

STATE OF ILLINOIS)
)SS
COUNTY OF COOK)

ATTORNEY NO. 40668

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
FIRST MUNICIPAL DISTRICT**

PASULKA & WHITE, LLC.,)
a limited liability corporation)
Plaintiff,)
vs.)
BENJAMIN J. HART,)
Defendant.)

20091152754
CALENDAR ROOM 1117
TIME 09:30
Branch of Court

No.

Amount: \$5,735.05 + costs

07-22-09

VERIFIED COMPLAINT AT LAW

NOW COMES the Plaintiff, PASULKA & WHITE, LLC. ("PASULKA"), and complains against the Defendant, BENJAMIN J. HART ("DEFENDANT") for breach of contract, and in support thereof, your Plaintiff states as follows:

1. David P. Pasulka is a principal of PASULKA & WHITE, LLC. Mitchell B. Gordon is an associate with the law firm of PASULKA & WHITE, LLC; and all are duly licensed as attorneys engaged in the practice of law in the State of Illinois and particularly in Cook County. The attorney primarily responsible for the day to day handling of this case was Mitchell B. Gordon.

2. The law firm of PASULKA was retained by the DEFENDANT on or about January 14, 2008 to represent him in his post-decree Domestic Relations proceedings and this firm so represented him from that date until on or about January 14, 2009.

3. Since the date retained, the law firm of PASULKA has performed extensive legal services in connection with DEFENDANT's Domestic Relations proceedings. That said legal services included, but are not limited to, court appearances, office conferences, negotiations with

K26

counsel and parties, preparation of pleadings, review of pleadings, telephone conferences with the client, preparation of documents, investigation of assets and parenting matters.

4. Through the present date, PASULKA is owed \$5,735.05 for legal services rendered. Additional estimated time for telephone calls, messages, returning telephone calls and additional time in connection with the preparation of this complaint and the estimated time for the presentation of this complaint will be spent in connection with this matter.

5. The reasonable and customary fees of PASULKA are \$425.00 per hour for work performed by David P. Pasulka, \$300.00 per hour for work performed by Mitchell B. Gordon, and \$175.00 per hour for work performed by legal assistants employed by PASULKA. Said hourly fees set forth in the Engagement Agreement between PASULKA and DEFENDANT was signed on or about January 14, 2008. (Engagement Agreement setting forth each attorney's hourly rates is incorporated herein by reference. Due to attorney/client confidentiality, said Engagement Agreement will be provided upon request).

6. The time spent in the preparation of this cause is reasonable, necessary and customary, and the rates charged by PASULKA are reasonable and customary.

7. The total fees incurred in this cause are reasonable, necessary and customary. The DEFENDANT has an obligation to pay said fees.

8. PASULKA is a duly licensed Illinois professional corporation with it's principal office in Cook County, Illinois.

9. DEFENDANT is a resident of Cook County, Illinois.

10. The contract between PASULKA and DEFENDANT was entered into in Chicago, Cook County, Illinois, for services performed in Cook County, Illinois.

11. DEFENDANT, on information and belief, has sufficient income and assets with which to pay the attorney's fees of PASULKA.

12. The total fees and expenses incurred by PASULKA through the present date amount to \$29,735.05.

13. DEFENDANT has paid a total of \$24,000.00 towards the fees and expenses of PASULKA, leaving an unpaid balance of \$5,735.05.

WHEREFORE, your Plaintiff, PASULKA, prays as follows:

A. That the Court enter a judgment in favor of PASULKA and against the DEFENDANT in the amount of \$5,735.05; and

B. That the Court enter a judgment for costs and attorney's fees incurred by PASULKA in bringing this cause of action;

C. For any and all other relief as this Honorable Court deems just and equitable.

Respectfully submitted,
PASULKA & WHITE, L.L.C.

BY: 

DAVID P. PASULKA

PASULKA & WHITE, L.L.C.
Pro Se
70 West Madison Street, Suite 650
Chicago, Illinois 60602
312/236-9150
Attorney No. ~~40886~~ 40668


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) SS
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I, DAVID P. PASULKA, being first duly sworn on oath depose and state that I am the Plaintiff in the above and foregoing cause of action, that I have read the above Verified Complaint at Law subscribed by me and know the contents thereof to be true in substance and in fact.

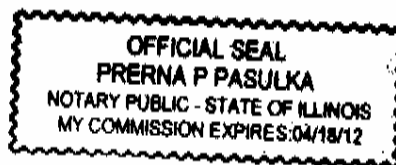


David P. Pasulka

SUBSCRIBED and SWORN to
before me this 23rd day
of June, 2009.



Notary Public



PASULKA & WHITE, L.L.C.
Pro Se
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Chicago, Illinois 60602
312/236-9150
Attorney No. 40886