

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.) Case No. 15 C 8532
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)

AFFIDAVIT OF SARA STEWART SCHUMANN

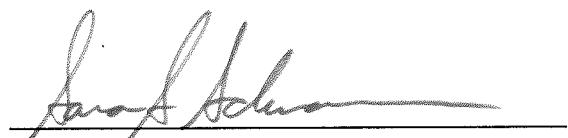
STATE OF ILLINOIS)
COUNTY OF COOK)

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

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	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	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	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		
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Grand Total		Billable	6.50		1267.50
		Unbillable	0.00		0.00
		Total	6.50		1267.50
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