorney at the law firm of Johnson & Krol, LLC. Being first duly sworn, on oath deposes and states that to the best of my knowledge, the following is an accurate statement as to the attorney's fees and costs the Plaintiffs have incurred in the above-captioned matter:

Date/Description	Min/Hrs/Rate	Amount
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(See attached billing summary for amounts already billed)

<b>Total (Actual)</b>	<b>\$3,033.14</b>
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**Anticipated Attorney's Fees**

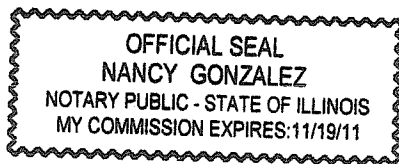
Review Motion For Default Judgment	1.0 / \$195.00	\$195.00
Scan and E-file Motion	1.0 / \$195.00	\$195.00
Court Appearance for Motion	1.0 / \$195.00	\$195.00
<b>Total Anticipated</b>	<b>3:00 / \$195.00</b>	<b>\$585.00</b>
<b>GRAND TOTAL</b>		<b>\$3,618.14</b>

Further, the affiant saith not.

Subscribed and sworn  
Before me this 24 day of  
February, 200910

Nancy Gonzalez  
Notary Public

Jeffrey A. Krol  
Mr. Jeffrey A. Krol



Selection Criteria

Refe.Selection Include: Monarch HVAC, Inc.  
Slip.Transaction Dat 10/1/2009 - 2/26/2010  
Slip.Transaction Dat 10/1/2009 - 2/26/2010  
Slip.Classification Open

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client	Reference	Units	DNB Time	Rate	Rate Info	Slip Value
								Est. Time	Variance	Bill Status		
49201	10/27/2009	TIME	Conference with JAK	Will	Conference			0.17	0.00	195.00	T@1	32.50
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49839	10/27/2009	TIME	Telephone conference with auditor	Joe	tc			0.17	0.00	225.00	T@1	37.50
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49840	10/27/2009	TIME	Conference with WPC and JAK	Joe	Conference			0.33	0.00	225.00	T@1	75.00
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49841	10/27/2009	TIME	Update status of case in Litigation Matters	Joe	Update			0.33	0.00	225.00	T@1	75.00
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49185	10/27/2009	TIME	E-mail correspondence with FO; draft Complaint and other initial documents.	Jeff	e-mail			1.33	0.00	80.00	T@1	106.67
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49370	11/3/2009	TIME	Draft revisions to Complaint; prepare documents for filing; file documents; research Monarch and Moretti; prepare documents for service; draft letter to process server.	Jeff	Draft			1.50	0.00	80.00	T@1	120.00
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49376	11/3/2009	TIME	Review Complaint	Will	Review			0.17	0.00	195.00	T@1	32.50
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.		0.00	0.00			
49388	11/3/2009	EXP	Complaint Filing Fee. (electronic payment: Pay.gov Tracking ID: 24VV0817)	J&K	Complaint			1		350.00		350.00
	Billed	G:12337		11/16/2009	597 TF	Monarch HVAC, Inc.						

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status	Description	Activity	DNB Time	Rate Info	
		Client	Est. Time	Bill Status	
		Reference	Variance		
49678	TIME	Jeff	0.17	80.00	13.33
	11/13/2009 9:43 AM	Court file	0.00	T@1	
	Billed G:12337	11/16/2009 597 TF	0.00		
	Court Filing: summons returned executed.	Monarch HVAC, Inc.	0.00		
50421	EXP	J&K	1	58.00	58.00
	11/24/2009	Process Service			
	Billed G:12395	12/16/2009 597 TF			
	Process service fee completed on 11/12/09 (J&K check 4371)	Monarch HVAC, Inc.			
50412	TIME	Joe	0.50	225.00	112.50
	11/30/2009	tc client	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Tel. conf. with fund office.	Monarch HVAC, Inc.	0.00		
	Tel. conf. with contractor				
	Telephone conference with auditor				
50413	TIME	Joe	0.17	225.00	37.50
	11/30/2009	Update	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Update status of case in Litigation Matters	Monarch HVAC, Inc.	0.00		
51181	EXP	J&K	1	10.00	10.00
	12/1/2009	Research			
	Billed G:12395	12/16/2009 597 TF			
	Reimbursement of research database charges	Monarch HVAC, Inc.			
50608	TIME	Joe	0.17	225.00	37.50
	12/4/2009	Receipt/review	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Receipt and review of correspondence from contractor	Monarch HVAC, Inc.	0.00		
50715	TIME	Jeff	0.67	195.00	130.00
	12/9/2009 9:24 AM	Review	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Review trust funds records; draft letter to Monarch.	Monarch HVAC, Inc.	0.00		
50723	TIME	Jeff	0.25	195.00	48.75
	12/9/2009 10:58 AM	Draft	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Begin drafting motion for default.	Monarch HVAC, Inc.	0.00		
50760	TIME	Jeff	0.58	195.00	113.75
	12/10/2009 10:18 AM	Draft	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Draft motion for default and other documents.	Monarch HVAC, Inc.	0.00		
50878	TIME	Jeff	0.50	195.00	97.50
	12/11/2009 2:10 PM	Court file	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Court Filing: motion for default judgment.	Monarch HVAC, Inc.	0.00		
50909	TIME	Joe	0.17	225.00	37.50
	12/11/2009	Receipt/review	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Receipt and review of correspondence from auditor	Monarch HVAC, Inc.	0.00		

