

# EXHIBIT LIST

## EXHIBIT A

Agreed Order of Dismissal

## EXHIBIT B

Sworn Declaration Pursuant To 28 U.S.C.A. § 1746  
John Libby, Manager, Audits & Collections

## EXHIBIT C

Sworn Declaration Pursuant To 28 U.S.C.A. § 1746  
Daniel P. McAnally, Plaintiffs Attorney

# Exhibit A

**Exhibit A**

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

TRUSTEES of the CHICAGO REGIONAL COUNCIL )  
OF CARPENTERS PENSION FUND et al. )

Plaintiffs, )

v. )

JOHN'S INSTALLATION SERVICE INC. )

Defendant. )

Case No. 16 C 4017

Judge Durkin

Order of Default

WHEREAS, the Plaintiffs filed their Complaint on April 5, 2016 and the Defendant was personally served with copies of Summons and Complaint; and

WHEREAS, the Defendant has failed to answer or otherwise plead; and

NOW THEREFORE, upon application of the Plaintiffs and for good cause shown, a default is hereby entered against the Defendant in accordance with the prayer of the Complaint in the above styled action; and

IT IS HEREBY ORDERED that Defendant, JOHN'S INSTALLATION SERVICE INC., submit reports and contributions for the period December 2015 through present to the Plaintiffs within ten days. The Court will retain jurisdiction solely to enter a final judgment for the contributions and dues checkoff shown to be owed by way of an estimate or otherwise, including interest, liquidated damages and attorney fees pursuant to the trust agreements and ERISA Section 1132(g)(2).

ENTERED:



THOMAS M. DURKIN  
UNITED STATES DISTRICT JUDGE

7/12/2016

DATED:

# Exhibit B

**Exhibit B**

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

TRUSTEES of the CHICAGO REGIONAL	)	
COUNCIL of CARPENTERS PENSION	)	
FUND, et al.	)	
	)	
Plaintiffs,	)	Case No. 16 C 4017
	)	
v.	)	Judge Durkin
	)	
JOHN'S INSTALLATION SERVICE INC.	)	
	)	
Defendant.	)	

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

---

John Libby declares as follows:

1. I am the Manager, Audits & Collections for the Chicago Regional Council of Carpenters Pension Fund and the Chicago Regional Council of Carpenters Welfare Fund ("Trust Funds") and in such capacity I am authorized to make this Declaration on behalf of the Trust Funds.

2. The Defendant executed an Agreement with the Chicago and Northeast Illinois Regional Council of Carpenters ("Union") whereby it agreed to be bound by the provisions of a Collective Bargaining Agreement and to all Collective Bargaining Agreements subsequently negotiated.

3. Pursuant to the provisions of the Agreement and the Collective Bargaining Agreements, the Defendant agreed to be bound by the provisions of the Agreements and Declarations of Trust, which created the Plaintiffs' Trust Funds.

4. Pursuant to the provisions of the Collective Bargaining Agreements and Trust Agreements, the Defendant is required to submit monthly reports which list the number of hours worked by its carpenter employees and the Defendant is required to pay contributions based upon the hours listed.

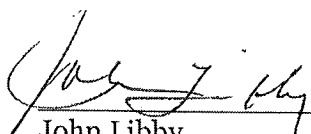
5. The Defendant submitted the contribution reports for the period December 2015 through April 2016 but did not pay the contributions. The reports show that \$8,704.76 is owed in ERISA contributions. The Defendant also failed to remit the union dues it withheld from the employees' wages. The amount of dues withheld is \$562.38 for the period December 2015 through April 2016.

6. Because of its failure to pay contributions in a timely manner, the Trust Agreement and Collective Bargaining Agreement mandate the assessment of liquidated damages. The liquidated damages calculation was based on the rate set forth in the controlling Trust Agreements, which is 1.5% compounded per month. The amount of liquidated damages owed is \$4,492.44 for the period July 2013 through April 2016.

7. The interest calculation is based on the ERISA Section awarding such interest, 29 U.S.C. §1132(g)(2) and the calculation was done pursuant to Section 6621 of the Internal Revenue Code. The amount of interest owed is \$286.43.

