

**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 CATHERINE)
WENSKUS, Assistant Administrator of the)
Funds.)**

Plaintiffs,

v.

**HARMON MOTOR SERVICES &)
CONSTRUCTION, INC.,)
Defendant.)**

Case No. 17 C 3921

Honorable Harry D. Leinenweber

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 "Laborers' Funds") in the action against Harmon Motor Services & Construction, Inc. This affidavit is submitted to document attorneys' fees and costs incurred by the Laborers' Funds for the period from May 17, 2017 to January 8, 2018, for work performed in connection with obtaining contributions owed.

2. Since May 17, 2017, this firm has billed the Laborers' Funds on an hourly basis for

collections services rendered to the Funds, 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 D1.

3. Exhibit D1 hereto sets forth the time expended from May 17, 2017 through January 8, 2018, by the firm's attorneys and paralegals in this matter. The billable entries were reviewed, and any duplicative entries were struck. As set forth in Exhibit D1, the Laborers' Funds have incurred legal fees to my firm in this matter in the amount of \$3,691.00.

4. In addition, the Laborers' Funds have incurred court costs in the prosecution of this matter totaling \$486.71, which consists of filing fees, and fees for service of process.

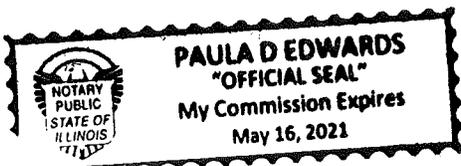


Sara Stewart Schumann, Associate
ALLISON, SLUTSKY & KENNEDY, P.C.

Subscribed and sworn to before me
this 9th day of January 2018.



NOTARY PUBLIC



Selection Criteria

Slip Classification Open
 Clie. Selection Include: Labrs P&W 1
 Refe. Selection Include: Harmons Motor Service and Construction
 Slip. Transaction Date 5/15/2017 - 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
297643	TIME			K. Engelhardt		0.20	225.00	45.00
	5/17/2017			Legal Services		0.00	C@1	
	Billed	G:12393	6/6/2017	Labrs P&W 1		0.00		
			Redact CBA, call w/ R. Marcello	Harmons Motor Service		0.00		
297658	TIME			K. Engelhardt		0.40	225.00	90.00
	5/19/2017			Legal Services		0.00	C@1	
	Billed	G:12393	6/6/2017	Labrs P&W 1		0.00		
			Prepare complaint for filing	Harmons Motor Service		0.00		
298019	TIME			Andre Smith		1.00	110.00	110.00
	5/24/2017			Legal Services		0.00	C@3	
	Billed	G:12393	6/6/2017	Labrs P&W 1		0.00		
			Prepare/file new lawsuit: civil cover, exhibit labels, scan documents	Harmons Motor Service		0.00		
298127	TIME			Andre Smith		0.30	110.00	33.00
	5/30/2017			Legal Services		0.00	C@3	
	Billed	G:12393	6/6/2017	Labrs P&W 1		0.00		
			Prepare service: summons; draft letter	Harmons Motor Service		0.00		
298327	TIME			K. Engelhardt		0.20	225.00	45.00
	6/2/2017			Legal Services		0.00	T	
	Billed	G:12416	7/6/2017	Labrs P&W 1		0.00		
			Letter to J. Mashos	Harmons Motor Service		0.00		
298947	TIME			K. Engelhardt		0.20	225.00	45.00
	6/23/2017			Legal Services		0.00	C@1	
	Billed	G:12416	7/6/2017	Labrs P&W 1		0.00		
			Report to Trustees	Harmons Motor Service		0.00		
299195	TIME			Andre Smith		0.30	110.00	33.00
	6/27/2017			Legal Services		0.00	C@3	
	Billed	G:12416	7/6/2017	Labrs P&W 1		0.00		
			Follow-up calls/emails for service	Harmons Motor Service		0.00		

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Slip Listing

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		
299308	TIME			K. Engelhardt		0.10	225.00	22.50
	6/29/2017			Legal Services		0.00	C@1	
	Billed	G:12416	7/6/2017	Labrs P&W 1		0.00		
	Report to Trustees			Harmons Motor Service		0.00		
299556	TIME			Andre Smith		0.50	110.00	55.00
	6/30/2017			Legal Services		0.00	C@3	
	Billed	G:12416	7/6/2017	Labrs P&W 1		0.00		
	Review and file return of service			Harmons Motor Service		0.00		
299676	TIME			K. Engelhardt		0.10	225.00	22.50
	7/6/2017			Legal Services		0.00	C@1	
	Billed	G:12436	8/3/2017	Labrs P&W 1		0.00		
	o/c w/ A. Smith			Harmons Motor Service		0.00		
300321	TIME			Andre Smith		1.05	110.00	115.50
	7/13/2017			Legal Services		0.00	C@3	
	Billed	G:12436	8/3/2017	Labrs P&W 1		0.00		
	Service issues; calls and emails; draft affidavit of compliance			Harmons Motor Service		0.00		
300323	TIME			Andre Smith		0.50	110.00	55.00
	7/19/2017			Legal Services		0.00	C@3	
	Billed	G:12436	8/3/2017	Labrs P&W 1		0.00		
	Review and e-file return of service			Harmons Motor Service		0.00		
301239	TIME			Sara Schumann		2.00	195.00	390.00
	8/15/2017			Legal Services		0.00	C@2	
	Billed	G:12457	9/5/2017	Labrs P&W 1		0.00		
	Review docket for appearance, service and case status; draft motion for default; call w/A. Grossi; conf. w/K. Engelhardt; review mailing and o/c of A. Smith			Harmons Motor Service		0.00		
302372	TIME			Sara Schumann		2.50	195.00	487.50
	9/21/2017			Legal Services		0.00	C@2	
	Billed	G:12475	10/4/2017	Labrs P&W 1		0.00		
	Draft motion for default judgment, notice of motion and certification; draft cover letter to L. Harmon; prepare courtesy copy for court and mailing, email and fax to L. Harmon			Harmons Motor Service		0.00		
302373	TIME			Sara Schumann		0.10	195.00	19.50
	9/22/2017			Legal Services		0.00	C@2	
	Billed	G:12475	10/4/2017	Labrs P&W 1		0.00		
	O/c of A. Smith regarding courtesy copy			Harmons Motor Service		0.00		

