

267 East Main Street
Newark, DE 19711
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Josiah R. Wolcott
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Reply to Newark Office:
267 East Main Street
Newark, Delaware 19711

CONNOLLY
GALLAGHER

April 1, 2013

**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 the following 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. Second Supplemental Affidavit of Gary Staffieri
- 2. Supplemental Affidavit of Josiah R. Wolcott
- 3. Supplemental Affidavit of Sharon Cherry

Also enclosed for the Court's consideration is a proposed form of order awarding attorneys' fees and costs to Plaintiffs Gary and Adria Charles Staffieri. The amount of attorneys' fees and costs reflected in the proposed order are supported by the above-mentioned affidavits, as well as the affidavits of Gary Staffieri, Sharon Cherry, and K. Kirk Karagelian, which were filed on December 21, 2012, as well as the affidavit of Josiah R. Wolcott, which was filed on December 26, 2012, and the supplemental affidavit of Gary Staffieri, which was filed on January 25, 2013.

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)

05049543/33574*1

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.

SECOND SUPPLEMENTAL AFFIDAVIT OF GARY STAFFIERI

COMMONWEALTH OF PENNSYLVANIA)

SS.

COUNTY OF DELAWARE)

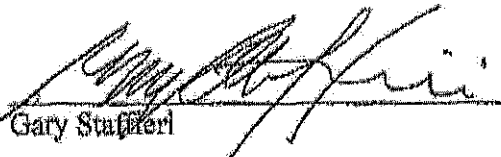
Gary Staffieri, one of the plaintiffs in the above-referenced action, respectfully represents as follows:

1. I am one of the Plaintiffs in the above-captioned action and am authorized to make this affidavit on behalf of myself and Adria Charles Staffieri.

2. I make this affidavit in further support of the Plaintiffs' request for attorneys' fees and costs in the above-captioned litigation. This affidavit is designed to supplement the affidavit that I signed on December 17, 2012, and which was submitted on my behalf on December 21, 2012, as well as the affidavit that I signed on January 22, 2013, and which was submitted on my behalf on January 25, 2013.

3. In addition to those attorneys' fees and costs identified in my previous affidavits, during the course of the litigation, the Plaintiffs also incurred attorneys' fees and expenses for services rendered and disbursements posted by our attorneys since December 11, 2012, as follows:

Service Provider	Attorneys' Fees	Expenses	Total
Cherry Fieger & Cherry, P.C.	\$7,450.00	N/A	\$7,450.00
Connolly Gallagher LLP	\$9,875.00	\$511.53	\$10,386.53
Subtotals	\$17,325.00	\$511.53	
Total			\$17,836.53


Gary Stafferi

Dated: March ²⁹, 2013

Sworn and subscribed to before me
this ²⁹ day of March, 2013.



COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Maribel Alvarado Gonzalez, Notary Public
City of Chester, Delaware County
My Commission Expires Nov. 30, 2015
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

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.

SUPPLEMENTAL 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 further 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. This affidavit is designed to supplement my affidavit that was filed on December 26, 2012.

3. Since December 11, 2012, the Staffieris' attorneys' fees and expenses incurred for services rendered and disbursements posted through March 27, 2013, were as follows:

Service Provider	Attorneys' Fees	Expenses	Total
Connolly Gallagher LLP ¹	\$9,875.00	\$511.53	
Total			\$10,386.53

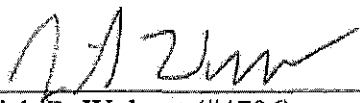
¹ See Ex. A.

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: March 28, 2013

Sworn and subscribed to before me
this 28th day of March, 2013.