8. A summary of the total claim for \$14,046.01 is attached hereto and incorporated herein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Signature:  \_\_\_\_\_  
John Libby  
Manager, Audits & Collections

Dated: 1/25/17

John's Installation Service, Inc.  
 11808 S Brightway  
 Mokena, Il. 60448

01/11/2017

Account # 11431

<u>Contributions</u>		<u>Liquidated Damages</u>	<u>Dues</u>	<u>Interest</u>	<u>Total</u>
Jul-13	\$0.00	\$24.96	\$0.00	\$0.00	\$24.96
Sep-13	\$0.00	\$547.91	\$0.00	\$0.00	\$547.91
Oct-13	\$0.00	\$119.31	\$0.00	\$0.00	\$119.31
Nov-13	\$0.00	\$117.55	\$0.00	\$0.00	\$117.55
Dec-13	\$0.00	\$137.48	\$0.00	\$0.00	\$137.48
Jan-14	\$0.00	\$10.06	\$0.00	\$0.00	\$10.06
Feb-14	\$0.00	\$246.45	\$0.00	\$0.00	\$246.45
Mar-14	\$0.00	\$59.10	\$0.00	\$0.00	\$59.10
Apr-14	\$0.00	\$36.57	\$0.00	\$0.00	\$36.57
May-14	\$0.00	\$153.25	\$0.00	\$0.00	\$153.25
Jun-14	\$0.00	\$235.72	\$0.00	\$0.00	\$235.72
Jul-14	\$0.00	\$116.00	\$0.00	\$0.00	\$116.00
Aug-14	\$0.00	\$49.20	\$0.00	\$0.00	\$49.20
Sep-14	\$0.00	\$300.23	\$0.00	\$0.00	\$300.23
Oct-14	\$0.00	\$60.47	\$0.00	\$0.00	\$60.47
Nov-14	\$0.00	\$7.72	\$0.00	\$0.00	\$7.72
Dec-14	\$0.00	\$157.96	\$0.00	\$0.00	\$157.96
Jan-15	\$0.00	\$251.18	\$0.00	\$0.00	\$251.18
Apr-15	\$0.00	\$39.47	\$0.00	\$0.00	\$39.47
May-15	\$0.00	\$13.42	\$0.00	\$0.00	\$13.42
Jun-15	\$0.00	\$19.11	\$0.00	\$0.00	\$19.11
Jul-15	\$0.00	\$38.31	\$0.00	\$0.00	\$38.31
Aug-15	\$0.00	\$10.92	\$0.00	\$0.00	\$10.92
Sep-15	\$0.00	\$13.89	\$0.00	\$0.00	\$13.89
Oct-15	\$0.00	\$170.43	\$0.00	\$0.00	\$170.43
Nov-15	\$0.00	\$53.33	\$0.00	\$0.00	\$53.33
Dec-15	\$453.50	\$87.60	\$27.50	\$16.55	\$585.15
Jan-16	\$6,759.06	\$1,189.18	\$444.41	\$227.90	\$8,620.55
Feb-16	\$204.82	\$32.56	\$12.42	\$6.41	\$256.21
Mar-16	\$1,097.22	\$155.55	\$66.52	\$30.86	\$1,350.15
Apr-16	\$190.16	\$23.72	\$11.53	\$4.71	\$230.12
Totals:	\$8,704.76	\$4,478.61	\$562.38	\$286.43	\$14,032.18

Account # 51369

<u>Contributions</u>		<u>Liquidated Damages</u>	<u>Dues</u>	<u>Interest</u>	<u>Total</u>
Jun-14	\$0.00	\$13.83	\$0.00	\$0.00	\$14.03
Totals:	\$8,704.76	\$4,492.44	\$562.38	\$286.43	\$14,046.01

# Exhibit C

**Exhibit C**



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

TRUSTEES of the CHICAGO REGIONAL	)	
COUNCIL OF CARPENTERS PENSION	)	
FUND, et al.	)	
	)	
Plaintiffs,	)	Case No. 16 C 4017
	)	
v.	)	Judge Durkin
	)	
JOHN'S INSTALLATION SERVICE INC.	)	
	)	
Defendant.	)	

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

---

Daniel P. McAnally declares as follows:

1. I am an associate of the law firm of Whitfield McGann & Ketterman and am licensed to practice law in the State of Illinois and in the U.S. Dist. Court for Northern District of Illinois, Eastern Division.
2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.
3. I have in excess of 23 years experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to collect delinquent employer contributions.
4. The Collective Bargaining Agreement and the Trust Agreements under which this action is based provide for the payment of attorneys' fees and costs incurred if the Trust Funds utilize legal counsel to collect unpaid ERISA contributions.
5. Attorneys of this firm have devoted 25.50 hours in connection with the this case at the rate of \$215.00 per hour. The total attorney fees billings is \$5482.50.

