

EXHIBIT LIST

EXHIBIT A Order of Default

EXHIBIT B

Sworn Declaration Pursuant To 28 U.S.C.A. § 1746
John Libby, Supervisor, 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,) Case No. 16 C 7840
)
v.) Judge John Robert Blakey
)
JDM LLC)
)
Defendant.)

ORDER OF DEFAULT

WHEREAS, the Plaintiffs filed their Complaint on August 4, 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, JDM LLC, submit reports, contributions and dues for the period July 2016 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).

Date: October 6, 2016

ENTERED:


John Robert Blakey
United States District Judge

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 7840
)
)) Judge Blakey
v.)
)
JDM LLC)
)
) 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 October 2016 and November 2016 but did not pay the contributions. The reports show that \$5,210.37 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 \$352.95 for the period October 2016 and November 2016.

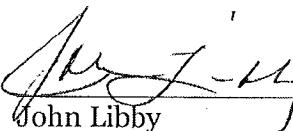
6. Because of its failure to pay contributions in a timely manner, the Trust Agreement and Collective Bargaining Agreement mandate the assessment of liquidated damages. The liquidated damages calculation was based on the rate set forth in the controlling Trust Agreements, which is 1.5% compounded per month. The amount of liquidated damages owed is \$4,158.57 for the period December 2015 through November 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 \$11.73.

8. A summary of the total claim for \$9,733.62 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:

2/10/17

25249 JDM, LLC.
5400 NEWPORT DR
UNIT 19
ROLLING MEADOWS, IL 60008

1/24/2017

	FRINGES	DUES	LD'S	INTEREST	TOTAL
Dec-15	\$0	\$0	\$134.24	\$0	\$134.24
Jan-16	\$0	\$0	\$191.36	\$0	\$191.36
Feb-16	\$0	\$0	\$315.20	\$0	\$315.20
Mar-16	\$0	\$0	\$152.54	\$0	\$152.54
Apr-16	\$0	\$0	\$296.09	\$0	\$296.09
May-16	\$0	\$0	\$266.53	\$0	\$266.53
Jun-16	\$0	\$0	\$805.44	\$0	\$805.44
Jul-16	\$0	\$0	\$1,194.68	\$0	\$1,194.68
Aug-16	\$0	\$0	\$472.28	\$0	\$472.28
Sep-16	\$0	\$0	\$146.40	\$0	\$146.40
Oct-16	\$1,706.32	\$127.64	\$77.98	\$7.59	\$1,919.53
Nov-16	<u>\$3,504.05</u>	<u>\$225.31</u>	<u>\$105.83</u>	<u>\$4.14</u>	<u>\$3,839.33</u>
TOTAL	\$5,210.37	\$352.95	\$4,158.57	\$11.73	\$9,733.62

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 7840
v.)
JDM LLC)
Defendant.)
Judge Blakey

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 law firm have devoted 27.25 hours in connection with the this case at the rate of \$200.00 and \$215.00 per hour. The total attorney fees billings is \$5,836.25.

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, the fees for service of process, \$65.00 and a UPS mailing to the defendant enclosing the Order of Default for \$23.27. These costs totaled \$488.27.

8. I certify that the attached detailed attorney fees and costs totaling \$6,324.52 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: February 9, 2017

s/ DANIEL P. McANALLY

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

Selection Criteria

Slip Classification Open
Case Selection Include: CTF-C./N10629
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		
536726 8/1/16 TIME	DPM Billable	1.25 0.00	215.00 T@7	268.75
Billed G:98538 9/1/2016 CTF-C./N10629		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.		0.00		
536727 8/2/16 TIME	DPM Billable	1.50 0.00	215.00 T@7	322.50
Billed G:98538 9/1/2016 CTF-C./N10629		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.		0.00		
536728 8/4/16 TIME	DPM Billable	1.25 0.00	215.00 T@7	268.75
Billed G:98538 9/1/2016 CTF-C./N10629		0.00		
Prepare complaint, summons, appearance forms and civil cover sheet for Trust Funds' claims and compliance matters pursuant to ERISA Section 1132.		0.00		
536729 8/4/16 TIME	DPM Billable	0.25 0.00	215.00 T@7	53.75
Billed G:98538 9/1/2016 CTF-C./N10629		0.00		
Prepare the complaint, summons, civil cover sheet and appearance for electronic filing; file the documents.		0.00		
536730 8/5/16 TIME	DPM Billable	0.75 0.00	215.00 T@7	161.25
Billed G:98538 9/1/2016 CTF-C./N10629		0.00		
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		0.00		

