



CONNOLLY
GALLAGHER LLP

Josiah R. Wolcott
Dir Dial: (302) 888-6271
Email: jwolcott@connollygallagher.com
Reply to Newark Office:
267 East Main Street
Newark, Delaware 19711

December 21, 2012

**BY LEXISNEXIS FILE & SERVE
AND HAND DELIVERY**

The Honorable J. Travis Laster
Court of Chancery
500 North King Street
Wilmington, Delaware 19801

**Re: *Staffieri v Black, et al.*
C.A. No. 7439-VCL**

Dear Vice Chancellor Laster:

Enclosed for the Court's consideration, pursuant to Chancery Court Rule 88, are four affidavits in support of an award of attorneys' fees and costs to Plaintiffs Gary and Adria Charles Staffieri as granted by Your Honor's October 24, 2012 Post-Trial Order:

1. Affidavit of Gary Staffieri
2. Affidavit of Sharon Cherry
3. Affidavit of Josiah R. Wolcott
4. Affidavit of K. Kirk Karagelian

Should Your Honor have any questions, counsel is available at the convenience of the Court.

Respectfully,

Josiah R. Wolcott
(Del. Bar No. 4796)

JRW/saj
Enclosures

cc: Richard Abbott, Esquire (by LexisNexis File & Serve)
Paul and Candy Miller (by first class mail)


05008191/33574*1



Service Provider	Attorneys' Fees	Expenses	Total
Carroll & Karagelian LLP	\$9,240.00	\$1,855.80	\$11,095.80
Cherry Fieger & Cherry, P.C.	\$113,999.00	N/A	\$113,999.00
Connolly Bove Lodge & Hutz LLP	\$9,625.00	\$2,710.87	\$12,335.87
Connolly Gallagher LLP	\$17,495.00	\$4,453.73	\$21,948.73
Subtotals	\$150,359.00	\$9,020.40	
Total			\$159,379.40

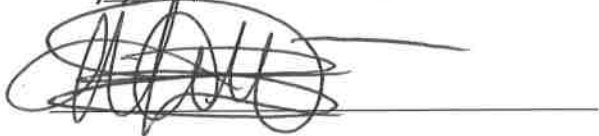
4. During the course of the litigation, the Plaintiffs also incurred costs related to expert witnesses and deposition transcripts. Said costs, as calculated and provided by counsel, are as follows:

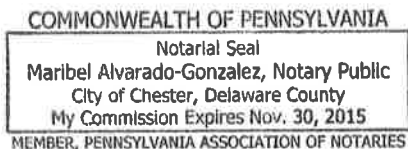
Service Provider	Attorneys' Fees	Expenses	Total
Veritext Mid-Atlantic ¹	N/A	\$937.20	\$937.20
Register in Chancery	N/A	\$295.00	\$295.00
The Pelsa Company ²	N/A	\$2,700.00	\$2,700.00
Reflection Automotive Detail ³	N/A	\$1,750.00	\$1,750.00
Total	N/A	\$5,682.20	\$5,682.20


 Gary Staffieri

Dated: December 17, 2012

Sworn and subscribed to before me
 this 17 day of December, 2012.





¹ See Ex. B.
² See Ex. C.
³ See Ex. D.

Exhibit A

INVOICE

Veritext Mid-Atlantic

1801 Market St., Suite 1800
Philadelphia, PA 19103
Tel. 888-777-6690 Fax. 215-241-1539

Paid 10/16/12
Check #
2083

Bill To: Sharon M. Cherry
Cherry Fieger & Cherry, P.C.
11 East Second Street
Media, PA 19063

Invoice #: Pa1531448
Invoice Date: 09/24/2012
Balance Due: \$937.20

Case: Gary Staffieri And Adria Charles Staffieri v. Henry Black, Et Al.
Job #: 1509613 | Job Date: 8/10/2012 | Delivery: Normal
Location: Abbott Law Offices - 724 Yorklyn Road
724 Yorklyn Road | Suite 240 | Hockessin, DE 19707

	Witness	Description	Amount
	Adria Charles Staffieri	Transcript Services	\$456.50
		Exhibits	\$66.00
	Gary Staffieri	Transcript Services	\$405.75
		Shipping & Handling	\$8.95
Notes:			Invoice Total: \$937.20
			Payment:
			Credit:
			Interest: \$0.00
Fed. Tax ID: 20-3132569			Balance Due: \$937.20
Term: Net 30			

TERMS: Payment upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees.
Contact us to correct payment errors. No adjustments will be made after 90 days.

Exhibit B

THE PELSAC COMPANY
CONSULTANTS & LAND SURVEYORS

610 Peoples Plaza
Newark, DE 19702
(302)834-3771 fax (302)834-2282
pelsaoffice@thepelsacompany.com

September 4, 2014

Gary Staffieri and Adria Charles-Staffieri
c/o 202 Auto Spa
1707 Concord Pike
Wilmington, DE 19803

RE: 1707 Concord Pike

Invoice P-2492

Scope of Service:

- 1) Site meetings with client and attorney to discuss and review project.
- 2) Review deeds for easements and boundaries (1701-1707 Concord Pike).
- 3) Prepare Exhibit Plan showing property per deed calls with easements.
- 4) Revise plan per client's attorney.
- 5) Survey and locate boundary lines, locate existing concrete bumper strips.
- 6) Revise Exhibit Plan to show concrete bumper strips.
- 7) Prepare photo of property line and bumper strips.
- 8) Survey and locate boundary line, to locate railroad ties,
- 9) Revise Exhibit Plan to show railroad ties in relationship to property lines.
- 10) Prepare photo of property line and railroad ties.
- 11) Prepare narrative report describing survey, deeds and locations.
- 12) Process plans and photos.

Charges:

<i>P. L. S.</i>	6 hrs x \$ 125.00 hr	750.00
<i>Survey crew</i>	6 hrs x \$150.00 hr	900.00
<i>Survey</i>	8 hrs x \$ 68.75 hr	550.00
<i>CAD Tech</i>		
		<u>\$2,200.00</u>

Paid	<u>\$2,200.00</u>
Balance	00.00

MRP/mf

THE **PELSA** COMPANY
CONSULTANTS & LAND SURVEYORS

610 Peoples Plaza
Newark, DE 19702
(302)834-3771 fax (302)834-2282
pelsaoffice@thepelsacompany.com

October 31, 2012

Gary Staffieri and Adria Charles-Staffieri
c/o 202 Auto Spa
1707 Concord Pike
Wilmington, DE 19803

RE: 1707 Concord Pike

Invoice P-2492b

Scope of Service:

Prepare for and attend court as expert witness.

Charges:

\$500.00

paid 10/21/12

MRP/inf

Exhibit C

Reflection Automotive Detail

1313 Wilmington Pike
West Chester, PA 19382

Phone # 610-455-0145
Fax # 610-455-3938

nick@reflectiondetail.com
www.reflectiondetail.com

Date	Invoice #
10/30/2012	6691

Bill To
Gary and Adria Staffleri 100 Sackville Lane Wallingford, PA 19086



P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
2	Building Evaluation	125.00	250.00
4	Deposition	125.00	500.00
1.5	Preparation For Court Hearing	125.00	187.50
6.5	Court Hearing	125.00	812.50
		Subtotal	\$1,750.00
		Sales Tax (0.0%)	\$0.00
		Total	\$1,750.00
		Payments/Credits	\$0.00
		Balance Due	\$1,750.00



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GARY STAFFIERI and
ADRIA CHARLES STAFFIERI

Plaintiffs,

v.

C.A. No. 7439-VCL

HENRY BLACK and MARY LOU BLACK and
RAYMOND BUCHTA and SCOTT BLACK
BLACKBALL PROPERTIES LLC, and
PAUL MILLER AND CANDY MILLER, and
GAKIS PROPERTIES II, LLC

Defendants.

AFFIDAVIT OF SHARON CHERRY

COMMONWEALTH OF PENNSYLVANIA)

SS.

COUNTY OF CHESTER)

Sharon Cherry, co-counsel for Plaintiffs Gary and Adria Charles Staffieri (the "Staffieris") in the above-referenced action, respectfully represents as follows:

1. I am a member of the Pennsylvania bar and I was admitted *pro hac vice* in the above-captioned litigation. I have practiced law since 1983. During the course of my legal career, I have had extensive litigation and trial experience.

2. I make this affidavit in support of the Staffieris' request for attorneys' fees and costs in the above-captioned litigation. In its October 24, 2012 Post-Trial Order (the "Order"), the Court granted the Staffieris' request for an award of attorneys' fees and costs. *See* Order at 11.

3. The Staffieris' attorneys' fees and expenses incurred for services rendered by my firm through November 21, 2012, were as follows:

Service Provider	Attorneys' Fees	Expenses	Total
Sharon Cherry, Esquire	\$113,999.00	N/A	\$113,999.00

In addition, I expect the Staffieris to incur further fees and costs in litigating this fee petition as well as any appeals.

4. During the pendency of this litigation, the rate that I charged the Staffieris was \$300 per hour. To date, I have worked 380 hours on the above-captioned litigation. *See* Ex. A.

I believe that that rate is consistent with a competitive rate for attorneys of similar experience and standing in the profession practicing in Pennsylvania as well as in Delaware.

5. The fees and costs were and will be incurred in successfully prosecuting the above-captioned litigation. The successful litigation included and will include services in communicating with the clients, conducting research regarding the Staffieris' claims, drafting pleadings, settlement efforts, meeting with retained experts, significant discovery, pretrial briefing, a two-day trial, post-trial briefing, further briefing on the instant fee petition, and a potential appeal.

6. I believe that this fee and cost request is reasonable and in compliance with Rule 1.5 of the Rules of Professional Conduct.


Sharon Cherry

Dated: December 5, 2012

Sworn and subscribed to before me
this 5 day of December, 2012.



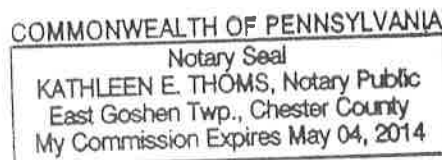


Exhibit A

CHERRY FIEGER & CHERRY, P.C.
ATTORNEYS AND COUNSELLORS AT LAW

11 EAST SECOND STREET
MEDIA, PENNSYLVANIA 19063
(610) 565-8300

FILE #: SMC 2 - 2012

BILL #: 1

BILLING ATTORNEY: SMC

BILLING DATE: 9-7-12

TO: GARY STAFFIERI AND
ADRIA CHARLES STAFFIERI
100 Sackville Mills Lane
Wallingford, Pennsylvania 19086

SEE ATTACHED INVOICE

MATTER:

GARY STAFFIERI – ADRIA CHARLES STAFFIERI v. BLACKS, BUCHTA, et. al.