6. I have spoken with four other lawyers from four different labor law firms who practice this type of ERISA trust fund litigation. Based on my knowledge and experience, the rates charged by the hour in this case are less than or equal to the usual and customary rates charged by other law firms doing similar work in the United States District Court for the Northern District of Illinois.

7. In addition, the filing fee was \$400.00.

8. I certify that the attached detailed attorney fees and costs totaling \$5882.50 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: January 25, 2017

s/ DANIEL P. McANALLY

Attorney for the Trustees of the Chicago  
Regional Council of Carpenters Pension Fund,  
et al.

Selection Criteria

Case.Selection Include: CTF-C./N10552/11431  
 Slip.Transaction Typ 1 - 1  
 Slip.Classification Open  
 Case.Selection Include: CTF-C./N10552/11431  
 Slip.Transaction Typ 1 - 1

Rate Info - identifies rate source and level

Slip ID		ATTORNEY	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Case	Est. Time	Bill Status	
Description		Reference	Variance		
529654	TIME	DPM	1.00	215.00	215.00
4/1/2016		Billable	0.00	T@7	
Billed	G:97836	5/2/2016 CTF-C./N10552/11431	0.00		
Review referral from the Chicago Regional Carpenter Trust Funds; review trust fund claim, agreement between the parties and history of communication between the fund office and the signatory employer; prepare database and load information regarding case facts, history and legal strategy; prepare file for litigation; prepare summary and entry into the litigation status report for presentation to the trustees.					
529655	TIME	DPM	1.25	215.00	268.75
4/2/2016		Billable	0.00	T@7	
Billed	G:97836	5/2/2016 CTF-C./N10552/11431	0.00		
Review the Illinois Secretary of State web site and perform LEXIS research to determine corporate status and registered agent information for legal process; search for related individuals, entities, pending cases and assets.					
529656	TIME	DPM	1.25	215.00	268.75
4/4/2016		Billable	0.00	T@7	
Billed	G:97836	5/2/2016 CTF-C./N10552/11431	0.00		
Prepare complaint, summons, appearance forms and civil cover sheet for Trust Funds' claims and compliance matters pursuant to ERISA Section 1132.					
529657	TIME	DPM	0.25	215.00	53.75
4/5/2016		Billable	0.00	T@7	
Billed	G:97836	5/2/2016 CTF-C./N10552/11431	0.00		
Prepare the complaint, summons, civil cover sheet and appearance for electronic filing; file the documents.					
529658	TIME	DPM	0.75	215.00	161.25
4/5/2016		Billable	0.00	T@7	
Billed	G:97836	5/2/2016 CTF-C./N10552/11431	0.00		

