

**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.: 13-CV-195
BOARD OF TRUSTEES of the CHICAGO AREA)	
MECHANICAL CONTRACTING INDUSTRY)	
IMPROVEMENT TRUST;)	
THE PIPE FITTERS' ASSOCIATION,)	
LOCAL 597 U.A.; BOARD OF TRUSTEES)	
of the PIPE FITTERS' INDIVIDUAL)	MAGISTRATE
ACCOUNT and 401(K) PLAN; and)	JUDGE: SOAT BROWN
BOARD OF TRUSTEES of the PIPE FITTING)	
COUNCIL OF GREATER CHICAGO,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
KRAMER MECHANICAL LLC, an Illinois)	
Limited Liability Company; and)	
TIMOTHY KRAMER, an Individual.)	
)	
Defendants.)	

AFFIDAVIT OF MICHAEL MALONEY

I, Michael Maloney, hold the title of Field Representative and Collection Coordinator for the PIPE FITTERS RETIREMENT FUND, LOCAL 597, the PIPE FITTERS WELFARE FUND, LOCAL 597, the PIPE FITTERS TRAINING FUND, LOCAL 597, The CHICAGO AREA MECHANICAL CONTRACTING INDUSTRY IMPROVEMENT TRUST PIPE FITTERS' INDIVIDUAL ACCOUNT and 401(K) PLAN, the PIPE FITTING COUNCIL OF GREATER CHICAGO ("TRUST FUNDS") and the PIPE FITTERS' ASSOCIATION, LOCAL 597 U.A. ("UNION"). Being first duly sworn, on oath state that to the best of my knowledge the

EXHIBIT
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following is an accurate statement as to the Defendants' delinquency and the costs that the TRUST FUNDS and UNION have incurred in the above-captioned matter:

1. The Defendants failed to pay contributions for the months of September and October 2013 in the amount of \$89,755.58, in breach of the Secured Settlement Agreement.
2. Defendants currently owe Plaintiffs \$72,076.72 in unpaid principal pursuant to the breached Secured Settlement Agreement.
3. The Defendants owe the Plaintiffs \$15,065.18 in unpaid liquidated damages as a result of the breached Secured Settlement Agreement and for untimely contribution payments for the months of June, September and October 2013.

Subscribed and sworn
before me this 2nd day of
December, 2013

Gail P. Hansen

Notary Public

Further, the affiant saith not.

Mr. Michael Maloney