Totals Per Attached Pages

Page 2 61 hours 5 minutes

Page 3 38 hours 40 minutes

Page 4 31 hours 35 minutes

Page 5 35 hours 20 minutes

Page 6 40 hours 25 minutes

Sub-Total 205 hours 125 minutes = 207 hours 5 minutes
Hourly Rate X \$ 300.00 per hour

Total Due \$ 62,125.00

Remit payment to "Sharon M. Cherry, Esquire"

Thank you

Staffieri-Invoice

		Hours	Minutes
1/24/2012	inspection of property; meeting with Staffieris to review case and documents; review of deeds	7	50
2/26/2012	Legal research	4	20
2/27/2012	Review of Deeds and documents, letter to Title Company	4	25
2/1/2012	Meeting with Staffieris review of further documentation obtained from Recorder of Deeds	3	5
2/2/2012	Review of documents; phone call with Deldot engineer in re entrance permit	3	50
2/4/2012	Review of corresp. from Title Company, preparation of response; draft of letter to Rich Abbott	4	5
2/6/2012	Revisions to letters to Title Company and Rich Abbott	1	5
2/7/2012	Legal research in re action to quiet title	2	55
2/9/2012	Phone call with Staffieri; draft of Complaint	8	15
2/13/2012	Revisions to Complaint	2	45
2/14/2012	Revisions to Complaint		55
2/16/2012	Revisions to Complaint; phone call with Staffieris	3	5
2/21/2012	Phone call with Kirk Karagelian		30
2/23/2012	Legal research; revisions to complaint; phone call with Staffieri	4	15
2/27/2012	Phone call with Kirk Karagelian; legal research	1	5
2/28/2012	Phone call with Jim Smith from Land Use; revisions to Complaint	2	20
2/29/2012	Met with surveyor at property; legal research	6	20

Total time this page = 61 hours 5 minutes

		Hours	Minutes
3/2/2012	Legal research covenant running with land, revision to Complaint	2	35
3/5/2012	Phone call with Kirk Karagelian;		50
2/9/2012	Review email from Jim Smith; legal research; response to email		30
4/4/2012	Met with surveyor; legal research	3	15
4/5/2012	Phone call with K. Karagelian; phone call with A. Staffieri		30
4/19/2012	Phone call with K. Karagelian, Esquire		10
4/20/2012	Preparation draft Memorandum of Law in re easement appurtenant	7	55
4/23/2012	Preparation of Memo of Law	1	50
4/24/2012	Review of Defendant's Answer to Complaint and Answer to Motion to Expedite; Attendance at conference with Vice Chancellor Laster	2	50
5/1/2012	Preparation of Answer to Counterclaim	1	15
5/2/2012	Preparation of Answer to Counterclaim	7	45
5/7/2012	Review of Answer to Pro Hac Vice Motion and case law; telephone call with K. Karagelian	1	20
5/9/2012	phone conversation with K. Karagelian; phone call Jim Smith; phone call with Ryan Newall, Esquire; phone call with Staffieri		45
5/11/2012	Meeting with Joe Wolcott and Staffieris	4	
5/12/2012	Phone call with Mrs. Miller		30
5/14/2012	Phone call with Surveyor		30
5/15/2012	Phone call with Surveyor		30
5/16/2012	Correspondence Joe Wolcott, Esquire		20
5/17/2012	Draft of Amended Complaint; correspond Joe Wolcott		25
5/18/2012	Motion for Alternative Service		55

Total time this page = 38 hours 40 minutes

		Hours	Minutes
5/21/2012	Phone conversation with A.Staffieri; phone call with Joe Wolcott Motion Amend Complaint revisions	5	25
5/23/2012	Phone call Joe Wolcott; revisions Amended Complaint		55
5/24/2012	Phone call Joe Wolcott Alternate Service & Amend Comp		10
5/25/2012	Phone call with Joe Wolcott-re stipulation, review of stipulation, phone call with Mike Paraskewich, legal research piercing corporate veil, preparation of subpoena NCC Land Use	2	5
6/01/2012	Phone call Joe Wolcott		15
6/04/2012	Review of Motion filed by draft of letter to VC Laster, phone call with Joe Wolcott	1	5
6/05/2012	phone call with Joe Wolcott, phone call with VC Laster		30
6/06/2012	phone call with Joe Wolcott, phone call with Mike Paraskewich, review of Miller fax, draft of letter to Millers, preparation of Affidavit of Service	1	5
6/07/2012	phone call with Joe Wolcott		5
6/11/2012	phone call with Joe Wolcott in re service 10 minutes		10
6/12/2012	met Gary Staffieri at office at 12:30, met with Mike Paraskewich 1:30-3 pm return to office at 3:45	2	30
6/13/2012	Staffieri –research Motion Sum Judgment telephone call to Mr. Miller	1	40
6/14/2012	Phone call with Joe Wolcott, Phone call with M. Woloshin, sent Mel survey via email		25
6/15/2012	Phone call Joe Wolcott, phone call with clients, phone call with Joe Wolcott legal research Motion for Summary Judgment	5	40
6/16/2012	Preparation of Motion Summary Judgment	2	30
6/18/2012	Review of Blacks Answer to Counterclaim, Response to Counterclaim	7	5

Total time this page = 31 hours 35 minutes

		Hours	Minutes
6/21/2012	Preparation of Motion Summary Judgment	2	55
6/27/2012	Meeting at NCC Land Use (1 hour plus travel)	2	
6/27/2012	Correspondence with Joe Wolcott		10
6/28/2012	Correspondence with Joe Wolcott		10
6/29/2012	Staffieri Motion Summary Judgment, Answer to Black Counterclaim	2	55
6/29/2012	Correspondence with Joe Wolcott		10
6/30/2012	Staffieri draft of letter to Rich Abbott	1	10
7/2/2012	Phone call with Joe Wolcott		20
7/6/2012	Email NCC Land Use, phone call & fax to Alex Giribaldi		25
7/10/2012	phone call Joe Wolcott		5
7/11/2012	Answer to Black Interrogatories and Request to Produce	1	20
7/12/2012	phone call NCC Land Use		5
7/13/2012	Meeting NCC Land Use, phone call to Joe Wolcott	1	35
7/15/2012	Visit property (parked vehicles, measurements, photos)	2	
7/19/2012	phone call Joe Wolcott, phone call Staffieris		40
7/20/2012	emails to Mr. Abbott and Staffieri		20
7/20/2012	preparation of Pre-Trial Brief / Motion Summary Judgment, phone call Alex Giribaldi, Esquire	3	10
7/24/2102	prepare ltr to M. Woloshin & R. Abbott re rental income		5
7/27/2012	two phone calls NCC Land Use, phone call Staffieris; phone message Pelsa		35
7/28/2012	preparation of Motion for Summary Judgment / Pre-Trial Brief	4	
7/29/2012	visit to 1707 Concord Pike, took pictures, Motion Summary Judgment / Pre-Trial Brief	4	
7/30/2012	Motion for Summary Judgment / Pre-Trial Brief	7	
8/1/2012	phone call Joe Wolcott		10

Total time this page = 35 hours 20 minutes

		<u>Hours</u>	<u>Minutes</u>
8/2/2012	Summary Judgment / Pre-Trial Brief	8	
8/6/2012	review of email from Mr. Abbott, phone call to client		45
8/7/2012	phone call Joe Wolcott, email Mr. Abbott		25
8/8/2012	phone call Joe Wolcott		10
8/10/2012	attend depositions - Plaintiffs	9	
8/11/2012	Staffieri Motion Summary Judgment / Pre-Trial Brief	2	30
8/13/2012	Motion for Summary Judgment/pre-trial brief	4	20
8/22/2012	phone call Joe Wolcott		5
8/24/2012	letter to Millers, phone call to Joe Wolcott, review email from Mr. Abbott		25
8/28/2012	phone call Mr. Abbott , phone call Staffieris , legal research lost profits	7	5
8/29/2012	Motion for Default Judgment against Millers	1	10
8/30/2012	pre-trial brief preparation damages, interest	6	30

Total time this page = 40 hours 25 minutes

CHERRY FIEGER & CHERRY, P.C.
ATTORNEYS AND COUNSELLORS AT LAW

11 EAST SECOND STREET
MEDIA, PENNSYLVANIA 19063
(610) 565-8300

FILE # _____

BILL # _____

BILLING ATTORNEY _____

BILLING DATE _____

TO: GARY STAFFIERI AND
ADRIA CHARLES STAFFIERI
100 Sackville Mills Lane
Wallingford, Pennsylvania 19086

SEE ATTACHED INVOICE

MATTER:

GARY STAFFIERI – ADRIA CHARLES STAFFIERI v. BLACKS, BUCHTA, et. al.

