#### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF	7 )	
CARPENTERS PENSION FUND, et al	<i>!.</i> , )	
	)	
Plaintiffs,	)	14 CV 04513
v.	)	
	)	Judge Lee
COMMERCIAL CORPORATE SERVI	ICES, )	
INC., et al.,	)	
	)	
Defendan	ts.	

#### PLAINTIFFS' MOTION FOR DEFAULT AND FOR FINAL JUDGMENT

Plaintiffs, the CHICAGO REGIONAL COUNCIL OF CARPENTERS PENSION FUND, *ET AL*. (collectively "Trust Funds"), by their attorney Kevin P. McJessy, hereby move this Court pursuant to Federal Rules of Civil Procedure 54, 55 and 58 to enter an order of default and for final judgment against COMMERCIAL CORPORATE SERVICES, INC. ("COMMERCIAL"). In support of their motion, Trust Funds state as follows:

- 1. The Trust Funds filed a complaint against COMMERCIAL under the Employee Retirement Income Security Act ("ERISA") because COMMERCIAL is the alter ego of CLEVELAND CORPORATE SERVICES, INC., a dissolved Illinois corporation ("CLEVELAND"). CLEVELAND was signatory to the Area Agreement with the Chicago Regional Council of Carpenters ("Union").
- 2. Whether to treat a non-signatory company as an alter ego of the signatory company and therefore be bound by the collective bargaining agreement depends on numerous factors, including the following: (1) common employees; (2) common management and supervision of employees; (3) common business purpose and customers; (4) common operations; (5) common equipment; (6) common ownership; and (7) whether there is an intent by the

signatory company to circumvent its collective bargaining agreement obligations. Although no individual factor is dispositive in determining whether an alter-ego relationship exists, "the Seventh Circuit considers *unlawful motive or intent to avoid collective bargaining agreement obligations to be the [most] critical elements of the inquiry.*" *Trustees of Pension Funds of Local 701 v. Favia Elec.*, 995 F.2d 785, 789 (7th Cir. 1993).

- 3. As alleged in Trust Funds' complaint in this action, COMMERCIAL is the alter ego of CLEVELAND in that COMMERCIAL assumed the single, major customer of CLEVELAND, engaged in the same work as CLEVELAND using the same equipment, had the same management and control as CLEVELAND, and operated out of the same location as CLEVELAND. As also alleged, COMMERCIAL was formed for the sole purpose of avoiding liability for unpaid fringe benefit contributions of CLEVELAND; its Articles of Incorporation being filed the same day a judgment was entered against CLEVELAND and in favor of the Trust Funds. *See* Complaint ¶17-22, 35-39, 44-52, 60-62, Docket Report Document No. 1.
- 4. The summons and complaint in this action were served on COMMERCIAL and this Court entered an order directing COMMERCIAL to file its answer or responsive pleading on or before February 26, 2015. *See* Exhibit A, Notification of Docket Entry dated February 5, 2015.
- 5. This Court should enter an order of default against COMMERCIAL pursuant to Federal Rule of Civil Procedure 55(a) because COMMERCIAL has failed to answer or otherwise plead.
- 6. Accordingly, Trust Funds hereby submit this motion for default and for entry of final judgment against COMMERCIAL.
  - 7. The amount owed by COMMERCIAL is \$93,590.79 as follows.

- A. Commercial owes \$61,437.78 in unpaid contributions pursuant to the audit. *See* Decl. of J. Libby, ¶7, Exhibit B; The Trust Funds collected \$10,000.00 from a bond posted to secure payment of CLEVELAND fringe benefit contributions.
- B. Commercial owes \$2,736.00 for auditor's fees of incurred by the Trust Funds to complete the audit. See Decl. of J. Libby, ¶9, Exhibit B; *Trustees of the Chicago Plastering Institute Pension Trust v. Cork Plastering Co.*, 570 F.3d 890, 902 (7th Cir. Ill. 2009) ("ERISA itself grants the district court authority to award the plaintiffs their reasonable attorney's fees and costs . . . This court, among others, has construed the latter provision to include an award of audit costs."); *Moriarty ex rel. Local Union No. 727, I.B.T. Pension Trust v. Svec*, 429 F.3d 710, 721 (7th Cir. 2005).
- C. Commercial owes \$5,930.04 in interest pursuant to 29 U.S.C. § 1132(g)(2)(B) on the amount that is due. *See* Decl. of J. Libby, ¶8, Exhibit B; 29 U.S.C. § 1132(g)(2)(B); 29 U.S.C. § 1132(g)(2)(C).
- D. Commercial owes \$12,287.55 in liquidated damages pursuant to 29 U.S.C. § 1132(g)(2)(C). See Decl. of J. Libby, ¶8, Exhibit B; 29 U.S.C. § 1132(g)(2)(B).
- E. Commercial owes \$21,199.42 in reasonable attorneys' fees and costs the Trust Funds incurred pursuant to 29 U.S.C. § 1132(g)(1) and/or § 1132(g)(2)(D). See Decl. of J. Libby, ¶10, Exhibit B; Decl. of K. McJessy, ¶5, Exhibit C; 29 U.S.C. § 1132(g)(1) and (g)(2)(D). See also Trustees of the Chicago Plastering Institute Pension Trust v. Cork Plastering Co., 570 F.3d 890, 902, 903 (7th Cir. Ill. 2009); Chicago Regional Council of Carpenters Pension Fund v. RCI Enterprises, Inc., 2011 U.S. Dist LEXIS \*6-7 (N.D. Ill., July 20, 2011) (Feinerman, J.); Board of Trustees of the Rockford Pipe Trades Indus. Pension Fund v. Fiorenza Enters., 2011 U.S. Dist. LEXIS 28209, 21-22 (N.D. Ill. Mar. 18, 2011.
- 8. The Trust Funds are also entitled to recover attorneys' fees incurred to enforce or collect the amounts due. *See Free v. Briody,* 793 F.2d 807, 808-09 (7<sup>th</sup> Cir. 1986) (holding that union-affiliated fringe benefit funds are entitled to collect attorneys' fees for work incurred to collect on a judgment rendered under ERISA).
  - 9. A draft order is attached as Exhibit D.

WHEREFORE, Plaintiffs the Chicago Regional Council of Carpenters' Fund et al. hereby move this Court to enter judgment in their favor and against Defendant, COMMERCIAL CORPORATE SERVICES, INC., in the amount of \$93,590.79, and additional relief as follows:

A. \$51,437.78 in unpaid contributions pursuant to the audit;

- B. \$2,736.00 for auditor's fees of incurred by the Trust Funds to complete the audit;
- C. \$5,930.04 in interest under ERISA on the amount that is due;
- D. \$12,287.55 in liquidated damages;
- E. \$21,199.42 in reasonable attorneys' fees and costs the Trust Funds incurred pursuant to 29 U.S.C. § 1132(g)(1) and/or § 1132(g)(2)(D);
- F. reasonable attorney' fees and costs incurred by the Trust Funds in enforcing this order; and
- G. such other relief as this Court deems appropriate.

CHICAGO REGIONAL COUNCIL OF CARPENTERS PENSION FUND et al.

By: s/ Kevin P. McJessy
One of their attorneys

Kevin P. McJessy McJessy, CHING & THOMPSON, LLC 3759 North Ravenswood, Suite 231 Chicago, Illinois 60613 (773) 880-1260 (773) 880-1265 (facsimile) mcjessy@MCandT.com Kevin P. McJessy McJessy, Ching & Thompson, LLC 3759 North Ravenswood, Suite 231 Chicago, Illinois 60613 (773) 880-1260 (773) 880-1265 (facsimile) mcjessy@MCandT.com

#### **CERTIFICATE OF SERVICE**

I, Kevin P. McJessy, an attorney, certify that I caused the foregoing **Plaintiffs' Motion** for **Default and for Final Judgment** be served upon

David R. Herzog Herzog & Schwartz, P.C. 77 W. Washington St. Suite 1717 Chicago, IL 60602

via the Court's CM/ECF system on this 16<sup>th</sup> day of March 2015.

s/ Kevin P. McJessy
Kevin P. McJessy

# 14 CV 04513

# Exhibit A

Case: 1:14-cv-04513 Document #: 19 Filed: 02/05/15 Page 1 of 1 PageID #:62

# UNITED STATES DISTRICT COURT FOR THE Northern District of Illinois – CM/ECF LIVE, Ver 6,1 Eastern Division

Chicago Regional Council of Carpenters Pension Fund, et al.		
	Plaintiff,	
v.		Case No.: 1:14-cv-04513 Honorable John Z. Lee
Commercial Corporate Services, Inc., et al.		Tionordole John Z. Lee
,,	Defendant.	

#### NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Thursday, February 5, 2015:

MINUTE entry before the Honorable John Z. Lee: Status hearing held on 2/5/15. For the reasons stated on the record, Plaintiffs' motion to lift stay as to Defendant Commercial Corporate Services [17] is granted. Commercial Corporate Services answer or responsive pleading is due by 2/26/15. Status hearing set for 3/10/15 at 9:00 a.m. at which time the parties are to report on the status of settlement discussions. Mailed notice(ca,)

**ATTENTION:** This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at www.ilnd.uscourts.gov.

# 14 CV 04513

# Exhibit B

#### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHICAGO REGIONAL C CARPENTERS PENSION		)	
v.	Plaintiffs,	) ) 14 )	4 CV 04513
COMMERCIAL CORPOR INC., et al.,	ATE SERVICES,	) ) Ju )	ıdge Lee
	Defendants	)	

#### **DECLARATION OF JOHN LIBBY**

I, John Libby, hereby declare under penalty of perjury pursuant to the laws of the United States, that the statements set forth herein are true and correct to the best of my knowledge, information and belief.

- 1. I am the Manager, Audits & Collections for the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program, and the Labor/Management Union Carpentry Cooperation Promotion Fund (collectively "the Trust Funds").
- 2. As part of my duties, I am responsible for managing the collection of contributions for medical, pension and other benefits due from numerous employers pursuant to collective bargaining agreements between the employers and the Chicago and Northeast Illinois Regional Council of Carpenters ("Union").
- 3. The Trust Funds allege in this lawsuit that COMMERCIAL CORPORATE SERVICES, INC. ("Defendant") is the alter ego of CLEVELAND CORPORATE SERVICES, INC. ("CLEVELAND"). CLEVELAND is signatory to the Area Agreement with the Union.

Therefore, as alleged by the Trust Funds, Defendant is an employer bound by the collective bargaining agreement with the Union. Pursuant to the collective bargaining agreement,

Defendant is therefore also bound by the declarations of trust establishing the Trust Funds

(collectively "Trust Agreements"). Pursuant to the collective bargaining agreement and the

Trust Agreements, Defendant is therefore required to pay fringe benefit contributions to the Trust

Funds for work performed by its and CLEVELAND's employees and non-union subcontractors

performing work falling within the jurisdiction of the Union.

- 4. On March 30, 2006, CLEVELAND and the Chicago Regional Council of Carpenters entered into a collective bargaining agreement pursuant to which CLEVELAND agreed to make contributions to the Trust Funds. A true and accurate copy of the parties' Memorandum of Agreement ("Agreement") is attached as Exhibit B-1.
- 5. Pursuant to the Agreement, CLEVELAND agreed to be bound by the Trust Agreements creating the Trust Funds and the applicable collective bargaining agreement.

  Pursuant to these agreements, CLEVELAND agreed to submit to a periodic audit of its books and records in order to verify the accuracy of the contributions reported and paid to the Trust Funds.
- 6. CLEVELAND produced books and records to Legacy Professionals LLP ("Legacy"), an auditing firm engaged by the Trust Funds, to conduct a review of CLEVELAND's fringe benefit contributions for the period January 1, 2011 to September 30, 2012 ("Audit Period").
- 7. A copy of the audit report prepared by Legacy is attached as Exhibit B-2 ("Audit Report"). According to the Audit Report and based on the records produced by CLEVELAND to Legacy, CLEVELAND owes \$61,437.78 in unpaid contributions.

