

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

OXEBRIDGE QUALITY RESOURCES
INTERNATIONAL, LLC, and
CHRISTOPHER PARIS, individually,

Plaintiffs,

CASE NO.: 8:15-CV-11-T-17TBM

v.

MARC TIMOTHY SMITH, individually,
and d/b/a CAYMAN BUSINESS SYSTEMS,

Defendants.

VERIFIED STATEMENT OF PLAINTIFFS' ATTORNEY'S TIME (LIMITED)

I, William R. Wohlsifer, Esq., on behalf of the law firm of William R. Wohlsifer, PA, and as counsel for plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC ("OXEBRIDGE") and CHRISTOPHER PARIS, individually ("PARIS") being duly sworn, verify and say that the following information is true and correct:

1. My name is William R. Wohlsifer. I am older than eighteen (18) years of age, and a citizen of the United States.
2. I am an attorney at law, duly licensed, to engaged in the practice of law in Florida since 1996, and in the District of Columbia since 1999.
3. I am the Attorney of Record for OXEBRIDGE and PARIS, individually, the plaintiffs in this action, and have represented these same plaintiffs in other civil actions.
4. I have personal knowledge of the books and records of William R. Wohlsifer, PA, and how they are maintained as they relate to the *Oxebridge Quality Resources International, LLC and Christopher Paris v. Marc Timothy Smith d/b/a Cayman Business Systems*, United

States District Court, Middle District of Florida, Tampa Division, Case No. 8:15-cv-11-T-17TBM.

5. I keep such records in the course of my regularly conducted business activity, including entries of billable attorney and attorney-supervised law clerk time, and any related costs incurred, as a practicing attorney in the State of Florida. The entries are made by me, from my personal knowledge of the information being recorded. It is the regular practice of Affiant, to record such entries, at or near the time such tasks are performed or costs incurred.
6. My clients, OXEBRIDGE and PARIS, retained counsel on a billable hourly fee basis under a written, signed attorney-client fee agreement.
7. A copy of the attorney-client fee agreement between OXEBRIDGE RESOURCES INTERNATIONAL, LLC and CHRISTOPHER PARIS, individually, and WILLIAM R. WOHLISIFER, PA is attached hereto as Exhibit "A."
8. The average and normal billing rate of the undersigned attorney for this type of matter is \$275 per hour for attorney time and \$90 per hour for attorney-supervised law clerk's time, as shown in Section II, Paragraph 1 of the signed attorney-client hourly fee agreement (said Exhibit "A").
9. Attorney's fees have continued to accrue since the date of the filing of the Original Complaint in this action. **However**, on July 28, 2016, Magistrate Judge McCoun, III, filed his Report and Recommendation stating that, "I conclude further that a limited award of attorneys' fees and costs is warranted because Plaintiffs achieved some success of the instant Motion. I recommend that Plaintiffs' counsel be directed to file a pleading directed

to fees and costs incurred in connection with their Motion with fifteen (15) days of the Court's Order on this Report and Recommendation" (**Doc #99**).

10. On September 14, 2016, The Honorable Kovachevich, U.S. District Judge, filed her Order Adopting Report & Recommendation (**Doc #104**).

11. Attorney's fees incurred since the June 3, 2015 filing of Plaintiff's Notice of Defendant's Breach of Joint Stipulation on Injunction and Violation of Court Order and Motion to Compel Compliance with Joint Stipulation on Injunction (**Doc #48**) through entry of this Court's Order Adopting Report & Recommendation (**Doc #104**) are relevant to this Affidavit.

12. The Affiant's billing statements reflecting the fees described in the paragraph immediately above and the amounts charged for such tasks are attached hereto and incorporated herein as Plaintiff's Exhibit's "B"- "F."

a. Invoice # 2833 (redacted to reflect limited time) dated July 23, 2015 (Exhibit "B" hereto):

i. Attorney's Time (limited): 13.75 hrs.

ii. Law Clerk Time (limited): 0.00 hrs.

b. Invoice # 2965 (redacted to reflect limited time) dated October 31, 2015 (Exhibit "C" hereto):

i. Attorney's Time (limited): 6.00 hrs.

ii. Law Clerk Time (limited): 4.50 hrs.

c. Invoice # 3031 (Redacted to reflect limited time; dated January 14, 2016 (Exhibit "D" hereto):

i. Attorney's Time (limited): 4.25 hrs.

ii. Law Clerk Time (limited): 0.75 hrs.

d. Invoice # 3093 (redacted to reflect limited time) dated July 14, 2016 (Exhibit "E" hereto):

i. Attorney's Time (limited): 14.75 hrs.

ii. Law Clerk Time (limited): 0.00 hrs.

e. Invoice # 3111 (redacted to reflect limited time; dated September 28, 2016 (Exhibit "F" hereto):

i. Attorney's Time (limited): 6.00 hrs.

ii. Law Clerk Time (limited): 0.75 hrs.

13. Total (limited) Attorney's Time) = **44.75 hrs.** @ \$275 per hour = **\$12,306.25**; plus, total (limited) Supervised Law Clerk Time = **6.00 hrs.** @ \$90 per hr. = **\$540.00**; thus **\$12,846.25 being the total claim of limited reasonable attorney's fees** to be awarded in favor of OXEBRIDGE and PARIS and against MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS.

FURTHER AFFIANT SAYETH NAUGHT.

VERIFICATION

I affirm under penalties of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 28th day of September 2016.

Respectfully submitted by:

WILLIAM R. WOHLISIFER, PA

By: /s/ William R. Wohlsifer
William R. Wohlsifer, Esquire

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all parties receiving electronic notification via the CM/ECF filing system as of September 28, 2016, and further certify that a copy has been furnished via U.S. First Class Mail to Marc Timothy Smith, 8466 LeSourdsville-West Chester Road, Olde West Chester, Ohio 45069.

WILLIAM R. WOHLISIFER, PA

By: /s/ William R. Wohlsifer
William R. Wohlsifer, Esquire
Fla. Bar No: 86827