

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA

SEANPAUL REYES,

Case No.: 05-2025-CA-053072

Plaintiff,

v.

PAUL SIDNEY ALFREY,

Defendant.

**DEFENDANT'S MOTION FOR DETERMINATION FOR AMOUNT OF ATTORNEY'S
FEES AND COSTS**

Defendant, PAUL SIDNEY ALFREY, by and through the undersigned counsel, hereby moves this Court pursuant to Rule 1.525, Fla. R. Civ. P. to determine award amount of attorneys' fees and costs against Plaintiffs, SEANPAUL REYES, and in support thereof state as follows:

1. Defendant was the prevailing party pursuant to the Order granting Defendant's Motion to Dismiss, with prejudice, and should therefore be awarded all of the attorneys' fees they have incurred in connection with this action.
2. The Order on Motion to Dismiss reserved ruling on Defendant's Motion for Sanctions as to Plaintiff's Amended Complaint, and further reserved as to attorney's fees and costs.
3. Pursuant to Rule 1.525, Fla. R. Civ. P., the Court should determine the amount of attorneys' fees and costs due to Defendant.
4. Defendant submits for the Court's consideration an Affidavit of Fees and Costs and an Affidavit of Reasonable Fees, attached hereto and incorporated herein as **Exhibit "A"** and **Exhibit "B"**, respectively.

5. Defendant has incurred attorney's fees and costs as a result of this Motion and Defendant expects to spend an additional 5.0 hours for preparation and attending any hearing on the same, which results in estimated additional legal fees in the amount of \$2,750.00.

WHEREFORE, Defendant respectfully requests that this Court award their reasonable attorneys' fees and costs, and such further relief as this Court deems proper.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished via US Mail to SeanPaul Reyes at 66 S. Village Drive, Bellport, NY 11713 on July 31, 2026.

WIDERMANN MALEK, PL
1990 West New Haven Avenue
Second Floor
Melbourne, FL 32904
Tel. 321-255-2332
Fax 321-255-2351
Primary email:
Scott@USLegalTeam.com
Secondary emails:
JWiderman@USLegalTeam.com
Jessica@USLegalTeam.com
CDarrall@USLegalTeam.com



Scott D. Widerman, Esquire
Florida Bar No. 585823
Jared Widerman, Esquire
Florida Bar No. 1068922
Attorneys for PAUL SIDNEY ALFREY

Exhibit "A"

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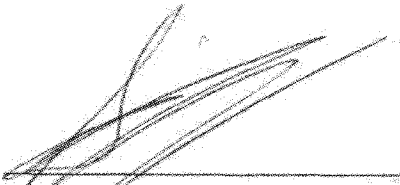
AFFIDAVIT OF ATTORNEY'S FEES

STATE OF FLORIDA
COUNTY OF BREVARD

BEFORE ME, the undersigned authority, personally appeared, SCOTT D. WIDERMANN, who, after duly swearing an oath, deposed and stated as follows:

1. My name is SCOTT D. WIDERMANN. I have been admitted to practice law in all of the Courts of the State of Florida since 2002. I am a partner in the law firm Widerman Malek, PL the firm that represents Plaintiff, PAUL SIDNEY ALFREY, in connection with this action. My firm's fee agreement with Plaintiff is hourly. My normal hourly rate is \$550.00 per hour. Other members of my firm that performed services for Plaintiff charge between \$125.00 and \$550.00 per hour.
2. Since October 15, 2025, the date on which work began in this action, my firm has spent approximately 142.00 hours in connection with trying to enforce the terms of the Asset Purchase and Receipt, which has resulted in legal fees of \$39,487.12. Additionally, Plaintiff incurred costs in the amount of \$1,675.97.
3. Therefore, the total of all fees and costs related to this action is \$41,163.09.
4. Copies of my firm's billing and cost records for this account are attached hereto and expressly incorporated herein as **Attachment "A"**.

FURTHER AFFIANT SAYETH NAUGHT.



SCOTT D. WIDERMAN

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 29th day of July 2026, by Scott D. Wideman, he ☒ is personally known to me or ☐ has produced _____ as identification.