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status	Description	Activity	DNB Time	Rate Info	
		Client	Est. Time	Bill Status	
		Reference	Variance		
50910	TIME	Joe	0.17	225.00	37.50
	12/11/2009	Update	0.00	T@1	
	Billed G:12395	12/16/2009 597 TF	0.00		
	Update status of case in litigation matters	Monarch HVAC, Inc.	0.00		
51215	TIME	Jeff	0.75	195.00	146.25
	12/17/2009 9:56 AM	Draft	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Draft a motion to compel defendant to submit to an audit.	Monarch HVAC, Inc.	0.00		
51213	TIME	Jeff	1.00	195.00	195.00
	12/17/2009	Court	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Court Appearance for motion for default.	Monarch HVAC, Inc.	0.00		
51305	TIME	Jeff	0.58	195.00	113.75
	12/18/2009 11:55 AM	Draft	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Draft revisions to motion; file motion with court.	Monarch HVAC, Inc.	0.00		
51422	TIME	Jeff	0.17	195.00	32.50
	12/22/2009 4:23 PM	e-mail	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	E-mail correspondence with process server.	Monarch HVAC, Inc.	0.00		
51432	TIME	Jeff	0.50	195.00	97.50
	12/23/2009 11:49 AM	Draft	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Draft citations to bank and contractor.	Monarch HVAC, Inc.	0.00		
51440	TIME	Jeff	0.17	195.00	32.50
	12/23/2009	Phone	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Phone call with contractor.	Monarch HVAC, Inc.	0.00		
52172	EXP	J&K	1	33.00	33.00
	12/31/2009	Research			
	Billed G:12409	1/18/2010 597 TF			
	Reimbursement of research database charges: December 2009	Monarch HVAC, Inc.			
51608	TIME	Jeff	0.17	195.00	32.50
	1/4/2010 9:27 AM	Phone	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Phone call to contractor regarding materials for audit.	Monarch HVAC, Inc.	0.00		
51778	TIME	Jeff	0.17	195.00	32.50
	1/7/2010 2:26 PM	Phone	0.00	T@1	
	Billed G:12409	1/18/2010 597 TF	0.00		
	Phone call with auditor regarding supplied documents	Monarch HVAC, Inc.	0.00		
51933	EXP	J&K	1	58.00	58.00
	1/11/2010	Process Service			
	Billed G:12409	1/18/2010 597 TF			
	Process Service Fee on 12/24/09. (J&K check 4436)	Monarch HVAC, Inc.			

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status	Description	Activity	DNB Time	Rate Info	
		Client	Est. Time	Bill Status	
		Reference	Variance		
52395	TIME	Jeff	0.25	195.00	48.75
1/20/2010	1:52 PM	Phone	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Phone call to auditor; revisions to citations.	Monarch HVAC, Inc.	0.00		
52446	TIME	Jeff	0.25	195.00	48.75
1/22/2010	11:15 AM	Draft	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Draft certificate of service; prepare citations for service.	Monarch HVAC, Inc.	0.00		
52763	TIME	Jeff	0.25	195.00	48.75
2/3/2010	10:23 AM	Phone	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Phone call to bank regarding citation; fax to bank; review receipt information in file.	Monarch HVAC, Inc.	0.00		
52788	TIME	Jeff	0.25	195.00	48.75
2/3/2010	3:10 PM	Phone	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Phone call with bank representative (x2); draft answer form for bank.	Monarch HVAC, Inc.	0.00		
52875	TIME	Jeff	0.67	195.00	130.00
2/5/2010	2:47 PM	Phone	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Phone call with contractor regarding judgment (x2); phone call to bank; draft letter of understanding.	Monarch HVAC, Inc.	0.00		
52904	TIME	Jeff	0.25	195.00	48.75
2/8/2010	11:33 AM	Phone	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Phone call to bank; review fax from contractor.	Monarch HVAC, Inc.	0.00		
53011	TIME	Jeff	0.25	195.00	48.75
2/10/2010	3:43 PM	Receipt	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Receipt of check from bank; review file; draft letter to fund office.	Monarch HVAC, Inc.	0.00		
53171	TIME	Jeff	0.25	195.00	48.75
2/15/2010	3:45 PM	Phone	0.00	T@1	
Billed	G:12467	2/17/2010 597 TF	0.00		
	Phone call contractor.	Monarch HVAC, Inc.	0.00		
53325	TIME	Jeff	0.17	195.00	32.50
2/16/2010		Phone	0.00	T@1	
WIP		597 TF	0.00		
	Phone call with Greg Watson.	Monarch HVAC, Inc.	0.00		
53335	TIME	Jeff	0.17	195.00	32.50
2/16/2010		Phone	0.00	T@1	
WIP		597 TF	0.00		
	Phone call with Greg; review current account receivable report.	Monarch HVAC, Inc.	0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
53344	TIME	Jeff	0.25	195.00	48.75
2/17/2010	10:21 AM	Phone	0.00	T@1	
WIP		597 TF	0.00		
Review audit; phone call to auditor regarding audit.		Monarch HVAC, Inc.	0.00		
53391	TIME	Jeff	0.42	195.00	81.25
2/18/2010	9:58 AM	Phone	0.00	T@1	
WIP		597 TF	0.00		
Phone call with contractor; draft letter enclosing offer and audit to contractor.		Monarch HVAC, Inc.	0.00		
53650	TIME	Jeff	0.16	195.00	30.39
2/26/2010	12:02 PM	Draft	0.00	T@1	
WIP		597 TF	0.00		
Draft motion for final judgment.		Monarch HVAC, Inc.	0.00		
Grand Total					
		Billable	14.45		3033.14
		Unbillable	0.00		0.00
		Total	14.45		3033.14