

SUPPLEMENTAL AFFIDAVIT OF JEREMY M. BARR

COUNTY OF COOK)
) SS
STATE OF ILLINOIS)

I, **Jeremy M. Barr**, of full age, being duly sworn on my oath, hereby depose and say as follows:

1. I am an attorney admitted to the General Bar of this Court and the State of Illinois.
2. Since February 2010, I have been an associate in the firm Dowd, Bloch & Bennett (“Firm”), where I practice exclusively in the areas of labor, employment, and employee benefits law. In my position at the Firm, I represent the Plaintiffs in Case Number 13-cv-2032.
3. This affidavit is based on my personal knowledge and, if necessary, I could testify to the facts contained in this affidavit.
4. The rate which our firm charges the Funds is \$240.00 per hour for partners’ work; \$175.00 per hour for work completed by me and other associates; and \$90.00 per hour for law clerks’ work. I believe these rates are extremely reasonable in light of the Firm’s experience and the nature of the case.
5. Through December 10, 2013, the Firm has devoted a total of 114.1 billable hours to the representation of the Local No. 731, I.B. of T., Private Scavengers Health and Welfare Fund and the Local No. 731, I.B. of T., Private Scavengers and Garage Attendants Pension (collectively, “Funds”) in connection with this case.
6. Based on the above rates and 114.1 hours of work through December 10, 2013, the Funds have incurred attorneys’ fees and \$20,483.75 related to this case.

Exhibit A

7. Through May 15, 2013 the Funds incurred attorneys' fees for work including demanding payment, communicating with the Funds and the Defendant regarding the status of the case, preparing the Complaint and other related documents, arranging for service, preparing the motion for entry of default, appearing at the hearing on the motion for default, communicating with the Defendants concerning completion of the contribution reports, and preparing the prove-up affidavits and proposed judgment order.

8. Since May 15, 2013 the Funds have incurred attorneys' fees for work including preparing three motions for turnover, drafting a motion for a judgment against Armor Recycling of Indiana, Inc., preparing and litigating a motion for a rule to show cause against the Defendants' owner for violating citations to discover assets, litigating which creditor was entitled to Clune Construction Company's accounts payable to Union Recycling, and conducting three citation examinations.

9. In addition to attorneys' fees, the Funds have incurred costs in the amount of \$1,190.10, comprised of \$350.00 in filing fees, \$272.00 in service fees, \$51.38 in postage and shipping costs, \$343.10 in photocopying and document production expenses, and \$173.62 for LEXIS research fees.

10. Attached as Exhibit 1 are invoices for this case through December 10, 2013, reflecting attorneys' fees of \$20,483.75 and costs of \$1,190.10 related to this case, which have been or will be billed to the Funds.

11. Since December 10, 2013, the Firm has devoted an additional 1.5 hours to resolving this case, including reviewing, revising, and supplementing this affidavit, the motion for a supplemental judgment, and the proposed judgment order, electronically filing those documents, and submitting the proposed judgment order.

12. Consequently, the Funds have incurred an additional \$239.50 in attorneys' fees for services provided from December 11, 2013 through the date this affidavit is filed.

13. I anticipate that, after filing the motion for a supplemental judgment and related documents and submitting the proposed judgment order, I will devote at least three additional hours to this case, in preparing for and attending the hearing on the motion, examining any orders that the Court may enter, and informing my clients and the Defendant of the results.

14. The Funds will therefore incur an additional \$525.00 in attorneys' fees for services provided after the date this affidavit is filed.

15. Accordingly, the total amount of attorneys' fees and costs and fees incurred by the Funds as a result of this action will be \$22,438.35.

I have read the foregoing affidavit and swear that it is true and correct to the best of my knowledge, information, and belief.

Jeremy M. Barr

Jeremy M. Barr

Subscribed and sworn to
before me this 11th day of
December, 2013.

Elsa J. Contreras

Notary Public