Totals Per First Invoice Pages 1 to 5

Total 205 hours 125 minutes =
Hourly Rate

207 hours 5 minutes
X \$ 300.00 per hour

Sub-Total Original Invoice

\$ 62,125.00

Totals Per Supplemental Invoice

Page 1 65 hours 20 minutes

Page 2 53 hours 10 minutes

Page 3 54 hours 25 minutes

Sub-Total 172 hours 55 minutes
Hourly Rate X \$ 300.00 per hour

Total Supplemental Invoice

\$ 51,874.00

Total Original Invoice & Supplemental Invoice

\$ 113,999.00

Remit payment to "Sharon M. Cherry, Esquire"

Staffieri – Invoice – billable hours for September 1, 2012 through October 24, 2012

		<u>Hours</u>	<u>Minutes</u>
9/1/2012	Preparation of Pre-trial Brief	6	40
9/2/2012	Preparation of Pre-trial Brief	9	20
9/3/2012	Preparation for Trial	3	15
9/4/2012	Review of email from R. Abbott; review of email from R. Abbott's secretary; telephone call with Staffieri; telephone call with expert Nick Lombardi	1	10
9/5/2012	Meeting with surveyor, meeting with NCC employee James Smith	3	50
9/6/2012	Phone call with Staffieris		30
9/7/2012	Phone call with James Smith		10
9/7/2012	Phone call J. Wolcott		20
9/7/2012	Preparation of Pre-trial Brief	4	30
9/8/2012	Preparation for Pre-trial Brief	9	30
9/9/2012	Phone call J. Wolcott		15
9/9/2012	Preparation for Pre-trial Brief	7	45
9/10/2012	Meeting with Gabe Del Fabbro (1 hour 30 minutes); Deposition of Gabe Del Fabbro (50 minutes); Phone call with Joe Wolcott (30 minutes)	2	50
9/11/2012	Preparation of Pre-trial Brief (research- damages cases law)	5	15
9/12/2012	Preparation of Pre-trial Brief	3	10
9/14/2012	Depositions of Nick Lombardi and Ted and C. Lewis	6	50

Total time page 1 = 65 hours 20 minutes

		<u>Hours</u>	<u>Minutes</u>
9/18/2012	Phone call with Joe Wolcott		15
9/19/2012	Review of Defendant's Brief and Preparation of Reply Brief, phone call J. Wolcott	7	45
9/20/2012	Legal research; 2 phone calls with Joe Wolcott; preparation of Reply Brief	8	15
9/21/2012	Final revisions to Reply Brief	2	15
9/22/2012	Preparation of Exhibit List and Pre-trial Order	7	45
9/24/2012	Phone call J. Wolcott		10
9/25/2012	2 phone calls Joe Wolcott		20
9/25/2012	Video-taping demonstration of vehicle movement at 1707	2	30
9/26/2012	Preparation for trial	6	15
9/27/2012	Video taping at 1707; Review of Court Order in re Millers; preparation for trial, phone call J. Wolcott	2	45
9/28/2012	Phone call J. Wolcott, Preparation of Pre-trial Order and Preparation for Trial	2	10
9/29/2012	Preparation for trial	9	45
9/30/2012	Preparation for trial	2	15
10/1/2012	Phone call with Joe Aberle		10
10/1/2012	Phone call with Joe Wolcott		15
10/1/2012	Phone call with James Edwards		5
10/1/2012	Conference call with Joe Wolcott and Rich Abbott in re Exhibits		15

Total time page 2 = 53 hours 10 minutes

		<u>Hours</u>	<u>Minutes</u>
10/1/2012	Trial preparation	7	15
10/2/2012	Telephone call with Joe Wolcott		10
10/2/2012	Conference call with Vice Chancellor Laster		20
10/2/2012	Trial Preparation	11	30
10/3/2012	Preparation for trial; phone with Joe Walcott	12	20
10/4/2012	Trial and trial preparation	10	45
10/5/2012	Trial and trial preparation	8	45
10/12/2012	Trial – final witness Marv Redmond	2	-
10/16/2012	Phone call with Joe Wolcott re Exhibit list, Exhibit letter review		30
10/17/2012	Phone call Joe Wolcott		20
10/24/2012	Phone call Joe Wolcott		30

Total time page 3 = 54 hours 25 minutes



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GARY STAFFIERI and
ADRIA CHARLES STAFFIERI

Plaintiffs,

v.

C.A. No. 7439-VCL

HENRY BLACK and MARY LOU BLACK and
RAYMOND BUCHTA and SCOTT BLACK
BLACKBALL PROPERTIES LLC, and
PAUL MILLER AND CANDY MILLER, and
GAKIS PROPERTIES II, LLC

Defendants.

AFFIDAVIT OF K. KIRK KARAGELIAN

COMMONWEALTH OF PENNSYLVANIA)
) SS.
COUNTY OF DELAWARE)

K. Kirk Karagelian, past co-counsel for Plaintiffs Gary and Adria Charles Staffieri (the "Staffieris") in the above-referenced action, respectfully represents as follows:

1. I am a member of both the Delaware and the Pennsylvania bar. I am a partner in the law firm of Carroll & Karagelian LLP. I have practiced law since 1985 and have been barred in Delaware since 1986. During the course of my legal career, I have had extensive civil litigation and trial experience involving complex real estate and business matters. I have been AV Peer Review Rated by Martindale-Hubbell since 2007.

2. I make this affidavit in support of the Staffieris' request for attorneys' fees and costs in the above-captioned litigation. In its October 24, 2012 Post-Trial Order (the "Order"), the Court granted the Staffieris' request for an award of attorneys' fees and costs. See Order at 11.

3. The Staffieris' attorneys' fees and expenses incurred for services rendered by my firm through May 8, 2012, were as follows:

Service Provider	Attorneys' Fees	Expenses	Total
Carroll & Karagelian LLP	\$9,240.00	\$1,855.80	\$11,095.80

4. During this litigation, I charged a rate of \$300 per hour. According to the bill from my firm, I worked 30.8 hours on this case. See Ex. A. I believe that that rate is consistent

with a competitive rate for attorneys of similar experience and standing in the profession practicing in Pennsylvania as well as in Delaware.

5. The fees and costs were and will be incurred in successfully prosecuting the above-captioned litigation. The services that I provided in this litigation included services in communicating and strategizing with co-counsel, drafting the initial pleadings, drafting a motion for preliminary injunctive relief, reviewing and analyzing documents, participating in conference with Court regarding preliminary injunction, and communicating with opposing counsel.

6. I believe that this fee and cost request is reasonable and in compliance with Rule 1.5 of the Rules of Professional Conduct.


K. Kirk Karagelian

Dated: December 14, 2012

Sworn and subscribed to before me
this 14th day of December, 2012.


Notary Public

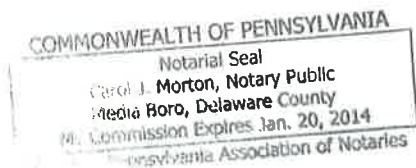


Exhibit A

CARROLL & KARAGELIAN LLP

15 W. Front Street, PO Box 1440

Media, PA 19063

610-892-9800

Fax - 610-892-0895

EIN 23-2623401

Invoice submitted to:

May 18, 2012

Mr. & Mrs. Gary Staffieri

100 Sackville Mills Lane

Wallingford, PA 19086

Invoice # 11030

Professional Services Rendered in re:

Staffieri v. Henry Black, Raymond Butcha and Blackball
Properties LLC (breach of easement)
K-4209

		<u>Hours</u>
2/20/2012	KK Review forwarded material from S. Cherry.	0.80
2/21/2012	KK Review forwarded material; telephone conference with S. Cherry.	3.40
2/27/2012	KK Telephone conference with S. Cherry; review earlier draft of Motion for Admission; prepare revised motion for admission pro hac vice.	0.90
3/2/2012	KK Review revised Complaint from S. Cherry.	1.10
3/5/2012	KK Continued review of revised Complaint; telephone conference with S. Cherry to discuss change in strategy and presentation of theories to court.	1.70
4/2/2012	KK Review file; research Delaware law regarding Chancery Court; prepare revisions to Complaint and motion pro hac vice; forward to Sharon Cherry.	3.80
4/5/2012	KK Telephone conference with S. Cherry; prepare verifications; telephone conference with Chancery Court.	0.40

<u>Hours</u>		
4/9/2012 KK	Preparation of Motion for Preliminary Injunctive Relief; review Chancery Court Rules; begin preparation of motion to expedite.	2.60
4/17/2012 KK	Revise Motion for Preliminary Injunction and proposed Order; finalize Motion to Expedite and proposed Order; prepare Supplemental Information Sheet under Rule 3(A).	2.70
4/18/2012 KK	Review and revise pleadings; telephone conference with Register in Chancery; finalize and file Complaint and Motion to Expedite; follow-up with process server.	2.20
4/19/2012 KK	Telephone conference with Vice Chancellor's office; telephone conference with Sharon Cherry; review of motion for Preliminary Injunction; telephone conference with Richard Abbott, Esquire; preparation of correspondence to be hand-delivered to the Millers regarding Judge's conference.	1.40
4/20/2012 KK	Coordinate service; correspondence to Vice Chancellor.	0.40
4/23/2012 KK	Correspondence to Court; review communication from R. Abbott; review survey plans; review forwarded information.	1.20
4/24/2012 KK	Preparation for, travel to and attendance at conference with Vice Chancellor Laster; post conference follow-up.	3.00
4/25/2012 KK	Follow-up on service of the Millers (avoiding service); review and respond to communications.	0.70
5/1/2012 KK	Telephone conference with Christie in Vice Chancellor Laster's office regarding scheduling order.	0.80
5/7/2012 KK	Review and revise Answer to Counterclaim.	2.20
5/8/2012 KK	Finalize revisions to Answer to Counterclaim of Black defendants and Affirmative Defenses; review Chancery Court Rules.	1.50

		Hours	
	For professional services rendered	30.80	\$9,240.00
	Additional Charges :		
4/20/2012	Parcels - service of process 6 defendants	322.80	
4/24/2012	Parking (Delaware Chancery Ct)	4.00	
4/25/2012	Joseph Tinari - delivery to Chancery Ct	59.00	
5/8/2012	Lexis Nexis File & Serve - initial filing fees (Complaint, Motion to Expedite, Motion for Preliminary Injunction, proposed Orders, Summons)	822.00	
	Court of Chancery -Register charges	150.00	
5/15/2012	Lexis Nexis File & Serve -Pro Hac Vice motion (\$300.50); Answer to Counterclaim; verifications; certificates of service; stipulation for substitution of counsel.	433.00	
	Parcels, Inc. - additional attempts of service upon Millers	65.00	
	Total costs		\$1,855.80
	✓ Total amount of this bill	4953.00 - Lexis Nexis	✓ \$11,095.80
5/18/2012	Payment from IOLTA account	300.50 - Lexis Nexis	(\$2,500.00)
	Total payments and adjustments	Pro Hac Vice motion	(\$2,500.00)
	Balance due		\$8,595.80

For services rendered through **May 8, 2012**. NOTE: Additional time or disbursements, if any, will be billed subsequently. Balance may not reflect payments after "Invoice Through" date as referenced above.

PLEASE RETURN COPY OF BILL WITH PAYMENT

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GARY STAFFIERI and
ADRIA CHARLES STAFFIERI

Plaintiffs,

v.

C.A. No. 7439-VCL

HENRY BLACK and MARY LOU BLACK and
RAYMOND BUCHTA and SCOTT BLACK
BLACKBALL PROPERTIES LLC, and
PAUL MILLER AND CANDY MILLER, and
GAKIS PROPERTIES II, LLC

Defendants.

AFFIDAVIT OF JOSIAH R. WOLCOTT

STATE OF DELAWARE)
) SS.
COUNTY OF NEW CASTLE)

Josiah R. Wolcott, counsel for Plaintiffs Gary and Adria Charles Staffieri (the “Staffieris”) in the above-referenced action, respectfully represents as follows:

1. I am a member of the Delaware bar and am associated with the law firm of Connolly Gallagher LLP (“CG”), where I have practiced since September 3, 2012. Prior to that I was associated with the law firm of Connolly Bove Lodge & Hutz LLP (“CBLH”), where I practiced between September of 2006 through August of 2012.