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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
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.				
536731 8/15	TIME Billed G:98538 9/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00 0.00	0.40 215.00 T@7	86.00
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.				
536732 8/15	TIME Billed G:98538 9/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00 0.00	0.50 215.00 T@7	107.50
Prepare correspondence to legal process server directing service of the summons and complaint.				
536733 8/16	TIME Billed G:98538 9/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00 0.00	0.50 215.00 T@7	107.50
Prepare correspondence to John Libby, Manager, Audits & Collections and Richard Oginski at the carpenter trust fund office regarding the filing of the complaint, court information, nature of the claim and legal strategy in proceeding.				
536738 8/16	TIME Billed G:98538 9/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00 0.00	0.50 215.00 T@7	107.50
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable John Robert Blakey; This case has been assigned to the calendar of the Honorable John Robert Blakey. An initial status conference is set for 10/5/2016 at 9:45 a.m. in Courtroom 1725.; download documents to the file folder; print document and enclose in file.				
536881 8/15/2016	TIME Billed G:98538 9/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00 0.00	0.75 215.00 T@7	161.25
Review correspondence from special process server, Scott Forrest Stern & Assoc., Inc., regarding the report on service of the summons and complaint; review process server remarks regarding details of service; review affidavit of service for legality;				

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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
electronically file the proof of service with the clerk of the U.S. Dist. Court for the Northern Dist. of Illinois; docket follow-up dates for Answer due date; correspondence to John Libby, trust fund manager regarding service of the complaint; attach affidavit of special process server.			1/0	215.50
536882 TIME 8/17/2016 Billed G:98538 9/1/2016 CTF-C./N10629	DPM Billable	0.00 0.00 0.00	215.00 T@7	
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 JDM LLC on 8/14/2016, answer due 9/5/2016; download documents to the file folder; print document and enclose in file.				
538669 TIME 9/22/2016 Billed G:98723 10/3/2016 CTF-C./N10629	DPM Billable	0.20 0.00 0.00 0.00	215.00 T@7	43.00
Telephone conference with Richard Oginski, Field Representative, trust fund office regarding status of the reporting; individual was not available to take the call was transferred to voice mail and left a detailed message regarding the status of the litigation; note to file regarding same.				
538950 TIME 9/23/2016 Billed G:98723 10/3/2016 CTF-C./N10629	DPM Billable	0.40 0.00 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.				
538993 TIME 9/27/2016 Billed G:98723 10/3/2016 CTF-C./N10629	DPM Billable	2.00 0.00 0.00 0.00	215.00 T@7	430.00
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.				
538994 TIME 9/28/2016 Billed G:98723 10/3/2016 CTF-C./N10629	DPM Billable	1.00 0.00 0.00 0.00	215.00 T@7	215.00
Prepare a proposed order for the judge's signature;				