Notary Public
Printed Name: _____
My Commission Expires: _____

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.									
9738.00003	10/17/2025	147	A	1	125.00	0.10	12.50	Docket pertinent deadline for responding to Complaint served.	ARCH
9738.00003	10/17/2025	99	A	1	275.00	0.10	27.50	Telephone conference with Attorney Widerman regarding complaint served on client and steps moving forward.	ARCH
9738.00003	10/17/2025	99	A	1	275.00	0.20	55.00	Telephone conference with Attorney Widerman regarding case status and strategy.	ARCH
9738.00003	10/21/2025	99	A	1	275.00	0.40	110.00	Telephone conference with Attorney Widerman regarding complaint and our Motion to Dismiss in response. Office conference with Attorney Hostetler regarding the same.	ARCH
9738.00003	10/21/2025	99	A	1	275.00	3.50	962.50	Office conference with Attorney Hostetler regarding the complaint and case strategy (.4). Telephone conference with Attorney Widerman regarding case strategy and Motion to Dismiss (.6). Research of case law for Motion to Dismiss (1.8). Drafting Motion to Dismiss (.7).	ARCH
9738.00003	10/21/2025	30	A	1	475.00		0.00	Office conference with attorney Jared Widerman regarding general response strategy to Complaint [.2]	ARCH
9738.00003	10/21/2025	2	A	1	550.00	1.70	935.00	Continue review of Complaint and Motion to Dismiss. Conference with Attorney J. Widerman regarding the same.	ARCH
9738.00003	10/22/2025	30	A	1	475.00	0.60	285.00	Strategy meeting with attorney Jared Widerman, breaking down Complaint and preparing points for our motion to dismiss [.6]	ARCH
9738.00003	10/22/2025	99	A	1	275.00	0.70	192.50	Discussion with Attorney Hostetler regarding strategy and tactics for Motion to Dismiss.	ARCH
9738.00003	10/22/2025	99	A	1	275.00	0.50	137.50	Office conference with Ms. Lee regarding case law research.	ARCH
9738.00003	10/23/2025	99	A	1	275.00	1.70	467.50	case law research for Motion to Dismiss.	ARCH
9738.00003	10/24/2025	99	A	1	275.00	2.00	550.00	Research for Motion to Dismiss.	ARCH
9738.00003	10/24/2025	168	A	1	175.00	1.10	192.50	Research defamation elements, case law on standards for defamation, and when punitive damages are allowed in a defamation case for Motion to Dismiss.	ARCH
9738.00003	10/27/2025	168	A	1	175.00	1.00	175.00	Continue Research for Motion to Dismiss and Florida's single publication/single action rule which prohibits multiple causes of action. (.5). Begin preparation to draft Motion to Dismiss. (.5)	ARCH
9738.00003	10/27/2025	99	A	1	275.00	2.30	632.50	Research for Motion to Dismiss. Drafting Motion to Dismiss. Telephone conference with Irene Fonzi regarding status. Office conference with Ms. Lee.	ARCH
9738.00003	10/28/2025	99	A	1	275.00	3.20	880.00	case law review and drafting Motion to Dismiss.	ARCH
9738.00003	10/28/2025	67	A	1	200.00	0.10	20.00	Office conference with Attorney Widerman, Attorney Widerman, and Ms. Darrall regarding status and strategy.	ARCH
9738.00003	10/29/2025	67	A	1	200.00	0.90	180.00	Office conference with Attorney J. Widerman regarding status. [.1] Prepare Notice of Appearance. E-file the same. [.2] Review Case Management Order. Enter Applicable Deadlines. [.6]	ARCH
9738.00003	10/29/2025	30	A	1	475.00	0.20	95.00	Office conference with attorney Jared Widerman to discuss strategy for motion to dismiss [.2]	ARCH
9738.00003	10/29/2025	99	A	1	275.00	5.80	1,595.00	Drafting Motion to Dismiss. review of Notice of Appearance.	ARCH
9738.00003	10/30/2025	99	A	1	275.00	2.20	605.00	Drafting of Motion to Dismiss.	ARCH
9738.00003	10/30/2025	2	A	1	550.00	0.70	385.00	Review Motion to Dismiss for Reyes Complaint. Conference with Attorney J. Widerman regarding the same.	ARCH
9738.00003	10/31/2025	99	A	1	275.00	1.60	440.00	revisions to Motion to Dismiss.	ARCH
9738.00003	10/31/2025	99	A	99	275.00		-3,155.00	COURTESY DISCOUNT	ARCH
9738.00003	10/31/2025	147	A	99	125.00		-12.50	COURTESY DISCOUNT	ARCH
9738.00003	11/03/2025	99	A	1	275.00	0.60	165.00	final revision to Motion to Dismiss.	ARCH
9738.00003	11/03/2025	35	A	1	500.00	1.50	750.00	Review Motion to Dismiss and office conferences	ARCH

Widerman Malek, PL

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.								
9738.00003	11/03/2025	7	A	1	275.00	2.30	632.50	ARCH
							with Ms. Sangeleer and Attorney J. Widerman regarding revisions, etc. and approve for filing [1.5].	
9738.00003	11/03/2025	147	A	1	125.00	0.20	25.00	ARCH
							Review and revise draft Motion to Dismiss in preparation with filing with the Court; office conference with Attorney J. Widerman and Attorney Frazier regarding same.	
9738.00003	11/04/2025	147	A	1	125.00	0.20	25.00	ARCH
							Finalize and E-File Motion to Dismiss. [1] Prepare and transmit correspondence to Mr. Reyes regarding Motion to Dismiss filing. [1]	
9738.00003	11/12/2025	147	A	1	125.00	0.20	25.00	ARCH
							Prepare materials to transmit Motion to Dismiss to Mr. Reyes. Transmit the same.	
9738.00003	11/18/2025	99	A	1	275.00	0.40	110.00	ARCH
							Update calendar to reflect adding Attorney Warzecha to case deadlines and tasks.	
9738.00003	11/19/2025	147	A	1	125.00	0.10	12.50	ARCH
							Research in preparation for hearing on Motion to Dismiss.	
9738.00003	11/19/2025	99	A	1	275.00	0.70	192.50	ARCH
							Review Plaintiff's Response to Motion to Dismiss.	
9738.00003	11/20/2025	147	A	1	125.00	0.30	37.50	ARCH
							Review of SeanPaul Reyes response to our Motion to Dismiss (.5). Telephone conference with Attorney Widerman regarding the same (.2).	
9738.00003	11/20/2025	67	A	1	200.00	0.20	40.00	ARCH
							Review correspondence from Mr. Alfrey. Update file with photos from the same.	
9738.00003	11/20/2025	99	A	1	275.00	2.10	577.50	ARCH
							Office conference with Attorney Widerman regarding status of Motion to Dismiss and hearing for the same and strategy moving forward.	
9738.00003	11/20/2025	2	A	1	550.00	1.70	935.00	ARCH
							Drafting Motion to Determine Standing (.5). Research of case law for motion to determine Standing (1.6).	
9738.00003	11/24/2025	99	A	1	275.00	0.20	55.00	ARCH
							Review reply to Motion to Dismiss. Conference with Attorney J. Widerman regarding evidentiary hearing on Standing.	
9738.00003	11/24/2025	67	A	1	200.00	0.20	40.00	ARCH
							Office conference with Attorney Widerman and Ms. Sangeleer regarding case status and strategy.	
9738.00003	11/24/2025	99	A	1	275.00	0.70	192.50	ARCH
							Office conference with Attorney Widerman, Attorney J. Widerman, and Ms. Sangeleer regarding Standing and Discovery related issues.	
9738.00003	11/24/2025	2	A	1	550.00	0.60	330.00	ARCH
							Revising Motion to Determine Standing.	
9738.00003	11/25/2025	7	A	1	275.00	1.20	330.00	ARCH
							Review Motion for Evidentiary hearing on Standing.	
9738.00003	11/26/2025	147	A	1	125.00	0.10	12.50	ARCH
							Conference with Attorney J. Widerman and Ms. Sangeleer regarding the same.	
9738.00003	11/26/2025	99	A	1	275.00	1.10	302.50	ARCH
							Review and revise Motion to Determine Standing.	
9738.00003	11/26/2025	99	A	1	275.00	0.30	82.50	ARCH
							Review and update file with documents from Mr. Alfrey.	
9738.00003	11/26/2025	147	A	1	125.00	0.20	25.00	ARCH
							Watching Plaintiff's YouTube video.	
9738.00003	11/26/2025	99	A	1	275.00	0.10	27.50	ARCH
							Office conference with Attorney Widerman regarding status of the case (.1). Reviewing of the revisions made by Ms. Sangeleer (.1). Office conference with Ms. Darrall regarding filing and attached exhibits (.1).	
9738.00003	11/26/2025	147	A	1	125.00	0.20	25.00	ARCH
							Begin finalizing Motion to Determine Standing.	
9738.00003	11/26/2025	99	A	1	275.00	0.10	27.50	ARCH
							Telephone conference with Mr. alfrey regarding documents needed.	
9738.00003	11/30/2025	2	A	99	550.00		-253.00	ARCH
							COURTESY DISCOUNT	
9738.00003	11/30/2025	7	A	99	275.00		-192.50	ARCH
							COURTESY DISCOUNT	
9738.00003	11/30/2025	35	A	99	500.00		-150.00	ARCH
							COURTESY DISCOUNT	
9738.00003	11/30/2025	67	A	99	200.00		-16.00	ARCH
							COURTESY DISCOUNT	
9738.00003	11/30/2025	99	A	99	275.00		-341.00	ARCH
							COURTESY DISCOUNT	
9738.00003	11/30/2025	147	A	99	125.00		-27.50	ARCH
							COURTESY DISCOUNT	
9738.00003	12/01/2025	99	A	1	275.00	0.50	137.50	ARCH
							Watched YouTube video created by opposing party.	
9738.00003	12/01/2025	147	A	1	125.00	0.50	62.50	ARCH
							Gather and finalize exhibits to be added to Motion for Hearing to Determine Standing. [2] Revise and finalize Motion for Hearing to Determine Standing. [2] E-file the same. [1]	
9738.00003	12/01/2025	2	A	1	550.00	0.40	220.00	ARCH
							Review correspondence regarding public speaking documents and issues for the same.	

