

**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,	)	
	)	Judge John Z. Lee
Plaintiffs,	)	
v.	)	
	)	Case No. 16 C 8350
CONCRETE ETC., INC.,	)	
	)	
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:

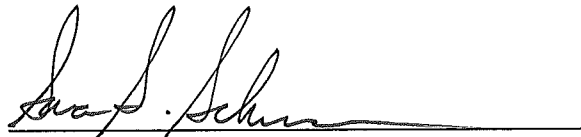
1. I am an associate attorney at the law firm of Allison, Slutsky & Kennedy, P.C., counsel for Plaintiffs Laborers' Pension Fund and Laborers' Welfare Fund of the Health and Welfare Department of the Construction and General Laborers' District Council of Chicago and Vicinity (the "Funds") in the action against Concrete Etc, Inc. (the "Company"). This affidavit is submitted to document attorneys' fees and costs incurred by the Laborers' Funds for the period from August 1, 2016 to February 28, 2017, for work performed in connection with obtaining contributions owed.

2. Since August 1, 2016, this firm has billed the Laborers' Funds on an hourly basis for collections services rendered to the Funds on this matter, 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

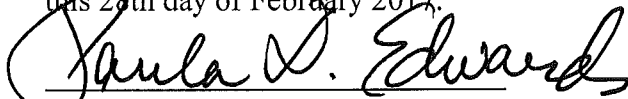
cause records kept for legal work on this matter were kept contemporaneously and are attached hereto as Exhibit E1.

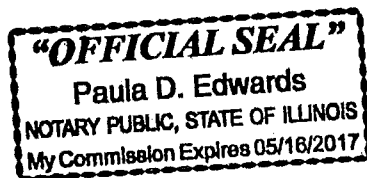
3. Exhibit E1 hereto sets forth the time expended from August 1, 2016 through February 28, 2017, by the firm's attorneys and clerks/paralegals in this matter. The billable entries were reviewed, and any duplicative entries were struck. As set forth in Exhibit E1, the Laborers' Funds have incurred legal fees to my firm in this matter in the amount of \$5,221.50.

4. In addition, the Laborers' Funds have incurred court costs in the prosecution of this matter totaling \$475.00, which consists of filing fees, and fees for service of process.


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

Subscribed and sworn to before me
this 28th day of February 2017.


NOTARY PUBLIC



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Slip Listing

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Selection Criteria

Slip Classification Open
Clie. Selection Include: Labrs P&W 1
Refe. Selection Include: Concrete Etc.
Slip Transaction Date 8/1/2016 - 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
287298	TIME			K. Engelhardt		0.70	225.00	157.50
	8/22/2016			Legal Services		0.00	C@1	
	Billed	G:12210	8/1/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			Call w/ R. Marcello; review web re: company's corporate information; draft complaint and summons					
287684	TIME			Andre Smith		1.00	110.00	110.00
	8/25/2016			Legal Services		0.00	C@3	
	Billed	G:12210	8/1/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			File new lawsuit: *Draft: complaint, appearance, civil covers, exhibit labels, scan documents, e-file					
287685	TIME			Andre Smith		1.00	110.00	110.00
	8/26/2016			Legal Services		0.00	C@3	
	Billed	G:12210	8/1/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			Draft letter and prepare service to JDS					
288734	TIME			Andre Smith		0.30	110.00	33.00
	9/2/2016			Legal Services		0.00	C@3	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			Draft and file appearances					
288747	TIME			Andre Smith		1.00	110.00	110.00
	9/15/2016			Legal Services		0.00	C@3	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			Review return. Draft affidavit of compliance					
288654	TIME			Sara Schumann		0.20	195.00	39.00
	9/26/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			Receive assignment; review status on service					
288896	TIME			Sara Schumann		0.30	195.00	58.50
	9/29/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
				Concrete Etc.		0.00		
			Email w/K. Engelhardt; call to K. Coen					