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

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

Exhibit A

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: January 9, 2013
Statement No. 1272
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
11/05/2012	JRW	Reviewed motion for reargument.	1.20	300.00
11/06/2012	JRW	Reviewed motion for reargument; research re: same; drafted response.	3.20	800.00
11/07/2012	JRW	Drafted response in opposition to motion for reargument; spoke with S. Cherry re: same; reviewed orders.	6.50	1,625.00
12/2012	JRW	Research re: affidavit for attorneys' fees.	0.90	225.00
11/13/2012	JRW	Spoke with R. Abbott re: status and settlement; drafted fee affidavit; spoke with S. Cherry re: same.	1.50	375.00
11/15/2012	JRW	Drafted fee affidavits; corresponded with S. Cherry re: same.	0.70	175.00
11/16/2012	JRW	Drafted fee affidavits; spoke with S. Cherry re: same and appeal deadline.	1.30	325.00
11/19/2012	JRW	Reviewed and revised fee affidavits.	0.80	200.00
11/20/2012	JRW	Revised and finalized fee affidavits.	0.70	175.00
11/21/2012	JRW	Spoke with A. Staffieri re: status and settlement; corresponded with R. Abbott re: same.	0.50	125.00
11/30/2012	JRW	Conferred with A. Staffieri re: settlement; spoke with S. Cherry re: same; revised fee affidavits.	1.20	300.00
12/03/2012	JRW	Spoke with S. Cherry re: status; reviewed emails from S. Cherry and A. Staffieri.	1.00	250.00
12/04/2012	JRW	Reviewed email from A. Staffieri; spoke with S. Cherry re: same.	0.80	200.00
12/5/2012	JRW	Spoke with S. Cherry re: status; revised Staffieri fee affidavit; corresponded with A. Staffieri re: same and appeal.	0.70	175.00

			Hours	
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.	1.10	275.00
12/11/2012	JRW	Finalized fee affidavits.	0.60	150.00
12/19/2012	JRW	Spoke with S. Cherry re: status; corresponded with A. Staffieri re: same.	0.60	150.00
12/20/2012	JRW	Spoke with Staffieris re: appeal; spoke with S. Cherry re: same.	1.30	n/c
12/21/2012	JRW	Reviewed and finalized fee affidavits for filing.	0.60	150.00
		For Current Services Rendered	23.90	5,975.00
		Total Non-billable Hours	1.30	

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Joe Wolcott	23.90	\$250.00	\$5,975.00

Expenses

10/15/2012	Filing Fees - File & ServeXpress LLC - Invoice # PP-Q312-0695233701	1.00
10/15/2012	Filing Fees - File & ServeXpress LLC - Invoice # PP-Q312-0695233701	821.00
10/31/2012	Filing Fees - (64.00) LexisNexis - Invoice #2012100695233701	130.00
11/1/2012	Conference Call InterCall - Inv# 1741651254	44.12
11/2/2012	Plaintiff's Share of Storage Fee for Joint Trial Exhibits: (41.00) Register in Chancery	1,130.00
12/03/2012	Filing Fees - File & ServeXpress LLC - Inv# 2012110695233701	22.00
12/04/2012	Filing Fees - File & ServeXpress LLC - Invoice # 2012120695233701	67.00
12/26/2012	Courier/Messenger - Reliable Wilmington - Invoice #: WLO38256	5.00
	Total Expenses	2,220.12
	Total Current Services	8,195.12
	Previous Balance	\$14,947.61
	Balance Due	<u>\$23,142.73</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: February 15, 2013
Statement No. 2845
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
01/04/2013	JRW	Corresponded with A. Staffieri re: briefing schedule for appeal and settlement; spoke with S. Cherry re: same; reviewed Black's website.	0.90	225.00
01/07/2013	JRW	Reviewed correspondence from S. Cherry; reviewed post-trial order.	0.30	75.00
01/11/2013	JRW	Reviewed radio broadcast of R. Buchta; spoke with S. Cherry re: status; communicated with R. Abbott re: settlement.	0.80	200.00
01/14/2013	JRW	Spoke with S. Cherry re: status; spoke with R. Newell re: form of order for fees and costs.	0.50	125.00
01/16/2013	JRW	Drafted proposed form of order and letter to court; spoke with S. Cherry re: same; corresponded with A. Staffieri re: same.	1.00	250.00
01/17/2013	JRW	Drafted supplemental affidavit for G. Staffieri; revised proposed order and letter; corresponded with A. Staffieri re: same; reviewed settlement offer from Blacks.	1.00	250.00
01/18/2013	JRW	Drafted letter to R. Abbott re: removal of fence.	0.60	150.00
01/22/2013	JRW	Spoke with G. Staffieri re: status and settlement and other issues.	1.30	n/c
01/23/2013	JRW	Spoke with S. Cherry re: appeal; reviewed opening brief; search for form motion to affirm.	0.60	150.00
01/28/2013	JRW	Drafted disclosure of corporate interest; corresponded with A. Staffieri re: same; spoke with S. Cherry re: several issues.	0.80	200.00
01/29/2013	JRW	Revised and finalized corporate disclosure; corresponded with A. Staffieri re: same and trial transcript; spoke with S. Cherry re: same.	0.80	200.00
01/30/2013	JRW	Reviewed and revised motion to affirm; spoke with S. Cherry re: same; corresponded with A. Staffieri re: same.	2.80	700.00
01/31/2013	JRW	Spoke with S. Cherry re: status; spoke with G. Staffieri and A.		