Widerman Malek, PL

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Client ID 9738.00003 Alfrey Roofing, Inc.									
9738.00003	12/02/2025	67	A	1	200.00	0.70	140.00	Obtain YouTube Videos Uploaded by Plaintiff. Update file with the same. Prepare and transmit memorandum to team regarding the same.	ARCH
9738.00003	12/05/2025	99	A	1	275.00	0.10	27.50	office conference with Ms. Darrall regarding setting hearing time.	ARCH
9738.00003	12/09/2025	99	A	1	275.00	0.30	82.50	Review and respond to correspondence received from client regarding ongoing case issues. Sent to Attorney Widerman to review.	ARCH
9738.00003	12/09/2025	99	A	1	275.00	0.10	27.50	transmit correspondence to client after review by Attorney Widerman.	ARCH
9738.00003	12/09/2025	2	A	1	550.00	0.50	275.00	Review reply to correspondence from Mr. Alfrey. Conference with Attorney J. Widerman regarding reply.	ARCH
9738.00003	12/10/2025	67	A	1	200.00	0.20	40.00	Upload new youtube videos to file.	ARCH
9738.00003	12/11/2025	67	A	1	200.00	0.10	20.00	Receive Plaintiff's Response in Opposition to our Motion to Determine Standing. Update file with the same.	ARCH
9738.00003	12/11/2025	99	A	1	275.00	0.10	27.50	office conference with Attorney Widerman regarding case status and strategy.	ARCH
9738.00003	12/17/2025	99	A	1	275.00	0.40	110.00	Watching newest YouTube video and transmitting memorandum to Ms. Slaughter to download the video for the file.	ARCH
9738.00003	12/17/2025	99	A	1	275.00	0.20	55.00	Review and respond to correspondence received regarding public records request for speaker form.	ARCH
9738.00003	01/09/2026	67	A	1	200.00	0.90	180.00	E-file Notice of Hearing. Transmit the same via US Mail to Pro Se Plaintiff. [2] Prepare and transmit correspondence to Judicial Assistant, copying Pro Se Plaintiff, with a copy of the Notice of Hearing. [1] Reserve Court Reporter for Hearing. Update Calendar and enter applicable deadlines. [2] Begin preparation of hearing materials for evidentiary hearing. Prepare and transmit memo to Attorney J. Widerman regarding evidence for the same. [4]	ARCH
9738.00003	01/15/2026	67	A	1	200.00	0.10	20.00	Amend Notice of Hearing to correct year. E-file the same.	ARCH
9738.00003	01/20/2026	99	A	1	300.00	0.80	240.00	Document review and collection in preparation for hearing.	ARCH
9738.00003	01/26/2026	67	A	1	200.00	0.40	80.00	Office conference with Attorney Widerman regarding hearing on Motion to Determine Standing and evidence for the same.	ARCH
9738.00003	01/26/2026	147	A	1	200.00	0.50	100.00	Conference with Attorney Widerman and Ms. Slaughter regarding evidence for hearing on Standing.	ARCH
9738.00003	01/29/2026	99	A	1	300.00	0.10	30.00	Case status and strategy Office conference with Ms. Darrall and Attorney Widerman.	ARCH
9738.00003	01/29/2026	99	A	1	300.00	2.00	600.00	Review YouTube Videos for Time stamping mentions of Long Island Audit.	ARCH
9738.00003	01/30/2026	99	A	1	300.00	4.50	1,350.00	Reviewing videos and time stamping for hearing Prep.	ARCH
9738.00003	01/31/2026	99	A	99	300.00		-470.00	COURTESY DISCOUNT	ARCH
9738.00003	02/02/2026	147	A	1	200.00	0.40	80.00	Begin preparation of Safe-Harbor Letter and Motion for Sanctions.	ARCH
9738.00003	02/02/2026	99	A	1	300.00	0.90	270.00	Research and draft 57.105 Motion and safe harbor letter.	ARCH
9738.00003	02/02/2026	99	A	1	300.00	0.10	30.00	Office conference with Ms. Darrall regarding skeletons for draft 57.105 Motion and Safe Harbor Letter.	ARCH
9738.00003	02/03/2026	99	A	1	300.00	2.40	720.00	Revise 57.105 motion and safe harbor letter.	ARCH
9738.00003	02/03/2026	2	A	1	550.00	1.00	550.00	Review 57.105 and issues for the same. Conference with Attorney J. Widerman regarding the same.	ARCH
9738.00003	02/04/2026	99	A	1	300.00	1.00	300.00	Case law research and review of 57.105 Motion (.9). Office conference with Ms. Sangeleer to review draft motion (.1).	ARCH
9738.00003	02/04/2026	7	A	1	275.00	1.00	275.00	Review and revise Motion for Sanctions.	ARCH