8. A summary of the revised and updated interest and liquidated damages that have accrued since the date when the contributions were due is attached as Exhibit B-3.

CLEVELAND owes \$5,930.04 in unpaid interest and \$12,287.55 in liquidated damages.

9. The Trust Funds paid Legacy \$2,736.00 in auditors' fees to complete the review of CLEVELAND's fringe benefit contributions for the Audit Period and to produce the Audit Report. These charges are consistent with the charges by Legacy to the Trust Funds for similar matters.

10. The Trust Funds have collected \$10,000 from a wage and fringe benefit bond posted by CLEVELAND.

11. Because CLEVELAND and, therefore, Defendant have failed to comply with the terms of the collective bargaining agreement and related Trust Agreements, the Trust Funds have had to employ the services of McJessy, Ching & Thompson, LLC. As a result, the Trust Funds incurred attorneys' fees and costs.

12. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.

FURTHER AFFIANT SAYETH NOT.

# 14 CV 04513

# Exhibit B-1

#### Memorandum of Agreement

Employer	Cleveland Corporate S	Services	, Inc.	Address	109 Sp	ringbro	ok Trail Souz	-H.
City Osw	rego	State	IL	Zip _	60543	Phone	630-859-2611	

THIS AGREEMENT is entered into between the Chicago Regional Council of Carpenters ("Union") and the Employer, including its successors and assigns covering the geographic jurisdiction of the Union including the following counties in Illinois: Boone, Bureau, Carroll, Cook, De Kalb, DuPage, Grundy, Henderson, Henry, Iroquois, Jo Daviess, Kane, Kankakee, Kendall, Lake, La Salle, Lee, Marshall, McHenry, Mercer, Ogle, Putnam, Rock Island, Stark, Stephenson, Whiteside, Will, Winnebago. The following counties in Iowa: Allamakee, Appanoose, Benton, Black Hawk, Bremer, Buchanan, Butler, Cedar, Cerro Gordo, Chickasaw, Clayton, Clinton, Davis, Delaware, Des Moines, Dubuque, Fayette, Floyd, Franklin, Grundy, Hancock, Henry, Howard, Iowa, Jackson, Jefferson, Johnson, Jones, Keokuk, Kossuth, Lee, Linn, Louisa, Mahaska, Mitchell, Monroe, Muscatine, Scott, Tama, Van Buren, Wapello, Washington, Wayne, Winnebago, Winneshiek, Worth, Wright. The following counties in Wisconsin: Kenosha, Milwaukee, Ozaukee, Racine, Washington and Waukesha. The Union and the Employer do hereby agree to the following:

- 1. The Employer recognizes the Union as the sole and exclusive bargaining representative on behalf of its employees who are working within the territorial and occupational jurisdiction of the Union.
- 2. The Employer has reviewed sufficient evidence and is satisfied that the Union is the exclusive bargaining representative of a majority of its employees presently working within the territorial and occupational jurisdiction of the Union.
- 3. The Employer and the Union agree to incorporate into this Memorandum Agreement and to be bound by the Agreements negotiated between the Chicago Regional Council of Carpenters and various employers and employer associations, including all Area Agreements for the period beginning with the execution of this Memorandum Agreement and ending on the expiration dates of chiral and successor Agreements which are incorporated herein (see attached list). Unless the full to written notice by certified mail to the Chicago Regional Council of its desire to the modify the Agreement at least three (3) calendar months prior to the expiration of such Agreements, the green shall continue in full force and effect through the full term and duration of all the sequent agreements which are incorporated by reference.
- 4. The Employer agrees to be bound to the terms of the various Trust recements to the contributions are required to be made under the Agreements incorporated in Paragraph 3 including all rules and regulations adopted by the Trustees of each Fund.

In Witness Whereof the parties have executed this Memorandum of Agreement on this <u>30th</u> day of <u>March</u>, <u>2006</u>.

**EMPLOYER** 

CHICAGO REGIONAL COUNCIL OF CARPENTERS

Ally Human A Authorized Regional Council

Representative

Print Name and Title

#### Agreements

(Central Region)

Mid American Regional Bargaining Association, Cook, Lake and DuPage Mid American Regional Bargaining Association, Kane, Kendall and McHenry Mid American Regional Bargaining Association, Will Kankakee Contractors Association
Residential Construction Employers Council, Cook, Lake and DuPage Residential Construction Employers Council, Will Residential Construction Employers Council, Grundy Woodworkers Association of Chicago (Mill-Cabinet)

(Western Region)

#### **Illinois**

Quad City Builders Association, Commercial, Rock Island Mercer, Henry and Henderson Floor Covering, Rock Island, Mercer, Henry and Henderson Residential, Henry, Mercer and Henderson Illinois Valley Contractors' Association, Bureau, LaSalle, Marshall, Putnam and Stark Window and Door, Boone, Bureau, Carroll, DeKalb, Henderson, Henry, Jo Daviess, LaSalle, Marshall, Mercer, Ogle, Putnam, Rock Island, Stark, Stephenson, Whiteside and Winnebago Commercial/Residential, DeKalb, Eastern Ogle and cities in Sandwhich and Somonauk Residential Construction Employers' Council, DeKalb, Eastern Ogle and cities in Sandwhich and Somonauk Residential Construction Employers' Council, Boone, Carroll, Jo Daviess, Lee, Ogle, Stephenson, Whiteside and Winnebago Northern Illinois Building Contractors Association Inc., Boone, Carroll, Jo Davies, Lee, Ogle, Stephenson, Whiteside and Winnebago Floor Covering, Boone, Carroll, DeKalb, Jo Daviess, Lee, Lee, Ogle, Stephenson, Whiteside and Winnebago Millwright, Boone, Bureau, Carroll, DeKalb, Henderson, Jo Daviss, LaSalle, Lee, Marsh Ogle, Putnam, Rock Island, Stark, Stephenson, Whiteside, and Winnebago Associated General Contractors of Illinois (Heavy and Highway) Highway Districts 1 and 8 <u>Iowa</u>

Commercial, Muscatine, Scott, Louisa north of Iowa River
Floorcovering, Lousia north of Iowa River, Muscatine and Scott
Residential, Clinton, Louisa, Muscatine, Scott and Seven southern most townships of Jackson County
including Monmouth, South Fork, Maquoketa, Fairfield, Van Buren, Iowa and Union
Heavy and Highway Associated Contractors Agreement Scott County
Herberger Construction Heavy and Highway
Heavy and Highway Contractors' Association- entire State except Scott County
Commercial Benton, Jones, Linn and Tama
Residential Benton, Jones, Linn and Tama
Commercial, Des Moines, Henry, Lee and Louisa south of Iowa River
Residential, Des Moines, Henry, Lee and Louisa south of Iowa River

Commercial/Residential Dubuque, Delaware, Clayton, and Six Northern Townships in Jackson Commercial/Residential, Appanoosa, Davis, Jefferson, Keokuk, Mahaska, Monroe, Van Buren, Wapello, and Wayne

Commercial, Clinton, Seven Southern most townships of Jackson including Monmouth, South Fork, Maquoketa, Fairfield, Van Buren, Iowa, and Union

Floor Covering, Dubuque, Deleware, Clayton, and six Northern Townships in Jackson Window and Door, State

Commercial, Ceder, Iowa, Johnson, Poweshiek and Washington

Commercial Interior Systems, Ceder, Iowa, Johnson, Poweshiek and Washington

Residential, Ceder, Iowa, Johnson, Poweshiek and Washington

Commercial, Cerro Gordo, Franklin, Hancock, Kossuth, Winnebago, Worth and Wright, Buchanan, Independent Contractors of Waterloo (Commercial) Butler, Chicksaw, Fayette, Floyd, Grundy, Howard, Mitchell, Winneshiek

Millwright, Adair, Allmakee, Appanoosa, Benton, Black Hawk, Boone, Bremer, Buchanan, Butler, Cedar, Calhoun, Carroll, Cerro Gordo, Chicksaw, Clayton, Clarke, Clinton, Dallas, Davis, Decatur, Deleware, Des Moines, Dubuque, Emmet, Fayette, Floyd, Franklin, Greene, Grundy, Guthrie, Hamilton, Hancock, Hardin, Henry, Howard, Humboldt, Iowa, Jackson, Jasper, Jefferson, Johnson, Jones, Keokuk, Lee, Linn, Lucas, Louisa, Madison, Mahaska, Marion, Marshall, Mitchell, Monroe, Muscatine, Palo Alto, Pocahontas, Polk, Poweshiek, Ringhold, Scott, Story, Tama, Union, Van Buren, Warren, Wapello, Washington, Wayne, Webster, Winnebego, Winneshiek, Worth, Wright

(Northern Region)

Commercial Carpenters and Floor Coverers' Agreement (Wisconsin) Commercial Capenters Agreement, Kenosha/Racine Millwright Erectors' Agreement Pile Drivers' Agreement Insulators Agreement Overhead Door Agreement

Overhead Door Agreement

The Employers Acknowledges receipt of a current copy of each agreement under the the will be performing work. Each of the agreements are available upon request

It is also understood and agreed that it is the Employers obligation to make a written requ additional Collective Bargaining Agreement(s) in the event that the Company performs work in areas for which it has not already obtained a copy of the applicable Agreement.

Employer Butla

Employer Date

# 14 CV 04513

# Exhibit B-2

## Discrepancy Summary By Month

Account Number:

24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer: Address:

Cleveland Corporate Services 109 Springbrook Trail So.

Contact: Title:

Grace Butera President

Oswego, IL 60543 630-673-0198 Phone:

Page:

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Reporting Period	Discrepancy Total Hours	Discrepancy Benefit Hours	Contribution Rate	Discrepancy Amount
reporting renou	Total Hours	Iberient riours	react 1	randant
January 2011	76.25	76.25	22.32	\$1,701.90
February 2011	13.50	13.50	22.32	\$301.32
May 2011	111.50	111.50	22.32	\$2,488.68
June 2011	91.25	91.25	24.32	\$2,219.20
July 2011	40.50	40.50	24.32	\$984.96
August 2011	159.00	159.00	24.32	\$3,866.88
September 2011	76.00	76.00	24.32	\$1,848.32
October 2011	121.25	121.25	24.32	\$2,948.80
November 2011	212.00	212.00	24.32	\$5,155.84
December 2011	118.75	118.75	24.32	\$2,888.00
January 2012	101.75	101.75	24.32	\$2,474.56
February 2012	98.00	98.00	24.32	\$2,383.36
March 2012	364.25	364.25	24.32	\$8,858.56
April 2012	213.25	213.25	24.32	\$5,186.24
May 2012	36.75	36.75	24.32	\$893.76
June 2012	256.75	256.75	25.67	\$6,590.77
July 2012	48.25	48.25	25.67	\$1,238.58
August 2012	91.75	91.75	25.67	\$2,355.22
September 2012	274.75	274.75	25.67	\$7,052.83

Total	Benefit		Discrepancy Amount	\$61,437.78
Hours 2,505.5	0 Hours	2,505.50	Liquidated Damages	\$10,113.27
			Total Amount Due	\$71,551.05

#### Discrepancy Summary By Error Type

Account Number:

24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Contact:

Grace Butera

Address:

109 Springbrook Trail So. Oswego, IL 60543

Title:

President

Phone:

630-673-0198

Page:

2 of 22

Code	Description	Dollar Amount
	SIGNATORY EMPLOYER: CASH DISBURSEMENTS	
CD3	Omission	\$48,796.28
CD49	Individual Paid Through Cash Disbursements No Invoice Provided	\$12,641.50

Sub-Total Discrepancies From All Listed Codes Liquidated Damages

\$10,113.27 Total Amount Due \$71,551.05

\$61,437.78

## Liquidated Damages Schedule

Account Number:

24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services 109 Springbrook Trail So.

