

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ALABAMA

SOUTHERN DIVISION

LAURA FAUGHT and STEVEN  
FAUGHT,

Plaintiffs,

v.

AMERICAN HOME SHIELD  
CORPORATION,

Defendant.

**Case No. 2:07-cv-1928:RDP**

**DECLARATION OF R. STEPHEN  
GRIFFIS IN SUPPORT OF  
OBJECTING CLASS MEMBERS'  
APPLICATION FOR AN AWARD  
OF ATTORNEYS' FEES AND  
COSTS**

I, R. Stephen Griffis, affirm the following:

1. I am a member in good standing of the Bar for the State of Alabama. I am admitted to practice before this court and I am local counsel for John W. Davis representing Miriam and John Chapon in this matter.
2. I am submitting this declaration in support of my firm's application for an award of attorneys' fees for services rendered in this matter.
3. The statements made herein are based on my personal knowledge and the files and records in this case of which I am aware and, if called on to do so, I could and would testify competently thereto.
4. I am the owner of R. Stephen Griffis, PC. While my firm devoted its time and resources to this matter, it has forgone other legal work for which it would have been compensated either on an hourly basis, a negotiated contingency basis or by a court-awarded fee.
5. Attached hereto as Exhibit "A" is a true and correct copy of my contemporaneous time records up until the date of entry of judgment.
6. My practice involves complex business transactions, complex litigation and I have substantial experience in class action litigation. My general hourly rate for transactional matters and court attendance in matters that are not considered "complex litigation" is \$295.00 per hour. When involved in complex litigation or class action litigation my hourly rate is substantially in

excess of said amount, however, due to the fact that I am acting as local counsel in this matter the appropriate rate for my time would be \$295.00 per hour. As reflected in the attached time record I billed 13.65 hours on this matter from the opening of this file through the entering of final judgment. My time records are kept contemporaneously and I have reviewed my records and compared my file as to work performed for accuracy.

This declaration has been signed under penalty of perjury under the laws of the United States of America and executed on the 10<sup>th</sup> day of May, 2010, in the County of Jefferson, State of Alabama.

/s/ R. Stephen Griffis  
R. Stephen Griffis

**EXHIBIT "A"**


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 -STATEMENT OF SERVICES-  
 R. STEPHEN GRIFFIS, PC
 

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*Re: American Home Shield Objection Case No. 2:07-cv-1928:RDP*

1/6/10	T/C with J. Davis re: potential local counsel for hearing in Alabama-discuss background of case	.25
1/8/10	Review Proposed Settlement and Class Notice	1.5
2/2/10	T/C with J. Davis re: litigation strategy	.60
2/4/10	T/C with J. Davis re: pro hac, local counsel and basis of objection	.50
2/6/10	Review Objection and revise T/C's with J. Davis	2.0
2/8/10	Review final Objection File Objection and one exhibit in local court Review Civil docket	.30
2/10/10	T/C with J. Davis re: case strategy	.25
2/16/10	Review Objectors' Motion to Intervene T/C with J. Davis	.25
2/26/10	Receipt and review plaintiff's brief in support of settlement Review evidentiary submissions, review federal case law re: hearsay and evidentiary requirements	1.0
3/1/10	Receipt and review American Home Shield brief in support of final approval	1.5
3/8/10	T/C with J. Davis re: appearance at Fairness Hearing	.50
3/10/10	Meeting with J. Davis Attend Fairness hearing	3.5

**EXHIBIT "A"**  
**(continued)**

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-STATEMENT OF SERVICES-  
R. STEPHEN GRIFFIS, PC

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*Re: American Home Shield Objection Case No. 2:07-cv-1928:RDP*

4/28/10	Receipt and review of final judgment and memorandum opinion, final judgment	1.5
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Total hours		13.65
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**13.65 Hours x \$295.00 per hour = \$4,026.75**