Filing 253748034

SEANPAUL REYES VS PAUL ALFREY

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Widerman Malek, PL

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.									
9738.00003	02/05/2026	67	A	1	200.00	0.60	120.00	Preparation of Hearing Materials for Hearing on Motion to Determine Standing.	ARCH
9738.00003	02/11/2026	67	A	1	200.00	0.20	40.00	Office conference with Attorney J. Widerman regarding video time stamps for upcoming hearing on Standing.	ARCH
9738.00003	02/11/2026	99	A	1	300.00	0.20	60.00	Hearing Prepare Office conference with Ms. Slaughter.	ARCH
9738.00003	02/11/2026	27	A	1	200.00	2.80	560.00	Prepare multiple hearing binders and upload multiple videos to a flash drive for upcoming March 24th hearing on our Motion to Determine Standing and Motion to Dismiss. [2.8]	ARCH
9738.00003	02/16/2026	99	A	1	300.00	0.50	150.00	Revise 57.105 motion and safe-harbor letter.	ARCH
9738.00003	02/16/2026	147	A	1	200.00	0.20	40.00	Finalize 57.105 Letter to be sent to Mr. Reyes. Transmit the same via email, US Mail, and Certified Mail.	ARCH
9738.00003	02/17/2026	67	A	1	200.00	0.10	20.00	Review Response from Defendant. Update file with th same.	ARCH
9738.00003	02/17/2026	147	A	1	200.00	0.10	20.00	Update calendar with deadline for Plaintiff to respond to 57.105.	ARCH
9738.00003	02/24/2026	99	A	1	300.00	1.00	300.00	Watching youTube Videos and timestamping for hearing Prep.	ARCH
9738.00003	02/25/2026	99	A	1	300.00	0.60	180.00	Watching youTube Videos and timestamping for hearing Prep. draft and transmit memorandum to Ms. Slaughter regarding the same.	ARCH
9738.00003	02/25/2026	147	A	1	200.00	0.20	40.00	Conference with Attorney Widerman regarding hearing materials on Motion to Determine Standing.	ARCH
9738.00003	02/25/2026	67	A	1	200.00	0.60	120.00	Office conference with Attorney Widerman regarding hearing materials and needs for hearing. [2] Update hearing materials to include Sanctions Motion Case Law. [2] Review and revise Notice of Hearing for future filing to include Sanctions. [1] Prepare cover letter to Judge regarding hearing materials. [1]	ARCH
9738.00003	02/25/2026	2	A	1	550.00	0.70	385.00	Conference with staff and review of evidence binder in preparation for hearing.	ARCH
9738.00003	02/28/2026	99	A	99	300.00		-1,010.00	COURTESY DISCOUNT	ARCH
9738.00003	03/10/2026	67	A	1	200.00	0.80	160.00	E-file Motion for Sanctions and Amended Notice of Hearing. [2] Transmit the same to Defendant as described in Certificate of Service. [1] Update hearing binders for March 24, 2026 hearing. [3] Prepare correspondence to Judicial Assistant regarding hearing materials. [1] Prepare and transmit correspondence to Mr. Alfrey regarding the same. [1]	ARCH
9738.00003	03/10/2026	147	A	1	200.00	0.10	20.00	Conference with Ms. Slaughter regarding notes needed for upcoming hearing.	ARCH
9738.00003	03/13/2026	147	A	1	200.00	0.10	20.00	Review and update file with Plaintiff's Amended Complaint. Update calendar with deadline to respond to the same.	ARCH
9738.00003	03/13/2026	99	A	1	300.00	1.10	330.00	Office conference with Attorney Widerman regarding amended complaint by Plaintiff and case strategy for Motion to Dismiss (.1). Research and revisions to prior Motion to Dismiss regarding the same (.7). Telephone conference with Ms. Darrall and Ms. Gaug regarding research case law regarding damages alleged by plaintiff (.1).	ARCH
9738.00003	03/13/2026	147	A	1	200.00	0.20	40.00	Telephone conference with Attorney J. Widerman regarding needs for Case Law research. [1] Conference with Ms. Gaug regarding the same. [1]	ARCH
9738.00003	03/13/2026	147	A	1	200.00	0.30	60.00	Review Motion to Dismiss Amended Complaint. [1] Finalize Motion to Dismiss Amended Complaint. [1] Prepare Amended Notice of Hearing. [1]	ARCH
9738.00003	03/13/2026	150	A	1	275.00	0.10	27.50	office conference with Ms. Darrall regarding legal research on defamation (.1)	ARCH