Contact: Title:

Grace Butera

Address: Oswego, IL 60543

President

Phone:

630-673-0198

Page:

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	Contributions	Compounding	Calculating	Total Liquidated
Reporting Period	Due	Periods	Percentage	Damages Owed
January 2011	\$1,701.90	25.00	20.00%	\$340.38
February 2011	\$301.32	24.00	20.00%	\$60.26
May 2011	\$2,488.68	21.00	20.00%	\$497.74
June 2011	\$2,219.20	20.00	20.00%	\$443.84
July 2011	\$984.96	19.00	20.00%	\$196.99
August 2011	\$3,866.88	18.00	20.00%	\$773.38
September 2011	\$1,848.32	17.00	20.00%	\$369.66
October 2011	\$2,948.80	16.00	20.00%	\$589.76
November 2011	\$5,155.84	15.00	20.00%	\$1,031.17
December 2011	\$2,888.00	14.00	20.00%	\$577.60
January 2012	\$2,474.56	13.00	20.00%	\$494.91
February 2012	\$2,383.36	12.00	19.56%	\$466.19
March 2012	\$8,858.56	11.00	17.79%	\$1,575.94
April 2012	\$5,186.24	10.00	16.05%	\$832.39
May 2012	\$893.76	9.00	14.34%	\$128.17
June 2012	\$6,590.77	8.00	12.65%	\$833.73
July 2012	\$1,238.58	7.00	10.98%	\$136.00
August 2012	\$2,355.22	6.00	9.34%	\$219.98
September 2012	\$7,052.83	5.00	7.73%	\$545.18

**Total Discrepancies** 

\$61,437.78

**Total Damages this Schedule** 20% of Discrepancies \$10,113.27 \$12,287.56

**Assessed Damages** 

\$10,113.27

## Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

Phone:

109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Month:

January 2011

Page#:

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	<u> </u>	ſ	Total	Benefit	* *	* * * *	Actual Hou	rs Per Wee	k* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported		Jan-11	! 				Hours	Hours	Difference	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Czischki Tim	CD3	0.00	0.00	76.25					76.25	"	76.25	76.25
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L,,,				Total	76.25	0.00	0.00	0.00	0.00	76.25		76.25	76.25

## Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

Phone:

109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Month: Page#:

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February 2011

		T	Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * * *	* *	<u> </u>	Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name Name	Code		Reported	Feb-11			L		Hours	Hours	Difference	
	Czischki Tim	CD3	0.00	0.00	13.50					13.50		13.50	13.50
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				Total	13.50	0.00	0.00	0.00	0.00	13.50		13.50	13.50

Total Items Listed in this Period:

## Monthly Detail Report

Account Number:

24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services 109 Springbrook Trail So. Oswego, IL 60543 630-673-0198

Month:

May 2011

Address:

Page#:

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Phone:

	T	[	Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code		Reported	May-11					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	72.50					72.50		72.50	72.50
200-00-0000	Lewis Mike	CD49	0.00	0.00	14.50					14.50		14.50	14.50
300-00-0000	Rapp Dave	CD49	0.00	0.00	24.50		ł			24.50		24.50	24.50
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								0.00		- 44 55		444 50	111 50
			ì	Total	111.50	0.00	0.00	0.00	0.00	111.50		111.50	111.50

#### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Month: Page#:

7 of 22

June 2011

Phone:

		T	Total	Benefit	* *	* * * *	Actual Hou	rs Per Wee	k* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported		Jun-11					Hours	Hours	Difference	
402 102 200	Czischki Tim	CD3	0.00	0.00	91.25					91.25		91.25	91.25
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		<u> </u>		Total	91.25	0.00	0.00	0.00	0.00	91.25		91.25	91.25

Total Items Listed in this Period:

## Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services 109 Springbrook Trail So.

Address:

Oswego, IL 60543

Phone: 630-673-0198 Month:

July 2011

Page#:

8 of 22

			Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month				7	Total	Capped	Hour	Hour
Number	Name	Code	Reported		Jul-11					Hours	Hours	Difference	Difference
<b>31.4 Mi. 77</b>	Czischki Tim	CD3	0.00	0.00	40.50					40.50		40.50	40.50
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				Total	40.50	0.00	0.00	0.00	0.00	40.50		40.50	40.50

## Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer: Address:

Phone:

Cleveland Corporate Services

109 Springbrook Trail So. Oswego, IL 60543 630-673-0198

Month:

August 2011

Page#:

9 of 22

	T	Ţ	Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	k* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code		Reported	Aug-11					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	125.00					125.00		125.00	125.00
200-00-0000	Lewis Mike	CD49	0.00	0.00	34.00			[ [		34.00		34.00	34.00
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L				Total	159.00	0.00	0.00	0.00	0.00	159.00		159.00	159.00

Total Items Listed in this Period:

#### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Month:

September 2011

Address:

109 Springbrook Trail So.

Page#:

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Oswego, IL 60543

Phone: 630-673-0198

		<u> </u>	Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	k * * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported		Sep-11					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	76.00					76.00		76.00	76.00
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				Total	76.00	0.00	0.00	0.00	0.00	76.00		76.00	76.00

## Monthly Detail Report

Account Number: 24170

Employer: Address:

Cleveland Corporate Services 109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Phone:

Audit Period:

January 1, 2011 to September 30, 2012

Month:

October 2011

Page #:

11 of 22

			Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month		,			Total	Capped	Hour	Hour
Number	Name	Code		Reported	Oct-11					Hours	Hours	Difference	
	Czischki Tim	CD3	0.00	0.00	121.25					121.25		121.25	121.25
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<u></u>				Total	121.25	0.00	0.00	0.00	0.00	121.25		121.25	121.25

#### Monthly Detail Report

Account Number:

24170

Audit Period:

Month:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Page#:

12 of 22

November 2011

Phone:

	1	I	Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * * *	* *	1	Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month			T		Total	Capped	Hour	Hour
Number	Name	Code	Reported		Nov-11					Hours	Hours	Difference	Difference
Value of the second	Czischki Tim	CD3	0.00	0.00	76.00					76,00		76.00	76.00
200-00-0000	Lewis Mike	CD49	0.00	0.00	136.00					136.00		136.00	136.00
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				Total	212.00	0.00	0.00	0.00	0.00	212.00		212.00	212.00

Total Items Listed in this Period:

## Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

Month:

December 2011

Oswego, IL 60543

Page#:

13 of 22

Phone: 630-673-0198

		]	Total	Benefit	* *	* * * *	Actual Hou	irs Per Wee	ek* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported		Dec-11					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	118.75		·			118.75		118.75	118.75
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		L		Total	118.75	0.00	0.00	0.00	0.00	118.75		118.75	118.75

Total Items Listed in this Period:

#### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Phone:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Month:

January 2012

Page #:

14 of 22

			Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported	Reported	Jan-12	*				Hours	Hours	Difference	Difference
- Francisco Paris Config.	Czischki Tim	CD3	0.00	0.00	101.75					101.75		101.75	101.75
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		<u></u>		Total	101.75	0.00	0.00	0.00	0.00	101.75		101.75	101.75

Total Items Listed in this Period:

#### Monthly Detail Report

Account Number:

24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer: Address: Cleveland Corporate Services

109 Springbrook Trail So.

Oswego, IL 60543

Month: Page #:

15 of 22

February 2012

Phone:

630-673-0198

			Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code		Reported	Feb-12					Hours	Hours	Difference	
100-00-0000	Czischki Marianne	CD49	0.00	0.00	39.25					39.25		39.25	39.25
	Czischki Tim	CD3	0.00	0.00	58.75					58.75	]	58.75	58.75
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				Total	98.00	0.00	0.00	0.00	0.00	98.00		98.00	98.00

#### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer: Address:

Phone:

Cleveland Corporate Services

109 Springbrook Trail So.

Month:

March 2012

Oswego, IL 60543 630-673-0198

Page#:

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		1	Total	Benefit	* *	* * * *	Actual Hou	irs Per Wee	ek* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month		Tioldariioc	T C VVC	T	Total	Capped	Hour	Hour
Number	Name	Code		Reported	Mar-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00		284.50			<del> </del>	<del> </del>	284.50	710010	284.50	284.50
200-00-0000	Lewis Mike	CD49	0.00	0.00	79.75			]		79.75		79.75	79.75
250 50 5505	20010 WING	00.10	0.00	0.00	10.10					1			
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L	J		L	Total	364.25	0.00	0.00	0.00	0.00	364.25		364.25	364.25

Total Items Listed in this Period:

#### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

April 2012

Oswego, IL 60543 630-673-0198

Page#:

Month:

17 of 22

Phone:

			Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	k* * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported		Apr-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	213.25					213.25		213.25	213.25
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	1			Total	213.25	0.00	0.00	0.00	0.00	213.25		213.25	213.25

#### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

109 Springbrook Trail So.

Month:

May 2012

Address:

Oswego, IL 60543 630-673-0198

Page#:

18 of 22

Phone:

			Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * * *	* *	<u> </u>	Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported	Reported	May-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	36.75					36.75		36.75	36.75
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													60.75
				Total	36.75	0.00	0.00	0.00	0.00	36.75		36.75	36.75

Total Items Listed in this Period:

## Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

Month:

June 2012

Oswego, IL 60543 630-673-0198 Phone:

Page#:

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		j	Total	Benefit		* * * *	Actual Hou	ırs Per Wee	ek * * * *		}	Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month		1			Total	Capped	Hour	Hour
Number	Name	Code	Reported	Reported	Jun-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	131.25					131.25		131.25	131.25
200-00-0000	Lewis Mike	CD49	0.00	0.00	125.50		İ			125.50		125.50	125.50
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1				Total	256.75	0.00	0.00	0.00	0.00	256.75		256.75	256.75
				rotar	200.75	0.00	0.00	0.00	0.00	200.70		200.70	200.70

Total Items Listed in this Period:

Legacy Professionals LLP

### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

109 Springbrook Trail So.

Month:

July 2012

Address:

Oswego, IL 60543 630-673-0198

Page#:

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Phone:

	]		Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code	Reported		Jul-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	48.25					48.25		48.25	48.25
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L	<u> </u>			Total	48.25	0.00	0.00	0.00	0.00	48.25		48.25	48.25

Legacy Professionals LLP

### Monthly Detail Report

Account Number: 24170

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Cleveland Corporate Services

Address:

Phone:

109 Springbrook Trail So.

Oswego, IL 60543 630-673-0198

Month:

August 2012

Page#:

21 of 22

		1	Total	Benefit	* *	* * * *	Actual Hou	ırs Per Wee	ek * * *	* *	<u> </u>	Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number	Name	Code		Reported	Aug-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	91.75					91.75		91.75	91.75
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										04.75		64.75	04.75
			ĺ	Total	91.75	0.00	0.00	0.00	0.00	91.75		91.75	91.75

Total Items Listed in this Period:

1.00

Legacy Professionals LLP

### Monthly Detail Report

Account Number: 24170

630-673-0198

Audit Period:

January 1, 2011 to September 30, 2012

Employer:

Phone:

Cleveland Corporate Services

Address:

109 Springbrook Trail So.

Month:

September 2012

Oswego, IL 60543

Page #:

22 of 22

		<u> </u>	Total	Benefit	* *	* * * * *	Actual Hou	rs Per Wee	k * * * *	* *		Total	Benefit
Reference	Employee / Payee	Error	Hours	Hours	Month					Total	Capped	Hour	Hour
Number_	Name	Code	Reported		Sep-12					Hours	Hours	Difference	Difference
	Czischki Tim	CD3	0.00	0.00	215.50					215.50		215.50	
200-00-0000	Lewis Mike	CD49	0.00	0.00	59.25					59.25		59,25	59.25
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				Total	274.75	0.00	0.00	0.00	0.00	274.75		274.75	274.75

Total Items Listed in this Period:

2.00

## 14 CV 04513

# Exhibit B-3

### Interest & Damages Summary

Account Number:

24170

Calculation Date: March 16, 2015

Employer: Address: Cleveland Corporate Services 109 Springbrook Trail So

Oswego, IL 60543

***************************************	Delinquency		Liquidated	Total
Reporting Period	Amount	Interest	Damages	Due
January 2011	\$1,701.90 <b> </b>	\$232.51	\$340.38	\$2,274.79
February 2011	\$301.32	\$40.36	\$60.26	\$401.94
May 2011	\$2,488.68	\$305.98	\$497.74	\$3,292.40
June 2011	\$2,219.20	\$264.76	\$443.84	\$2,927.80
July 2011	\$984.96	\$113.86	\$196.99	\$1,295.81
August 2011	\$3,866.88	\$432.31	\$773.38	\$5,072.57
September 2011	\$1,848.32	\$201.06	\$369.66	\$2,419.04
October 2011	\$2,948.80	\$312.41	\$589.76	\$3,850.97
November 2011	\$5,155.84	\$532.36	\$1,031.17	\$6,719.37
December 2011	\$2,888.00	\$290.27	\$577.60	\$3,755.87
January 2012	\$2,474.56	\$241.46	\$494.91	\$3,210.93
February 2012	\$2,383.36	\$226.46	\$476.67	\$3,086.49
March 2012	\$8,858.56	\$817.06	\$1,771.71	\$11,447.33
April 2012	\$5,186.24	\$464.53	\$1,037.25	\$6,688.02
May 2012	\$893.76	\$77.56	\$178.75	\$1,150.07
June 2012	\$6,590.77	\$554.55	\$1,318.15	\$8,463.47
July 2012	\$1,238.58	\$100.87	\$247.72	\$1,587.17
August 2012	\$2,355.22	\$185.31	\$471.04	\$3,011.57
September 2012	\$7,052.83	\$536.36	\$1,410.57	\$8,999.76
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Totals	\$61,437.78	\$5,930.04	\$12,287.55	\$79,655.37

## 14 CV 04513

# Exhibit C

U	INITED STATES	DIST	RICT COURT
N	ORTHERN DIST	RICT	OF ILLINOIS
	EASTERN	DIV	ISION
CHICAGO REGIONAL COU	JNCIL OF	)	
CARPENTERS PENSION FU	JND, et al.,	)	
		)	
	Plaintiffs,	)	14 CV 04513
v.		)	
		)	Judge Lee
COMMERCIAL CORPORAT	ΓE SERVICES,	)	
INC., et al.,		)	
		)	
	Defendants.	)	

#### **DECLARATION OF KEVIN P. MCJESSY**

- I, Kevin P. McJessy, hereby declare, under penalty of perjury pursuant to the laws of the United States, that the following statements are true:
- 1. I am one of the attorneys representing the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program, and the Labor/Management Union Carpentry Cooperation Promotion Fund (collectively "the Trust Funds") in the above-captioned lawsuit ("Lawsuit") against Commercial Corporate Services, Inc. ("Defendant").
- 2. I am also one of the attorneys who represented the Trust Funds in the lawsuit Chicago Regional Council of Carpenters Pension Fund et al. v. Cleveland Corporate Services, Inc., 12 CV 8974.
- 3. I have been licensed to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois since 1995. I am an attorney with McJessy, Ching & Thompson, LLC ("MC&T").

- 4. As part of my practice, I handle claims under ERISA. I personally represented the Trust Funds throughout the lawsuit against Defendant and throughout this alter-ego Lawsuit against Defendant to collect unpaid fringe benefit contributions.
- 5. The Trust Funds have incurred \$21,199.42 in fees and expenses to compel Defendant and then, through this alter-ego claim, Defendant to comply with its obligations under the terms of the Collective Bargaining Agreement and applicable trust agreements. A redacted copy of the billing statement from MC&T from the inception of this lawsuit to the present, redacted to protect privileged communications, is attached as Exhibit C-1. The detailed billing statement describes in detail all work performed by MC&T in this matter.
  - a) The Trust Funds have collectively incurred fees totaling \$16,384.00 for 102.40 hours of attorney services. The substantially reduced hourly rate for attorneys at MC&T for Trust Funds matters is \$160.00 per hour.
  - b) The Trust Funds have collectively incurred fees totaling \$738.00 for 12.30 hours of paralegal time. The substantially reduced hourly rate for paralegals at MC&T for Trust Fund matters is \$60.00 per hour.
  - c) The Trust Funds incurred \$4,077.42 in expenses for the filing fee; process server charges; legal research charges; courier charges; photocopy charges; postage charges; court reporter charges, witness fees and charges for Illinois Secretary of State documents.
- 6. The attorneys' fees, paralegal fees and costs charged to the Trust Funds in this matter are consistent with MC&T's regular charges for services to the Trust Funds on similar matters and are substantially reduced from MC&T for other clients.

7. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.

FURTHER AFFIANT SAYETH NOT.

Kevin P. McJessy

Date

### 14 CV 04513

## Exhibit C-1

181/10/2013				t Ledger DATES	TITC .		rage: I
ate Entry #	Received From/Paid To Explanation	Chq# Rec#	Gene		Fees	Bld   Inv# Acc	Ropts Disbs Balance
183-CLEV	go Regional Council of Carpenters - Cleveland Corporate Services Lawyer: KM 0.30 Hrs X 160.00 Reviewed correspondence from M. Curtain dated 8/3/12 for demand letter. (.1) Prepared correspondence to Cleveland Corporate making demand for audit. (.2)				48.00	6951	Resp Lawyer: KM
ug 16/2012 69300					48.00	6951	
ug 17/2012 68544 ug 24/2012	Lawyer: KM 0.10 Hrs X 160.00 Reviewed and responded to correspondence from J. Libby forwarding ISSL re			0.00	16.00	6951	
68724 \ug 27/2012 68840	Call from M. Curtin at Legacy regarding Cleveland Corporate Services' 8/24/12 deadline with no response from Cleveland. Confer with K. McJessy and prepared			0.00	12.00	6857 6951	
70533	Lawyer: KM 0.10 Hrs X 160.00 Reviewed records showing Cleveland Corporate is a signatory without record of termination.				16.00	7091	
)ct 8/2012 69601 )ct 29/2012 69918 )ct 29/2012	Billing on Invoice 6951 FEES 124.00 Billing on Invoice 6983 Chicago Regional Council of Carpe			0.00		6951 6983	
69949 Nov 8/2012 70192	Telephone call with Robert Lid to confirm that Cleveland Corporate Services has not terminated its agreement with the union; R. Lid confirmed Cleveland Corporate still bound by its agreement, submitted reports of no carpenters in 2012. (.2) Reviewed audit referral file and prepared draft complaint against Cleveland Corporate	01235	124.00		240.00	7182	
Nov 8/2012 70618					60.00	7182	
√ov 27/2012 70634 √ov 30/2012 70595	Lawyer: SK 0.20 Hrs X 60.00 Reviewed affidavit of service from process server and filed same with court. Expense Recovery	00253		3.84	12.00	7182 7182	
Dec 6/2012 70910 Dec 13/2012 70987	Billing on Invoice 7091 FEES 16.00 Midwest Investigations	3977		0.00		7091 7279	
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				ient Ledger			
Date Entry #	Received From/Paid To Explanation	Chq# Rec#		ALL DATES eneral  Disbs	Fees	Bld Inv#	Acc Rcpts Disbs Balance
71259	Filing Fee -	3987	THE SERVICE SET	350.00		7279	and the state of t
Dec 20/2012 71280	LexisNexis Legal Research	3990		9.32		7279	
Dec 21/2012 72139	Lawyer: KM 0.30 Hrs X 160.00 Telephone call with R. Krug regarding complaint filed and need for audit arrangements.				48.00	7279	
	(.2) Prepared correspondence to R. Krug forwarding auditors' information. Reviewed correspondence from R. Krug acknowledging receipt of same. (.1)						
Dec 27/2012 71305	Chicago Regional Council of Carpe	01254	16.00				
Dec 28/2012 71339	Lawyer: KM 0.20 Hrs X 160.00 Reviewed correspondence from R. Krug, counsel for defendant, regarding difficulty arranging audit. Prepared correspondence				32.00	7279	
	to R. Krug responding to same and forwarding contact information for M. Ragona. (.1) Telephone call with M. Ragona to discuss status of contact with Cleveland corporate and that they may be calling to schedule and audit. (.1)						
Jan 3/2013 72648	Lawyer: KM 0.30 Hrs X 160.00 Reviewed and responded to correspondence from M. Ragona regarding status of the audit; sending second record request to Grace at Cleveland Corporate. (.1) Reviewed and responded to correspondence				48.00	7359	
	from M. Curtain forwarding record request to Cleveland Corporate; reviewed record request. (.2)						
Jan 7/2013 71768	Billing on Invoice 7182 FEES 312.00 DISBS 3.84			0.00		7182	
Jan 18/2013 72343	Billing on Invoice 7279 FEES 80.00 DISBS 444.32			0.00		7279	
Jan 24/2013 72388	Chicago Regional Council of Carpe PMT -	01268	315.84				
Jan 28/2013 72821	Lawyer: KM 0.10 Hrs X 160.00 Reviewed and responded to correspondence from R. Krug dated 1/28/13 regarding court		P0,018		16.00	7359	
	appearance and Cleveland Corporate's cooperation.						
Jan 31/2013 72850	Lawyer: KM 0.10 Hrs X 160.00 Prepared correspondence to M. Curtain inquiring on status of audit.				16.00	7359	
Feb 1/2013 73491	Lawyer: KM 0.40 Hrs X 160.00 Telephone call with Legacy Professionals regarding status of audit, audit proceeding very slow. (.2) Prepared				64.00	7429	
	correspondence to R. Krug summarizing the documents that Cleveland Corporate has produced and advising that Cleveland Corporate is not fully cooperating and, therefore, needs to file an appearance. (.2)						
Feb 5/2013 72497	Chicago Regional Council of Carpe PMT -	01278	524.32				
Feb 5/2013	Lawyer: KM 2.70 Hrs X 160.00	01270	021105		400.00	7400	
72531	Appeared in court for pre-scheduled status hearing before Judge Gottschall. (1.7) Reviewed and responded to correspondence of 2/4/13 from R. Krug, counsel for Cleveland Corporate, responding to his email asking				432.00	7429	) 
	as to what documents are still due and advising that Cleveland Corporate did not cooperate timely and needs to file an appearance by Friday to avoid motion for default; reviewed file for record request to respond to R. Krug.						

			AI	L DATES					
Date Entry #	Received From/Paid To Explanation	Chq# Rec#	Gen Rcpts	eral  Disbs	Fees	Bld   Inv# Acc	Trust Ad Ropts	ctivity Disbs	Balance
	(.4) Reviewed ECF court order		*						
	of Judge Gottschall setting next status date and prepared								
	correspondence to R. Krug								
	forwarding same for his								
	information. (.2) Telephone call from R. Krug asking that								
	KPM follow up with auditor								
	because his client produced								
	additional documents today and he wants to know whether the								
	documents are sufficient for								
	audit, and discussed that Cleveland corporate still								
	needs to file an appearance								
	and answer. (.2) Telephone								
	call to M. Curtin (left message) and prepared								
	correspondence to M. Curtin								
	following up on whether Cleveland Corporate produced								
	additional records per R.								
: := /001:0 :	Krug's request. (.2)								
eb 5/2013 73230	Expense Recovery Postage Recovery	00259		0.46		7429			
eb 6/2013	Lawyer: KM 0.40 Hrs X 160.00								
73522	Telephone call with M. Curtain regarding status of Cleveland				64.00	7429			
	Corporate's record production.								
	(.2) Prepared correspondence								
	to R. Krug regarding confirmation that Cleveland								
	Corporate has produced								
	additional records to the auditor but not all requested								
	records have been produced.								
	(.1) Prepared correspondence to M. Curtain forwarding email								
	sent to R. Krug and request to								
	be kept abreast of any further								
	production of records by Cleveland Corporate. Reviewed								
	correspondence from R. Krug								
	advising that he will follow								
	up with his client further today for production of								
-1 14520040	records. (.1)								
eb 15/2013 72646	Lawyer: KM 0.20 Hrs X 160.00 Telephone call from R. Krug				32.00	7429			
	seeking status of audit.								
Feb 18/2013 73593	Lawyer: KM 0.20 Hrs X 160.00 Prepared correspondence to M.				32.00	7429			
,0030	Ragona seeking status of				32.00	, 123			
	audit. Reviewed								
	correspondence from M. Curtain forwarding revised record								
. 1 . 10 /0010	request list.								
eb 19/2013 73601	Lawyer: KM 2.80 Hrs X 160.00 Drafted motion for entry of				448.00	7429			
	default judgment against								
	Cleveland Corporate; reviewed file documents as necessary to								
	prepare motion. (1.0) Filed								
	motion via court's ECF system.								
	(.2) Appeared in court for status hearing before Judge								
	Gottschall and notice of								
	<pre>intent to file motion for entry of default judgment.</pre>								
	(1.5) Prepared correspondence								
	to R. Krug forwarding record								
	request and advising of motion for entry of default judgment								
	filed today. (.1)								
eb 20/2013 73066	Billing on Invoice 7359 FEES 80.00			0.00		7359			
eb 20/2013	Lawyer: KM 0.10 Hrs X 160.00								
73088	Reviewed and responded to				16.00	7429			
	correspondence from R. Krug asking KPM to resend updated								
	record request by auditor.								
eb 26/2013 73128	Lawyer: KM 0.40 Hrs X 160.00 Telephone call with M. Curtain				64.00	7429			
13148	regarding status of Cleveland				04.00	1447			
	auditi.e., not all documents								
	were produced but based on those that were produced there								
	are findings. (.2) Telephone								
	call with M. Curtain following								
	up on whether production of the audit report by 3/15/13 is								