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

Statement Date: 02/15/2013
Statement No. 2845
Page No. 2

	Hours	
Staffleri re: same; revised and finalized motion to affirm.	3.20	800.00
For Current Services Rendered	13.30	3,325.00
Total Non-billable Hours	1.30	

	Recapitulation		
Timekeeper	Hours	Rate	Total
Joe Wolcott	13.30	\$250.00	\$3,325.00

Expenses

01/15/2013	Filing Fees - File & ServeXpress LLC - DE Court of Chancery Civil Action, Invoice #:PQ412695233701	29.00
01/15/2013	Filing Fees - File & ServeXpress LLC - DE Court of Chancery Civil Action, Invoice #:PQ412695233701	18.00
01/15/2013	Filing Fees - File & ServeXpress LLC - DE Court of Chancery Civil Action, Invoice #:PQ412695233701	92.00
01/29/2013	Photocopies Reliable Wilmington Invoice# WL038874	5.00
01/31/2013	Courier/Messenger - Reliable Wilmington - Invoice #;WL038961	5.00
	Total Expenses	149.00
	Total Current Services	3,474.00
	Previous Balance	\$23,142.73
	Balance Due	<u>\$26,616.73</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: March 22, 2013
Statement No. 3617
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
02/08/2013	JRW	Discussed case with M. Walton; spoke with S. Cherry; reviewed motion filed by R. Abbott; spoke with client re: options.	2.20	550.00
02/11/2013	JRW	Corresponded with client re: decision to withdraw.	0.50	125.00
02/12/2013	JRW	Spoke with S. Cherry re: status; reviewed emails from A. Staffieri.	0.60	150.00
02/13/2013	JRW	Research and draft response to motion for reargument.	4.20	1,050.00
02/14/2013	JRW	Research and draft response to motion for reargument; spoke with S. Cherry and Staffieri re: same; finalized response for filing; drafted motion to withdraw from Chancery and accompanying documents.	6.20	1,550.00
02/15/2013	JRW	Reviewed and revised motion to withdraw; spoke with M. Walton and M. Boyer re: same; corresponded with A. Staffieri re: same.	0.80	200.00
02/18/2013	JRW	Drafted motion to dismiss appeal; reviewed order from VC Laster; spoke with G. Staffieri and A. Staffieri re: same; spoke with S. Cherry re: same; spoke with R. Abbott re: status.	3.50	875.00
02/21/2013	JRW	Revised letter to VC Laster re: motion to dismiss appeal.	0.20	50.00
02/28/2013	JRW	Spoke with A. Staffieri re: status; revised motion to withdraw; revised letter to VC Laster re: motion to dismiss appeal.	0.80	200.00
		For Current Services Rendered	19.00	4,750.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Joe Wolcott	19.00	\$250.00	\$4,750.00