Filing 253748034

SEANPAUL REYES VS PAUL ALFREY

05-2025-CA-053072-XXCA-BC

Widerman Malek, PL

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.									
9738.00003	03/14/2026	147	A	1	200.00	0.30	60.00	Finalize and E-File Amended Notice of Hearing and Motion to Dismiss Plaintiff's Amended Complaint. [2] Prepare and transmit correspondence to Judicial Assistant regarding including filings in hearing materials. [1]	ARCH
9738.00003	03/16/2026	147	A	1	200.00	0.40	80.00	Conference with Attorney Widerman regarding updating hearing materials for upcoming hearing. [1] Update hearing materials for Attorney Widerman. [3]	ARCH
9738.00003	03/16/2026	147	A	1	200.00	0.10	20.00	Review and update file with Plaintiff's Response in Opposition to Defendant's Motion to Dismiss Amended Complaint.	ARCH
9738.00003	03/16/2026	99	A	1	300.00	0.30	90.00	Review of Plaintiffs Response in opposition to Amended Motion to Dismiss.	ARCH
9738.00003	03/16/2026	2	A	1	550.00	1.60	880.00	Review Motion to Dismiss and Reply. Preparation for hearing on the same.	ARCH
9738.00003	03/17/2026	150	A	1	275.00	2.10	577.50	Research and draft memorandum to Attorney Widerman regarding research findings and applicable case law.	ARCH
9738.00003	03/17/2026	99	A	1	300.00	0.70	210.00	Review of opposing parties Response in Opposition to Motion to Dismiss (.5). Office conference with Ms. Gaug regarding research on challenging damages (.2).	ARCH
9738.00003	03/17/2026	2	A	1	550.00	1.60	880.00	Prepare for hearing on Standing.	ARCH
9738.00003	03/18/2026	99	A	1	300.00	0.70	210.00	Case law research in preparation for hearing to determine standing for ways to counter alleged damages of Plaintiff.	ARCH
9738.00003	03/19/2026	99	A	1	300.00	2.60	780.00	Office conference with Attorney Widerman and client regarding Preparation for hearing on 3/24 (1.5). Office conference with Attorney Widerman regarding the same (.3).Research of case law regarding ability for a party to record the civil hearing (.7). Office conference with Attorney Widerman regarding the same (.1)	ARCH
9738.00003	03/19/2026	2	A	1	550.00	1.10	605.00	Conference with Mr. Alfrey and Attorney J. Widerman regarding Motion for Standing preparation.	ARCH
9738.00003	03/20/2026	147	A	1	200.00	0.10	20.00	Prepare and transmit correspondence to Mr. Alfrey regarding multiple filings.	ARCH
9738.00003	03/20/2026	147	A	1	200.00	0.20	40.00	Update file with new documents provided by Mr. Alfrey.	ARCH
9738.00003	03/23/2026	59	A	1	200.00	0.10	20.00	Prepare and transmit correspondence to Attorney Majeed regarding filings for tomorrows hearing.	ARCH
9738.00003	03/23/2026	99	A	1	300.00	1.60	480.00	Review case law for attacking damages claims in a hearing to determine standing.	ARCH
9738.00003	03/23/2026	165	A	1	750.00	0.50	375.00	Review file and pleadings. Office conference with Mr. Widerman to prepare for trial.	ARCH
9738.00003	03/24/2026	147	A	1	200.00	0.10	20.00	Conference with Attorney J. Widerman regarding documents needed for hearing.	ARCH
9738.00003	03/24/2026	147	A	1	200.00	0.40	80.00	Conference with Attorney Widerman regarding needs for additional hearing binders. [1] Revise hearing binders for hearing on Standing, Motion to Dismiss, and Sanctions.	ARCH
9738.00003	03/24/2026	99	A	1	300.00	6.50	1,950.00	Travel to Courthouse, hearing strategy and preparations with client, and attendance of Hearing on Motion to Determine Standing, Motion to Dismiss, and Motion for Sanctions.	ARCH
9738.00003	03/24/2026	2	A	1	550.00	4.70	2,585.00	Prepare for and Attend Hearing on Motion to Determine Standing, Motion to Dismiss, and Motion for Sanctions.	ARCH
9738.00003	03/24/2026	165	A	1	750.00	4.50	3,375.00	Attend bench trial before Judge Polk.	ARCH
9738.00003	03/25/2026	147	A	1	200.00	0.20	40.00	Conference with Attorney J. Widerman regarding outcome of hearing and needs for continuance.	ARCH
9738.00003	03/25/2026	147	A	1	200.00	0.50	100.00	Multiple conferences with Attorney J. Widerman	ARCH

Filing 253748034

SEANPAUL REYES VS PAUL ALFREY

05-2025-CA-053072-XXCA-BC

Wideman Malek, PL

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.								
							regarding needs for sending exhibits to Mr. Reyes. [3] Prepare and transmit correspondence to Mr. Reyes regard exhibits entered as evidence. [2]	
9738.00003	03/25/2026	99	A	1	300.00	0.80	240.00	Watching live YouTube video discussing hearing. ARCH
9738.00003	03/25/2026	35	A	1	525.00	1.10	577.50	Watch YouTube Live broadcast [8], Office ARCH
							conferences with Attorney J. Wideman and Attorney Wideman regarding issues contained within same and hearing/case strategy [3].	
9738.00003	03/25/2026	2	A	1	550.00	0.60	330.00	Conference with litigation team regarding status and strategy for continued hearing. ARCH
9738.00003	03/27/2026	147	A	1	200.00	0.10	20.00	Update file with notes from hearing on Standing, Motion to Dismiss, and Sanctions. ARCH
9738.00003	03/27/2026	99	A	1	300.00	0.10	30.00	Office conference with Ms. Darrall regarding continued hearing on Motion to Determine Standing, Motion to Dismiss, and motion for Sanctions. ARCH
9738.00003	03/27/2026	147	A	1	200.00	0.30	60.00	Review and respond to correspondence from Judicial Assistant regarding availability for continued hearing. [1] Telephone conference with Attorney J. Wideman regarding the same. [1] Prepare and transmit correspondence to Mr. Alfrey regarding the same. [1] ARCH
9738.00003	03/30/2026	147	A	1	200.00	0.30	60.00	Prepare and transmit correspondence to Judicial Assistant regarding confirmation of full day hearing availability. [1] Prepare and E-File Notice of Continued Hearing. [2] ARCH
9738.00003	03/31/2026	2	A	99	550.00		-792.00	COURTESY DISCOUNT ARCH
9738.00003	03/31/2026	35	A	99	525.00		-86.63	COURTESY DISCOUNT ARCH
9738.00003	03/31/2026	59	A	99	200.00		-3.00	COURTESY DISCOUNT ARCH
9738.00003	03/31/2026	67	A	99	200.00		-24.00	COURTESY DISCOUNT ARCH
9738.00003	03/31/2026	99	A	99	300.00		-648.00	COURTESY DISCOUNT ARCH
9738.00003	03/31/2026	147	A	99	200.00		-108.00	COURTESY DISCOUNT ARCH
9738.00003	03/31/2026	150	A	99	275.00		-90.75	COURTESY DISCOUNT ARCH
9738.00003	04/07/2026	18	A	1	525.00	0.10	52.50	Attend office conference with Attorney J. Wideman regarding the Complaint and response to the same. ARCH
9738.00003	04/30/2026	165	A	99	750.00		0.00	COURTESY DISCOUNT ARCH
9738.00003	05/07/2026	147	A	1	200.00	0.20	40.00	Update file with Subpoenas to be served on City members by Mr. Reyes. [1] Conference with Ms. Slaughter regarding the same. [1] ARCH
9738.00003	05/07/2026	147	A	1	200.00	0.20	40.00	Telephone conference with Mr. Simmons from the City of Melbourne regarding subpoenas that his clients received. [1] Conference with Attorney J. Wideman regarding the same. [1] ARCH
9738.00003	05/08/2026	147	A	1	200.00	0.10	20.00	Conference with Attorney J. Wideman regarding City of Melbourne attorney filing Motion to Quash Service of subpoenas. ARCH
9738.00003	05/11/2026	147	A	1	200.00	0.10	20.00	Conference with Attorney J. Wideman regarding Subpoenas for testimony at hearing. ARCH
9738.00003	05/13/2026	147	A	1	200.00	0.10	20.00	Prepare and transmit correspondence to Milestone Reporting regarding Court Reporter for continued hearing. ARCH
9738.00003	05/13/2026	67	A	1	200.00	0.20	40.00	Office conference with Attorney Wideman regarding upcoming hearing and needs for the same. ARCH
9738.00003	05/15/2026	147	A	1	200.00	0.10	20.00	Update calendar with Court Reporter information for continued hearing. ARCH
9738.00003	05/15/2026	99	A	1	300.00	0.10	30.00	Office conference with Ms. Darrall regarding case status and strategy. ARCH
9738.00003	05/15/2026	147	A	1	200.00	0.10	20.00	Conference with Attorney J. Wideman regarding case status and strategy. ARCH
9738.00003	06/03/2026	147	A	1	200.00	0.10	20.00	Prepare and transmit follow up correspondence to Mr. Reyes regarding videos to be admitted as evidence. ARCH
9738.00003	06/03/2026	67	A	1	200.00	0.20	40.00	Office conference with Attorney J. Wideman and ARCH