(.1) Reviewed and replied to correspondence from R. Krug advising that he forwarded the

ar/16/2015 McJessy, Ching & Thompson, LLC Page: 4 Client Ledger ALL DATES Bld |----- Trust Activity -----| Chaff ate Received From/Paid To |---- General ----| Entry # Explanation Dishs Fees Inv# Acc Repts Disbs sufficient and whether he should respond to Cleveland Corporate's inquiry to him about what it should do about the status hearing, he will tell them to appear. (.2)
Lawyer: KM 1.90 Hrs X 160.00 'eb 27/2013 73160 Reviewed correspondence from R. 304.00 7429 Krug regarding appearance at hearing by Cleveland Corporate officer. (.1) Appeared in court before Judge Gottschall for status hearing and hearing on motion for entry of default; motion continued to April. (1.6) Prepared correspondence to M. Curtain asking for updated record request even though he is preparing a final audit report based on those records that were produced. (.1) Prepared correspondence to R. Krug with copy to auditor and client regarding results of hearing, not all records produced and notice of completed audit report by 3/15/13, will produce with demand when received. (.1) Expense Recovery 'eb 28/2013 Photocopy Recovery Lawyer: KM 0.20 Hrs X 160.00 Reviewed 2/27/13 correspondence 00258 5.88 7429 73208 1/2013 lar 73161 32.00 7492 from M. Curtain forwarding record request; reviewed record request. Prepared correspondence to R. Krug forwarding record request. 1/2013 Expense Recovery 73225 Postage Recovery 00259 2.65 7492 11/2013 Chicago Regional Council of Carps 73308 01298 80.00 PMT -11/2013 Lawyer: KM 0.40 Hrs X 160.00 74092 Reviewed court order of Judge 64.00 7492 Gottschall resetting hearing date and diaried same. Prepared correspondence to R. Krug, counsel for Cleveland advising that hearing set for tomorrow is reset; telephone call to R. Krug concerning same so his client does not show up. (.2) Prepared correspondence to M. Curtain, Legacy Professionals, asking for status of audit. (.1) Reviewed correspondence from M. Curtain advising that the report is complete and has been submitted for review. 4ar 21/2013 US Messenger & Logistics 73394 Courier Recovery 4076 14.60 7492 4ar 27/2013 Billing on Invoice 7429 73804 1456.00 0.00 7429 DISBS 6.34 4ar 27/2013 Lawyer: KM 0.10 Hrs X 160.00 74187 Reviewed correspondence from J. 16.00 7492 Conklin 4ar 31/2013 Expense Recovery 73912 00261 1.08 7492 Photocopy Recovery 1/2013 Lawyer: KM 0.10 Hrs X 160.00 16.00 7558 74216 Reviewed correspondence from R. Krug from 3/28/13 asking about status of audit report. 1/2013 Lawyer: KM 0.60 Hrs X 160.00 74713 Telephone call with J. Conklin 96.00 7558 (.1) Reviewed correspondence from J. Conklin reviewed copy of audit report. (.3) Prepared correspondence to R. Krug forwarding audit report of Cleveland Corporate.

				DATES					
Date Entry #	Received From/Paid To Explanation	Chq# Rec#	Rcpts	al  Disbs	Fees	Bld   Inv# Acc	Trust Ropts	Activity Disbs	Balance
	audit report to his client.		**************************************				The state of the s		
	Appeared before Judge Gottschall regarding continued hearing on motion for default and status of audit. (1.8)				288.00	7558			
Apr 4/2013 74866					16.00	7558			19
74002 Apr 18/2013 74240		01313	1462.34	0.00		7492			
Apr 25/2013	PACEr			1 22					
75125 Apr 26/2013 74523	PACR Chicago Regional Council of Carpe PMT -	4092 01322	130.33	1.30		7558			
Apr 30/2013 74831	Lawyer: KM 0.30 Hrs X 160.00 Telephone call to R. Krug; prepared correspondence to R. Krug regarding whether his client intends to respond to				48.00	7558			
	the audit report previously sent to it. (.1) Telephone call to J. Conklin regarding new (.1) Reviewed correspondence from J. Conklin								
	forwarding d								
May 1/2013 75263	Lawyer: KM 1.60 Hrs X 160.00 Appeared in court for hearing on status before Judge Gottschall; brief conversation with owner of Cleveland Corporate afterward regarding audit report.				256.00	7615			
May 6/2013 75420	Lawyer: KM 0.10 Hrs X 160.00				16.00	7615			
May 9/2013 74641					16.00	7615			
May 13/2013 75213 May 17/2013 74903	Expense Recovery Postage Recovery	00264		0.46		7615 7558			
May 31/2013	DISBS 1.30								
75225 Jun 6/2013 75262	Photocopy Recovery Lawyer: KM 2.10 Hrs X 160.00	00265		0.72	336.00	7 <b>615</b> 7678			
	(.1) Reviewed correspondence from J. Conklin								
	Prepared correspondence to J. Conklin regarding								
	Prepared draft of J. Libby declaration to support motion for default judgment. (.5) Prepared declaration of K.								
	McJessy to support claim for damages for attorneys fees and costs. (.3) Prepared revised motion for default judgment; and, reviewed FRCP 55, information from J. Conklin								
	and reviewed file materials								

ALL DATES Received From/Paid To Chq# |----- General -----| Bld |-----| Balance Entry # Explanation Rec# Rcpts Disbs Fees Inv# Acc Disbs Rcpts for correspondence between K. McJessy and R. Krug or G. Butera to use as exhibits to motion. (1.1) Lawyer: KM 0.90 Hrs X 160.00 Jun 7/2013 75261 Telephone call from J. Libby 144.00 7678 regarding (.2) Reviewed orrespondence from J. Conklin Final review and edits to motion to J. Libby declaration and to K. McJessy declaration. (.6)Jun 10/2013 Lawyer: SK 0.60 Hrs X 60.00 75296 Prepared notice of motion for 36.00 7678 entry of default judgment (.1). Filed motion for entry of default judgment and exhibits A-G with court (.3). Scheduled and filed notice of motion with court (.1). Prepared correspondence to Judge Gottschall forwarding file-stamped courtesy copies of same (.1). Jun 10/2013 Lawyer: KM 1.10 Hrs X 160.00 75342 Reviewed and responded to 176.00 7678 correspondence from G. Butera with copy to R. Krug regarding her request to continue status hearing because she is not available on Wednesday. Coordination of filing of motion for entry of default judgment. Telephone call with T. Perdue substitute for R. Johnson this week regarding request to continue hearing to 6/19/13. Reviewed ECF court order of Judge Gottschall continuing hearing if 6/12/13 to 6/19/13. Prepared correspondence to R. Krug and G. Butera forwarding court order. Telephone call from U.S. Messenger Service regarding difficulties in delivering package, no answer at chambers and cannot gain access. Telephone call to Judge's chambers, U.S. Messenger Service advised that they have gained access and were able to deliver the package. Telephone call from Judge Gottschall's secretary confirming that she did receive the courtesy copies. Jun 10/2013 Chicago Regional Council of Carpe 465.30 01344 75399 PMT -Jun 10/2013 Expense Recovery 2.92 7678 00266 75916 Postage Recovery Jun 19/2013 Lawyer: KM 1.70 Hrs X 160.00 272.00 75467 Appeared in court before Judge 7678 Gottschall regarding motion for entry of final judgment. (1.3) Prepared correspondence to client regarding (.1)Prepared proposed draft order of judgment. (.2) Prepared correspondence to order submission box forwarding draft order. (.1) Jun 19/2013 Lawyer: KM 0.10 Hrs X 160.00 16.00 7678 76101 Prepared correspondence to J Conklin regarding Jun 20/2013 Billing on Invoice 7615 75646 FEES 288.00 0.00 7615 DISBS 1.18 Jun 21/2013 UPS 75699 Courier - UPS - recovery 4150 24.25 7678 Jun 21/2013 Lawyer: KM 0.20 Hrs X 160.00 75877 Reviewed ECF court order of 32.00 7678

Libby.

Sep 24/2013 Lawyer: KM 0.10 Hrs X 160.00

far/16/2015 McJessy, Ching & Thompson, LLC Page: 7 Client Ledger ALL DATES Bld |-----| )ate Received From/Paid To Chq# |---- General ----| Entry # Explanation Rec Rcpts Disbs Fees Inv# Acc Rcpts Disbs Judge Pallmeyer regarding entry of judgment. Prepared correspondence to client Jun 30/2013 Expense Recovery Photocopy Recovery 75928 7678 00267 38.76 18/2013 Chicago Regional Council of Carpe 76035 PMT -01353 289.18 US Messenger & Logistics Jul 19/2013 76070 Courier Recovery 4160 14.60 7739 Billing on Invoice 7678 19/2013 0.00 76141 FEES 1012.00 7678 DISBS 65.93 Jul 24/2013 Lawyer: SK 0.20 Hrs X 60.00 Prepared email correspondence 76170 12.00 7739 to process server forwarding citation notice and citation to discover assets for service on defendant. Tul 31/2013 Expense Recovery Photocopy Recovery 00268 7739 76365 2.88 2/2013 Chicago Regional Council of Carpe lug 01359 1077.93 76400 PMT lug 15/2013 Lawyer: KM 1.40 Hrs X 160.00 Prepared citation to discover 224.00 7799 77243 assets to Cleveland Corporate and prepared third party citation to Chase Bank.
Lawyer: KM 0.50 Hrs X 160.00 lug 15/2013 Revised citation rider to 80.00 7799 77342 Cleveland Corporate. Revised third-party citation rider to Chase Bank. Aug 16/2013 Expense Recovery Postage Recovery 00270 1.32 7799 77019 Aug 19/2013 Billing on Invoice 7739 12.00 17.48 0.00 FEES 7739 76750 DISBS lug 21/2013 Lawyer: SK 0.10 Hrs X 60.00 Call from process server 6.00 76910 7799 regarding G. Butera's continued avoidance of service of citation papers and approval for limited stake-out time. lug 21/2013 Expense Recovery 77015 Postage Recovery 00270 1.32 7799 Lawyer: KM 0.10 Hrs X 160.00 22/2013 77295 Reviewed Chase Bank response to 16.00 7799 citation to discover assets. Aug 27/2013 Lawyer: KM 0.20 Hrs X 160.00 76959 Telephone call with Genny 32.00 7799 Berkowitz (317) 757-7357, Chase Bank, as to date and time of production of records by Chase, will be 9/25/13. Lawyer: KM 0.20 Hrs X 160.00 Aug 27/2013 76963 Reviewed citation response to 32.00 7799 Chase Bank, accounts closed no assets but Chase did not produce records in response to citation, follow up on same. Aug 31/2013 Expense Recovery 77025 Photocopy Recovery 00271 9.00 7799 Sep 12/2013 Chicago Regional Council of Carpe 77102 01375 Sep 19/2013 Midwest Investigations 77153 4201 220.00 7868 Process Server recovery -Service of Citation on Cleveland Corp. Services with stake out time Sep 20/2013 Billing on Invoice 7799 77362 FEES 390.00 0.00 7799 DISBS 11.64 Sep 24/2013 Lawyer: SK 0.30 Hrs X 60.00 77539 Confer with K. McJessy to 18.00 7868 . Reviewed file materials and internet materials for phone numbers for G. Butera in order to confirm citation on 9/27. Left several messages at several phone numbers; other numbers not in service. Performed updated Lexis search for G. Butera and left message at work place. Call from G. Butera confirming citation for 9/27 and relayed same to J.

