

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,)
)
Plaintiffs,)
)
v.) Case No. 16 C 9330
)
PLATINUM SCAFFOLDING SERVICES, INC.) Judge Der-Yeghiayan
)
Defendant.)

AFFIDAVIT OF KAREN I. ENGELHARDT

STATE OF ILLINOIS)
)
COUNTY OF COOK)

I, Karen I. Engelhardt declare under oath and under the penalty of perjury the following:

1. I am an attorney and a shareholder at the law firm of Allison, Slutsky & Kennedy, P.C., counsel for Laborers' Pension Fund and the 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. This affidavit is submitted to document attorneys' fees and costs incurred by the plaintiffs for work performed in connection with the above captioned lawsuit filed under Section 502(a)(3) of the Employee Retirement Income Security Act, 29 U.S.C. § 1132(a)(3), as amended, covering the period from September 27, 2016, through the present.

2. For all attorney time from September 27, 2016, forward, services were rendered to the Funds at the rate of \$225.00 per hour for shareholder, \$195.00 per hour for associates, and \$110.00 per hour for clerks/paralegals. In this cause, records for legal work on this matter were kept contemporaneously and are attached hereto as Exhibit 1.

3. Exhibit 1 hereto sets forth the time expended from September 27, 2016, through December 27, 2016, by the firm's attorneys and paralegals in this matter. As set forth in that Exhibit, the Laborers' Funds have incurred legal fees to my firm in this matter in the amount of \$2,632.00.

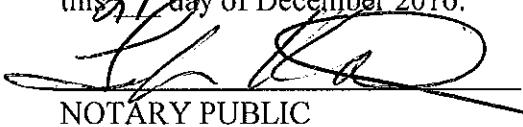
4. In addition, the Plaintiffs have incurred the following costs in the prosecution of this matter totaling \$442.00, which include filing and service fees.

FURTHER AFFIANT SAYETH NOT.

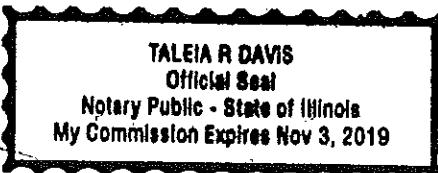


Karen L. Engelhardt

Subscribed and sworn to before me
this 27th day of December 2016.



NOTARY PUBLIC



Selection Criteria

Slip Classification	Open
Clie.Selection	Include: Labrs P&W 1
Refe.Selection	Include: Platinum Scaffolding

Rate Info - identifies rate source and level

Slip ID		Attorney	Units	Rate	Slip Value
		Activity	DNB Time	Rate Info	
		Client	Est. Time	Bill Status	
		Reference	Variance		
288835	TIME	K. Engelhardt	0.80	225.00	180.00
9/27/2016		Legal Services	0.00	C@1	
Billed	G:12232	10/11/2016	Labrs P&W 1	0.00	
Prepare lawsuit; call w/ J. Gilleran; draft complaint		Platinum Scaffolding	0.00		
288752	TIME	Andre Smith	1.00	110.00	110.00
9/28/2016		Legal Services	0.00	C@3	
Billed	G:12232	10/11/2016	Labrs P&W 1	0.00	
Rile new lawsuit; draft complaint, appearance, civil cover, exhibit labels, scan documents and e-file		Platinum Scaffolding	0.00		
290014	TIME	Andre Smith	0.75	110.00	82.50
10/4/2016		Legal Services	0.00	C@3	
Billed	G:12247	11/3/2016	Labrs P&W 1	0.00	
Draft letter for service		Platinum Scaffolding	0.00		
289245	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		Platinum Scaffolding	0.00		
289254	TIME	K. Engelhardt	0.20	225.00	45.00
10/7/2016		Legal Services	0.00	C@1	
Billed	G:12247	11/3/2016	Labrs P&W 1	0.00	
Report to Trustees		Platinum Scaffolding	0.00		
289369	TIME	K. Engelhardt	0.20	225.00	45.00
10/13/2016		Legal Services	0.00	C@1	
Billed	G:12247	11/3/2016	Labrs P&W 1	0.00	
Report to Trustees		Platinum Scaffolding	0.00		
290022	TIME	Andre Smith	0.50	110.00	55.00
10/27/2016		Legal Services	0.00	C@3	
Billed	G:12247	11/3/2016	Labrs P&W 1	0.00	
E-file summons return		Platinum Scaffolding	0.00		
290276	TIME	K. Engelhardt	0.40	225.00	90.00
11/3/2016		Legal Services	0.00	C@1	
Billed	G:12275	12/5/2016	Labrs P&W 1	0.00	
Call w/ R. Marentes, D. Timm		Platinum Scaffolding	0.00		