Filing 253748034

SEANPAUL REYES VS PAUL ALFREY

05-2025-CA-053072-XXCA-BC

Widerman Malek, PL

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.								
							Attorney Widerman regarding upcoming continued hearing on standing.	
9738.00003	06/10/2026	2	A	1	550.00	1.60	880.00	Preparation for continuation of Standing hearing. ARCH
9738.00003	06/11/2026	99	A	1	300.00	0.20	60.00	Draft and transmit correspondence to opposing party regarding video review per court order. ARCH
9738.00003	06/11/2026	67	A	1	200.00	0.10	20.00	Review correspondence regarding authenticity of evidence for upcoming hearing. ARCH
9738.00003	06/15/2026	67	A	1	200.00	0.10	20.00	Review and respond to correspondence from Judicial Assistant regarding hearing. ARCH
9738.00003	06/15/2026	147	A	1	200.00	0.10	20.00	Conference with Attorney J. Widerman regarding preparation for upcoming hearing. ARCH
9738.00003	06/15/2026	147	A	1	200.00	0.20	40.00	Finalize and e-file Motion to Admit Evidence as Waiver. ARCH
9738.00003	06/15/2026	99	A	1	300.00	1.50	450.00	Draft Defendant's motion to deem Plaintiff's failure to object a waiver and to admit specified evidence into the record. ARCH
9738.00003	06/15/2026	2	A	1	550.00	0.70	385.00	Preparation for continued hearing regarding standing. ARCH
9738.00003	06/16/2026	67	A	1	200.00	0.20	40.00	Multiple conferrals with Attorney Widerman regarding hearing scheduled for today. ARCH
9738.00003	06/16/2026	147	A	1	200.00	0.10	20.00	Telephone conference with Milestone Reporting regarding court reporter attendance at hearing. ARCH
9738.00003	06/16/2026	147	A	1	200.00	0.10	20.00	Telephone conference with Attorney J. Widerman regarding outcome of hearing. ARCH
9738.00003	06/16/2026	99	A	1	300.00	8.20	2,460.00	Case law research in preparation for hearing. Attended hearing on Motion to Dismiss, Motion to Determine Standing, and Motion for Sanctions. Telephone conference with Attorney Widerman regarding the same. ARCH
9738.00003	06/16/2026	2	A	1	550.00	8.00	4,400.00	Preparation, travel, and attend hearing on standing and dismissal. Conference with Mr. Alfrey regarding multiple issues. Conference with Ms. Fonzi regarding the same. ARCH
9738.00003	06/17/2026	147	A	1	200.00	0.10	20.00	Review Judge's requirements for submission of Proposed Orders. ARCH
9738.00003	06/17/2026	147	A	1	200.00	0.20	40.00	Begin preparation of Proposed Order on Defendant's Motion to Determine Standing and Granting Defendant's Motion to Dismiss. ARCH
9738.00003	06/17/2026	147	A	1	200.00	0.10	20.00	Prepare correspondence to Judge regarding Proposed Order on Motion to Dismiss and Standing. ARCH
9738.00003	06/17/2026	99	A	1	300.00	0.50	150.00	Watched latest YouTube video by Long Island Audit. ARCH
9738.00003	06/19/2026	147	A	1	200.00	0.10	20.00	Conference with Attorney J. Widerman regarding status of Proposed Order to be sent to Mr. Reyes for review following conclusion of hearing. ARCH
9738.00003	06/23/2026	99	A	1	300.00	1.60	480.00	Review file and notes for Proposed Order on Defendant's Motion to Dismiss and Motion to Determine Standing. Draft Proposed Order on Defendant's Motion to Dismiss and Motion to Determine Standing. Telephone conference with Attorney Widerman regarding the same. ARCH
9738.00003	06/24/2026	99	A	1	300.00	1.00	300.00	Revise proposed order and researched case law regarding requirements for corporation to file lawsuit. ARCH
9738.00003	06/26/2026	99	A	1	300.00	0.10	30.00	Draft and transmit memorandum to Attorney Widerman regarding Proposed Order on Hearing for Motion to Determine Standing. ARCH
9738.00003	06/26/2026	67	A	1	200.00	0.30	60.00	Receive Transcript for ruling from June 16, 2026 Hearing. Update file with the same. [1] Receive and Review Pltf's Motion for Rehearing. Update file with the same. [1] Receive and review correspondence from Mr. Reyes regarding the same. Update file with the same. [1] ARCH
9738.00003	06/30/2026	99	A	1	300.00	0.80	240.00	Revise Proposed order on Motion to Determine Standing and based upon the Court's Oral ruling ARCH