### McJessy, Ching & Thompson, LLC

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Date Entry #	Received From/Paid To Explanation	Chq# Rec#	Rcpts		Fees	Bld Inv#		Trust Ropts	Activity Disbs	 Balance
77854					16.00	7868				
Sep 25/2013 77866	Lawyer: KM 0.30 Hrs X 160.00 Prepared correspondence to G. Buterra demanding production of records before citation examination and postponing citation examination.				48.00	7868				
Sep 26/2013 77576	Lawyer: SK 0.10 Hrs X 60.00				6.00	7868				
Sep 26/2013 77870 Sep 30/2013	Reviewed Chase Bank response to citation to discover assets, reporting no assets.				16.00	7868				
77688 Sep 30/2013 77869	Photocopy Recovery Lawyer: KM 0.40 Hrs X 160.00 Telephone call with G. Buterra and reviewed all documents requested by rider to citation and her confirmation that she will obtain documents she has but which have not been	00272		0.60	64.00	7868 7868				
Oct 2/2013	<pre>produced. Chicago Regional Council of Carpe</pre>								lang.	
77638 Oct 7/2013 77679	PMT - Lawyer: KM 0.30 Hrs X 160.00 Reviewed correspondence from G. Butera forwarding documents and advising that still further documents are on their way. Prepared correspondence to J. Conklin	01388	401.64		48.00	7940				
Oct 8/2013 78517	Lawyer: KM 0.10 Hrs X 160.00 Reviewed correspondence from G. Buterra forwarding documents responsive to citation.				16.00	7940				
Oct 10/2013 77732		4214		25.19		7940				
Oct 18/2013 77904	Billing on Invoice 7868 FEES 168.00 DISBS 220.60	3.4.4.3		0.00		7868				
Oct 23/2013 77971 Oct 30/2013 78191 Nov 7/2013	LexisNexis Legal Research Chicago Regional Council of Carpe PMT - JP Morgan Chase N.A.	4223 01401	388.60	5,31		7940				
78331	Photocopy Recovery - Response to Citation	4230		75.56		8050	)			
Nov 12/2013 78396	Lawyer: KM 0.30 Hrs X 160.00 Reviewed file materials and information provided by G. Butera; prepared correspondence to J. Conklin				48.00	8050				
Nov 20/2013 78683 Dec 5/2013 79073	Billing on Invoice 7940 FEES 64.00 DISBS 30.50 Chicago Regional Council of Carpe	€ 01418	94.50	0.00		7940	)			
Dec 18/2013 79428	Billing on Invoice 8050 FEES 48.00 DISBS 75.56			0.00		805	0 " "			
Jan 13/2014 79561	Lawyer: KM 0.20 Hrs X 160.00 Reviewed file for response by G. Butera to set citation date. Prepared correspondence to G. Butera regarding availability for citation during first two weeks of February.				32.00	816	0			
Jan 14/2014 80438 Jan 15/2014	Lawyer: KM 0.10 Hrs X 160.00 Reviewed and responded to correspondence from Cleveland Corporate / Grace Butera regarding date of citation and scheduling of same. Lawyer: KM 0.10 Hrs X 160.00				16.00	816	0			
80322					16.00	816	0			

4ar/16/2015 McJessy, Ching & Thompson, LLC Page: 9 Client Ledger ALL DATES Received From/Paid To Chq# |---- General ----| Bld | ----- Trust Activity -----| Inv# Acc Entry # Explanation Ropts Fees Rcpts Disbs Jan 20/2014 Chicago Regional Council of Carpe 01430 123 56 79789 РМТ -20/2014 Jan Billing on Invoice 8109 0.00 8109 79986 Jan 20/2014 Lawyer: KM 0.10 Hrs X 160.00 16.00 80358 Reviewed and responded to 8160 correspondence from G. Butera confirming date, time and location of the Citation. Lawyer: KM 1.30 Hrs X 160.00 ?eb 6/2014 80684 Reviewed documents produced by 208.00 8236 Cleveland Corporate to begin preparing for citation examination, including tax returns and a portion of the bank statements produced by bank. (1.2) Prepared correspondence to G. Butera advising that specific documents are missing from production and seeking to follow up on same. (.1) Feb 7/2014 Lawyer: KM 0.40 Hrs X 160.00 80154 Assembled document to prepare 64.00 8236 for citation examination. Prepared correspondence to L. Helmandtoler/J. Conklin/J. Libby 🖸 Feb 10/2014 Lawyer: KM 4.20 Hrs X 160.00 80702 Reviewed correspondence from G. 672.00 8236 Butera advising that she has produced all records and does not have any of the documents requested which are referred to in KPM's prior correspondence. (.1) Reviewed and responded to correspondence from G. Butera seeking confirmation she will appear for citation tomorrow. (.1) Prepared correspondence to J. Libby 🚭 Reviewed correspondence from G. Butera confirming appearance for citation. (.1) Telephone call to J. Libby regarding Prepared correspondence to J. Libby Drafted portion of citation examination outline for G. Butera and assembled exhibits for citation examination; reviewed documents as necessary to prepare for citation examination including review of nearly all detailed daily expenditures, which appear to be personal in nature, as shown on two years worth of bank statements for two accounts at Chase Bank. (3.7)Feb 11/2014 Lawyer: SK 0.30 Hrs X 60.00 18.00 8236 80162 Confer with K. McJessy and compared WKR Lexis report with G. Butera Lexis report; researched We Keep Running Messenger service. Feb 11/2014 Lawyer: KM 4.70 Hrs X 160.00 8236 752.00 80705 Completed preparation for deposition of G. Butera, including finished reviewing detailed bank statements appearing to show use of corporate assets for personal expenses purposes and commingling of funds. (1.2) Conducted citation examination of G. Butera. (3.2) Confer with J. Libby

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ate Entry #	Received From/Paid To Explanation	Chq# Rec#	Gener		Fees	Bld   Inv# Acc	Trust Activity Rcpts Disbs	Balance
	. (.3)							
'eb 12/2014 80719	Lawyer: KM 0.20 Hrs X 160.00				32.00	8236		
60713	regarding				32.00	8230		
ob 12/2014	Laurent VM 0 20 Hrs V 160 00							
80722	Lawyer: KM 0.20 Hrs X 160.00 Reviewed correspondence from N.				32.00	8236		
	Lagalo							
	reviewed forwarded							
'eb 13/2014	documents.							
80177	Prepared deposition/document				36.00	8236		
	Subpoenas for Frank Neubauer & Co., WKR Trucking and							
	Henricksen & Company; confer with Illinois Secretary of State Office to order articles							
	of incorporation for Commercial Corporate Services.							
	Lawyer: KM 2.80 Hrs X 160.00 Research and investigation into				448.00	8236		
00731	accountants who prepared tax returns for Cleveland				440.00	0230		
	Corporate for purposes of obtaining corporate records,							
	reviewed LEXIS report, property records, corporate							
	information and online information. Prepared							
	subpoena and rider for request of documents to Frank Neubauer							
	& Co., Inc. Research and investigation into Henricksen.							
	Prepared subpoena and rider for request of documents and							
	deposition to Henricksen. Research and investigation							
	into WKR Trucking, Cleveland Corporate's apparent only							
reb 14/2014	major vendor.							
80188					736,00	8236		
	Neubauer, Inc.; online research for information							
	related to Frank Neubauer, Inc. to determine if it is							
	still in business and who may have possession of its							
	records. (1.8) Drafted subpoena 30(b)(6) rider for							
	Henricksen subpoena and drafted subpoena document							
	request rider for Henricksen; reviewed corporate records							
	(LEXIS) obtained regarding Henricksen to try and find							
	links between Henricksen and either Cleveland Corporate							
	Services and/or Commercial Corporate Services.							
	Revised/drafted subpoena cover letter to Henricksen advising							
	that upon service of the subpoena, Henricksen should							
	contact MC&T to discuss the subpoena. (1.8) Reviewed							
	online records related to the ownership of the three							
	vehicles reported on Cleveland Corporate's taxes for							
	depreciation, i.e., 2000 Chevy Tahoe, 2007 Denali and 2009 G30							
	Box Van. (.4) Reviewed Linkedin, Facebook and other							
	online records for Tim Czeschki, who appears as owner							
	of the vehicles which were taken as a deduction on							
100	Cleveland Corporate's tax returnshis Linkedin Page							
	shows him as owner of "CCS" which could mean either							
	Cleveland or Commercial Corporate Services. (.4)							
Feb 14/2014	Henricksen & Company, Inc.							

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ate Entry #	Received From/Paid To Explanation	Chq# Rec#		ALL DATES neral  Disbs	Fees	Bld   Inv# Acc	Trust Activ	vity  Disbs Balance
80190	Witness Fee - Rule 30(b)(6)	4304	Керез	61.00	1003	8236	KOPUS Z	1333 Datance
eb 20/2014	Deposition Billing on Invoice 8160							
80471	FEES 80.00 Lawyer: KM 0.30 Hrs X 160.00			0.00		8160		
80821	Reviewed documents from				48.00	8236		
	Illinois Secretary of State for Cleveland Corporate							
	Services and Commercial Corporate Services, showing							
	both business operating out of							
	same locationi.e., Grace Butera's homeand Commercial							
	Corporate Services is owned by Timothy Czischki. (.2)							
	Prepared correspondence to N. Lagalo / J. Libby							
	. (.1)							
eb 28/2014	Expense Recovery							
80903 eb 28/2014		00283		91.42		8236		
81024	Court Reporter - Deposition of G. Butera - Appearance and	4325		826.80		8236		
-1-00/2014	Transcript Midwest Investigations							
81027	Process Server recovery -	4326		85.00		8236		
	Service of Subpoena upon Henricksen & Company							
ar 6/2014 80948	, , , , , , , , , , , , , , , , , , ,	e 01449	80.00					
ar 7/2014 81209	Billing on Invoice 8236			0.00		8236		
	DISBS 1064.22			<b>3.</b>		0200		
ar 7/2014 81705	Telephone call from T. McLean,				32.00	8284		
	counsel for Henricksen regarding receipt of subpoena							
	and additional time to respond and likely produce information							
	on spreadsheets as documents would be voluminous and hard,							
10 (2014	expensive to locate.							
ar 10/2014 81233	Prepared notice of filing of				18.00	8284		
	affidavit of service of subpoena to Henricksen & Co.							
	and filed same with court; prepared correspondence to							
	Judge Gottschall forwarding courtesy copy of same.							
ar 10/2014	Expense Recovery	00284		0.69		8284		
81489 ar 11/2014		00284		0.69				
81669	Prepared correspondence to J. Libby regarding				16.00	8284		
far 12/2014	Lawyer: KM 0.50 Hrs X 160.00							
81682	Telephone call from T. McLean				80.00	8284		
	regarding rescheduling of deposition and production of							
	information. (.2) Prepared correspondence to J. Libby							
	(.2) Reviewed correspondence							
	from T. McLean confirming conversations over							
	modification of documents to be produced. (.1)							
far 19/2014	LexisNexis	4340		47.42		8284		
81297 1ar 19/2014	LexisNexis							
81298 1ar 19/2014		4340		33.76		8284		
81591					16.00	8284		
	response of Henricksen in the							
	form of Excel spreadsheets and invoices and purchase orders.							
4ar 20/2014 81313		p∈ 01456	4110.22					
	Lawyer: KM 2.10 Hrs X 160.00							