2. I make this affidavit in support of the Staffieris’ request for attorneys’ fees and costs in the above-captioned litigation. In its October 24, 2012 Post-Trial Order (the “Order”), the Court granted the Staffieris’ request for an award of attorneys’ fees and costs. *See* Order at 11.

3. The Staffieris’ attorneys’ fees and expenses incurred for services rendered and disbursements posted through December 11, 2012, were as follows:

Service Provider	Attorneys’ Fees	Expenses	Total
Connolly Bove Lodge & Hutz LLP ¹	\$9,625.00	\$2,710.87	\$12,335.87
Connolly Gallagher LLP ²	\$17,495.00	\$4,453.73	\$21,948.73
Sub-Totals	\$27,120.00	\$7,164.60	
Total			\$34,284.60

¹ See Ex. A.

² See Ex. B.

In addition, I expect the Staffieris to incur further fees and costs in litigating this fee petition as well as any appeals.

4. During the pendency of this litigation, as an associate at both CBLH and CG, my normal hourly billing rate ranged from \$285 to \$345 per hour. The rate that I charged the Staffieris was reduced to \$250 per hour. I believe that that rate is consistent with a competitive rate for attorneys of similar experience and standing in the profession practicing in Delaware.

5. The fees and costs were and will be incurred in successfully prosecuting the above-captioned litigation. The successful litigation included and will include services in communicating with the clients, settlement efforts, significant discovery, pretrial briefing, a two-day trial, post-trial briefing, further preparation of the instant fee petition, and a potential appeal.

6. I believe that this fee and cost request is reasonable and in compliance with Rule 1.5 of the Rules of Professional Conduct.



Josiah R. Wolcott

Dated: December 21, 2012

Sworn and subscribed to before me
this 21st day of December, 2012.



Shirley Anne Jones
Notary Public State of Delaware
My Commission Expires Nov. 8, 2013

Exhibit A

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Billed Through 06/30/12
Invoice Date July 19, 2012
Invoice Number 404737

Client Number 33574 MBW

Easement Litigation

Our file number 33574-00001

FOR PROFESSIONAL SERVICES RENDERED

05/10/12	JW	Reviewed pleadings.	1.30 hrs	250.00 /hr	325.00
05/11/12	RN	Initial meeting with Adria and Gary Staffieri (NO CHARGE)	1.70 hrs	0.00 /hr	N/C
05/11/12	JW	Met with G. Staffieri, A. Staffieri and S. Cherry re: litigation; reviewed pleadings; spoke with K. Karagelian re: status.	3.80 hrs	0.00 /hr	N/C
05/14/12	JW	Spoke with K. Karagelian re: substitution of counsel; drafted same; finalized same for filing; reviewed pleadings.	1.60 hrs	250.00 /hr	400.00
05/15/12	JW	Reviewed pleadings and other documents; spoke with G. Staffieri re: status and representation.	1.20 hrs	0.00 /hr	N/C
05/16/12	JW	Reviewed correspondence from S. Cherry; corresponded with S. Cherry.	0.50 hrs	0.00 /hr	N/C
05/17/12	JW	Spoke with R. Abbott re: case; corresponded with S. Cherry re: files; reviewed correspondence from S. Cherry.	1.00 hrs	250.00 /hr	250.00
05/18/12	JW	Met with G. Staffieri re: files.	0.30 hrs	0.00 /hr	N/C
05/20/12	JW	Reviewed motion to amend complaint and other documents.	0.70 hrs	250.00 /hr	175.00
05/21/12	JW	Reviewed pleadings and motion to amend; spoke with S. Cherry re: motion and other issues; corresponded with S. Cherry re: service and motion to amend.	1.60 hrs	250.00 /hr	400.00
05/23/12	JW	Spoke with S. Cherry re: status and motions; drafted motion for leave to amend complaint; research re: same.	1.80 hrs	250.00 /hr	450.00
05/24/12	JW	Drafted motion for alternative service; drafted motion to amend complaint; spoke with S. Cherry re: same.	1.80 hrs	250.00 /hr	450.00

05/25/12	JW	Finalized motion for leave to amend complaint; reviewed same; spoke with S. Cherry re: same.	2.50 hrs	250.00 /hr	625.00
05/29/12	JW	Spoke with VC Laster's chambers re: motion to amend; spoke with S. Cherry re: same; spoke with R. Abbott re: same; spoke with S. Cherry re: strategy going forward.	0.40 hrs	0.00 /hr	N/C
05/30/12	JW	Reviewed correspondence from R. Abbott; corresponded with R. Abbott re: same.	0.50 hrs	0.00 /hr	N/C
05/31/12	JW	Revised subpoena and finalized same for service; spoke with S. Cherry re: various issues; drafted stipulation re: motion to amend and briefing schedule.	2.20 hrs	250.00 /hr	550.00
06/01/12	JW	Corresponded with R. Abbott re: status; spoke with S. Cherry re: same.	0.80 hrs	250.00 /hr	200.00
06/04/12	JW	Speak with R. Abbott and K. Williams re: teleconference; spoke with S. Cherry re: same; spoke with P. Miller re: case; revised letter to Court re: scheduling.	2.30 hrs	250.00 /hr	575.00
06/05/12	JW	Spoke with S. Cherry re: teleconference; participated in teleconference; spoke with S. Cherry and A. Staffieri re: strategy.	1.80 hrs	250.00 /hr	450.00
06/06/12	JW	Spoke with S. Cherry re: status and service on Millers.	0.50 hrs	0.00 /hr	N/C
06/07/12	JW	Corresponded with K. Curtis re: exhibits to amended complaint.	0.20 hrs	0.00 /hr	N/C
06/08/12	JW	Reviewed docket; spoke with S. Cherry re: status; reviewed documents sent by S. Cherry for proof of service; spoke with S. Cherry re: service on Gakis; research re: same.	1.60 hrs	250.00 /hr	400.00
06/11/12	JW	Spoke with S. Cherry re: status of service and other issues.	0.50 hrs	250.00 /hr	125.00
06/12/12	JW	Corresponded with Court re: summons.	0.20 hrs	0.00 /hr	N/C
06/13/12	JW	Spoke with M. Woloshin re: case; spoke with S. Cherry re: status.	0.60 hrs	0.00 /hr	N/C
06/14/12	JW	Spoke with S. Cherry re: scheduling order; drafted same; corresponded with R. Abbott re: same.	0.80 hrs	250.00 /hr	200.00
06/15/12	JW	Corresponded with R. Abbott re: scheduling order; reviewed same.	0.50 hrs	250.00 /hr	125.00
06/18/12	JW	Revised scheduling order; corresponded with R. Abbott re: same.	0.60 hrs	250.00 /hr	150.00
06/20/12	JW	Reviewed statute re: service; spoke with K. Dunn re: service on Gakis.	0.30 hrs	250.00 /hr	75.00
06/21/12	JW	Corresponded with S. Cherry re: status.	0.30 hrs	250.00 /hr	75.00

06/22/12	JW	Reviewed letter from M. Woloshin.	0.30 hrs	0.00 /hr	N/C
06/25/12	JW	Corresponded with S. Cherry re: subpoena responses; corresponded with R. Abbott re: same and other issues.	0.60 hrs	250.00 /hr	150.00
06/26/12	JW	Corresponded with R. Abbott re: various issues; corresponded with M. Woloshin re: scheduling order; drafted letter to VC Laster re: scheduling order.	0.80 hrs	250.00 /hr	200.00
06/27/12	JW	Corresponded with S. Cherry re: letters and status.	0.40 hrs	250.00 /hr	100.00
06/28/12	JW	Corresponded with S. Cherry re: status; drafted letter to T. Gakis re: service of amended complaint.	0.50 hrs	0.00 /hr	N/C
06/29/12	JW	Reviewed discovery responses from R. Abbott; corresponded with S. Cherry re: same.	0.40 hrs	250.00 /hr	100.00

Total fees for this matter \$6,550.00

TIMEKEEPER SUMMARY

JW	Joe Wolcott	26.20 hrs	250.00 /hr	6,550.00
JW	Joe Wolcott	9.00 hrs	0.00 /hr	N/C
RN	Ryan Newell	1.70 hrs	0.00 /hr	N/C
		<u>36.90 hrs</u>		<u>\$6,550.00</u>

DISBURSEMENTS

05/23/12	Services rendered - - Shamrock Printing Company	430.00
06/05/12	Services rendered - - Brandywine Process Servers	45.00
06/13/12	Services rendered - - Diane G. McGrellis	75.00
06/14/12	LexisNexis File & Serve - - LexisNexis	68.50
06/14/12	LexisNexis File & Serve - - LexisNexis	148.00
06/22/12	Services rendered - - Parcels, Inc.	5.00
06/29/12	Services rendered - - Brandywine Process Servers	180.00
06/29/12	Westlaw charges	87.19
06/30/12	Postage	97.56
06/30/12	Photocopies	266.70

Total disbursements for this matter \$1,402.95

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Billed Through 07/31/12
Invoice Date August 8, 2012
Invoice Number 405799
Client Number 33574 MBW

Easement Litigation

Our file number 33574-00001

FOR PROFESSIONAL SERVICES RENDERED

07/02/12	JW	Reviewed letter to R. Abbott; spoke with S. Cherry re: same and other issues.	0.90 hrs	0.00 /hr	N/C
07/09/12	JW	Reviewed reply to counterclaim and prepared same for filing.	0.80 hrs	250.00 /hr	200.00
07/10/12	JW	Reviewed and finalized reply to counterclaims; spoke with S. Cherry re: same.	0.90 hrs	0.00 /hr	N/C
07/12/12	JW	Reviewed letter from R. Abbott and response by S. Cherry; corresponded with S. Cherry re: same.	0.30 hrs	250.00 /hr	75.00
07/13/12	JW	Reviewed and finalized discovery and other things.	1.70 hrs	250.00 /hr	425.00
07/16/12	JW	Corresponded with M. Woloshin and R. Abbott re: documents responsive to subpoena.	0.30 hrs	0.00 /hr	N/C
07/19/12	JW	Spoke with S. Cherry re: status; spoke with R. Abbott re: potential settlement.	1.10 hrs	250.00 /hr	275.00
07/24/12	JW	Reviewed letter from S. Cherry; corresponded with S. Cherry re: same.	0.30 hrs	0.00 /hr	N/C
07/26/12	JW	Reviewed letter to M. Woloshin; corresponded with M. Woloshin re: same.	0.30 hrs	0.00 /hr	N/C
07/26/12	NCG	Confer with J. Wolcott re letter for client; draft letter to defendant's counsel re Answer filing	0.20 hrs	0.00 /hr	N/C
07/31/12	JW	Spoke with M. Woloshin re: status.	0.30 hrs	0.00 /hr	N/C
Total fees for this matter					\$975.00