1/25/2017  
10:14 AM

McGANN, KETTERMAN & RIOUX  
Slip Listing

Page 2

Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
Review email from the U.S. District Court Clerk regarding the electronic filing; download and print the complaint, summons, civil cover sheet and attorney appearance; review the complaint; load information regarding the filing date, case number and assigned judge and magistrate into the database; online review of the judge's standing orders regarding pre-trial litigation, motion practice and status hearing dates; review minute clerk contact information; prepare courtesy copy of the complaint for the assigned judge.		0.00		
529659	TIME	DPM	215.00	107.50
4/6/2016		Billable	T@7	
Billed	G:97836	5/2/2016		
Prepare summons for the signatory corporate defendant; include court information; electronically file the summons; communication with the clerk of the court regarding the issuance of the summons; review email from the clerk regarding the completed summons for service; download summons and enclose in file.	CTF-C./N10552/11431	0.00		
		0.00		
529660	TIME	DPM	215.00	107.50
4/7/2016		Billable	T@7	
Billed	G:97836	5/2/2016		
Prepare correspondence to legal process server directing service of the summons and complaint.	CTF-C./N10552/11431	0.00		
		0.00		
529661	TIME	DPM	215.00	107.50
4/8/2016		Billable	T@7	
Billed	G:97836	5/2/2016		
Prepare correspondence to John Libby, Manager, Audits & Collections and Earl Oliver at the carpenter trust fund office regarding the filing of the complaint, court information, nature of the claim and legal strategy in proceeding.	CTF-C./N10552/11431	0.00		
		0.00		
531575	TIME	DPM	215.00	53.75
5/13/2016		Billable	T@7	
Billed	G:98014	6/1/2016		
Review file for current status; telephone conference with Earl E. Oliver, Field Representative, trust fund office regarding status; note to file regarding same.	CTF-C./N10552/11431	0.00		
		0.00		
532600	TIME	DPM	215.00	43.00
5/23/2016		Billable	T@7	
Billed	G:98014	6/1/2016		
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding the status hearing scheduled for June 14, 2016; download	CTF-C./N10552/11431	0.00		
		0.00		

1/25/2017  
10:14 AM

McGANN, KETTERMAN & RIOUX  
Slip Listing

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
			documents to the file folder; print document and enclose in file.				
532601	TIME			DPM	0.40	215.00	86.00
	5/24/2016			Billable	0.00	T@7	
	Billed	G:98014	6/1/2016	CTF-C./N10552/11431	0.00		
			Review the legal process server. Scott Forrest Stern & Associates, Inc. reports for non-service; review correspondence from the fund office regarding the death of the John Patrick; note to file regarding same.		0.00		
532602	TIME			DPM	1.50	215.00	322.50
	5/25/2016			Billable	0.00	T@7	
	Billed	G:98014	6/1/2016	CTF-C./N10552/11431	0.00		
			Prepare affidavit of compliance for service on the Illinois Secretary of State pursuant to 5.25 of the Illinois Business Corporation Act of 1983; prepare correspondence to Jesse White regarding the affidavit and filing; correspondence to the defendant signatory contractor regarding the service on the Illinois Secretary of State; enclose copy of the summons and complaint.		0.00		
532603	TIME			DPM	0.40	215.00	86.00
	5/26/2016			Billable	0.00	T@7	
	Billed	G:98014	6/1/2016	CTF-C./N10552/11431	0.00		
			Review correspondence from the fund office regarding the monthly litigation status report; update status of the case and future steps to be taken; review the attorney fees and update since the last report.		0.00		
533419	TIME			DPM	0.20	215.00	43.00
	6/1/2016			Billable	0.00	T@7	
	Billed	G:98181	7/1/2016	CTF-C./N10552/11431	0.00		
			Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable Thomas M. Durkin: The filing of a joint status report is not required. Status hearing set for 6/14/2016 at 09:00 AM.; download documents to the file folder; print document and enclose in file.		0.00		
533421	TIME			DPM	0.20	215.00	43.00
	6/2/2016			Billable	0.00	T@7	
	Billed	G:98181	7/1/2016	CTF-C./N10552/11431	0.00		
			Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding SUMMONS Returned Unexecuted by Trustees of the Chicago Regional Council of Carpenters Pension Fund, Chicago Regional Council of Carpenters		0.00		

