

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.

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**AFFIDAVIT OF PLAINTIFFS' COUNSEL REGARDING PREVIOUSLY EMPLOYED  
ASSOCIATE ATTORNEY IN SUPPORT OF PLAINTIFFS' MOTION FOR LIMITED  
REASONABLE AWARD OF ATTORNEY'S FEES [DOC 111]**

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

1. I make this affidavit under oath in support of Plaintiffs' Motion For Limited Reasonable Award of Attorney's Fees [Doc 111] filed in this action on September 28, 2016.
2. My name is William R. Wohlsifer and I am the lead attorney at WRWPA. I am older than eighteen (18) years of age, and a citizen of the United States.
3. I am an attorney at law, duly licensed, to engage in the practice of law in Florida since 1996, and in the District of Columbia since 1999, and the Middle District Court of Florida since 1997.

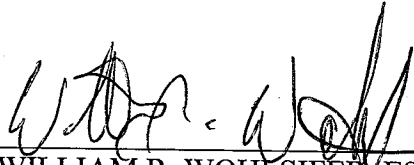
4. I am the attorney of record for OXEBRIDGE and PARIS, the plaintiffs in this action, and have represented these same plaintiffs in other civil actions.
5. I have personal knowledge of the books and records of William R. Wohlsifer, PA, and how they are maintained as they relate to the *Oxebridge Quality 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.
6. 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.
7. This affidavit speaks to the same matters as Verified Statement of Plaintiffs' Attorney's Time (Limited) [Doc 110] filed on September 28, 2016.
8. Leighanne Boone, Esq. was formerly employed as an associate attorney for William R. Wohlsifer. Leighanne Boone, Esq. is older than eighteen (18) years of age, and a citizen of the United States.
9. Leighanne Boone, Esq. is an attorney at law, duly licensed, to engaged in the practice of law in Florida since 2013.
10. Leighanne Boone, Esq. received her juris doctorate from Vermont Law School in 2013.
11. Leighanne Boone, Esq. is a member of:
  - a. Florida Northern District Bankruptcy Court;

- b. U.S. District Court, Middle District of Florida; and
  - c. U.S. District Court, Northern District of Florida.
12. Leighanne Boone, Esq. worked as Assistant General Counsel at the Florida Department of Transportation from November 2013-2014.
  13. Leighanne Boone, Esq. worked as a Student Attorney for the Duke Environmental Law Clinic from January 2013 to May 2013.
  14. Leighanne Boone, Esq. is currently a volunteer attorney for the Legal Services of North Florida.
  15. Leighanne Boone, Esq. is currently a volunteer attorney for the Legal Aid Foundation of the Tallahassee Bar Association, Inc.
  16. Leighanne Boone, Esq. was an associate attorney who was supervised by lead attorney, William Wohlsifer, Esq., for the plaintiffs in this action, and have represented these same plaintiffs in other civil actions.
  17. Leighanne Boone, Esq. kept such records in the course of her 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.
  18. The average and normal billing rate of an associate attorney for this type of matter is \$275 per hour for attorney time in North Florida.
  19. The billing rate of an associate attorney for this type of matter is \$275 per hour for attorney time as shown in Section II, Paragraph 1, of the signed attorney-client hourly fee agreement

(see Exhibit "A" to the Verified Statement of Plaintiffs' Attorney's Time (Limited) [Doc 110].)

20. The Affiant's billing statements attached as Exhibit's "B"- "F" to the Verified Statement of Plaintiffs' Attorney's Time (Limited) [Doc 110] reflects the sum of 30.75 hours for total attorney's time at \$275.00 per hour, thus \$8,456.25 for Attorney Boone's time; and 14 hours for Attorney Wohlsifer's time at \$275.00 per hour, thus \$3,850.00, thus plaintiffs seek \$12,306.25 for the limited time of litigation following breach, for which plaintiffs seek reimbursement from defendant, Marc Smith.

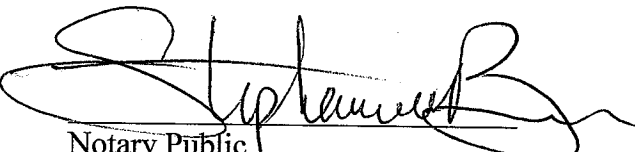
FURTHER AFFIANT SAYETH NAUGHT.

  
WILLIAM R. WOHLISIFER, ESQ.

STATE OF FLORIDA                    )  
COUNTY OF LEON                    )

The foregoing Affidavit of Attorney's Time was acknowledged before me this 21<sup>st</sup> day of December, 2016 by WILLIAM R. WOHLISIFER, who presented his Florida Driver License as identification to me and who did take an oath.



  
Notary Public

**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 December 21, 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.

Respectfully submitted by:

**WILLIAM R. WOHLISIFER, PA**

By: /s/ William R. Wohlsifer  
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