TIMEKEEPER SUMMARY

33574
Gary and Adria Staffieri

Page 2
Invoice Number 405799

JW	Joe Wolcott	3.90 hrs	250.00 /hr	975.00
JW	Joe Wolcott	3.00 hrs	0.00 /hr	N/C
NCG	N. Christopher Griffiths	0.20 hrs	0.00 /hr	N/C
		7.10 hrs		<u>\$975.00</u>

DISBURSEMENTS

07/01/12	Clerical Support	67.26
07/06/12	LexisNexis File & Serve - - LexisNexis	390.00
07/06/12	LexisNexis File & Serve - - LexisNexis	126.00
07/15/12	Clerical Support	40.36
07/18/12	Services rendered - - InterCall	40.80
07/30/12	Westlaw charges	30.10
07/31/12	Photocopies	21.30
	Total disbursements for this matter	<u>\$715.82</u>

BILLING SUMMARY

TOTAL FEES	\$975.00
COURTESY DISCOUNT PER BILLING ATTORNEY	(\$97.50)
TOTAL DISBURSEMENTS	<u>\$715.82</u>
TOTAL CHARGES FOR THIS BILL	\$1,593.32
PAST DUE BALANCE	\$3,297.95
TOTAL BALANCE NOW DUE THIS MATTER	<u><u>\$4,891.27</u></u>

33574
Gary and Adria Staffieri

Page 4
Invoice Number 404737

BILLING SUMMARY

TOTAL FEES	\$6,550.00
<i>COURTESY DISCOUNT PER BILLING ATTORNEY</i>	<i>(\$655.00)</i>
TOTAL DISBURSEMENTS	\$1,402.95
<i>LESS TRUST APPLIED</i>	<i>(\$4,000.00)</i>
TOTAL CHARGES FOR THIS BILL	\$3,297.95
TOTAL BALANCE NOW DUE THIS MATTER	\$3,297.95

BEGINNING TRUST ACCOUNT BALANCE	\$4,000.00
<i>TRUST AMOUNT APPLIED TO THIS BILL</i>	<i>(\$4,000.00)</i>
ENDING TRUST BALANCE	\$0.00

CONNOLLY BOVE LODGE & HUTZ LLP

267 E. Main Street
Newark, Delaware 19711
Telephone (302) 658-9141
Fax (302) 658-5614

Federal E.I.N. 51-0095196

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date October 8, 2012

Client Number 33574 MBW

RE: Easement Litigation

Our file number 33574-00001

Our records indicate that the following invoice(s) are outstanding. Please disregard this statement if payment has been made.

<u>INV NUMBER</u>	<u>INV DATE</u>	<u>ORIG. INV AMOUNT</u>	<u>PAYMENTS/ CREDITS</u>	<u>BALANCE DUE</u>
404737	07/19/12	\$7,297.95	\$4,000.00	\$3,297.95
405799	08/08/12	\$1,593.32	\$0.00	\$1,593.32
408529	09/18/12	\$2,692.10	\$0.00	\$2,692.10
409210	09/27/12	\$550.50	\$0.00	\$550.50
TOTAL BALANCE NOW DUE				<u>\$8,133.87</u>

Please mail all checks and money orders to the following address:

Connolly Bove Lodge & Hutz LLP
ATTN: Accounts Receivable
1007 North Orange Street P.O. Box 2207
Wilmington, Delaware 19899

Electronic Payments:

Bank Name:
Bank Address:
Account Name:
Account No:
ABA Routing No:
Int'l Swift Code:

Wire Instructions:

Bank of America, N.A.
100 W. 33rd St. New York, NY 10001
Connolly Bove Lodge & Hutz LLP
383007327306
026009593
BOFAUS3N

ACH Instructions:

Bank of America, N.A.
100 W. 33rd St. New York, NY 10001
Connolly Bove Lodge & Hutz LLP
383007327306
031202084
Not Applicable

Exhibit B

CONNOLLY GALLAGHER LLP

The Brandywine Building
1000 West Street, Suite 1400
Wilmington DE 19801

(302) 757-7300

Federal ID #: 45-5440339

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date: October 11, 2012
Statement No. 147
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
09/07/2012	JRW	Spoke with S. Cherry re: representation and status.	0.40	100.00
09/09/2012	JRW	Corresponded with S. Cherry re: upcoming depositions.	0.30	n/c
09/10/2012	JRW	Spoke with S. Cherry re: status.	0.60	150.00
09/12/2012	JRW	Corresponded with S. Cherry re: compendium.	0.20	n/c
	JRW	Corresponded with R. Abbott re: deposition schedule.	0.30	n/c
09/14/2012	JRW	Reviewed pretrial brief; corresponded with S. Jones re: status.	0.80	n/c
09/17/2012	JRW	Reviewed pre-trial opening brief.	1.20	300.00
09/18/2012	JRW	Finalized pretrial opening brief and affidavit; drafted courtesy copy letter to VC Laster; spoke with S. Cherry re: brief; organized same with A. Staffieri.	3.90	975.00
09/19/2012	JRW	Spoke with S. Cherry re: status; corresponded with S. Cherry re: Blacks' brief and motion for default judgment.	0.70	175.00
09/20/2012	JRW	Drafted motion for default judgment; spoke with S. Cherry re: same and other issues.	1.20	300.00
09/24/2012	GP	File Brief and attachments on Lexis/Nexis	0.80	120.00
	JRW	Reviewed and revised pretrial answering brief; spoke with S. Cherry re: same; finalized same for filing.	3.20	800.00
09/25/2012	JRW	Corresponded with S. Cherry re: exhibit list; reviewed draft pretrial order; corresponded with R. Abbott re: same; drafted motion for entry of default judgment; spoke with S. Cherry re: same.	1.80	450.00
09/27/2012	JRW	Spoke with S. Cherry re: default judgment against Millers and other issues.	0.80	200.00
09/28/2012	JRW	Reviewed and revised pretrial order; spoke with R. Abbott re: same; spoke with S. Cherry re: same.	2.50	625.00

Gary and Adria Staffieri
Account No. 33574.0000
RE: Easement Litigation

Statement Date: 10/11/2012
Statement No. 147
Page No. 2

	<u>Hours</u>	
For Current Services Rendered	17.10	4,195.00
Total Non-billable Hours	1.60	

	Recapitulation		
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Joe Wolcott	16.30	\$250.00	\$4,075.00
Gina Price	0.80	150.00	120.00

Expenses

09/19/2012	Outside Printing; (62.00) Shamrock Printing Company - Invoice #48010	96.00
09/26/2012	Outside Printing; (5.00) Reliable Wilmington - Invoice #WL036328	258.41
09/26/2012	Courier/Messenger - (5.00) Reliable Wilmington - Invoice #WL036350	5.00
	Total Expenses	359.41
	Total Current Work	4,554.41
	Balance Due	<u>\$4,554.41</u>

CONNOLLY GALLAGHER LLP

The Brandywine Building
1000 West Street, Suite 1400
Wilmington DE 19801

(302) 757-7300

Federal ID #: 45-5440339

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date: November 7, 2012
Statement No. 368
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
10/01/2012	JRW	Spoke with S. Cherry re: several issues; spoke with Register re: technology; drafted subpoenas; participated in teleconference re: exhibits.	3.20	800.00
10/02/2012	JRW	Participated in pretrial teleconference; spoke with S. Cherry re: various issues; drafted motion for default judgment against Gakis; reviewed and revised draft list of facts admitted without formal proof; reviewed and revised final joint trial exhibit list.	3.50	875.00
10/03/2012	JRW	Reviewed and finalized motion for default judgment against Gakis; reviewed and finalized joint trial exhibits; reviewed and finalized amended pretrial order re: facts admitted without formal proof; conferred with court staff re: technology; spoke with S. Cherry re: various issues.	4.00	1,000.00
10/04/2012	JRW	Prepared for and attended trial.	9.00	2,250.00
10/05/2012	JRW	Prepared for and attended trial.	5.50	1,375.00
10/09/2012	JRW	Corresponded with R. Abbott re: hearing on Friday.	0.30	n/c
10/12/2012	JRW	Attended final testimony for trial; conferred with R. Abbott and S. Cherry re: exhibits.	1.30	325.00
10/15/2012	JRW	Drafted letter to VC Laster re: trial exhibit list; revised final joint trial exhibit list.	1.20	300.00
10/16/2012	JRW	Reviewed and revised letter re: exhibits; spoke with S. Cherry re: same; corresponded with R. Abbott re: same.	0.90	225.00
10/17/2012	JRW	Revised letter to VC Laster; spoke with S. Cherry re: same; corresponded with R. Abbott re: same.	0.90	225.00
10/18/2012	JRW	Corresponded with G. Price re: filing.	0.30	n/c
10/23/2012	JRW	Corresponded with S. Cherry re: default judgment against Millers.	0.20	50.00

Gary and Adria Staffieri
Account No. 33574.0000
RE: Easement Litigation

Statement Date: 11/07/2012
Statement No. 368
Page No. 2

			Hours	
10/24/2012	JRW	Reviewed post-trial order; spoke with S. Cherry re: same.	0.80	200.00
10/31/2012	JRW	Conferred with M. Walton re: attorneys fees affidavit.	0.30	n/c
		For Current Services Rendered	30.50	7,625.00
		Total Non-billable Hours	0.90	

	Recapitulation		
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Joe Wolcott	30.50	\$250.00	\$7,625.00