1/25/2017  
10:14 AM

McGANN, KETTERMAN & RIOUX  
Slip Listing

Page 4

Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
<hr/>				
Apprentice & Trainee Program Fund, Chicago Regional Council of Carpenters Welfare Fund, Chicago Regional Council of Carpenters Supplemental Retirement Fund as to John's Installation Service Inc.; download documents to the file folder; print document and enclose in file.				
533422	TIME	DPM	215.00	215.00
6/10/2016		Billable	T@7	
Billed	G:98181	7/1/2016	CTF-C./N10552/11431	
Review correspondence from the Illinois Secretary of State regarding service of the affidavit of compliance; prepare correspondence to the defendant / signatory employer regarding same; electronically file the document with the U.S. District Clerk.		1.00		
		0.00		
		0.00		
		0.00		
533423	TIME	DPM	215.00	53.75
6/11/2016		Billable	T@7	
Billed	G:98181	7/1/2016	CTF-C./N10552/11431	
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding SUMMONS Returned Executed by Trustees of the Chicago Regional Council of Carpenters Pension Fund, Chicago Regional Council of Carpenters Apprentice & Trainee Program Fund, Chicago Regional Council of Carpenters Welfare Fund, Chicago Regional Council of Carpenters Supplemental Retirement Fund as to John's Installation Service Inc. on 5/31/2016, answer due 6/21/2016.; download documents to the file folder; print document and enclose in file.		0.25		
		0.00		
		0.00		
		0.00		
533424	TIME	DPM	215.00	150.50
6/13/2016		Billable	T@7	
Billed	G:98181	7/1/2016	CTF-C./N10552/11431	
Prepare for court status/motion hearing; review file for current status and most recent activity; telephone conversation with trust fund regarding status of the litigation; review court docket to confirm that the case will be called for status; confer with attorney Nicholas Kasmer regarding same.		0.70		
		0.00		
		0.00		
		0.00		
534119	TIME	NEK	215.00	150.50
6/13/2016		Billable	T@7	
Billed	G:98181	7/1/2016	CTF-C./N10552/11431	
Correspondence with Daniel P McAnally on matter as well as review of notes in case. Also drafting and filing appearance in case. Also review of docket and file for case.		0.70		
		0.00		
		0.00		
		0.00		

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
534120	TIME			NEK	1.00	215.00	215.00
	6/14/2016			Billable	0.00	T@7	
	Billed	G:98181	7/1/2016	CTF-C./N10552/11431	0.00		
			Travel to and from court appearance in matter as well as attempted appearance as well as review of docket sheet, discussion with court clerk, and discussion with Daniel P McAnally following attempted appearance.		0.00		
534652	TIME			DPM	0.20	215.00	43.00
	7/1/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
			Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable Thomas M. Durkin: The 6/14/2016 status date is vacated and reset for 7/11/2016 at 09:00 AM.; download documents to the file folder; print document and enclose in file.		0.00		
534657	TIME			DPM	2.00	215.00	430.00
	7/5/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
			Prepare motion for order of default to obtain contribution reports and contributions or in the alternative estimate on contributions due if no reports are submitted; prepare exhibits; review judge's schedule for hearing date and time.		0.00		
534658	TIME			DPM	0.25	215.00	53.75
	7/7/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
			Prepare the document for electronic filing; electronically file the document with the U.S. Dist. Court clerk's office; prepare courtesy copy for the assigned Judge Durkin.		0.00		
534659	TIME			DPM	1.00	215.00	215.00
	7/7/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
			Prepare a proposed judgment in support of the Trust Funds motion; calculate all amounts owed; correspondence to the Court regarding same.		0.00		
534660	TIME			DPM	0.20	215.00	43.00
	7/8/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
			Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable Thomas M. Durkin: The 6/14/2016 status date is vacated and reset for 7/11/2016 at 09:00 AM; MOTION by Plaintiffs Chicago Regional Council of Carpenters		0.00		

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
Apprentice & Trainee Program Fund, Chicago Regional Council of Carpenters Supplemental Retirement Fund, Chicago Regional Council of Carpenters Welfare Fund, Trustees of the Chicago Regional Council of Carpenters Pension Fund for order of default (Attachments: # (1) Exhibit); download documents to the file folder; print document and enclose in file.							
535491	TIME			NEK	0.50	215.00	107.50
	7/11/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
	Review of case file, notes, docket, and motion for court appearance in matter.				0.00		
535526	TIME			NEK	1.00	215.00	215.00
	7/12/2016			Billable	0.00	T@7	
	Billed	G:98343	8/1/2016	CTF-C./N10552/11431	0.00		
	Travel to and from court appearance in matter as well as actual appearance in case.				0.00		
536206	TIME			DPM	0.20	215.00	43.00
	8/1/2016			Billable	0.00	T@7	
	Billed	G:98526	9/1/2016	CTF-C./N10552/11431	0.00		
	Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding ORDER OF DEFAULT. Plaintiff's motion for an order of default is granted. Motion hearing held on 7/12/2016. Signed by the Honorable Thomas M. Durkin on 7/12/2016.; download documents to the file folder; print document and enclose in file.				0.00		
536207	TIME			DPM	0.75	215.00	161.25
	8/2/2016			Billable	0.00	T@7	
	Billed	G:98526	9/1/2016	CTF-C./N10552/11431	0.00		
	Prepare correspondence to the defendant / signatory regarding compliance with the court order; prepare correspondence to the fund office regarding status of the litigation.				0.00		
536208	TIME			DPM	0.50	215.00	107.50
	8/1/2016			Billable	0.00	T@7	
	Billed	G:98526	9/1/2016	CTF-C./N10552/11431	0.00		
	Review correspondence from the fund office regarding the monthly litigation status report; update status of the case and future steps to be taken; review the attorney fees and update since the last report.				0.00		
536209	TIME			DPM	0.50	215.00	107.50
	8/4/2016			Billable	0.00	T@7	
	Billed	G:98526	9/1/2016	CTF-C./N10552/11431	0.00		



