

EXHIBIT B
Sworn Declaration of David Whitfield

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

TRUSTEES OF THE CHICAGO)	
REGIONAL COUNCIL OF CARPENTERS)	
PENSION FUND, et al.)	CASE NO. 12 cv 7785
)	
Plaintiffs,)	JUDGE KENDALL
vs.)	
)	
VAN DER LAAN BROTHERS CONCRETE)	
CONTRACTORS, INC.,)	
)	
Defendant.)	

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

David Whitfield, declares as follows:

1. I am an associate of the law firm Whitfield McGann & Ketterman, and I am licensed to practice law in the State of California, the State of Illinois, and in the United States District Court for Northern District of Illinois, Eastern Division.
2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.
3. I have been a licensed attorney for 30 months and have over 24 months of experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to collect delinquent employer contributions.
4. The Collective Bargaining Agreement and the Trust Agreements under which this action is based provide for the payment of attorney's fees and costs incurred if the Trust Funds utilize legal counsel to collect unpaid ERISA contributions.
5. I have spoken with senior attorneys within my firm who in turn have conferred with lawyers from several different labor law firms who practice this type of ERISA trust fund litigation. Based on my knowledge and experience, the rates charges by the hour in this case are less than or equal to the usual and customary rates charged by other law firms doing similar work in the United States District Court for the

Northern District of Illinois.

6. My firm has devoted 53.63 hours in connection with this case at the rate of \$175.00 to \$225.00 per hour. The total attorney fees billings and costs is \$9,885.17.

8. I certify that the attached detailed attorney fees and costs totaling \$9,885.17 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date December 10, 2013

/s/ David Whitfield

Attorney for the Trustees of the Chicago Regional
Council of Carpenters Pension Fund, et al.