

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

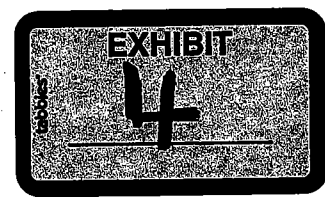
INTERNATIONAL PAINTERS AND ALLIED	)	
TRADES INDUSTRY PENSION FUND	)	
	)	Civil Action No.
Plaintiff	)	05-972 (RBW)
v.	)	
	)	
ORTEGA CONSTRUCTION METHODS, INC.	)	
	)	
Defendant	)	

**DECLARATION OF SHELLEY R. GOLDNER, ESQUIRE**

Shelley R. Goldner, Esquire, states under penalty of perjury that the following is true and correct.

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 from June 28, 2005 through March 23, 2006.

2. Attached as Exhibit 5 is a computerized list showing all work performed by the offices of Jennings Sigmond and related costs in connection with the collection of the contributions at issue in this action from June 28, 2005 through March 23, 2006. The



computerized listing is prepared from contemporaneous attorney time and expense records, the originals of which are maintained in the regular business records of Jennings Sigmond.

3. Based upon my review of Exhibit 5, the Funds have incurred attorneys' fees and costs of \$3,232.63 from June 28, 2005 through March 23, 2006.

4. I have executed this Declaration in support of the Motion of Plaintiff for Entry of Supplemental Judgment, and request this Court to consider the same as proof in support of the allegations contained in the Complaint of the Funds and other facts stated in this Declaration.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: March 27, 2006

/s/ Shelley R. Goldner, Esquire  
SHELLEY R. GOLDNER, ESQUIRE