

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

**LABORERS' PENSION FUND and)
LABORERS' WELFARE FUND OF THE)
HEALTH AND WELFARE DEPARTMENT)
OF THE CONSTRUCTION AND GENERAL)
LABORERS' DISTRICT COUNCIL OF)
CHICAGO AND VICINITY, and JAMES S.)
JORGENSEN, Administrator of the Funds,)**

Plaintiffs,)

v.)

**WINDY CITY MAINTENANCE)
CONTRACTORS, INC.)**

Defendant.)

Case No. 15 C 5331

Judge Harry D. Leinenweber

AFFIDAVIT OF SARA STEWART SCHUMANN

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Sara Stewart Schumann, being first duly sworn on oath, deposes and states as follows:

1. I am an associate attorney at the law firm of Allison, Slutsky & Kennedy, P.C.,
counsel for the Plaintiffs Laborers' Pension Fund and Laborers' Welfare Fund of the Health and
Welfare Department of the Construction and General Laborers' District Council of Chicago and
Vicinity (the "Funds") in the action against Windy City Maintenance Contractors, Inc. This affidavit
is submitted to document attorneys' fees and costs incurred by the Laborers' Funds, in its efforts to
enforce the Parties' Settlement Agreement and collect on the Defendant's Installment Note
delinquency, covering work performed from the date of Defendant's breach on June 11, 2016

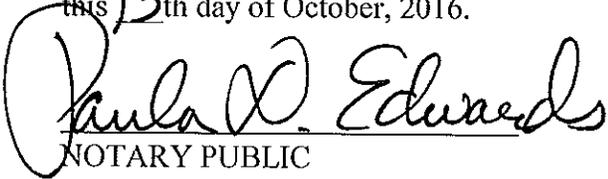
through the present.

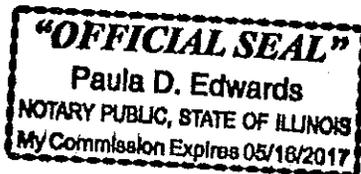
2. Since June 11, 2016, this firm has billed the Laborers' Funds on an hourly basis for collection services rendered to the Funds, at a rate of \$225.00 per hour for shareholders, \$195.00 per hour for associates, and \$110.00 per hour for clerks/paralegals. In this cause records kept for legal work on this matter were kept contemporaneously and are attached hereto as Exhibit 5A.

3. This fee report is attached here to as Exhibit 5A and sets forth the time expended from June 11, 2016 through the present, by the firm's attorneys and paralegals in this matter. The billable entries were reviewed, and any duplicate entries were struck. As set forth in Exhibit 5A, the Funds have incurred legal fees to my firm in this matter in the amount of \$3,003.00.


Sara Stewart Schumann, Associate
ALLISON, SLUTSKY & KENNEDY, P.C.

Subscribed and sworn to before me
this 13th day of October, 2016.


NOTARY PUBLIC



Selection Criteria

Slip Classification Open
 Refe. Selection Include: Windy City Maintenance
 Clie. Selection Include: Labrs P&W 1
 Slip. Transaction Dat 6/11/2016 - Latest

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
285349	TIME			Sara Schumann	0.40	195.00	78.00
	6/13/2016			Legal Services	0.00	C@2	
	Billed	G:12180	7/11/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Emails w/R. Young and A. Grossi				
285343	TIME			Sara Schumann	0.20	195.00	39.00
	6/14/2016			Legal Services	0.00	C@2	
	Billed	G:12180	7/11/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Calls w/R. Young				
285628	TIME			Sara Schumann	0.60	195.00	117.00
	6/29/2016			Legal Services	0.00	C@2	
	Billed	G:12180	7/11/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Call w/R. Young and A. Grossi; draft quarterly report				
285622	TIME			Sara Schumann	0.80	195.00	156.00
	6/30/2016			Legal Services	0.00	C@2	
	Billed	G:12180	7/11/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Emails w/R. Young; calls w/K. Hughes; draft quarterly report				-22.50
285617	TIME			Sara Schumann	0.80	195.00	156.00
	7/1/2016			Legal Services	0.00	C@2	
	Billed	G:12192	8/4/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Emails w/R. Young, A. Franz and A. Grossi				
285889	TIME			Sara Schumann	0.50	195.00	97.50
	7/5/2016			Legal Services	0.00	C@2	
	Billed	G:12192	8/4/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Emails w/A. Grossi and R. Young				
286091	TIME			K. Engelhardt	0.10	225.00	22.50
	7/8/2016			Legal Services	0.00	C@1	
	Billed	G:12192	8/4/2016	Labrs P&W 1	0.00		
				Windy City Maintenanc	0.00		
			Report to Trustees				

