

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

**LABORERS' PENSION FUND and )  
LABORERS' WELFARE FUND OF THE )  
HEALTH AND WELFARE DEPARTMENT )  
OF THE CONSTRUCTION AND GENERAL )  
LABORERS' DISTRICT COUNCIL OF )  
CHICAGO AND VICINITY, JAMES S. )  
JORGENSEN, Administrator of the Funds, )**

**Plaintiffs,**

**v.**

**FRANCIS, LLC**

**Defendant.**

**Case No. 11 C 3884**

**Judge St. Eve**

**AFFIDAVIT OF SARA STEWART SCHUMANN**

STATE OF ILLINOIS )  
 )  
COUNTY OF COOK )


Sara Stewart Schumann, being first duly sworn on oath, deposes and states as follows:

1. I am an associate attorney at the law firm of Allison, Slutsky & Kennedy, P.C., counsel for plaintiffs Laborers' Pension Fund and Laborers' Welfare Fund of the Health and Welfare Department of the Construction and General Laborers' District Council of Chicago and Vicinity (the "Funds") in the action against Francis, LLC (the "Company"). This affidavit is submitted to document attorneys' fees and costs incurred by the Laborers' Funds, in its efforts to enforce the Parties' Settlement Agreement and collect on defendant's Installment Note delinquency, covering work performed from the date of defendant's breach on January 11, 2013 through the present.

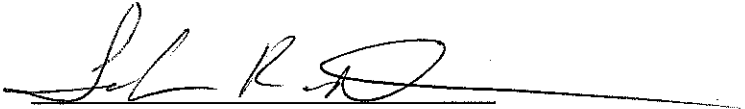
2. Since January 11, 2013, this firm has billed the Laborers' Funds on an hourly basis

for collection services rendered to the Funds, at a rate of \$200.00 per hour for shareholders, \$175.00 per hour for associates, and \$100.00 per hour for clerks/paralegals. In this cause records kept for legal work on this matter were kept contemporaneously and are attached hereto as Exhibit 4A.

3. This fee report is attached here to as Exhibit 4A and sets forth the time expended from January 11, 2013 through the present, by the firm's attorneys and paralegals in this matter. The billable entries were reviewed, and any duplicate entries were struck. As set forth in Exhibit 4A, the Funds have incurred legal fees to my firm in this matter in the amount of \$5,822.50.

  
Sara Stewart Schumann, Associate  
ALLISON, SLUTSKY & KENNEDY, P.C.

Subscribed and sworn to before me  
this 21<sup>st</sup> day of August 2013.

  
NOTARY PUBLIC



Selection Criteria

Slip Classification Open  
 Refe. Selection Include: Francis LLC  
 Clie. Selection Include: Labrs P&W 1  
 Slip.Transaction Dat 1/11/2013 - Latest