Expenses

09/14/2012	Overtime - Secretarial	107.62
09/18/2012	Overtime - Secretarial	107.62
10/01/2012	Filing Fees - (64.00) LexisNexis - File & Serve - Inv# 2012090695233701	201.00
10/01/2012	Outside Printing; (62.00) Shamrock Printing Company - Invoice #48047	10.00
10/03/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/3/12	4.00
10/03/2012	Process Service; (112.00) Brandywine Process Servers, Ltd. - Service on James Smith and Joe Aberle (NCC Land Use) - Invoice #105407	65.00
10/03/2012	Courier/Messenger - (5.00) Reliable Wilmington - Invoice #WL036498	5.00
10/04/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/4/12	11.00
10/05/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/5/12	4.00
10/05/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/5/12	11.00
10/05/2012	Outside Printing; (5.00) Reliable Wilmington - Invoice #WL036544	2,186.96
10/17/2012	Transcripts - (94.00) Jeanne Cahill, RDR, CRR Court's Comments - Invoice #2092	50.00
10/23/2012	Courier/Messenger - (5.00) Reliable Wilmington - Invoice #WL036913	5.00
	Total Expenses	2,768.20
	Total Current Services	10,393.20
	Previous Balance	\$4,554.41
	Balance Due	<u>\$14,947.61</u>

CONNOLLY GALLAGHER LLP

Primary Tmkpr: Max B. Walton Return To: _____

Reviewed By: _____ Review Date: _____

Notes: _____

☐ On Hold - Do not Bill

☐ Reprint New Prebill
After Edits

☐ Released to Bill
After Edits

☐ Apply Trust Funds

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date: December 11, 2012
Statement No. 797
Account No. 33574.00001
Page: 1

PREBILL

RE: Easement Litigation

Interim Statement

Fees

			Rate	Hours		
11/05/2012	JRW	Reviewed motion for reargument.	250.00	1.20	300.00	33
11/06/2012	JRW	Reviewed motion for reargument; research re: same; drafted response.	250.00	3.20	800.00	34
11/07/2012	JRW	Drafted response in opposition to motion for reargument; spoke with S. Cherry re: same; reviewed orders.	250.00	6.50	1,625.00	35
11/12/2012	JRW	Research re: affidavit for attorneys' fees.	250.00	0.90	225.00	36
11/13/2012	JRW	Spoke with R. Abbott re: status and settlement; drafted fee affidavit; spoke with S. Cherry re: same.	250.00	1.50	375.00	37
11/15/2012	JRW	Drafted fee affidavits; corresponded with S. Cherry re: same.	250.00	0.70	175.00	38
11/16/2012	JRW	Drafted fee affidavits; spoke with S. Cherry re: same and appeal deadline.	250.00	1.30	325.00	39
11/19/2012	JRW	Reviewed and revised fee affidavits.	250.00	0.80	200.00	40
11/20/2012	JRW	Revised and finalized fee affidavits.	250.00	0.70	175.00	41
11/21/2012	JRW	Spoke with A. Staffieri re: status and settlement; corresponded with R. Abbott re: same.	250.00	0.50	125.00	42
11/30/2012	JRW	Conferred with A. Staffieri re: settlement; spoke with S. Cherry re: same; revised fee affidavits.	250.00	1.20	300.00	43
12/03/2012	JRW	Spoke with S. Cherry re: status; reviewed emails from S.				

Gary and Adria Staffieri

Page: 2
12/11/2012
Account No: 33574-00001M
Statement No: 797

Easement Litigation

			Rate	Hours		
		Cherry and A. Staffieri.	250.00	1.00	250.00	44
12/04/2012	JRW	Reviewed email from A. Staffieri; spoke with S. Cherry re: same.	250.00	0.80	200.00	45
12/05/2012	JRW	Spoke with S. Cherry re: status; revised Staffieri fee affidavit; corresponded with A. Staffieri re: same and appeal.	250.00	0.70	175.00	46
12/10/2012	JRW	Spoke with A. Staffieri re: status; spoke with S. Cherry re: affidavit and status; spoke with K. Karagelian re: affidavit; revised same.	250.00	1.10	275.00	47
12/11/2012	JRW	Finalized fee affidavits.	250.00	0.60	150.00	48
		For Current Services Rendered		22.70	5,675.00	

Recapitulation

Timekeeper	Hours	Rate	Total
Joe Wolcott	22.70	\$250.00	\$5,675.00

Expenses

10/31/2012	Filing Fees - (64.00) LexisNexis - Invoice #2012100695233701	130.00	17
10/31/2012	Conference Call InterCall - Inv# 1741651254	44.12	20
11/19/2012	Plaintiff's Share of Storage Fee for Joint Trial Exhibits: (41.00) Register in Chancery	1,130.00	18
12/03/2012	Filing Fees - File & ServeXpress LLC - Inv# 2012110695233701	22.00	21
	Total Expenses	1,326.12	
	Total Current Services	7,001.12	
	Previous Balance	\$14,947.61	
	Balance Due	<u>\$21,948.73</u>	

Aged Due Amounts

Stmt Date	Stmt #	Billed	Due
10/11/2012	147	4,554.41	4,554.41
11/07/2012	368	10,393.20	10,393.20
			<u>14,947.61</u>

Billing History

Fees	Hours	Expenses	Finance Charge	Payments
17,495.00	70.30	4,453.73	0.00	0.00

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GARY STAFFIERI and
ADRIA CHARLES STAFFIERI

Plaintiffs,

v.

C.A. No. 7439-VCL

HENRY BLACK and MARY LOU BLACK and
RAYMOND BUCHTA and SCOTT BLACK
BLACKBALL PROPERTIES LLC, and
PAUL MILLER AND CANDY MILLER, and
GAKIS PROPERTIES II, LLC

Defendants.

AFFIDAVIT OF JOSIAH R. WOLCOTT

STATE OF DELAWARE)
) SS.
COUNTY OF NEW CASTLE)

Josiah R. Wolcott, counsel for Plaintiffs Gary and Adria Charles Staffieri (the “Staffieris”) in the above-referenced action, respectfully represents as follows:

1. I am a member of the Delaware bar and am associated with the law firm of Connolly Gallagher LLP (“CG”), where I have practiced since September 3, 2012. Prior to that I was associated with the law firm of Connolly Bove Lodge & Hutz LLP (“CBLH”), where I practiced between September of 2006 through August of 2012.

2. I make this affidavit in support of the Staffieris’ request for attorneys’ fees and costs in the above-captioned litigation. In its October 24, 2012 Post-Trial Order (the “Order”), the Court granted the Staffieris’ request for an award of attorneys’ fees and costs. *See* Order at 11.

3. The Staffieris’ attorneys’ fees and expenses incurred for services rendered and disbursements posted through December 11, 2012, were as follows:

Service Provider	Attorneys’ Fees	Expenses	Total
Connolly Bove Lodge & Hutz LLP ¹	\$9,625.00	\$2,710.87	\$12,335.87
Connolly Gallagher LLP ²	\$17,495.00	\$4,453.73	\$21,948.73
Sub-Totals	\$27,120.00	\$7,164.60	
Total			\$34,284.60

¹ See Ex. A.


² See Ex. B.

In addition, I expect the Staffieris to incur further fees and costs in litigating this fee petition as well as any appeals.

4. During the pendency of this litigation, as an associate at both CBLH and CG, my normal hourly billing rate ranged from \$285 to \$345 per hour. The rate that I charged the Staffieris was reduced to \$250 per hour. I believe that that rate is consistent with a competitive rate for attorneys of similar experience and standing in the profession practicing in Delaware.

5. The fees and costs were and will be incurred in successfully prosecuting the above-captioned litigation. The successful litigation included and will include services in communicating with the clients, settlement efforts, significant discovery, pretrial briefing, a two-day trial, post-trial briefing, further preparation of the instant fee petition, and a potential appeal.

6. I believe that this fee and cost request is reasonable and in compliance with Rule 1.5 of the Rules of Professional Conduct.



Josiah R. Wolcott (#4796)
CONNOLLY GALLAGHER LLP
267 East Main Street
Newark, Delaware 19711
(302) 888-6271
Attorney for Plaintiffs

Dated: December 21, 2012

Sworn and subscribed to before me
this 21st day of December, 2012.



Shirley Anne Jones
Notary Public State of Delaware
My Commission Expires Nov. 8, 2013

EXHIBIT A

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Billed Through 06/30/12
Invoice Date July 19, 2012
Invoice Number 404737

Client Number 33574 MBW

Easement Litigation

Our file number 33574-00001

FOR PROFESSIONAL SERVICES RENDERED

05/10/12	JW	Reviewed pleadings.	1.30 hrs	250.00 /hr	325.00
05/11/12	RN	Initial meeting with Adria and Gary Staffieri (NO CHARGE)	1.70 hrs	0.00 /hr	N/C
05/11/12	JW	Met with G. Staffieri, A. Staffieri and S. Cherry re: litigation; reviewed pleadings; spoke with K. Karagelian re: status.	3.80 hrs	0.00 /hr	N/C
05/14/12	JW	Spoke with K. Karagelian re: substitution of counsel; drafted same; finalized same for filing; reviewed pleadings.	1.60 hrs	250.00 /hr	400.00
05/15/12	JW	Reviewed pleadings and other documents; spoke with G. Staffieri re: status and representation.	1.20 hrs	0.00 /hr	N/C
05/16/12	JW	Reviewed correspondence from S. Cherry; corresponded with S. Cherry.	0.50 hrs	0.00 /hr	N/C
05/17/12	JW	Spoke with R. Abbott re: case; corresponded with S. Cherry re: files; reviewed correspondence from S. Cherry.	1.00 hrs	250.00 /hr	250.00
05/18/12	JW	Met with G. Staffieri re: files.	0.30 hrs	0.00 /hr	N/C
05/20/12	JW	Reviewed motion to amend complaint and other documents.	0.70 hrs	250.00 /hr	175.00
05/21/12	JW	Reviewed pleadings and motion to amend; spoke with S. Cherry re: motion and other issues; corresponded with S. Cherry re: service and motion to amend.	1.60 hrs	250.00 /hr	400.00
05/23/12	JW	Spoke with S. Cherry re: status and motions; drafted motion for leave to amend complaint; research re: same.	1.80 hrs	250.00 /hr	450.00
05/24/12	JW	Drafted motion for alternative service; drafted motion to amend complaint; spoke with S. Cherry re: same.	1.80 hrs	250.00 /hr	450.00