			Clie	nt Ledger L DATES				
ate Entry #	Received From/Paid To Explanation	Chq# Rec#		eral  Disbs	Fees	Bld   Inv# Acc	Trust Activity Repts Disb	
81389					336.00	8284		
ar 24/2014 81399	Lawyer: SK 1.20 Hrs X 60.00 Confer with K. McJessy and				72.00	8284		
far 25/2014 81393	Lawyer: KM 0.40 Hrs X 160.00 Prepared correspondence to N. Lagalo  (.2) Telephone call with J. Libby regarding				64.00	8284		
4ar 25/2014 81400	Lawyer: SK 0.80 Hrs X 60.00 Further review of invoice listing spreadsheet and vendor purchase order list to compare whether transactions balance or not.				48.00	8284		
Mar 26/2014 81410	Lawyer: SK 2.80 Hrs X 60.00				168.00	8284		
4ar 27/2014 81423	Capital One Services Illinois Secretary of State - client - Commerical Corporate Svcs Articles of Incorporation	4346		27.50		8284		
4ar 27/2014 81424 4ar 31/2014	client - Cleveland Corporate Articles of Incorporation, 2007 Annual Report, 2012 Annual Report	4346		77.50		8284		
81497 Mar 31/2014 81539 Apr 1/2014 82176	Photocopy Recovery US Messenger & Logistics Courier Recovery Lawyer: KM 0.60 Hrs X 160.00 Reviewed spreadsheets of information provided by Henricksen in response to	00285 4350		2.40	96.00	8284 8284 8352		
	subpoena and comparison notes prepared by S. Keating. Prepared correspondence to T. McLean regarding request to talk and detailing differences between spreadsheets and possible missing information or inconsistencies.							
Apr 4/2014 82214 Apr 8/2014	Lawyer: KM 0.10 Hrs X 160.00 Reviewed correspondence from T. McLean regarding follow up on KPM correspondence of 4/1/14 regarding questions raised about documents produced.				16.00	8352		
82229	Reviewed correspondence from T McLean explaining issues with respect to spreadsheets prepared and produced by Henricksen. Prepared correspondence to T. McLean regarding date and time for deposition. Reviewed correspondence from T. McLean				48.00	8352		
Apr 10/2014	responding to same. Billing on Invoice 8284							

McJessy, Ching & Thompson, LLC

[ar/16/2015			McJessy, Ching Clien	, & Thompson t Ledger	, LLC		Page: 13
ate Entry #		Chq# Rec#		DATES	Fees	Bld   Inv# Acc	Trust Activity  Rcpts Disbs Balance
81902	FEES 850.00 DISBS 203.87			0.00		8284	
pr 16/2014 81955	LexisNexis Legal Research	4360		21.94		8352	
pr 21/2014 81980 pr 22/2014	Chicago Regional Council of Carpe PMT - 0 Lawyer: KM 0.20 Hrs X 160.00	1464	1053.87				
82295	Telephone call to T. McLean seeking to schedule deposition				32.00	8352	
	in Cleveland Corporate matter; prepared correspondence to T.						
pr 24/2014 82115	McLean regarding same. Expense Recovery Postage Recovery 0	0287		0.96		8352	
pr 24/2014 82316	Lawyer: KM 0.10 Hrs X 160.00 Reviewed and responded to				16.00	8352	
	correspondence from T. McLean confirming deposition for 4/14/14. Prepared						
	correspondence to J. Libby						
pr 30/2014	Expense Recovery						
82090 pr 30/2014		0286		0.72		8352	
82374 fay 9/2014	PACR Lawyer: KM 0.10 Hrs X 160.00	4370		0.40	16.00	8352	
82750	Prepared correspondence to J. Libby regarding				16.00	8444	
1ay 14/2014 82792	Lawyer: KM 7.70 Hrs X 160.00 Prepared for deposition of T. Osborn, CFO for Henricksen				1232.00	8444	
	and gathered exhibits for deposition. (2.0) Travel						
	to/from Naperville and conducted deposition of T. Osborn. (5.7)						
1ay 15/2014 82800	Lawyer: KM 0.30 Hrs X 160.00 Reviewed correspondence from N.				48.00	8444	
	reviewed attachments. (.1) Telephone						
	call with J. Libby regarding						
	(.1) Reviewed correspondence from T. McLean forwarding FEIN's for						
	Cleveland Corporate and Commercial Corporate. (.1)						
4ay 19/2014 82521	Billing on Invoice 8352 FEES 208.00 DISBS 24.02			0.00		8352	
1ay 27/2014 82884	Lawyer: KM 2.40 Hrs X 160.00 LEXIS research and reviewed				384.00	8444	
	case authority regarding whether the federal courts have jurisdiction over claims						er ancertidos comentas quintidades este estados
	against business owners for fraudulent conveyance and for	ilijaji Laidaksi					
	piercing the corporate veil under section 502 of ERISA or section 301 of Taft-Hartley						
	Act in case where judgment has already been entered against						
	the signatory employer, generally no but exceptions apply; reviewed decisions in						
	Peacock v. Thomas, NECA IBEW v. Ernie, Flynn v. Greg						
	Anthony Construction, Southward v. South Central and Railroad Maintenance v. Kelly						
	Railroad, Hudson Carpenters v. VSR Construction, Board of						
4ay 28/2014	Trustees v. Universal Enterprises, etc. Lawyer: KM 2.30 Hrs X 160.00						
82893					368.00	8444	
	court jurisdiction, reviewed Central States Pension Fund,						
	Caliber Auto Expense decisions. Started drafting complaint against Commercial						
	Corporate Services, Czischki and Butera for piercing the						
	corporate veil, fraudulent						

Mat/10/2013				Client Ledger ALL DATES				rage: 14
Date Entry #	Received From/Paid To Explanation	Chq# Rec#	 Rcpts	General  Disbs	Fees	Bld   Inv# Acc	Trust Activity Rcpts Disbs	Balance
May 30/2014 82904	conveyance and alter-ego. Lawyer: KM 4.50 Hrs X 160.00 Completed drafting complaint against Commercial Corporate, Czischki and Butera for alter ego, fraudulent conveyance and piercing the corporate veil. Prepared correspondence to J. Libby				720.00	8444		
May 31/2014 82625	Expense Recovery Photocopy Recovery	00288		74.40		8444		
May 31/2014 82907 Jun 6/2014	Certified Reporting Co. Court Reporter - Deposition of Henricksen & Co Appearance Chicago Regional Council of Carpe PMT -	4394 : 01476	232,02	175.00		8444		
82917 Jun 9/2014 83168	Billing on Invoice 8444 FEES 2768.00	01470	232.02	0.00		8444		
Jun 9/2014 83803	DISBS 249.40  Lawyer: KM 6.70 Hrs X 160.00  Reviewed Illinois case authority on piercing corporate veil and revised draft complaint against Butera, Czischki and Commercial Corporate. Edited and revised complaint and filled in all fraudulent cash transfers; reviewed bank records as necessary to fill in bank transfers. Telephone call with J. Libby regarding				1072.00	8493		
Jun 10/2014 83802	Lawyer: KM 3.20 Hrs X 160.00 Extensive research on issue of supplemental jurisdiction over claims against River Front Chrysler. Prepared correspondence to J. Libby				512.00	8493		
Jun 12/2014 83676	Lawyer: KM 0.10 Hrs X 160.00 Reviewed and responded to correspondence from J. Libby				16.00	8493		
Jun 16/2014 83224	Lawyer: SK 0.70 Hrs X 60.00 Prepared civil cover sheet, K. McJessy appearance, summons to Commercial Corporate, summons to River Front Chrysler Jeep, summons to T. Czischki and summons to G. Butera (.4); filed complaint, civil cover sheet and appearance with				42.00	8493		
Jun 16/2014 83805	court (.3). Lawyer: KM 0.50 Hrs X 160.00 Final review and edits to complaint; review of documents attendant to complaint prior to				80.00	8493		
Jun 17/2014 83698 Jun 18/2014 83272	filing. Lawyer: KM 0.10 Hrs X 160.00 Reviewed ECF court order assigning judge and magistrate. Lawyer: SK 0.30 Hrs X 60.00 Reviewed ECF notice re: judges' assignments and completed summons to the 4 defendants; prepared email correspondence to court clerk forwarding summonses for issuance; prepared email correspondence to J. Libby and J. Conklin				16.00	8493		
Jun 19/2014 83258	LexisNexis Legal Research	4401		94.95		8493		
Jun 19/2014 83259 Jun 19/2014 83273	LexisNexis Legal Research Lawyer: SK 0.20 Hrs X 60.00 Reviewed ECF notice and summonses issued to 4 defendants; confer with and prepared email correspondence to process server forwarding summonses and complaint for	4401		10.95	12.00	8493 8493		
Jun 20/2014 83298	service. Chicago Regional Council of Carp	o∈ 01486	3017.4	0				

Thompson, LLC Page: 15

			ient Ledger ALL DATES					
)ate Entry #	Received From/Paid To Explanation	Chq# Rec#	eneral  Disbs	Fees	Bld   Inv# Acc	Rcpts	Activity Disbs	 Balance
Jun 20/2014	Lawyer: KM 0.30 Hrs X 160.00 Telephone call with G. Wilcox, represents River Front Chrysler Jeep, regarding introduction, possible defense to claim, G. Butera bought a car, he will obtain documents and forward, car was titled to Grazia Butera. (.2) Reviewed ECF court order of Judge Lee setting initial status hearing for 7/31/14.			48.00	8493			
83526	Lawyer: JS 4.60 Hrs X 160.00 Research on officer buying car with corporation funds and titling car to self when leaving corporation insolvent; voidability of same pursuant to Illinois' Fraudulent Transfer Act; expansion of research to personal items, generally, and then cars as to all states, rather than just Illinois.			736.00	8493			
	Lawyer: KM 1.20 Hrs X 160.00 Reviewed documents produced by Gary Wilcox regarding purchase of car by Grazia Butera using funds from Cleveland Corporate. Confer with J. Sopata regarding  . Reviewed case authority regarding whether car dealership can assert defense to claim for fraudulent transfer including Cafaro, Ewen, Glaubitz, Bonded Financial, Krol, Field			192.00	8493			
Jun 24/2014 83324	-			18.00	8493			
Jun 24/2014 83737				16.00	8493			
Jun 25/2014 83353				12.00	8493	·		
Jun 25/2014 83806				400.00	8493			
	of voluntary dismissal. Prepared correspondence to G.							

