

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

vs.

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

Defendants.

**NOTICE OF FILING SECOND VERIFIED STATEMENT COLLABORATING
REASONABLE ATTORNEY'S FEES, IN SUPPORT PLAINTIFF'S MOTION FOR
FEES [DKT. 111]**

COMES NOW the plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC and CHRISTOPHER PARIS cumulatively ("plaintiffs") by and through their undersigned attorney, and file the attached *Second Verified Statement Collaborating Reasonable Attorneys' Fees*, made under oath by expert witness, Allen P. Turnage, Esquire, in support of Plaintiffs *Motion For Limited Reasonable Award Of Attorney's Fees [Dkt. 111]* and further collaborating plaintiff's counsel's *Affidavit of Plaintiffs' Counsel Regarding Supervised Law Clerks [Dkt. 116] Made in Support of Plaintiffs' Motion for Reasonable Attorney's Fees [Dkt. 111]* and *Affidavit of Plaintiffs' Counsel Regarding Previously Employed Associate Attorney [Dkt. 117] Made in Support of Plaintiffs' Motion for Reasonable Attorney's Fees [Dkt. 111]*.

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, 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, on this 21st day of December 2016.

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

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and d/b/a CAYMAN BUSINESS SYSTEMS,

Defendants.

**SECOND VERIFIED STATEMENT COLLABORATING REASONABLE
ATTORNEY'S FEES**

I, Allen P. Turnage, verify on oath under penalties of perjury, and say that I am a member in good standing of the Florida Bar (admitted in 1993), actively engaged in the practice of law in Tallahassee, Florida, that I have represented parties in cases similar to the present case, and am familiar with fees charged by attorneys in such matters; that I have examined the file and the billing records of William R. Wohlsifer, PA, attorney for Plaintiffs, in the above styled case; and that I am familiar with and have taken into consideration the criteria set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), and rendered an opinion titled, Verified Statement Collaborating Reasonable Attorney's Fees [DOC 113-1] on November 11, 2016, that a fee of \$42,000 is a reasonable fee for the hours expended by the attorney and his staff in said cause.

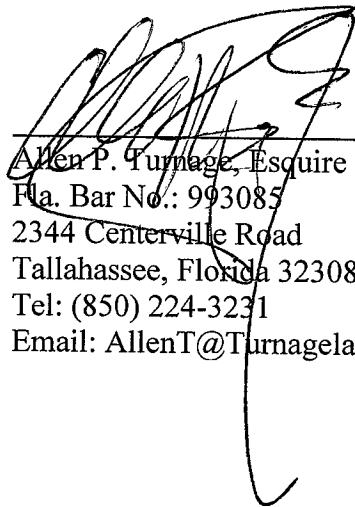
In addition to the foregoing, on December 21, 2016, I reviewed the Affidavit Of Plaintiffs' Counsel Regarding Supervised Law Clerks [DOC 116] Made In Support Of Plaintiffs' Motion For Limited Reasonable Award of Attorney's Fees [Doc 111] and conclude that the rate charged for supervised law clerk time of \$90 per hour is a reasonable rate for North Florida. On

December 21, 2016, I also reviewed the Affidavit Of Plaintiffs' Counsel Regarding Previously Employed Associate Attorney [DOC 117] Made In Support Of Plaintiffs' Motion For Limited Reasonable Award of Attorney's Fees [Doc 111] and conclude that the rate charged for associate counsel time of \$275 per hour is a reasonable rate for North Florida.

VERIFICATION STATEMENT

I declare under penalty of perjury under the laws of Florida that the foregoing is true and correct.

EXECUTED on this 21st day of December 2016.



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