

EXHIBIT C

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

CENTRAL STATES, SOUTHEAST AND)	
SOUTHWEST AREAS PENSION FUND;)	
and ARTHUR H. BUNTE, JR., as Trustee,)	
)	
<i>Plaintiffs,</i>)	Case No. 12 CV 167
)	
v.)	Judge Ruben Castillo
)	
RINSP, LLC,)	Magistrate Judge Arlander Keys
a Nevada limited liability company,)	
)	
<i>Defendant.</i>)	

DECLARATION OF CHARLES H. LEE

I, Charles H. Lee, having personal knowledge of the facts stated herein, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 as follows:

1. I am an Associate General Counsel employed by the Central States, Southeast and Southwest Areas Pension Fund (the "Pension Fund") and am familiar with the pending litigation.

2. I have reviewed the Plaintiffs' billing records attached hereto as Exhibit 1 and have determined that the billable work performed in connection with this case was performed by myself, Emily E. Gleason, and George O. Hansen.

3. I have been employed by the Pension Fund since July of 2000. I graduated from the University of Minnesota Law School in 1996. I was admitted to the bar of the State of Minnesota on October 25, 1996, and to the bar of the State of Illinois on May 7, 1998. I am admitted to practice in the United States District Court for the Northern District of Illinois

and the United States Court of Appeals for the Seventh Circuit. I am also a member of the Trial Bar of the United States District Court for the Northern District of Illinois.

4. Emily E. Gleason has been employed by the Pension Fund as an attorney since July of 2012. Ms. Gleason graduated from The John Marshall Law School in January 2009, and was admitted to the bar of the State of Illinois on May 7, 2009. She is also admitted to practice in the United States District Court for the Northern District of Illinois. Prior to being hired as an attorney for the Pension Fund, Ms. Gleason practiced for three years as an associate at the law firm Kopon Airdo, LLC.

5. George O. Hansen is a litigation paralegal employed by the Pension Fund.

6. The amount of time spent on this case by myself, Emily E. Gleason, and George O. Hansen, along with our hourly billable rates, are set forth below:

Charles H. Lee	2.7 hours x \$275.00
Charles H. Lee	26.8 hours x \$300.00
Emily E. Gleason	10.3 hours x \$200.00
George O. Hansen	1.0 hours x \$140.00

7. Based upon my experience in similar cases, I believe that the above rates are at or below the market rate charged for similar legal work and therefore, are reasonable. I also believe that the amount of time spent by each individual on this case is reasonable. On that basis, the total of legal fees incurred in this matter is \$10,982.50.

8. Plaintiffs have also incurred the following costs in connection with this litigation:

Filing Fee	\$350.00
Service of Process	21.00

Mileage and Parking	<u>124.63</u>
Total	<u>\$495.63</u>

9. I believe that the aforementioned legal fees and costs were necessarily incurred and are reasonable in amount.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2012

/s/ Charles H. Lee

Charles H. Lee

EXHIBIT 1

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

Page # 1

9/04/2012

RINSP, LLC

11412513

Description of Services

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours/Qty</u>	<u>Amount</u>
12/01/2011	Charles H. Lee	Draft Complaint.	0.50	\$137.50
12/15/2011	Charles H. Lee	Review Illinois law regarding UFTA; changes to complaint; forward complaint to John J. Franczyk for review.	1.00	\$275.00
1/03/2012	Charles H. Lee	Revisions to complaint; e-mail Andrew M. Sprau regarding complaint and incorporate A. Sprau's changes.	0.50	\$137.50
1/11/2012	George O. Hansen	Telephone conference to Carson Gunty, Sheriff; correspond with same.	1.00	\$140.00
3/02/2012	Charles H. Lee	Review judge's order regarding status report; draft status report.	0.70	\$192.50
3/05/2012	Charles H. Lee	E-mails with D. Brown regarding joint status report and conference call; draft joint status report and e-mail oc.	0.90	\$270.00
3/08/2012	Charles H. Lee	E-mails with D. Brown regarding status report and proposed changes.	0.20	\$60.00
3/09/2012	Charles H. Lee	Review defendant's proposed changes to status report; revise joint status report and prepare for e-filing.	0.30	\$90.00
3/14/2012	Charles H. Lee	Court appearance on status and travel time.	2.30	\$690.00
4/04/2012	Charles H. Lee	Draft Rule 26(a)(1) disclosures.	0.60	\$180.00
4/16/2012	Charles H. Lee	E-mails regarding changing settlement conference date.	0.10	\$30.00
4/23/2012	Charles H. Lee	E-mails with judge's clerk and D. Brown regarding submitting settlement letter.	0.10	\$30.00
5/04/2012	Charles H. Lee	Draft First Set of Interrogatories; admissions and document requests.	1.90	\$570.00
5/07/2012	Charles H. Lee	Draft First Set of Interrogatories; admissions; and document requests.	0.50	\$150.00

