

for payment, all of which are possessed and were specifically utilized to prepare ledger entries utilized by Contech to prepare and record its mechanic's lien. The undersigned personally oversaw the preparation of Contech's business records to create journal ledger entries and the documents which comprise the job project file and which were utilized to prepare the mechanic's lien claim. Furthermore, the undersigned personally participated in responding to inquiries from DCHC Liquidating Trust (the "Trust") concerning individual entries on journal ledger entries reciting check numbers, payments, dates of payments, amounts of payments, invoice numbers, customer numbers, and bank account numbers for the information maintained in the ordinary course of business by Contech for invoice and cash receipt and journal ledger entries.

3. The undersigned oversaw the maintenance of copies of all checks received from Michael Reese as payment to Contech. Copies of all checks received from Michael Reese, except for one check in 1999 and eight checks in 2000 which were purged in the ordinary course of business, are attached hereto as Exhibit 1. However, Contech, in good faith, is crediting Michael Reese for the payments made by those checks which were purged.

4. I personally observed glaring inadequacies in Ms. Jackson's Declaration attached to the Objection to Contech's Claim. Ms. Jackson establishes no basis for, or even any familiarity with, the individual report entries (Exhibit 2 to her Declaration), the method of entering the information contained therein, the accuracy of the underlying information in Exhibit 2, the location of the source documents which underlie the entries for the report, any personal knowledge of the identities of the persons who entered the information, when the information was entered, or whether anyone utilized original source documents in the

preparation of the report (Exhibit 2) which was utilized by her to “prepare” a spreadsheet (Exhibit 1).

5. Ms. Jackson, in her Declaration, asserts, wrongfully, that she included “dates, check numbers and amounts of individual payments.” Those allegations are demonstrably false based on Exhibit 1 hereto.

6. Ms. Jackson’s assertion, at paragraph 4 of her Declaration, that the information contained in the spreadsheet is accurate is also false. Specifically, her assertion that four payments were made on June 25, 2004, in the amount of \$147,725, \$19,934, \$5,600, and \$5,600, respectively, is false. See Exhibit 1 hereto.

7. Carolyn Jackson has no basis to make the Declaration or to attach a bare spreadsheet generated on July 22, 2008 (based on “RUN DATE” entered on said spreadsheet), to her Declaration, because Michael Reese has no source documents with which to prepare said spreadsheet. The spreadsheet attached to Ms. Jackson’s Declaration purports to be a mere summary of the other summary report document. Significantly, no source documents have ever been produced by the Trust, despite numerous, repeated requests of Trustee’s counsel by Contech. I am aware that Contech made requests of Candace Glover and Jeff Schmitt, both acting as counsel for the Trust. Both Mr. Schmitt and Ms. Glover have never produced original source documents, including the checks which the Trust asserts were made as payment to Contech.

8. The spreadsheet asserted to have been “created” by Ms. Jackson (paragraph 3 of her Declaration) suffers from even more fatal flaws. The Jackson spreadsheet, at Exhibit 1 to her Declaration, is not a “creation” or independent document from the other report mislabeled “Reese Hospital records.” Instead, it is a mere restatement of identical information contained

on the report marked as Exhibit 2 to the Jackson Declaration. Jackson's assertions concerning the entries on the spreadsheet and report, including, most particularly, that the check numbers and amounts of payments are contained in her spreadsheet, are simply false. A review of the spreadsheet indicates that no check numbers are contained on either spreadsheet or report attached to her Declaration, and certain payments listed are false, while other amounts listed have not been verified by the Trust or by Contech, despite laborious analysis conducted by me on behalf of Contech, which exceeded twenty hours of my time. Furthermore, the Trust and Ms. Jackson have completely failed to explain the discrepancies in the payment amounts listed. The total amounts billed and total amounts paid are wrong. Furthermore, the columns designated "Total Due" and "Gross" appear to describe the same amounts, but arrive at different totals. Contech received \$3,984,121.85, although Jackson's spreadsheet and the report, both attached to her Declaration, suggest payouts of \$4,570,168.00. Jackson's figure is wrong and not supported by the checks received, most of which are attached hereto. Moreover, the invoices listed by Jackson as issued by Contech are erroneous by a magnitude of several hundred thousand dollars, with Michael Reese erroneously asserting Contech issued higher amounts of invoices than were actually issued by Contech. The spreadsheet and report attached to the Jackson Declaration are inconsistent and cannot be reconciled with actual copies of checks issued by Michael Reese attached hereto as Exhibit 1. The Trust has failed to produce any original source documents. Contech's business records include copies of individual checks received from Michael Reese which corroborate the entries contained in Contech's records and contradict the information contained in the exhibits to the Jackson Declaration. The spreadsheets attached to Ms. Jackson's Declaration are inaccurate.

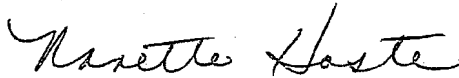
9. Based on Contech's business records, copies of actual checks received by Contech, and other checks recorded as received, Contech is entitled to immediate payment of its Secured Claim in the amount of \$364,039.35.

Further, Affiant saith naught.



Allen Bondi

Subscribed and Sworn to before me this 17th
day of December, 2008.



Notary Public



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