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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 judge's schedule for availability for the hearing date and time; prepare notice of motion and certificate of service; electronically file the motion with the clerk of the court; prepare a courtesy copy of the order of default and forward it to the court.				
539442 10/1/2016 Billed G:98933	TIME 11/1/2016 CTF-C./N10629 DPM Billable	0.20 0.00 0.00 0.00	215.00 T@7	43.00
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MOTION by Plaintiffs Chicago Regional Council of Carpenters 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); NOTICE of Motion by Daniel P. McAnally for presentment of motion for order, [6] before Honorable John Robert Blakey on 10/6/2016 at 09:45 AM.; download documents to the file folder; print document and enclose in file.				
539443 10/3/2016 Billed G:98933	TIME 11/1/2016 CTF-C./N10629 DPM Billable	0.20 0.00 0.00 0.00	215.00 T@7	43.00
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable John Robert Blakey; On the Court's own motion, the initial status conference previously set for 10/5/16 is stricken and reset to 10/6/16 at 9:45 a.m. in Courtroom 1725. ; download documents to the file folder; print document and enclose in file.				
539444 10/5/2016 Billed G:98933	TIME 11/1/2016 CTF-C./N10629 DPM Billable	0.50 0.00 0.00 0.00	215.00 T@7	107.50
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.		25		70.00
539450 10/5/2016 Billed G:98933	TIME 11/1/2016 CTF-C./N10629 DFW Billable	0.00 0.00 0.00	200.00 T@7	200.00
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, conference Daniel P. McAnally.				

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Slip ID Dates and Time Posting Status Description	TIME	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	
539453 10/6/2016 Billed Attended court hearing.	G:98933	11/1/2016 CTF-C./N10629	DFW Billable 0.00 0.00 0.00	1.25 0.00 0.00 0.00	200.00 T@7	250.00
540980 10/9/2016 Billed	TIME G:98933	11/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00	0.20 0.00 0.00 0.00	215.00 T@7	43.00
		Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable John Robert Blakey: Motion hearing held on 10/6/2016. Defendant failed to appear and failed to notify Chambers of any scheduling conflicts. Plaintiff's motion for order of default is granted. Enter order. Hearing on Plaintiffs' motion for default judgment, which Plaintiffs shall file in advance of the hearing date, is set for 11/30/2016 at 10:00 a.m. in Courtroom 1725. ; download documents to the file folder; print document and enclose in file.				
540988 10/23/2016 Billed	TIME G:98933	11/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00	1.00 0.00 0.00	215.00 T@7	215.00
		Prepare correspondence to defendant / signatory regarding compliance with the court order; correspondence to the fund office regarding status of the litigation and entry of the court order.				
542038 11/4/2016 Billed	TIME G:99147	12/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00	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.				
542688 11/18/2016 Billed	TIME G:99147	12/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00	2.00 0.00 0.00	215.00 T@7	430.00
		Review file for compliance with the court order from the signatory contractor pursuant to Judge Blakey order; prepare Motion for Rule to Show Cause for failure to comply with the court's order; prepare exhibits, notice of filing and proposed Rule Order.				
542704 11/28/2016 Billed	TIME G:99147	12/1/2016 CTF-C./N10629	DPM Billable 0.00 0.00 0.00	0.25 0.00 0.00	215.00 T@7	53.75
		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				

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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
last report.				
542919 11/29/2016 Billed	TIME G:99147 12/1/2016 CTF-C./N10629 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.	DPM Billable 0.50 0.00 0.00 0.00	215.00 T@7	107.50
542925 11/30/2016 Billed	TIME G:99147 12/1/2016 CTF-C./N10629 Telephone conference with Richard Oginski, Field Representative, trust fund office regarding reports and payments submitted.	DPM Billable 0.10 0.00 0.00 0.00	215.00 T@7	21.50
543095 11/29/2016 Billed	TIME G:99147 12/1/2016 CTF-C./N10629 Discussion with Daniel P McAnally on matter as well as review of notes, file, and prior motions in case for court appearance. Also drafting and filing appearance in matter as well.	NEK Billable 0.70 0.00 0.00 0.00	215.00 T@7	150.50
543108 11/30/2016 Billed	TIME G:99147 12/1/2016 CTF-C./N10629 Travel to and from court appearance in matter as well as actual appearance in matter. Also correspondence with Daniel P McAnally on matter.	NEK Billable 1.10 0.00 0.00 0.00	215.00 T@7	236.50
543474 12/3/2016 Billed	TIME G:99345 1/3/2017 CTF-C./N10629 Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable John Robert Blakey: Motion hearing held on 11/30/2016 and continued to 1/10/2017 at 9:45 a.m. in Courtroom 1725. Status will be stricken if the parties file dismissal documents prior to the next hearing.; download documents to the file folder; print document and enclose in file; telephone conference with the fund office regarding same.	DPM Billable 0.20 0.00 0.00 0.00	215.00 T@7	43.00
543475 12/7/2016 Billed	TIME G:99345 1/3/2017 CTF-C./N10629 Review case history; correspondence to Richard Oginski, Field Representative, trust fund office regarding same and request for the trust funds' claim	DPM Billable 0.50 0.00 0.00 0.00	215.00 T@7	107.50