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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
288901	TIME			Sara Schumann		0.30	195.00	58.50
	9/30/2016			Legal Services		0.00	C@2	
	Billed	G:12232	10/11/2016	Labrs P&W 1		0.00		
	Calls w/K. Coen			Concrete Etc.		0.00		
289031	TIME			Sara Schumann		0.30	195.00	58.50
	10/3/2016			Legal Services		0.00	C@2	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Calls and email w/R. Marcello; call to Calibre			Concrete Etc.		0.00		
289051	TIME			Sara Schumann		0.50	195.00	97.50
	10/4/2016			Legal Services		0.00	C@2	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Call w/J. Mashos and R. Marcello; calls and email w/K. Coen; calls w/L. Betar			Concrete Etc.		0.00		
289244	TIME			K. Engelhardt		0.20	225.00	45.00
	10/6/2016			Legal Services		0.00	C@1	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Letter to J. Mashos			Concrete Etc.		0.00		
289022	TIME			Sara Schumann		0.40	195.00	78.00
	10/7/2016			Legal Services		0.00	C@2	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Work on quarterly report			Concrete Etc.		0.00		
289250	TIME			K. Engelhardt		0.30	225.00	67.50
	10/7/2016			Legal Services		0.00	C@1	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Report to Trustees			Concrete Etc.		0.00		
289182	TIME			Sara Schumann		0.30	195.00	58.50
	10/11/2016			Legal Services		0.00	C@2	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Emails w/K. Engelhardt and L. Betar			Concrete Etc.		0.00		
289340	TIME			K. Engelhardt		0.10	225.00	22.50
	10/13/2016			Legal Services		0.00	C@1	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Report to Trustees			Concrete Etc.		0.00		
289196	TIME			Wes Kennedy		0.20	225.00	45.00
	10/14/2016			Legal Services		0.00	C@1	
	Billed	G:12247	11/3/2016	Labrs P&W 1		0.00		
	Work on status reports			Concrete Etc.		0.00		

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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		
289212	TIME	Wes Kennedy	0.20	225.00	45.00
10/15/2016		Legal Services	0.00	C@1	
Billed	G:12247	11/3/2016 Labrs P&W 1	0.00		
Work on status reports, summary status reports		Concrete Etc.	0.00		
289825	TIME	Sara Schumann	1.70	195.00	331.50
10/28/2016		Legal Services	0.00	C@2	
Billed	G:12247	11/3/2016 Labrs P&W 1	0.00		
Draft initial status report; emails w/S. Uezen		Concrete Etc.	0.00		
290236	TIME	Sara Schumann	0.30	195.00	58.50
11/2/2016		Legal Services	0.00	C@2	
Billed	G:12275	12/5/2016 Labrs P&W 1	0.00		
Emails w/K. Coen; prepare for court appearance		Concrete Etc.	0.00		
290235	TIME	Sara Schumann	1.00	195.00	195.00
11/3/2016		Legal Services	0.00	C@2	
Billed	G:12275	12/5/2016 Labrs P&W 1	0.00		
Court appearance		Concrete Etc.	0.00		
290410	TIME	Sara Schumann	0.70	195.00	136.50
11/9/2016		Legal Services	0.00	C@2	
Billed	G:12275	12/5/2016 Labrs P&W 1	0.00		
Calls w/S. Uscern, emails and call w/K. Coen		Concrete Etc.	0.00		
290599	TIME	Sara Schumann	1.50	195.00	292.50
11/16/2016		Legal Services	0.00	C@2	
Billed	G:12275	12/5/2016 Labrs P&W 1	0.00		
Draft employee declarations and indemnity agreement; emails w/K. Coen		Concrete Etc.	0.00		
291012	TIME	Sara Schumann	0.50	195.00	97.50
11/30/2016		Legal Services	0.00	C@2	
Billed	G:12275	12/5/2016 Labrs P&W 1	0.00		
Review company's documents; emails w/K. Coen and S. Uezen		Concrete Etc.	0.00		
291925	TIME	Sara Schumann	0.50	195.00	97.50
12/1/2016		Legal Services	0.00	C@2	
Billed	G:12295	1/10/2017 Labrs P&W 1	0.00		
Review documents; call w/R. Marcello; emails w/S. Uezen		Concrete Etc.	0.00		
291938	TIME	Sara Schumann	1.50	195.00	292.50
12/5/2016		Legal Services	0.00	C@2	
Billed	G:12295	1/10/2017 Labrs P&W 1	0.00		
Review documents; emails w/S. Uscern; email and call w/R. Marcello		Concrete Etc.	0.00		