Wideman Malek, PL

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9738.00003 Alfrey Roofing, Inc.								
							regarding the same. Draft and transmit memorandum to Attorney Wideman for review regarding the same. Review opposing party's motion for reconsideration and research on caselaw in opposition.	
9738.00003	06/30/2026	2	A	99	550.00		-1,133.00	COURTESY DISCOUNT ARCH
9738.00003	06/30/2026	67	A	99	200.00		-36.00	COURTESY DISCOUNT ARCH
9738.00003	06/30/2026	99	A	99	300.00		-834.00	COURTESY DISCOUNT ARCH
9738.00003	06/30/2026	147	A	99	200.00		-40.00	COURTESY DISCOUNT ARCH
9738.00003	07/01/2026	99	P	1	300.00	0.50	150.00	Revised Proposed Order based on Attorney Wideman notes. Reviewed transcript from hearing. Draft and transmit memorandum to to Attorney Wideman with revisions. 178
9738.00003	07/02/2026	99	P	1	300.00	0.80	240.00	Review and respond to correspondence received from Ms. Slaughter regarding case status and strategy. Telephone conference with Attorney Wideman regarding the same. Draft and transmit correspondence to Mr. Reyes regarding Proposed Order. Revise Letter to Judge based on opposing's response. Office conference with Ms. Darrall regarding the same. 183
9738.00003	07/02/2026	147	P	1	200.00	0.20	40.00	Finalize correspondence to Judge regarding Proposed Order on Motion to Dismiss and Standing. Finalize Proposed Order for the same. [.1] Prepare and transmit correspondence to Judicial Assistant regarding the same. [.1] 184
9738.00003	07/02/2026	147	P	1	200.00	0.10	20.00	Conference with Attorney J. Wideman regarding submission of Proposed Order. 185
9738.00003	07/07/2026	67	P	1	200.00	0.20	40.00	Prepare and transmit correspondence to Mr. Alfrey regarding Motion for Rehearing. 186
9738.00003	07/15/2026	147	P	1	200.00	0.20	40.00	Conference with Attorney J. Wideman regarding status of Order. [.1] Telephone conference with Judicial Assistant regarding the same. [.1] 187
9738.00003	07/15/2026	147	P	1	200.00	0.10	20.00	Review and update file with Order Granting Motion to Dismiss. 188
9738.00003	07/15/2026	99	P	1	300.00	0.50	150.00	Office conference with Attorney Wideman regarding status on Order from judge. Office conference regarding the same with Ms. Darrall. Review order from judge. Office conference with Ms. Slaughter and Attorney Wideman regarding the same. 189
9738.00003	07/15/2026	147	P	1	200.00	0.20	40.00	Conference with Ms. Slaughter regarding deadlines for rehearing and deadlines for appeal. 190
9738.00003	07/16/2026	147	P	1	200.00	0.10	20.00	Update calendar with deadline to seek entitlement of fees. 191
9738.00003	07/16/2026	99	P	1	300.00	0.10	30.00	Review and respond to correspondence received from Attorney Wideman regarding case status and strategy. 192
9738.00003	07/16/2026	147	P	1	200.00	0.10	20.00	Conference with Attorney J. Wideman regarding strategy for Plaintiff's Motion for Rehearing. 193
9738.00003	07/17/2026	147	P	1	200.00	0.40	80.00	Begin preparation of Motion for Determination of Attorneys Fees. [.2] Begin preparation of Affidavit of Attorney's Fees for the same. [.2] 194
9738.00003	07/17/2026	147	P	1	200.00	0.10	20.00	Prepare and transmit correspondence to Mr. Alfrey regarding Order on Defendant's Motion to Determine Standing and Granting Defendant's Motion to Dismiss Plaintiff's Amended Complaint. 195
9738.00003	07/23/2026	147	P	1	200.00	0.40	80.00	Telephone conference with Judicial Assistant regarding outstanding Motion for Reconsideration. [.2] Conference with Attorney J. Wideman regarding the same. [.1] Prepare and transmit correspondence to Judicial Assistant regarding the same. [.1] 196
9738.00003	07/24/2026	147	P	1	200.00	0.20	40.00	Review and update file with Order Denying Plaintiff's Motion for Rehearing and Reconsideration. [.1] 197

