

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

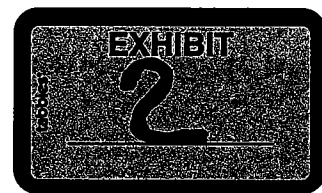
INTERNATIONAL PAINTERS AND ALLIED)	
TRADES INDUSTRY PENSION FUND)	
)	Civil Action No.
Plaintiff)	05-972 (RBW)
v.)	
)	
ORTEGA CONSTRUCTION METHODS, INC.)	
)	
Defendant)	

DECLARATION OF SHELLEY R. GOLDNER, ESQUIRE

Shelley R. Goldner, Esquire, declares on penalty of perjury under the laws of the United States as follows:

1. I am an associate with the law firm of Jennings Sigmond and presently serve as counsel to the International Painters and Allied Trades Industry Pension Fund (“Pension Fund”) in this case. I graduated from the George Washington University Law Center in 1980 and was admitted as a member of the Bar of the District of Columbia in 2003. I have been a member of the Pennsylvania Bar since 1980. I have represented employee benefit plans such as the Pension Fund since 2002. In that capacity, I have litigated numerous cases involving employers who have failed to pay pension contributions. I am submitting this Declaration to document the attorneys’ fees and costs which the Pension Fund has incurred in this case through June 28, 2005.

2. Attached as Exhibit 3 is an itemized statement detailing the unpaid attorneys’ fees and costs incurred by the Pension Fund through June 28, 2005, in connection with collecting



delinquent contributions and other amounts from Defendant. Based upon my review of Exhibit 3, the Fund has incurred \$1,817.48 in attorneys' fees and costs.

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 28, 2005

s/ Shelley R. Goldner
SHELLEY R. GOLDNER