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Slip Listing

Page 3

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		
302694	TIME			Sara Schumann		0.20	195.00	39.00
	9/27/2017			Legal Services		0.00	C@2	
	Billed	G:12475	10/4/2017	Labrs P&W 1		0.00		
	Prepare for court appearance on motion			Harmons Motor Service		0.00		
302672	TIME			Sara Schumann		1.00	195.00	195.00
	9/28/2017			Legal Services		0.00	C@2	
	Billed	G:12475	10/4/2017	Labrs P&W 1		0.00		
	Court appearance and conf. w/L. Harmon			Harmons Motor Service		0.00		
302587	TIME			K. Engelhardt		0.10	225.00	22.50
	9/29/2017			Legal Services		0.00	C@1	
	Billed	G:12475	10/4/2017	Labrs P&W 1		0.00		
	o/c w/ SS			Harmons Motor Service		0.00		
302997	TIME			Sara Schumann		0.70	195.00	136.50
	10/4/2017			Legal Services		0.00	C@2	
	Billed	G:12492	11/2/2017	Labrs P&W 1		0.00		
	Review Court's minute order; call w/J. Russell; research R. Krug			Harmons Motor Service		0.00		
302987	TIME			Sara Schumann		0.70	195.00	136.50
	10/6/2017			Legal Services		0.00	C@2	
	Billed	G:12492	11/2/2017	Labrs P&W 1		0.00		
	Review audits and call w/J. Russell			Harmons Motor Service		0.00		
303138	TIME			Sara Schumann		0.30	195.00	58.50
	10/10/2017			Legal Services		0.00	C@2	
	Billed	G:12492	11/2/2017	Labrs P&W 1		0.00		
	Call w/J. Russell			Harmons Motor Service		0.00		
303129	TIME			Sara Schumann		0.50	195.00	97.50
	10/12/2017			Legal Services		0.00	C@2	
	Billed	G:12492	11/2/2017	Labrs P&W 1		0.00		
	Draft quarterly report			Harmons Motor Service		0.00		
303346	TIME			K. Engelhardt		0.10	225.00	22.50
	10/16/2017			Legal Services		0.00	C@1	
	Billed	G:12492	11/2/2017	Labrs P&W 1		0.00		
	Report to Trustees			Harmons Motor Service		0.00		
304371	TIME			Sara Schumann		1.00	195.00	195.00
	11/1/2017			Legal Services		0.00	C@2	
	Billed	G:12514	12/4/2017	Labrs P&W 1		0.00		
	Court appearance			Harmons Motor Service		0.00		

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Slip Listing

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		
306042	TIME			Sara Schumann		0.50	195.00	97.50
	12/11/2017			Legal Services		0.00	C@2	
	Billed	G:12534	1/3/2018	Labrs P&W 1		0.00		
			Call and emails w/W. Parker; review court docket; conf. w/R. Thoma	Harmons Motor Service		0.00		
306376	TIME			Sara Schumann		0.70	195.00	136.50
	1/4/2018			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
			Work on draft motion for prove-up damages; review Wolf and Legacy audits	Harmons Motor Service		0.00		
306375	TIME			Sara Schumann		3.00	195.00	585.00
	1/5/2018			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
			Work on draft motion for prove-up damages; call w/D. Muzzarelli, emails and call w/R. Marcello and call w/K. Hughes; draft notice of motion and certificate of service; draft affidavits for Marcello and Schumann	Harmons Motor Service		0.00		
306399	TIME			Sara Schumann		2.50	195.00	487.50
	1/8/2018			Legal Services		0.00	C@2	
	WIP			Labrs P&W 1		0.00		
			Work on draft motion for prove-up damages; emails and call w/R. Marcello; revise draft affidavits for Marcello and Schumann; run fee report and review costs; prepare exhibits for filing and draft proposed order for damages	Harmons Motor Service		0.00		
Grand Total								
				Billable		20.75		3778.00
				Unbillable		0.00		0.00
				Total		20.75		3778.00

~~87.00~~
 \$ 3,691.00
 + 486.71 Costs