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
235317	TIME			Sara Schumann	4.00	175.00	700.00
	2/6/2013			Legal Services	0.00	C@2	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Review file, write motion to reinstate, notice of motion, draft J. Fosco affidavit, calls w/J. Fosco and J. Mashos	Francis LLC	0.00		
234948	TIME			K. Engelhardt	0.10	200.00	20.00
	2/7/2013			Legal Services	0.00	T	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Edit Report to Trustees	Francis LLC	0.00		
235033	TIME			K. Engelhardt	0.10	200.00	20.00
	2/8/2013			Legal Services	0.00	T	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Report to Trustees;	Francis LLC	0.00		
235501	TIME			Sara Schumann	0.30	175.00	52.50
	2/8/2013			Legal Services	0.00	C@2	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Call w/C. Donnelly, write quarterly reports and review delinquency	Francis LLC	0.00		
234746	TIME			Wes Kennedy	0.20	200.00	40.00
	2/10/2013			Legal Services	0.00	C@1	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Work on status reports	Francis LLC	0.00		
234839	TIME			Wes Kennedy	0.20	200.00	40.00
	2/12/2013			Legal Services	0.00	C@1	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Work on summary status reports	Francis LLC	0.00		
235333	TIME			Sara Schumann	1.00	175.00	175.00
	2/12/2013			Legal Services	0.00	C@2	
	Billed	G:11285	3/14/2013	Labrs P&W 1	0.00		
			Court appearance	Francis LLC	0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
235493	TIME			Sara Schumann		0.20	175.00	35.00
	2/21/2013			Legal Services		0.00	C@2	
	Billed	G:11285		3/14/2013	Labrs P&W 1	0.00		
	Email w/C. Donnelly			Francis LLC		0.00		
238392	TIME			Sara Schumann		0.20	175.00	35.00
	4/8/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Email w/C. Donnelly			Francis LLC		0.00		
238404	TIME			Sara Schumann		0.50	175.00	87.50
	4/15/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Email w/C. Donnelly and A. Grossi			Francis LLC		0.00		
238406	TIME			Sara Schumann		0.50	175.00	87.50
	4/16/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Call w/C. Donnelly, email to A. Grossi and J. Mashos			Francis LLC		0.00		
238313	TIME			Sara Schumann		0.20	175.00	35.00
	4/18/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Email w/C. Donnelly			Francis LLC		0.00		
238312	TIME			Sara Schumann		0.70	175.00	122.50
	4/19/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Email w/C. Donnelly, review settlement agreement, call J. Fosco			Francis LLC		0.00		
238310	TIME			Sara Schumann		0.70	175.00	122.50
	4/22/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Email w/C. Donnelly and write quarterly report			Francis LLC		0.00		
238309	TIME			Sara Schumann		3.00	175.00	525.00
	4/23/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Write motion to reinstate case and enforce settlement agreement, notice of motion and certificate of service, draft J. Fosco affidavit, email w/J. Mashos and A. Grossi, calls w/J. Fosco, A. Grossi, and V. Hoang			Francis LLC		0.00		
238308	TIME			Sara Schumann		2.00	175.00	350.00
	4/24/2013			Legal Services		0.00	C@2	
	Billed	G:11322		5/7/2013	Labrs P&W 1	0.00		
	Write motion to reinstate case and enforce settlement agreement, email w/J. Mashos			Francis LLC		0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time	Rate Rate Info	Slip Value
						Est. Time	Bill Status	
						Variance		
238417	TIME			Sara Schumann		1.00	175.00	175.00
	4/26/2013			Legal Services		0.00	C@2	
	Billed	G:11322	5/7/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Prepare for court appearance, draft order to compel, conf. w/K. Engelhardt					
238748	TIME			Sara Schumann		1.00	175.00	175.00
	4/28/2013			Legal Services		0.00	C@2	
	Billed	G:11322	5/7/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Write draft order for default and to compel reporting information, prepare for court appearance					
238511	TIME			K. Engelhardt		0.10	200.00	20.00
	4/29/2013			Legal Services		0.00	T	
	Billed	G:11322	5/7/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			conf. w/ S.S.					
238749	TIME			Sara Schumann		1.50	175.00	262.50
	4/29/2013			Legal Services		0.00	C@2	
	Billed	G:11322	5/7/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Court appearance, conf. w/K. Engelhardt, call w/J. Mashos					
238750	TIME			Sara Schumann		0.50	175.00	87.50
	4/30/2013			Legal Services		0.00	C@2	
	Billed	G:11322	5/7/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Review court order					
239366	TIME			K. Engelhardt		0.20	200.00	40.00
	5/1/2013			Legal Services		0.00	T	
	Billed	G:11349	6/10/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Report to Trustees					
239990	TIME			Sara Schumann		0.50	175.00	87.50
	5/1/2013			Legal Services		0.00	C@2	
	Billed	G:11349	6/10/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Emails w/C. Donnelly, conf. w/A. Smith re serving court order.					
240003	TIME			Sara Schumann		1.00	175.00	175.00
	5/3/2013			Legal Services		0.00	C@2	
	Billed	G:11349	6/10/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Draft affidavit and write cover letter to S. Searles					
240002	TIME			Sara Schumann		0.50	175.00	87.50
	5/6/2013			Legal Services		0.00	C@2	
	Billed	G:11349	6/10/2013	Labrs P&W 1		0.00		
				Francis LLC		0.00		
			Calls w/A. Smith, email w/C. Donnelly, draft letter to S. Searles					