Slip ID	Dates and Time	Posting Status	Description	Attorney	Activity	Client	Reference	Units	DNB Time	Rate	Rate Info	Slip Value
									Est. Time	Bill Status		
								Variance				
290283	TIME			K. Engelhardt				0.50	225.00			112.50
11/4/2016				Legal Services				0.00		C@1		
Billed	G:12275		Letter to R. Martenes	12/5/2016	Labrs P&W 1			0.00				
				Platinum Scaffolding				0.00				
290343	TIME			K. Engelhardt				0.30	225.00			67.50
11/7/2016				Legal Services				0.00		C@1		
Billed	G:12275		Call w/ J. Mashos; draft letter to Company	12/5/2016	Labrs P&W 1			0.00				
				Platinum Scaffolding				0.00				
290361	TIME			K. Engelhardt				0.00	225.00			0.00
11/7/2016				Legal Services				0.00		C@1		
Billed	G:12275		Call w/ J. Mashos; prepare and forward letter	12/5/2016	Labrs P&W 1			0.00		Do Not Bill		
				Platinum Scaffolding				0.00				
DUPLICATE												
290747	TIME			K. Engelhardt				0.10	225.00			22.50
11/22/2016				Legal Services				0.00		C@1		
Billed	G:12275		Call w/ J. Gilleran	12/5/2016	Labrs P&W 1			0.00				
				Platinum Scaffolding				0.00				
290953	TIME			K. Engelhardt				0.50	225.00			112.50
11/23/2016				Legal Services				0.00		C@1		
Billed	G:12275		Draft initial status report	12/5/2016	Labrs P&W 1			0.00				
				Platinum Scaffolding				0.00				
290970	TIME			K. Engelhardt				0.10	225.00			22.50
11/28/2016				Legal Services				0.00		C		
Billed	G:12275		Prepare for Court appearance	12/5/2016	Labrs P&W 1			0.00				
				Platinum Scaffolding				0.00				
290971	TIME			K. Engelhardt				2.00	225.00			450.00
11/29/2016				Legal Services				0.00		C		
Billed	G:12275		Court appearance; call w/ R. Marentes, T. Hancock; email to T. Hancock	12/5/2016	Labrs P&W 1			0.00				
				Platinum Scaffolding				0.00				
291280	TIME			K. Engelhardt				0.10	225.00			22.50
12/1/2016				Legal Services				0.00		C@1		
WIP				Labrs P&W 1				0.00				
Calls w/ R. Marentes				Platinum Scaffolding				0.00				
291400	TIME			K. Engelhardt				0.20	225.00			45.00
12/7/2016				Legal Services				0.00		C@1		
WIP				Labrs P&W 1				0.00				
Email to D. Timm				Platinum Scaffolding				0.00				
291410	TIME			K. Engelhardt				0.20	225.00			45.00
12/9/2016				Legal Services				0.00		C@1		
WIP				Labrs P&W 1				0.00				
Email w/ D. Timm; review Company request				Platinum Scaffolding				0.00				

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
291492 12/13/2016 WIP Calls w/ R. Marentes, D. Timm	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	0.30 0.00 0.00 0.00	225.00 C@1	67.50
291506 12/14/2016 WIP Call w/ D. Timm; conference call w/ R. Marentes; call w/ J. Gilleran	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	0.70 0.00 0.00 0.00	225.00 C@1	157.50
291577 12/15/2016 WIP Email J. Gilleran, R. Marentes; obtain fee report; letter to R. Marentes	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	1.00 0.00 0.00 0.00	225.00 C@1	225.00
291592 12/16/2016 WIP Call w/ J. Gilleran	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	0.10 0.00 0.00 0.00	225.00 C@1	22.50
291599 12/19/2016 WIP Email to A. Franz	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	0.10 0.00 0.00 0.00	225.00 C@1	22.50
291611 12/20/2016 WIP Call w/ R. Marentes	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	0.10 0.00 0.00 0.00	225.00 C@1	22.50
291817 12/27/2016 WIP Draft J. Mashos affidavit; calls w/ J. Mashos; draft motion for damages; compute attorneys' fees; draft fee affidavit; letter to J. Gilleran	K. Engelhardt Legal Services Labrs P&W 1 Platinum Scaffolding	2.50 0.00 0.00 0.00	225.00 C@1	562.50
Grand Total	Billable Unbillable Total	12.85 0.00 12.85		2632.50 0.00 2632.50