			Client Ledger ALL DATES			
Date Entry #	Received From/Paid To Explanation	Chq# Rec#	General  Rcpts Disbs		Bld  - [nv# A	Trust Activity  cc Rcpts Disbs Balance
	Wilcox forwarding notice of					
Jun 26/2014	voluntary dismissal. (.5) Midwest Investigations					
83378		4410	85.00	8	3493	
	Complaint on River Front	•				
Jun 26/2014	Chrysler Jeep Inc. Midwest Investigations					
83379	Process Server recovery - Service of Summons and	4410	85.00	{	8493	
Jun 26/2014	Complaint on Timothy Czischki					
83381	Court Reporter - Deposition of	4411	285.90	8	8493	
Jun 26/2014	Henricksen & Co Transcript Lawyer: KM 0.10 Hrs X 160.00					
83391	Reviewed correspondence from G. Wilcox affirming receipt of			16.00	8493	
Jun 30/2014	notice of voluntary dismissal.					
83474	Expense Recovery Photocopy Recovery	00290			8493	
Jul 1/2014 83419	Lawyer: SK 0.10 Hrs X 60.00 Call to process server			6.00	8560	
	regarding status of service of defendant Commercial Corp.					
Jul 10/2014	Services and defendant Butera.					
83533	Confer with process server re:			6.00	8560	
	T. Czischki and G. Butera avoiding service but attempts					
Jul 11/2014	will continue. Expense Recovery					
84067 Jul 17/2014	Postage Recovery Capital One Services	00292	0.48		8560	
83615 Jul 17/2014	Filing Fee -	4424	400.00		8560	
83621	Legal Research -	4425	50.43		8560	
Jul 17/2014 83622	LexisNexis Legal Research -	4425	135.75		8560	
Jul 17/2014 83638		4427	17,71		8560	
Jul 17/2014 83640	US Messenger & Logistics Courier Recovery	4427	14.60		8560	
Jul 17/2014	US Messenger & Logistics	4427			8560	
83642 Jul 18/2014	Courier Recovery Billing on Invoice 8493	4427	14.60			
83819	FEES 3206.00 DISBS 573.92		0.00		8493	
Jul 18/2014 84432	Lawyer: KM 0.40 Hrs X 160.00 Reviewed correspondence from			64.00	8560	
	counsel for T. Czischki regarding bankruptcy and					
	release of T. Czischki from lawsuit. Prepared					
	correspondence to B.					
	Scalambrino, Trust Funds' bankruptcy counsel, forwarding					
Jul 21/2014	same for assessment. Lawyer: SK 0.40 Hrs X 60.00					
84000	Teleconferences with process server and K. McJessy			24.00	8560	
	regarding service of summons and complaint on defendants					
	and attorney appearance of					
	defendants individually; prepared email correspondence					
	to process server regarding same; filed affidavit of					
	service upon Commercial Corporate with court; filed					
	affidavit of service upon G. Butera with court; prepared					
	correspondence to Judge Lee					
	forwarding courtesy copies of same.					
Jul 21/2014 84434	Lawyer: KM 0.30 Hrs X 160.00 Telephone call with B.			48.00	8560	
	Scalambrino regarding T. Czischki's bankruptcy (.1).					
	Confer with S. Keating regarding					
	(.1).					
	Telephone call with D. Herzog					
	regarding response to his letter of July 18th, will					
Jul 25/2014	follow up after July 30th (.1). Lawyer: KM 0.30 Hrs X 160.00					
84342				48.00	8560	
Tull .21 /901 4	Cleveland Corporate hearings. Colette Kuemmeth, CSR, RMR					
Jun 31/2014	COLUMN TO THE PROPERTY OF THE					

			Client Ledger ALL DATES					
Date Entry #	Received From/Paid To Explanation	Chq# Rec#	General  Rcpts Disbs		31d   nv# Acc	Trust . Rcpts	Activity Disbs	 Balance
84037	<del></del>	4435	116.80		660	Acpts		DATAILCE
	Transcripts 2/5/13, 2/19/13,							
	2/27/13, 4/3/13, 5/1/13, 6/19/13							
Jul 31/2014 84079		00293	21.60	8.5	560			
Jul 31/2014	Midwest Investigations							
84114	Process Server recovery - Service of summons and	4439	220.00	. 85	560			
	complaint upon Commercial Corporate, G. Butera, T.							
	Czischki (personal) with stake							
Jul 31/2014	out time US Messenger & Logistics							
84122	Courier Recovery	4440	15.92	85	560			
84927	Lawyer: KM 0.80 Hrs X 160.00 Prepared initial status report			128.00 86	614			
	to Court; reviewed court's standing order for form of							
7 15 /2014	initial status report.							
Aug 15/2014 84400	Lawyer: SK 0.20 Hrs X 60.00 Filed status report with court			12.00 80	614			
	and prepared correspondence to Judge Lee forwarding courtesy							
7.0014	copy of same.							
Aug 15/2014 84409	Lawyer: KM 0.30 Hrs X 160.00 Reviewed correspondence from D.			48.00 8	614			
	Herzog regarding bankruptcy of Grazia Butera and review of							
	status report. (.1) Reviewed							
	correspondence from D. Herzog regarding approval of status							
	report provided that notation of bankruptcy filing of Butera							
	is included. (.1) Made minor							
	revisions to status report and arranged with S. Keating to							
Aug 15/2014	file same with Court. (.1) Billing on Invoice 8560							
84477	FEES 196.00		0.00	8	3560			
Aug 19/2014	Chicago Regional Council of Carpe							
84593 Aug 20/2014		01510	3779.92					
84668	Appeared in court for status			176.00 8	3614			
	hearing on answers of defendants, court advised of							
	bankruptcy filing of G. Butera and prior filing of T.							
	Czischki, case stayed for 30 days. Reviewed ECF Court							
	order of Judge Lee setting							
	hearing for 9/30/14 and all matters stayed until then.							
Aug 22/2014 84915				64.00 8	8614			
01313	Meeting of Creditors for G.			01.00				
	Butera bankruptcy, Prepared correspondence to J. Libby and							
	B. Scalambrino							argan kapa
	Reviewed and responded to correspondence from B.							
	Scalambrino							
Aug 29/2014 84718		€ 01518	1203.89					
Aug 31/2014	Expense Recovery				9614			
84766 Sep 5/2014	Lawyer: KM 1.20 Hrs X 160.00	00294	4,56		8614			
85459	Reviewed correspondence from B. Scalambrino regarding			192.00	8677			
	. Prepared							
	correspondence to B.							
	Scalambrino copied to C. Muniz and J. Libby and J. Conklin							
	documents to prepare responses							
	goodments to brebare responses							

Date	Received From/Paid To	Chq#	Ge	ient Ledger ALL DATES eneral	_		Trust Activity	
Entry #	to B. Scalambrino and to forward documents. Reviewed and responded to correspondence from B. Scalambrino	Rec#	Rcpts	Disbs	Fees	Inv# Acc	Rcpts Disbs	Balance
3ep 8/2014 85631	Lawyer: KM 1.10 Hrs X 160.00 Telephone call with J. Libby  recommended that someone from				176.00	8677		
	Bruce Scalambrino's office attend the creditors meeting and advised J. Libby will  Reviewed correspondence from J. Libby to B. Scalambrino  Reviewed							
	correspondence from C. Muniz advising J. Libby that  Reviewed file materials, correspondence and documents for WESTLAW and LEXIS reports. Prepared correspondence to C. Munize							
Sep 12/2014 85473					32.00	8677		
	Reviewed correspondence from B. Scalambrino  Prepared correspondence to J. Libby and B. Scalambrino							
Sep 16/2014 85016 Sep 23/2014 85577	FEES 428.00 DISBS 4.56			0.00	48.00	8614		
Sep 24/2014 85189	schedules. Lawyer: SK 0.30 Hrs X 60.00 Filed notice of voluntary dismissal as to T. Czischki with court; prepared correspondence to Judge Lee forwarding courtesy copy of				18.00	8677		
Sep 24/2014 85585					48.00	8677		
Sep 26/2014 85195 Sep 30/2014 85261	Courier Recovery US Messenger & Logistics Courier Recovery	4480 4490		14.60 14.60		8677 8677		
3ep 30/2014 85301 3ep 30/2014	Appeared in court before Judge Lee regarding status of bankruptcy; case continued to early December.				240.00	8677		
85374 Oct 6/2014 85324	Photocopy Recovery Chicago Regional Council of Carp	00297 € 01524	432.56	0.72		8677		

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				DATES					
)ate Entry #	Received From/Paid To Explanation	Chq# Rec#	Gener	cal  Disbs	Fees	Bld   Inv# Acc		Trust Activity - ts Disbs	Balance
oct 8/2014				, , , , , , , , , , , , , , , , , , ,					
85318	Reviewed correspondence from C. Muniz				224.00	8741			
	Edited and revised requests								
	and prepared notes on issues								
	in litigation that may prompt additional requests; reviewed						•		
	prior correspondence and documents related to	•							
	Commercial litigation and								
	Cleveland litigation to form document requests.								
ot 10/2014 86068					16.00	8741			
	Muniz				10.00	0,11			
	briefly reviewed motion.								
Oct 20/2014 85659				0.00		8677			
	DISBS 29.92			0.00					
ot 30/2014 85873		4509		9.40		8741			
Nov 14/2014 86224		01537	783.92						
Nov 14/2014	Billing on Invoice 8741	0.007		0.00		0743			
86294	DISBS 9.40			0.00		8741			
Nov 21/2014 86472		01540	249.40						
Dec 4/2014	Lawyer: KM 1.30 Hrs X 160.00	01010				227.6			
87366	Appeared in court for hearing before Judge Lee regarding				208.00	8876			
	bankruptcy and stay proceedings. Reviewed ECF								
	court order of Judge Lee								
	confirming next hearing date set for 2/5/15.								
Dec 9/2014 87018	Billing on Invoice 8813			0.00		8813			
Jan 20/2015									
87541 Feb 4/2015	FEES 208.00 Lawyer: SK 0.40 Hrs X 60.00			0.00		8876			
87791	Prepared notice of motion for CRCC motion to lift stay;				24.00				
	filed notice and motion to								
?eb 4/2015									
87814	LEXIS research on applicability of stay to parties other than				256.00				
	debtor and motion to lift stay. (.8) Drafted motion to								
	lift bankruptcy stay. (.8)								
Feb 5/2015 87813					208.00				
	on status of bankruptcy and presented motion to lift								
	bankruptcy stay as to								
	defendant Commercial Corporate Services.								
Feb 10/2015	Chicago Regional Council of Carp	∈ 01571	208.00						
87835 Feb 17/2015	Billing on Invoice 8942	013/1	200,00			0015			
88133 Feb 28/2015				0.00		8942			
88425 Feb 28/2015	Photocopy Recovery	00308		3.00					
88546	Legal Research - January,	4624		10.20					
4ar 12/2015	February 2015 Lawyer: SK 0.40 Hrs X 60.00								10 mm
88587					24.00				
	electronically with court;								
	prepared correspondence to Judge Lee's deputy forwarding								
	courtesy copy of same.								
noma z o	UNBILLED		-		ILLED -	777	—    -	BALANCES	
POTALS PERIOD	CHE + RECOV + FEES 10.20 3.00 512.00	= TOT					IPTS 4.22	= A/R 0.00	TRUST 0.00
END DATE	10.20 3.00 512.00	525.	20 4064.22	16610.00	0.		4.22	0.00	0.00
777)	UNBILLED		_		ILLED —		-	BALANCES	
FIRM TOTAL PERIOD	CHE + RECOV + FEES 10.20 3.00 512.00	= TOT		16610.00	0.		IPTS 4.22	= A/R 0.00	TRUST 0.00
END DATE	10.20 3.00 512.00	525.					4.22	0.00	0.00
-									

## 14 CV 04513

# Exhibit D

#### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

	REGIONAL COUNCIL OF RS PENSION FUND, <i>et al.</i> ,	)	
v.	Plaintiffs,	)	14 CV 04513
	IAL CORPORATE SERVICES,  Defendants.	) ) ) ) )	Judge John Z. Lee
	FINAL JU	J <b>DG</b> I	<u>MENT</u>
Pursu	uant to Federal Rules of Civil Proce	dure	54,55 and 58, a final judgment is hereby
entered in fa	vor of the Chicago Regional Counc	il of	Carpenters Pension Fund et al. ("Trust
Funds") and	against defendant Commercial Cor	porat	e Services, Inc. in the amount of \$93,590.79
as follows:			
A.	\$51,437.78 in unpaid contribution	ns;	
В.	\$2,736.00 for auditor's fees incu	rred l	by the Trust Funds to complete the audit;
C.	\$5,930.04 in interest;		
D.	\$12,287.55 in liquidated damage	es; an	d
Е.	\$21,199.42 in reasonable attorne action.	ys' fe	ees and costs the Trust Funds incurred in this
The Trust Fu	ınds shall also recover reasonable a	ttorn	ey' fees and costs incurred by the Trust
Funds in enfo	orcing this order and any such furth	ier re	lief as this Court deems appropriate.
Date			Judge John Z. Lee