05/25/12	JW	Finalized motion for leave to amend complaint; reviewed same; spoke with S. Cherry re: same.	2.50 hrs	250.00 /hr	625.00
05/29/12	JW	Spoke with VC Laster's chambers re: motion to amend; spoke with S. Cherry re: same; spoke with R. Abbott re: same; spoke with S. Cherry re: strategy going forward.	0.40 hrs	0.00 /hr	N/C
05/30/12	JW	Reviewed correspondence from R. Abbott; corresponded with R. Abbott re: same.	0.50 hrs	0.00 /hr	N/C
05/31/12	JW	Revised subpoena and finalized same for service; spoke with S. Cherry re: various issues; drafted stipulation re: motion to amend and briefing schedule.	2.20 hrs	250.00 /hr	550.00
06/01/12	JW	Corresponded with R. Abbott re: status; spoke with S. Cherry re: same.	0.80 hrs	250.00 /hr	200.00
06/04/12	JW	Speak with R. Abbott and K. Williams re: teleconference; spoke with S. Cherry re: same; spoke with P. Miller re: case; revised letter to Court re: scheduling.	2.30 hrs	250.00 /hr	575.00
06/05/12	JW	Spoke with S. Cherry re: teleconference; participated in teleconference; spoke with S. Cherry and A. Staffieri re: strategy.	1.80 hrs	250.00 /hr	450.00
06/06/12	JW	Spoke with S. Cherry re: status and service on Millers.	0.50 hrs	0.00 /hr	N/C
06/07/12	JW	Corresponded with K. Curtis re: exhibits to amended complaint.	0.20 hrs	0.00 /hr	N/C
06/08/12	JW	Reviewed docket; spoke with S. Cherry re: status; reviewed documents sent by S. Cherry for proof of service; spoke with S. Cherry re: service on Gakis; research re: same.	1.60 hrs	250.00 /hr	400.00
06/11/12	JW	Spoke with S. Cherry re: status of service and other issues.	0.50 hrs	250.00 /hr	125.00
06/12/12	JW	Corresponded with Court re: summons.	0.20 hrs	0.00 /hr	N/C
06/13/12	JW	Spoke with M. Woloshin re: case; spoke with S. Cherry re: status.	0.60 hrs	0.00 /hr	N/C
06/14/12	JW	Spoke with S. Cherry re: scheduling order; drafted same; corresponded with R. Abbott re: same.	0.80 hrs	250.00 /hr	200.00
06/15/12	JW	Corresponded with R. Abbott re: scheduling order; reviewed same.	0.50 hrs	250.00 /hr	125.00
06/18/12	JW	Revised scheduling order; corresponded with R. Abbott re: same.	0.60 hrs	250.00 /hr	150.00
06/20/12	JW	Reviewed statute re: service; spoke with K. Dunn re: service on Gakis.	0.30 hrs	250.00 /hr	75.00
06/21/12	JW	Corresponded with S. Cherry re: status.	0.30 hrs	250.00 /hr	75.00

06/22/12	JW	Reviewed letter from M. Woloshin.	0.30 hrs	0.00 /hr	N/C
06/25/12	JW	Corresponded with S. Cherry re: subpoena responses; corresponded with R. Abbott re: same and other issues.	0.60 hrs	250.00 /hr	150.00
06/26/12	JW	Corresponded with R. Abbott re: various issues; corresponded with M. Woloshin re: scheduling order; drafted letter to VC Laster re: scheduling order.	0.80 hrs	250.00 /hr	200.00
06/27/12	JW	Corresponded with S. Cherry re: letters and status.	0.40 hrs	250.00 /hr	100.00
06/28/12	JW	Corresponded with S. Cherry re: status; drafted letter to T. Gakis re: service of amended complaint.	0.50 hrs	0.00 /hr	N/C
06/29/12	JW	Reviewed discovery responses from R. Abbott; corresponded with S. Cherry re: same.	0.40 hrs	250.00 /hr	100.00
Total fees for this matter					\$6,550.00

TIMEKEEPER SUMMARY

JW	Joe Wolcott	26.20 hrs	250.00 /hr	6,550.00
JW	Joe Wolcott	9.00 hrs	0.00 /hr	N/C
RN	Ryan Newell	1.70 hrs	0.00 /hr	N/C
		36.90 hrs		\$6,550.00

DISBURSEMENTS

05/23/12	Services rendered - - Shamrock Printing Company	430.00
06/05/12	Services rendered - - Brandywine Process Servers	45.00
06/13/12	Services rendered - - Diane G. McGrellis	75.00
06/14/12	LexisNexis File & Serve - - LexisNexis	68.50
06/14/12	LexisNexis File & Serve - - LexisNexis	148.00
06/22/12	Services rendered - - Parcels, Inc.	5.00
06/29/12	Services rendered - - Brandywine Process Servers	180.00
06/29/12	Westlaw charges	87.19
06/30/12	Postage	97.56
06/30/12	Photocopies	266.70
Total disbursements for this matter		\$1,402.95

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Billed Through 07/31/12
Invoice Date August 8, 2012
Invoice Number 405799

Client Number 33574 MBW

Easement Litigation

Our file number 33574-00001

FOR PROFESSIONAL SERVICES RENDERED

07/02/12	JW	Reviewed letter to R. Abbott; spoke with S. Cherry re: same and other issues.	0.90 hrs	0.00 /hr	N/C
07/09/12	JW	Reviewed reply to counterclaim and prepared same for filing.	0.80 hrs	250.00 /hr	200.00
07/10/12	JW	Reviewed and finalized reply to counterclaims; spoke with S. Cherry re: same.	0.90 hrs	0.00 /hr	N/C
07/12/12	JW	Reviewed letter from R. Abbott and response by S. Cherry; corresponded with S. Cherry re: same.	0.30 hrs	250.00 /hr	75.00
07/13/12	JW	Reviewed and finalized discovery and other things.	1.70 hrs	250.00 /hr	425.00
07/16/12	JW	Corresponded with M. Woloshin and R. Abbott re: documents responsive to subpoena.	0.30 hrs	0.00 /hr	N/C
07/19/12	JW	Spoke with S. Cherry re: status; spoke with R. Abbott re: potential settlement.	1.10 hrs	250.00 /hr	275.00
07/24/12	JW	Reviewed letter from S. Cherry; corresponded with S. Cherry re: same.	0.30 hrs	0.00 /hr	N/C
07/26/12	JW	Reviewed letter to M. Woloshin; corresponded with M. Woloshin re: same.	0.30 hrs	0.00 /hr	N/C
07/26/12	NCG	Confer with J. Wolcott re letter for client; draft letter to defendant's counsel re Answer filing	0.20 hrs	0.00 /hr	N/C
07/31/12	JW	Spoke with M. Woloshin re: status.	0.30 hrs	0.00 /hr	N/C

Total fees for this matter \$975.00

TIMEKEEPER SUMMARY

33574
Gary and Adria Staffieri

Page 2
Invoice Number 405799

JW	Joe Wolcott	3.90 hrs	250.00 /hr	975.00
JW	Joe Wolcott	3.00 hrs	0.00 /hr	N/C
NCG	N. Christopher Griffiths	0.20 hrs	0.00 /hr	N/C
		7.10 hrs		<u>\$975.00</u>

DISBURSEMENTS

07/01/12	Clerical Support	67.26
07/06/12	LexisNexis File & Serve - - LexisNexis	390.00
07/06/12	LexisNexis File & Serve - - LexisNexis	126.00
07/15/12	Clerical Support	40.36
07/18/12	Services rendered - - InterCall	40.80
07/30/12	Westlaw charges	30.10
07/31/12	Photocopies	21.30
	Total disbursements for this matter	<u>\$715.82</u>

BILLING SUMMARY

TOTAL FEES	\$975.00
COURTESY DISCOUNT PER BILLING ATTORNEY	(\$97.50)
TOTAL DISBURSEMENTS	<u>\$715.82</u>
TOTAL CHARGES FOR THIS BILL	\$1,593.32
PAST DUE BALANCE	\$3,297.95
TOTAL BALANCE NOW DUE THIS MATTER	<u><u>\$4,891.27</u></u>

33574
Gary and Adria Staffieri

Page 4
Invoice Number 404737

BILLING SUMMARY

TOTAL FEES	\$6,550.00
<i>COURTESY DISCOUNT PER BILLING ATTORNEY</i>	<i>(\$655.00)</i>
TOTAL DISBURSEMENTS	\$1,402.95
<i>LESS TRUST APPLIED</i>	<i>(\$4,000.00)</i>
TOTAL CHARGES FOR THIS BILL	\$3,297.95
TOTAL BALANCE NOW DUE THIS MATTER	\$3,297.95

BEGINNING TRUST ACCOUNT BALANCE	\$4,000.00
<i>TRUST AMOUNT APPLIED TO THIS BILL</i>	<i>(\$4,000.00)</i>
ENDING TRUST BALANCE	\$0.00

CONNOLLY BOVE LODGE & HUTZ LLP

267 E. Main Street
Newark, Delaware 19711
Telephone (302) 658-9141
Fax (302) 658-5614

Federal E.I.N. 51-0095196

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date October 8, 2012

Client Number 33574 MBW

RE: Easement Litigation

Our file number 33574-00001

Our records indicate that the following invoice(s) are outstanding. Please disregard this statement if payment has been made.

<u>INV NUMBER</u>	<u>INV DATE</u>	<u>ORIG. INV AMOUNT</u>	<u>PAYMENTS/ CREDITS</u>	<u>BALANCE DUE</u>
404737	07/19/12	\$7,297.95	\$4,000.00	\$3,297.95
405799	08/08/12	\$1,593.32	\$0.00	\$1,593.32
408529	09/18/12	\$2,692.10	\$0.00	\$2,692.10
409210	09/27/12	\$550.50	\$0.00	\$550.50
TOTAL BALANCE NOW DUE				<u>\$8,133.87</u>

Please mail all checks and money orders to the following address:

Connolly Bove Lodge & Hutz LLP
ATTN: Accounts Receivable
1007 North Orange Street P.O. Box 2207
Wilmington, Delaware 19899

Electronic Payments:

Bank Name:
Bank Address:
Account Name:
Account No:
ABA Routing No:
Int'l Swift Code:

Wire Instructions:

Bank of America, N.A.
100 W. 33rd St. New York, NY 10001
Connolly Bove Lodge & Hutz LLP
383007327306
026009593
BOFAUS3N

ACH Instructions:

Bank of America, N.A.
100 W. 33rd St. New York, NY 10001
Connolly Bove Lodge & Hutz LLP
383007327306
031202084
Not Applicable