Wideman Malek, PL

Client	Trans Date	Tkpr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 9738.00003 Alfrey Roofing, Inc.								
							Prepare and transmit correspondence to Mr. Alfrey regarding the same. [1]	
9738.00003	07/24/2026	99	P	1	300.00	0.10	30.00 Review Order from Court of Plaintiff's Motion for reconsideration.	198
Subtotal for Fees					Billable	142.00	39,487.12	
					Non-billable	0.50	85.00	
					Total	142.50	39,572.12	
9738.00003	10/21/2025	2	A	10			2.13 Westlaw Research Services on 10/21/25	ARCH
9738.00003	10/23/2025	2	A	10			4.25 Westlaw Research Services on 10/23/25	ARCH
9738.00003	10/24/2025	2	A	10			7.44 Westlaw Research Services on 10/24/25	ARCH
9738.00003	10/27/2025	2	A	10			1.06 Westlaw Research Services on 10/27/25	ARCH
9738.00003	10/28/2025	2	A	10			1.06 Westlaw Research Services on 10/28/25	ARCH
9738.00003	10/29/2025	2	A	10			148.55 Westlaw Research Services on 10/29/25	ARCH
9738.00003	10/30/2025	2	A	10			23.61 Westlaw Research Services on 10/30/25	ARCH
9738.00003	10/31/2025	2	A	10			210.01 Westlaw Research Services on 10/31/25	ARCH
9738.00003	11/04/2025	2	A	253	1.030		1.03 Postage	ARCH
9738.00003	11/04/2025	2	A	253	10.730		10.73 Postage	ARCH
9738.00003	11/20/2025	2	A	10			260.02 Westlaw Research Services on 11/20/25	ARCH
9738.00003	11/24/2025	2	A	10			1.15 Westlaw Research Services on 11/24/25	ARCH
9738.00003	01/09/2026	2	A	253	0.740		0.74 Postage	ARCH
9738.00003	01/09/2026	2	A	10			145.44 Westlaw Research Services on 01/09/26	ARCH
9738.00003	01/15/2026	2	A	253	0.740		0.74 Postage	ARCH
9738.00003	01/30/2026	2	A	10			8.86 Westlaw Research Services on 01/30/26	ARCH
9738.00003	02/03/2026	2	A	10			42.79 Westlaw Research Services on 02/03/2026.	ARCH
9738.00003	02/04/2026	2	A	10			15.41 Westlaw Research Services on 02/04/2026.	ARCH
9738.00003	02/16/2026	2	A	253	10.730		10.73 Postage	ARCH
9738.00003	02/16/2026	2	A	253	1.030		1.03 Postage	ARCH
9738.00003	02/25/2026	2	A	10			67.89 Westlaw Research Services on 02/25/2026.	ARCH
9738.00003	03/10/2026	2	A	253	11.310		11.31 Postage	ARCH
9738.00003	03/10/2026	2	A	253	1.610		1.61 Postage	ARCH
9738.00003	03/13/2026	2	A	10			0.67 Westlaw Research Services on 03/13/26	ARCH
9738.00003	03/13/2026	2	A	252	0.725		23.93 Mileage to/from Viera Courthouse	ARCH
9738.00003	03/17/2026	2	A	10			6.73 Westlaw Research Services on 03/17/26	ARCH
9738.00003	03/18/2026	2	A	10			2.02 Westlaw Research Services on 03/18/26	ARCH
9738.00003	03/19/2026	2	A	10			29.96 Westlaw Research Services on 03/19/26	ARCH
9738.00003	03/23/2026	2	A	10			136.69 Westlaw Research Services on 03/23/26	ARCH
9738.00003	03/24/2026	2	A	10			102.01 Westlaw Research Services on 03/24/26	ARCH
9738.00003	06/16/2026	2	A	252	0.725		24.07 Mileage to/from Viera Courthouse for hearing	ARCH
9738.00003	06/16/2026	2	A	252	0.725		24.36 Mileage to/from Viera Courthouse for Continued Hearing on Standing, Motion to Dismiss, and Sanctions	ARCH
9738.00003	06/16/2026	2	A	10			22.00 Westlaw Research Services on 06/16/26	ARCH
9738.00003	06/23/2026	2	A	10			1.07 Westlaw Research Services on 06/23/26	ARCH
9738.00003	06/24/2026	2	A	10			16.10 Westlaw Research Services on 06/24/26	ARCH
9738.00003	06/30/2026	2	A	10			0.54 Westlaw Research Services on 06/30/26	ARCH
Subtotal for Expenses					Billable	0.00	1,367.74	
9738.00003	10/22/2025	2	A	100	54.080		54.08 COST ADVANCED - Lunch meeting with Jared to discuss case - El Chico (paid with Attorney Hostetler personal card)	ARCH
9738.00003	06/16/2026	2	A	100	13.050		13.05 COST ADVANCED - Photocopies for hearing - A. Max Brewer Memorial Law Library Invoice #19171	ARCH
9738.00003	06/26/2026	2	A	100	241.100		241.10 COST ADVANCED - Transcript of Proceedings, Invoice Number 9373839 - Veritext	ARCH
Subtotal for Advances					Billable	0.00	308.23	
Total for Client ID 9738.00003					Billable	142.00	41,163.09 Alfrey Roofing, Inc.	
					Non-billable	0.50	85.00 LIT_adv. Reyes, SeanPaul	
					Total	142.50	41,248.09	

Client	Trans Date	Tkpr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
GRAND TOTALS								
Billable						142.00	41,163.09	
Non-billable						0.50	85.00	
Total						142.50	41,248.09	

Exhibit "B"

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA

SEANPAUL REYES,

Case No.: 05-2025-CA-053072

Plaintiff,

v.

PAUL SIDNEY ALFREY,

Defendant.

AFFIDAVIT OF REASONABLE ATTORNEY'S FEES

**STATE OF FLORIDA
COUNTY OF BREVARD**

BEFORE ME, the undersigned authority, this date personally appeared ADAM BIRD who, being first duly sworn, on oath, deposes and states:

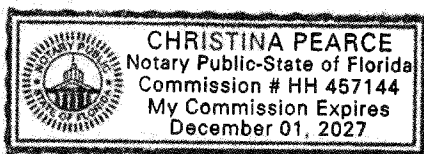
1. I am a resident of Florida, and I have been admitted to practice law in all of the courts of the State of Florida since 2008.
2. I am familiar with the services involved and the responsibility assumed on the part of attorneys in actions similar to this action. I am familiar with the amounts customarily charged by attorneys and paralegals and allowed by the court for attorneys' fees in actions of this type in the courts of this jurisdiction; and I know the reasonable value of such services.
3. I have examined the pleadings and other papers filed or served in this cause.
4. In arriving at my opinion of the value of reasonable attorneys' fees in this action, I have utilized and considered the following criteria:
 - a. The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly.

- b. The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer.
 - c. The fee customarily charged in the locality for similar legal services.
 - d. The amount involved and the results obtained.
 - e. The time limitations imposed by the client or by the circumstances.
 - f. The nature and length of the professional relationship with the client.
 - g. The experience and length of the professional relationship with the client.
 - h. The experience, reputation and ability of the lawyer or lawyers performing the services.
 - i. Whether the fees are fixed or contingent.
5. I have reviewed the Affidavit of Attorney's Fees and Costs related hereto, and it is my opinion that the hourly rates charged by said attorney, and the amount of time expended by said attorney in this action, are reasonable.
6. In my opinion, a reasonable attorney's fee to be allowed to the Defendants in this cause for attorney's services rendered in connection with this matter is \$41,163.09.

FURTHER AFFIANT SAYETH NAUGHT.


ADAM BIRD

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 29th day of July 2026, by ADAM BIRD, he ☒ is personally known to me or ☐ has produced N/A as identification.




Notary Public
Printed Name: Christina Pearce
My Commission Expires: 12-01-2027