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RINSP, LLC

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<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours/Qty</u>	<u>Amount</u>
5/15/2012	Charles H. Lee	E-mails regarding scheduling settlement conference.	0.20	\$60.00
5/29/2012	Charles H. Lee	E-mails with defendants and Pete Priede regarding scheduling settlement conference date.	0.30	\$90.00
6/27/2012	Charles H. Lee	Draft settlement letter.	1.80	\$540.00
7/02/2012	Charles H. Lee	Draft and revise settlement letter and serve same.	0.30	\$90.00
7/09/2012	Charles H. Lee	Review defendant's settlement letter; draft letter to Magistrate Judge Keys regarding settlement letters.	0.40	\$120.00
7/11/2012	Charles H. Lee	Review defendant's discovery responses.	0.50	\$150.00
7/19/2012	Charles H. Lee	Court appearance on status and travel time.	2.30	\$690.00
7/20/2012	Charles H. Lee	Draft and serve deposition notices.	0.70	\$210.00
7/27/2012	Charles H. Lee	Telephone conference with D. Brown regarding discovery responses; discuss offer of judgment with John J. Franczyk and research regarding offer of judgment and attorneys' fees.	1.30	\$390.00
7/30/2012	Charles H. Lee	Draft letter to D. Brown regarding discovery conference.	1.10	\$330.00
8/01/2012	Charles H. Lee	Draft and revise motion to compel and e-file same; draft response to motion for protective order.	3.90	\$1,170.00
8/02/2012	Charles H. Lee	Draft response in opposition to motion for protective order; revisions and e-file same.	2.30	\$690.00
8/07/2012	Charles H. Lee	Review Defendant's response to motion to compel; draft reply to motion to compel; e-file same.	2.50	\$750.00

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9/04/2012

RINSP, LLC

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Description of Services

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours/Qty</u>	<u>Amount</u>
8/08/2012	Emily E Gleason	Research bench trial issue in preparation for drafting motion.	1.50	\$300.00
8/08/2012	Charles H. Lee	Court appearance on motion to compel and travel time.	2.30	\$690.00
8/10/2012	Emily E Gleason	Research case law in preparation for moving to strike jury trial.	2.00	\$400.00
8/13/2012	Emily E Gleason	Draft motion to strike jury demand; research case law regarding bench trials for fraudulent transfers of real estate.	3.00	\$600.00
8/14/2012	Emily E Gleason	Draft motion to strike jury demand.	2.50	\$500.00
8/16/2012	Emily E Gleason	Draft Motion to Strike Jury Demand.	1.30	\$260.00
Total:			40.80	\$10,982.50
1/10/2012	Charles H. Lee	U.S. District Court, Northern District of Illinois - Complaint filing fee	1.00	\$350.00
1/11/2012	Charles H. Lee	Carson County Sheriff - fee for service of summons and complaint	1.00	\$21.00
3/14/2012	Charles H. Lee	Mileage and parking fees incurred to attend status hearing in Chicago, Illinois.	1.00	\$40.21
7/19/2012	Charles H. Lee	Mileage and parking fees incurred to attend status hearing in Chicago, Illinois.	1.00	\$44.21
8/08/2012	Charles H. Lee	Mileage and parking fees incurred to attend motion hearing in Chicago, Illinois.	1.00	\$40.21
8/21/2012	Charles H. Lee	Mileage and parking fees incurred to attend status hearing in Chicago, Illinois.	48.21	\$0.00