EXHIBIT B

CONNOLLY GALLAGHER LLP

The Brandywine Building
1000 West Street, Suite 1400
Wilmington DE 19801

(302) 757-7300

Federal ID #: 45-5440339

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date: October 11, 2012
Statement No. 147
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
09/07/2012	JRW	Spoke with S. Cherry re: representation and status.	0.40	100.00
09/09/2012	JRW	Corresponded with S. Cherry re: upcoming depositions.	0.30	n/c
09/10/2012	JRW	Spoke with S. Cherry re: status.	0.60	150.00
09/12/2012	JRW	Corresponded with S. Cherry re: compendium.	0.20	n/c
	JRW	Corresponded with R. Abbott re: deposition schedule.	0.30	n/c
09/14/2012	JRW	Reviewed pretrial brief; corresponded with S. Jones re: status.	0.80	n/c
09/17/2012	JRW	Reviewed pre-trial opening brief.	1.20	300.00
09/18/2012	JRW	Finalized pretrial opening brief and affidavit; drafted courtesy copy letter to VC Laster; spoke with S. Cherry re: brief; organized same with A. Staffieri.	3.90	975.00
09/19/2012	JRW	Spoke with S. Cherry re: status; corresponded with S. Cherry re: Blacks' brief and motion for default judgment.	0.70	175.00
09/20/2012	JRW	Drafted motion for default judgment; spoke with S. Cherry re: same and other issues.	1.20	300.00
09/24/2012	GP	File Brief and attachments on Lexis/Nexis	0.80	120.00
	JRW	Reviewed and revised pretrial answering brief; spoke with S. Cherry re: same; finalized same for filing.	3.20	800.00
09/25/2012	JRW	Corresponded with S. Cherry re: exhibit list; reviewed draft pretrial order; corresponded with R. Abbott re: same; drafted motion for entry of default judgment; spoke with S. Cherry re: same.	1.80	450.00
09/27/2012	JRW	Spoke with S. Cherry re: default judgment against Millers and other issues.	0.80	200.00
09/28/2012	JRW	Reviewed and revised pretrial order; spoke with R. Abbott re: same; spoke with S. Cherry re: same.	2.50	625.00

Gary and Adria Staffieri
Account No. 33574.0000
RE: Easement Litigation

Statement Date: 10/11/2012
Statement No. 147
Page No. 2

	Hours	
For Current Services Rendered	17.10	4,195.00
Total Non-billable Hours	1.60	

	Recapitulation		
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Joe Wolcott	16.30	\$250.00	\$4,075.00
Gina Price	0.80	150.00	120.00

Expenses

09/19/2012	Outside Printing; (62.00) Shamrock Printing Company - Invoice #48010	96.00
09/26/2012	Outside Printing; (5.00) Reliable Wilmington - Invoice #WL036328	258.41
09/26/2012	Courier/Messenger - (5.00) Reliable Wilmington - Invoice #WL036350	5.00
	Total Expenses	359.41
	Total Current Work	4,554.41
	Balance Due	<u>\$4,554.41</u>

CONNOLLY GALLAGHER LLP

The Brandywine Building
1000 West Street, Suite 1400
Wilmington DE 19801

(302) 757-7300

Federal ID #: 45-5440339

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date: November 7, 2012
Statement No. 368
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
10/01/2012	JRW	Spoke with S. Cherry re: several issues; spoke with Register re: technology; drafted subpoenas; participated in teleconference re: exhibits.	3.20	800.00
10/02/2012	JRW	Participated in pretrial teleconference; spoke with S. Cherry re: various issues; drafted motion for default judgment against Gakis; reviewed and revised draft list of facts admitted without formal proof; reviewed and revised final joint trial exhibit list.	3.50	875.00
10/03/2012	JRW	Reviewed and finalized motion for default judgment against Gakis; reviewed and finalized joint trial exhibits; reviewed and finalized amended pretrial order re: facts admitted without formal proof; conferred with court staff re: technology; spoke with S. Cherry re: various issues.	4.00	1,000.00
10/04/2012	JRW	Prepared for and attended trial.	9.00	2,250.00
10/05/2012	JRW	Prepared for and attended trial.	5.50	1,375.00
10/09/2012	JRW	Corresponded with R. Abbott re: hearing on Friday.	0.30	n/c
10/12/2012	JRW	Attended final testimony for trial; conferred with R. Abbott and S. Cherry re: exhibits.	1.30	325.00
10/15/2012	JRW	Drafted letter to VC Laster re: trial exhibit list; revised final joint trial exhibit list.	1.20	300.00
10/16/2012	JRW	Reviewed and revised letter re: exhibits; spoke with S. Cherry re: same; corresponded with R. Abbott re: same.	0.90	225.00
10/17/2012	JRW	Revised letter to VC Laster; spoke with S. Cherry re: same; corresponded with R. Abbott re: same.	0.90	225.00
10/18/2012	JRW	Corresponded with G. Price re: filing.	0.30	n/c
10/23/2012	JRW	Corresponded with S. Cherry re: default judgment against Millers.	0.20	50.00

Gary and Adria Staffieri
Account No. 33574.0000
RE: Easement Litigation

Statement Date: 11/07/2012
Statement No. 368
Page No. 2

			Hours	
10/24/2012	JRW	Reviewed post-trial order; spoke with S. Cherry re: same.	0.80	200.00
10/31/2012	JRW	Conferred with M. Walton re: attorneys fees affidavit.	0.30	n/c
		For Current Services Rendered	30.50	7,625.00
		Total Non-billable Hours	0.90	

	Recapitulation			
Timekeeper	Hours	Rate	Total	
Joe Wolcott	30.50	\$250.00	\$7,625.00	

Expenses

09/14/2012	Overtime - Secretarial	107.62
09/18/2012	Overtime - Secretarial	107.62
10/01/2012	Filing Fees - (64.00) LexisNexis - File & Serve - Inv# 2012090695233701	201.00
10/01/2012	Outside Printing; (62.00) Shamrock Printing Company - Invoice #48047	10.00
10/03/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/3/12	4.00
10/03/2012	Process Service; (112.00) Brandywine Process Servers, Ltd. - Service on James Smith and Joe Aberle (NCC Land Use) - Invoice #105407	65.00
10/03/2012	Courier/Messenger - (5.00) Reliable Wilmington - Invoice #WL036498	5.00
10/04/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/4/12	11.00
10/05/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/5/12	4.00
10/05/2012	Parking (111.00) Josiah R. Wolcott, Esquire - Parking 10/5/12	11.00
10/05/2012	Outside Printing; (5.00) Reliable Wilmington - Invoice #WL036544	2,186.96
10/17/2012	Transcripts - (94.00) Jeanne Cahill, RDR, CRR Court's Comments - Invoice #2092	50.00
10/23/2012	Courier/Messenger - (5.00) Reliable Wilmington - Invoice #WL036913	5.00
	Total Expenses	2,768.20
	Total Current Services	10,393.20
	Previous Balance	\$4,554.41
	Balance Due	<u>\$14,947.61</u>

CONNOLLY GALLAGHER LLP

Primary Tmkpr: Max B. Walton

Return To: _____

Reviewed By: _____

Review Date: _____

Notes: _____

☐ On Hold - Do not Bill

☐ Reprint New Prebill
After Edits

☐ Released to Bill
After Edits

☐ Apply Trust Funds

Gary and Adria Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

Statement Date: December 11, 2012

Statement No. 797

Account No. 33574.00001

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PREBILL

RE: Easement Litigation

Interim Statement

Fees

			Rate	Hours		
11/05/2012	JRW	Reviewed motion for reargument.	250.00	1.20	300.00	33
11/06/2012	JRW	Reviewed motion for reargument; research re: same; drafted response.	250.00	3.20	800.00	34
11/07/2012	JRW	Drafted response in opposition to motion for reargument; spoke with S. Cherry re: same; reviewed orders.	250.00	6.50	1,625.00	35
11/12/2012	JRW	Research re: affidavit for attorneys' fees.	250.00	0.90	225.00	36
11/13/2012	JRW	Spoke with R. Abbott re: status and settlement; drafted fee affidavit; spoke with S. Cherry re: same.	250.00	1.50	375.00	37
11/15/2012	JRW	Drafted fee affidavits; corresponded with S. Cherry re: same.	250.00	0.70	175.00	38
11/16/2012	JRW	Drafted fee affidavits; spoke with S. Cherry re: same and appeal deadline.	250.00	1.30	325.00	39
11/19/2012	JRW	Reviewed and revised fee affidavits.	250.00	0.80	200.00	40
11/20/2012	JRW	Revised and finalized fee affidavits.	250.00	0.70	175.00	41
11/21/2012	JRW	Spoke with A. Staffieri re: status and settlement; corresponded with R. Abbott re: same.	250.00	0.50	125.00	42
11/30/2012	JRW	Conferred with A. Staffieri re: settlement; spoke with S. Cherry re: same; revised fee affidavits.	250.00	1.20	300.00	43
12/03/2012	JRW	Spoke with S. Cherry re: status; reviewed emails from S.				

Gary and Adria Staffieri

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12/11/2012
Account No: 33574-00001M
Statement No: 797

Easement Litigation

			Rate	Hours		
		Cherry and A. Staffieri.	250.00	1.00	250.00	44
12/04/2012	JRW	Reviewed email from A. Staffieri; spoke with S. Cherry re: same.	250.00	0.80	200.00	45
12/05/2012	JRW	Spoke with S. Cherry re: status; revised Staffieri fee affidavit; corresponded with A. Staffieri re: same and appeal.	250.00	0.70	175.00	46
12/10/2012	JRW	Spoke with A. Staffieri re: status; spoke with S. Cherry re: affidavit and status; spoke with K. Karagelian re: affidavit; revised same.	250.00	1.10	275.00	47
12/11/2012	JRW	Finalized fee affidavits.	250.00	0.60	150.00	48
		For Current Services Rendered		22.70	5,675.00	

Recapitulation

Timekeeper	Hours	Rate	Total
Joe Wolcott	22.70	\$250.00	\$5,675.00

Expenses

10/31/2012	Filing Fees - (64.00) LexisNexis - Invoice #2012100695233701	130.00	17
10/31/2012	Conference Call InterCall - Inv# 1741651254	44.12	20
11/19/2012	Plaintiff's Share of Storage Fee for Joint Trial Exhibits: (41.00) Register in Chancery	1,130.00	18
12/03/2012	Filing Fees - File & ServeXpress LLC - Inv# 2012110695233701	22.00	21
	Total Expenses	1,326.12	
	Total Current Services	7,001.12	
	Previous Balance	\$14,947.61	
	Balance Due	<u>\$21,948.73</u>	

Aged Due Amounts

Stmt Date	Stmt #	Billed	Due
10/11/2012	147	4,554.41	4,554.41
11/07/2012	368	10,393.20	10,393.20
			<u>14,947.61</u>

Billing History

Fees	Hours	Expenses	Finance Charge	Payments
17,495.00	70.30	4,453.73	0.00	0.00