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
240023	5/7/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.40 0.00 0.00	175.00 C@2	70.00
			Email and calls w/S. Searles	Francis LLC				
239449	5/8/2013	TIME	Billed	K. Engelhardt	Labrs P&W 1	0.20 0.00 0.00	200.00 T	40.00
			Conf. w/ SS	Francis LLC				
240026	5/8/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.10 0.00 0.00	175.00 C@2	17.50
			Call w/B. Vargas and J. Mashos	Francis LLC				
240011	5/10/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.30 0.00 0.00	175.00 C@2	52.50
			Calls w/B. Vargas	Francis LLC				
239708	5/13/2013	TIME	Billed	K. Engelhardt	Labrs P&W 1	0.20 0.00 0.00	200.00 T	40.00
			Report to Trustees re: Installment Note	Francis LLC				
240015	5/15/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.10 0.00 0.00	175.00 C@2	17.50
			Call from L Bahtar	Francis LLC				
240032	5/24/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.40 0.00 0.00	175.00 C@2	70.00
			Call w/R. Karris, review file re audit	Francis LLC				
240189	5/28/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.20 0.00 0.00	175.00 C@2	35.00
			Call w/L. Bahtar	Francis LLC				
240190	5/29/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	0.20 0.00 0.00	175.00 C@2	35.00
			Calls and email w/R. Karris	Francis LLC				
240188	5/30/2013	TIME	Billed	Sara Schumann	Labrs P&W 1	1.00 0.00 0.00	175.00 C@2	175.00
			Court appearance, call and email w/R. Karris and S. Searles, call w/J. Mashos	Francis LLC				

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
242156	7/5/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	1.50 0.00 0.00 0.00	175.00 C@2	262.50
			Draft substitute motion for default judgment in amount sum certain				
242132	7/8/2013	TIME	Billed	K. Engelhardt Legal Services Labrs P&W 1 Francis LLC	0.20 0.00 0.00 0.00	200.00 T	40.00
			Report to Trustees, conf. w/ SS				
242157	7/8/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	0.50 0.00 0.00 0.00	175.00 C@2	87.50
			Conf. w/K. Engelhardt, email to S. Searles				
242180	7/9/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	1.00 0.00 0.00 0.00	175.00 C@2	175.00
			Call and email w/S. Searles, prepare for court appearance				
242584	7/10/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	1.30 0.00 0.00 0.00	175.00 C@2	227.50
			Court appearance, call and email w/S. Searles				
242585	7/15/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	0.20 0.00 0.00 0.00	175.00 C@2	35.00
			Email w/S. Searles				
243191	7/26/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	0.30 0.00 0.00 0.00	175.00 C@2	52.50
			Email w/S. Searles and call w/R. Karris				
243007	7/29/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	0.30 0.00 0.00 0.00	175.00 C@2	52.50
			Email w/S. Searles and R. Karris, review texts from S. Searles				
243212	7/31/2013	TIME	Billed	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	0.30 0.00 0.00 0.00	175.00 C@2	52.50
			Call w/S. Searles				
243862	8/21/2013	TIME	WIP	Sara Schumann Legal Services Labrs P&W 1 Francis LLC	4.50 0.00 0.00 0.00	175.00 C@2	787.50
			Write motion to reinstate cause, enforce settlement				

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Slip ID	Attorney	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
	agreement, and enter judgment, prepare exhibits and draft affidavit, run fee report			
Grand Total				
	Billable	33.40		5882.50
	Unbillable	0.00		0.00
	Total	33.40		5882.50

60.00  
\$5,822.50