

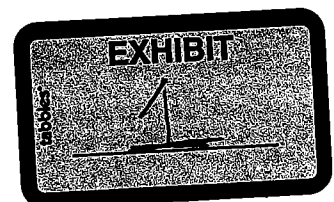
**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

INTERNATIONAL PAINTERS AND ALLIED)	
TRADES INDUSTRY PENSION FUND)	
)	Civil Action No.
Plaintiff)	05-972 (RBW)
v.)	
)	
ORTEGA CONSTRUCTION METHODS, INC.)	
)	
Defendant)	

**DECLARATION OF SHELLEY R. GOLDNER, ESQUIRE
FOR ENTRY OF DEFAULT**

Shelley R. Goldner, Esquire, having been first duly sworn according to law, hereby
deposes and states as follows:

1. I am the attorney for the Plaintiff in the above-entitled action.
2. The Complaint and Summons in this action were served on the Defendant, Ortega Construction Methods, Inc., ("Defendant"), by Thomas J. Richau, II, Process Server, who served the Defendant at 23 Palmer Place, Lancaster, NY 14086, on May 31, 2005. The Return of Service has been duly docketed with the Court.
3. The time in which Defendant may answer or otherwise move as to the Complaint has expired.
4. Defendant has not answered or otherwise moved and the time for Defendant to answer or otherwise move has not been extended by Order of the Court.



5. Defendant is neither an infant nor an incompetent person.

I declare under penalty of perjury in accordance with 28 U.S.C. §1746 that the foregoing is true and correct to the best of my knowledge, information and belief.

Date: June 24, 2005

/s/ Shelley R. Goldner
SHELLEY R. GOLDNER