

# 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. 17 cv 1262  
 )  
 ) ) Judge Leinenweber  
v. )  
 )  
HUGH HENRY CONSTRUCTION CO. )  
 )  
 ) Defendant. )

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

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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 24 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. I have devoted 15 hours in connection with the this case at the rate of \$215.00 per hour. The total attorney fees billings is \$3,225.00.

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. I certify that the attorney fees and costs totaling \$3,225.00 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: July 20, 2017

s/ Daniel P. McAnally

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