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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
of ERISA contributions, liquidated damages, interest and dues.				
545600 1/6/2017 WIP Contact from court clerk on status of matter as well as contacting Daniel P McAnally regarding such and correspondence with him on such.	NEK Billable CTF-C./N10629	0.20 0.00 0.00 0.00	215.00 T@7	43.00
545603 1/9/2017 WIP Contacting court regarding status of case as well as discussion with Daniel P McAnally on matter. Also correspondence with Daniel P McAnally on matter as well as reviewing court docket as well as notes and file on matter for possible appearance.	NEK Billable CTF-C./N10629	0.70 0.00 0.00 0.00	215.00 T@7	150.50
545756 1/18/2017 WIP 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.	DPM Billable CTF-C./N10629	0.50 0.00 0.00 0.00	215.00 T@7	107.50
545757 1/19/2017 WIP Travel to / from court; attend court appearance at the U.S. District Court for the Northern District of Illinois before Judge Blakey; telephone conference with the fund office regarding outcome of the court hearing; note to file regarding same.	DPM Billable CTF-C./N10629	1.25 0.00 0.00 0.00	215.00 T@7	268.75
545760 1/9/2017 WIP Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable John Robert Blakey: Oral motion to reset status hearing is granted. Status hearing previously set for 1/10/2017 is reset for 1/19/2017 at 9:45 a.m. in Courtroom 1725. ; download documents to the file folder; print document and enclose in file.	DPM Billable CTF-C./N10629	0.10 0.00 0.00 0.00	215.00 T@7	21.50
545761 1/18/2017 WIP Review file for current status; review attorney's fees billings incurred on the case; correspondence to	DPM Billable CTF-C./N10629	0.50 0.00 0.00 0.00	215.00 T@7	107.50

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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		
	Richard Oginski, Field Representative, trust fund office regarding same and for settlement.				
545762	TIME 1/21/2017 WIP	DPM Billable CTF-C./N10629	0.20 0.00 0.00 0.00	215.00 T@7	43.00
	Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before the Honorable John Robert Blakey: Status hearing held on 1/19/2017 and continued to 2/16/2017 at 9:45 a.m. in Courtroom 1725; download documents to the file folder; print document and enclose in file.				
545763	TIME 1/24/2017 WIP	DPM Billable CTF-C./N10629	0.20 0.00 0.00 0.00	215.00 T@7	43.00
	Review correspondence from Richard Oginski, 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.				
546104	TIME 1/29/2017 WIP	DPM Billable CTF-C./N10629	0.30 0.00 0.00 0.00	215.00 T@7	64.50
	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.				
546636	TIME 2/6/2017 WIP	DPM Billable CTF-C./N10629	1.00 0.00 0.00 0.00	215.00 T@7	215.00
	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.				
546637	TIME 2/6/2017 WIP	DPM Billable CTF-C./N10629	0.75 0.00 0.00 0.00	215.00 T@7	161.25
	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.				

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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		
546638	DPM	1.25	215.00	268.75
2/7/2017	Billable	0.00	T@7	
WIP	CTF-C./N10629	0.00		
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.		0.00		
Grand Total				
	Billable	28.30	6050.75	
	Unbillable	0.00	0.00	
	Total	28.30	6050.75	

27.29 \$ 5,836.25

Filing Fee \$ 400.00

Service Fee \$ 65.00

UPS mailing \$ 23.27

Total \$ 6,324.52