

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

CONSTRUCTION WORKERS PENSION  
TRUST FUND LAKE COUNTY AND  
VICINITY,

Plaintiff,

v.

ENVIRONMENTAL CLEANSING  
CORPORATION,

Defendant, and

Third-Party Plaintiff,

LABORERS' PENSION FUND &  
WELFARE FUNDS

Third-Party Defendants.

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, as Administrator of the Funds

Counter-Plaintiffs,

v.

ENVIRONMENTAL CLEANSING  
CORPORATION,

Counter-Defendant

Case No. 15 C 8532

Judge Sharon Johnson Coleman

**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 Environmental Cleansing Corporation, Inc. (the "Company"). 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 Company's Installment Note delinquency, covering work performed from the date of Defendant's breach on April 11, 2017 through the present.

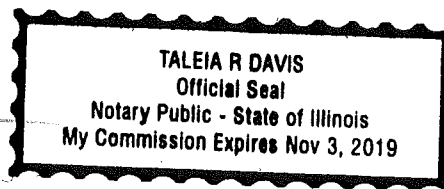
2. Since April 11, 2017, this firm has billed the Laborers' Funds on an hourly basis for collection services rendered to the Funds, at a rate of \$225.00 per hour for shareholders, \$195.00 per hour for associates, and \$110.00 per hour for clerks/paralegals. In this cause records kept for legal work 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 April 11, 2017 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 \$1,267.50.

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

Subscribed and sworn to before me  
this 10th day of July, 2017.

  
NOTARY PUBLIC



Selection Criteria

Slip Classification Open  
 Clie. Selection Include: Labrs P&W 1  
 Slip Transaction Date 4/11/2017 - Latest  
 Refe. Selection Include: Environmental Cleansing (Lake County Third Party-Litigation)

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
296634	TIME			Sara Schumann	0.30	195.00	58.50
	4/18/2017			Legal Services	0.00	C@2	
	Billed	G:12366	5/3/2017	Labrs P&W 1	0.00		
			Call w/M. Christopher and emails w/T. Condon	Environmental Cleansin	0.00		
297853	TIME			Sara Schumann	0.30	195.00	58.50
	5/9/2017			Legal Services	0.00	C@2	
	Billed	G:12393	6/6/2017	Labrs P&W 1	0.00		
			Call w/M. Christopher; email w/T. Condon	Environmental Cleansin	0.00		
297875	TIME			Sara Schumann	0.30	195.00	58.50
	5/22/2017			Legal Services	0.00	C@2	
	Billed	G:12393	6/6/2017	Labrs P&W 1	0.00		
			Call w/M. Christopher; email w/T. Condon	Environmental Cleansin	0.00		
298204	TIME			Sara Schumann	0.20	195.00	39.00
	5/30/2017			Legal Services	0.00	C@2	
	Billed	G:12393	6/6/2017	Labrs P&W 1	0.00		
			Call w/T. Condon	Environmental Cleansin	0.00		
298717	TIME			Sara Schumann	1.00	195.00	195.00
	6/15/2017			Legal Services	0.00	C@2	
	Billed	G:12416	7/6/2017	Labrs P&W 1	0.00		
			Draft letter to M. Konopko; call and email w/T. Condon; call w/M. Christopher	Environmental Cleansin	0.00		
298723	TIME			Sara Schumann	0.30	195.00	58.50
	6/16/2017			Legal Services	0.00	C@2	
	Billed	G:12416	7/6/2017	Labrs P&W 1	0.00		
			Conf. w/K. Engelhardt; call w/T. Condon	Environmental Cleansin	0.00		
299537	TIME			Sara Schumann	0.20	195.00	39.00
	6/27/2017			Legal Services	0.00	C@2	
	Billed	G:12416	7/6/2017	Labrs P&W 1	0.00		
			Calls w/T. Condon; call to M. Christopher; conf. w/K. Engelhardt	Environmental Cleansin	0.00		

7/6/2017  
6:57 PM

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

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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		
299565	TIME	Sara Schumann	0.20	195.00	39.00
6/28/2017		Legal Services	0.00	C@2	
Billed	G:12416	7/6/2017 Labrs P&W 1	0.00		
Call w/J. Gilleran and A. Grossi; conf. w/K. Engelhardt		Environmental Cleansin	0.00		
299529	TIME	Sara Schumann	0.20	195.00	39.00
6/29/2017		Legal Services	0.00	C@2	
Billed	G:12416	7/6/2017 Labrs P&W 1	0.00		
Call and email w/A. Grossi; call w/T. Condon; draft quarterly report		Environmental Cleansin	0.00		
299566	TIME	Sara Schumann	0.50	195.00	97.50
6/30/2017		Legal Services	0.00	C@2	
Billed	G:12416	7/6/2017 Labrs P&W 1	0.00		
Emails w/A. Grossi and draft quarterly report		Environmental Cleansin	0.00		
299611	TIME	Sara Schumann	3.00	195.00	585.00
7/6/2017		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Draft motion to reinstate action and enforce the Settlement Agreement; prepare exhibits and affidavits; run fee report; conf. w/K. Engelhardt; email w/T. Condon; call and fax w/M. Christopher		Environmental Cleansin	0.00		
Grand Total					
		Billable	6.50		1267.50
		Unbillable	0.00		0.00
		Total	6.50		1267.50