1/25/2017  
10:14 AM

McGANN, KETTERMAN & RIOUX  
Slip Listing

Page 7

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
			Review file for current status; review the court docket; correspondence to Earl E. Oliver, Field Representative, trust fund office regarding the trust funds' claim of ERISA contributions, liquidated damages, interest and dues; note to file regarding same.		0.00		
536873	8/17/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.10 0.00 0.00	215.00 T@7	21.50
			Review correspondence from Earl E. Oliver, Field Representative, trust fund office regarding the June 2016 report.		0.00		
538951	9/23/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.40 0.00 0.00	215.00 T@7	86.00
			Review correspondence from the fund office regarding the monthly litigation status report; update status of the case and future steps to be taken; review the attorney fees and update since the last report.		0.00		
540899	10/31/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.50 0.00 0.00	215.00 T@7	107.50
			Review file for current status; review the court docket; correspondence to Earl E. Oliver, Field Representative, trust fund office regarding the updated trust funds' claim of ERISA contributions, liquidated damages, interest and dues.		0.00		
541514	11/8/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.25 0.00 0.00	215.00 T@7	53.75
			Review correspondence from Earl E. Oliver, Field Representative, trust fund office regarding the trust funds' claim of ERISA contributions, liquidated damages, interest and dues; download the documents, print and enclose in the file; note to file regarding same.		0.00		
542046	11/18/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.40 0.00 0.00	215.00 T@7	86.00
			Update the litigation status report as to the current pending litigation, collections, attorney fees and future legal strategy; report to be presented at the November 2016 Board of Trustees Meeting.		0.00		

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
542695	11/21/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	1.00 0.00 0.00	215.00 T@7	215.00
			G:99138 12/1/2016				
			Prepare affidavit for John Libby, Manager Audit and Collections, Chicago District Council of Carpenters' Trust Funds in support of the Trust Funds' motion for default judgment; affidavit to support claim for ERISA fringe benefit contributions, and calculation of liquidated damages and interest pursuant to the terms of the trust agreements and Internal Revenue Code; prepare correspondence to Libby regarding the affidavit and request for execution.				
542697	11/22/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.75 0.00 0.00	215.00 T@7	161.25
			G:99138 12/1/2016				
			Review file for all entries for the attorney billings and costs incurred; compare with work performed on the file; prepare attorney fee declaration / affidavit and exhibits.				
542698	11/23/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	1.50 0.00 0.00	215.00 T@7	322.50
			G:99138 12/1/2016				
			Prepare motion for default judgment for the trust fund claims and ERISA damages; prepare exhibits; review judge's schedule for hearing date and time; prepare notice of motion and certificate of service.				
542699	11/29/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.50 0.00 0.00	215.00 T@7	107.50
			G:99138 12/1/2016				
			Prepare a proposed judgment in support of the Trust Funds motion; calculate all amounts owed.				
542701	11/28/2016	TIME	Billed	DPM Billable CTF-C./N10552/11431	0.20 0.00 0.00	215.00 T@7	43.00
			G:99138 12/1/2016				
			Review correspondence from Earl Oliver at the fund office regarding the monthly litigation status report to be presented at the Collection Committee Meeting; update status of the case and future steps to be taken; review the attorney fees and update since the last report.				
Grand Total				Billable	25.50		5482.50
				Unbillable	0.00		0.00
				Total	25.50		5482.50

*Filing Fee*      \$400  
*Total*                      \$5882.50