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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		
291465	TIME	K. Engelhardt	0.10	225.00	22.50
12/12/2016		Legal Services	0.00	C@1	
Billed	G:12295	1/10/2017 Labrs P&W 1	0.00		
Report to Trustees on Liquidated damages		Concrete Etc.	0.00		
292106	TIME	Sara Schumann	0.20	195.00	39.00
12/29/2016		Legal Services	0.00	C@2	
Billed	G:12295	1/10/2017 Labrs P&W 1	0.00		
Review docket and returned mail receipt		Concrete Etc.	0.00		
292639	TIME	Sara Schumann	0.80	195.00	156.00
1/6/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Draft declaration and cover letter to J. Mandujano; call and email w/R. Marcello and S. Uczen; draft quarterly report		Concrete Etc.	0.00		
292675	TIME	Sara Schumann	0.70	195.00	136.50
1/10/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Calls w/S. Uczen; call and email w/K. Coen		Concrete Etc.	0.00		
292674	TIME	Sara Schumann	1.00	195.00	195.00
1/11/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Court appearance		Concrete Etc.	0.00		
292767	TIME	K. Engelhardt	0.10	225.00	22.50
1/13/2017		Legal Services	0.00	C@1	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Report to Trustees		Concrete Etc.	0.00		
293145	TIME	Sara Schumann	1.50	195.00	292.50
1/16/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Review audit report; call w/R. Marcello; email w/T. Kalnes of Calibre; draft demand letter to K. Coen; run fee report		Concrete Etc.	0.00		
293152	TIME	Sara Schumann	1.00	195.00	195.00
1/17/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Call and email w/R. Marcello; review summary report; revise demand letter to K. Coen		Concrete Etc.	0.00		

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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		
293171	TIME	Sara Schumann	0.30	195.00	58.50
1/26/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Email w/K. Coen; review declaration		Concrete Etc.	0.00		
293328	TIME	Sara Schumann	0.20	195.00	39.00
1/27/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Call w/C. Wernick		Concrete Etc.	0.00		
293327	TIME	Sara Schumann	0.50	195.00	97.50
1/30/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Emails w/C. Wernick; review declaration of J. Mandujano		Concrete Etc.	0.00		
293550	TIME	Sara Schumann	0.30	195.00	58.50
1/31/2017		Legal Services	0.00	C@2	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
Email and call w/C. Wernick; conf. w/K. Engelhardt		Concrete Etc.	0.00		
293573	TIME	K. Engelhardt	0.20	225.00	45.00
1/31/2017		Legal Services	0.00	C@1	
Billed	G:12310	2/3/2017 Labrs P&W 1	0.00		
o/c SS		Concrete Etc.	0.00		
293872	TIME	Sara Schumann	0.50	195.00	97.50
2/2/2017		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Call w/K. Coen; calls w/C. Wernick; review audits and summary sheets		Concrete Etc.	0.00		
294115	TIME	Sara Schumann	1.80	195.00	351.00
2/14/2017		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Draft motion for default, notice of motion and certificate of service; prepare exhibits, courtesy copy and mailing		Concrete Etc.	0.00		
294365	TIME	K. Engelhardt	0.10	225.00	22.50
2/23/2017		Legal Services	0.00	C@1	
WIP		Labrs P&W 1	0.00		
o/c w/ SS		Concrete Etc.	0.00		

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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		
294468	TIME	Sara Schumann	1.00	195.00	195.00
2/23/2017		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Court appearance		Concrete Etc.	0.00		
294637	TIME	Sara Schumann	3.50	195.00	682.50
2/28/2017		Legal Services	0.00	C@2	
WIP		Labrs P&W 1	0.00		
Draft motion for damages; run fee report; draft affidavits and prepare exhibits for filing; draft proposed order, notice of motion and certificate of service; prepare courtesy copy and mailings; run fee report; emails w/R. Marcello; conf. w/A. Smith and K. Engelhardt		Concrete Etc.	0.00		
Grand Total					
		Billable	28.80		5401.50
		Unbillable	0.00		0.00
		Total	28.80		5401.50

- 180 -
\$5,221.50
+ \$475. costs
\$5,696.50