9/2/2016
4:39 PM

Allison, Slutsky & Kennedy, P.C.
Slip Listing

Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
286568	TIME	Sara Schumann	0.50	195.00	97.50
7/19/2016		Legal Services	0.00	C@2	
Billed	G:12192	8/4/2016 Labrs P&W 1	0.00		
Email w/R. Young, A. Grossi and Jim Fosco		Windy City Maintenanc	0.00		
286575	TIME	Sara Schumann	0.30	195.00	58.50
8/1/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Email and call w/J. Fosco; review note worksheet; call w/R. Young		Windy City Maintenanc	0.00		
287092	TIME	Sara Schumann	1.00	195.00	195.00
8/11/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Emails and call w/R. Young; work on draft motion to reinstate lawsuit		Windy City Maintenanc	0.00		
287361	TIME	Sara Schumann	0.70	195.00	136.50
8/23/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Call and emails w/J. Fosco; email w/A. Grossi; work on motion to reinstate		Windy City Maintenanc	0.00		
287663	TIME	Sara Schumann	0.50	195.00	97.50
8/24/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Work on draft motion to reinstate cause; emails w/J. Fosco		Windy City Maintenanc	0.00		
287665	TIME	Sara Schumann	2.00	195.00	390.00
8/25/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Work on draft motion to reinstate cause, notice of motion and certificate of service; draft affidavit for J. Fosco; prepare exhibits for motion; and email w/A. Smith, J. Fosco and A. Grossi		Windy City Maintenanc	0.00		
287667	TIME	Sara Schumann	0.70	195.00	136.50
8/26/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Work on draft motion to reinstate cause, call and email w/J. Fosco and K. Hughes; review accumulated liquidate damages; draft S. Schumann affidavit		Windy City Maintenanc	0.00		

~~390.00~~
-195-

10/13/2016
3:31 PM

Allison, Slutsky & Kennedy, P.C.
Slip Listing

Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
287668	TIME			Sara Schumann		0.30	195.00	58.50
	8/29/2016			Legal Services		0.00	C@2	
	Billed	G:12210	8/1/2016	Labrs P&W 1		0.00		
	Call w/R. Young			Windy City Maintenanc		0.00		
287946	TIME			Sara Schumann		2.50	195.00	487.50
	9/2/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Complete draft motion to reinstate cause; revise notice of motion, affidavits and fee report; review penalties			Windy City Maintenanc		0.00		
								58.50 429.00
288068	TIME			Sara Schumann		0.70	195.00	136.50
	9/6/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Email and call w/R. Young; review affidavit of J. Fosco; calls w/J. Fosco; emails w/A. Grossi			Windy City Maintenanc		0.00		
288075	TIME			Sara Schumann		0.30	195.00	58.50
	9/7/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Emails and call w/R. Young; call w/J. Fosco			Windy City Maintenanc		0.00		
288321	TIME			Sara Schumann		0.50	195.00	97.50
	9/12/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Emails and call w/R. Young and J. Mashos			Windy City Maintenanc		0.00		
288328	TIME			Sara Schumann		1.30	195.00	253.50
	9/13/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Court appearance on motion; calls w/J. Fosco; email w/J. Jorgensen			Windy City Maintenanc		0.00		
288671	TIME			Sara Schumann		0.80	195.00	156.00
	9/21/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Emails w/ R. Young, J. Fosco and A. Grossi			Windy City Maintenanc		0.00		
289037	TIME			Sara Schumann		0.30	195.00	58.50
	10/3/2016			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
	Call and email w/R. Young and D. Hayduck			Windy City Maintenanc		0.00		

10/13/2016
3:31 PM

Allison, Slutsky & Kennedy, P.C.
Slip Listing

Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
289038	TIME	Sara Schumann	0.30	195.00	58.50
10/5/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Review motion to withdraw		Windy City Maintenanc	0.00		
289039	TIME	Sara Schumann	0.50	195.00	97.50
10/6/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Emails w/J. Fosco and D. Hayduck, conf. w/K. Engelhardt		Windy City Maintenanc	0.00		
289040	TIME	Sara Schumann	0.20	195.00	39.00
10/7/2016		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Call w/J. Fosco		Windy City Maintenanc	0.00		
Grand Total					
		Billable	16.80		3279.00
		Unbillable	0.00		0.00
		Total	16.80		3279.00

-276-
3,003.00