Expenses

02/01/2013 Filing Fees - File & ServeXpress LLC - Letter- Invoice#

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

Statement Date: 03/22/2013
 Statement No. 3617
 Page No. 2

	201301695233701	45.50
02/01/2013	Filing Fees - File & ServeXpress LLC - Disclosure - Invoice# 201301695233701	2.50
02/18/2013	Courier/Messenger - Rellable Wilmington - Invoice# WL039280	5.00
02/27/2013	Outside Printing; Shamrock Printing Company Invoice #48381	10.00
	Total Expenses	63.00
	Total Current Services	4,813.00
	Previous Balance	\$26,616.73
	Balance Due	<u>\$31,429.73</u>

Aged Due Amounts			
<u>Stmt Date</u>	<u>Stmt #</u>	<u>Billed</u>	<u>Due</u>
10/11/2012	147	4,554.41	4,554.41
11/07/2012	368	10,393.20	10,393.20
01/09/2013	1272	8,195.12	8,195.12
02/15/2013	2845	3,474.00	3,474.00
			<u>26,616.73</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: March 28, 2013
Statement No. 3658
Account No. 33574.00001
Page: 1

RE: Easement Litigation

Fees

			Hours	
03/04/2013	JRW	Spoke with S. Cherry re: status.	0.50	125.00
03/05/2013	JRW	Gathered documents for answering brief; corresponded with A. Staffieri re: same.	0.90	225.00
03/07/2013	JRW	Spoke with S. Cherry re: status; corresponded with A. Staffieri re: requirements for brief; spoke with A. Staffieri re: same.	0.80	200.00
03/13/2013	JRW	Reviewed Supreme Court decision on motion to dismiss; spoke with S. Cherry re: same;	0.40	100.00
03/14/2013	JRW	Spoke with A. Staffieri re: status; drafted letter to VC Laster re: dismissal of appeal; research re: jurisdiction.	0.70	175.00
03/15/2013	JRW	Finalized letter to VC Laster re: dismissal of appeal.	0.30	75.00
03/19/2013	JRW	Spoke with S. Cherry re: status.	0.40	100.00
03/21/2013	JRW	Corresponded with S. Cherry and A. Staffieri re: briefing on attorneys' fees.	0.30	75.00
03/22/2013	JRW	Corresponded with A. Staffieri re: briefing schedule; corresponded with R. Abbott re: same - NC.	0.40	100.00
03/26/2013	JRW	Drafted supplemental fee affidavit.	0.40	100.00
03/27/2013	JRW	Drafted supplemental fee affidavits.	1.30	325.00
		For Current Services Rendered	6.40	1,600.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Joe Wolcott	6.40	\$250.00	\$1,600.00

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

Statement Date: 03/28/2013
Statement No. 3658
Page No. 2

Expenses

03/01/2013	Court Documents: File & ServeXpress LLC - Response in Opposition, Letter & Motion to Withdraw - Invoice #201302695233701	68.00
03/01/2013	Court Documents: File & ServeXpress LLC - Motion - Invoice #201302695233701	5.50
03/01/2013	On-line Legal Research West Payment Center - Invoice #826770905	211.03
03/05/2013	Outside Printing; Reliable Wilmington - Invoice #WL039557	5.00
03/19/2013	Courier/Messenger - Reliable Wilmington Invoice #WL039876	5.00
	Total Expenses	294.53
	Total Current Services	1,894.53
	Previous Balance	\$31,429.73
	Balance Due	<u>\$33,324.26</u>

Aged Due Amounts

<u>Stmt Date</u>	<u>Stmt #</u>	<u>Billed</u>	<u>Due</u>
10/11/2012	147	4,554.41	4,554.41
11/07/2012	368	10,393.20	10,393.20
01/09/2013	1272	8,195.12	8,195.12
02/15/2013	2845	3,474.00	3,474.00
03/22/2013	3617	4,813.00	4,813.00
			<u>31,429.73</u>

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GARY STAFFIERI and
ADRIA CHARLES STAFFIERI

Plaintiffs,

v.

C.A. No. 7439-VCI.

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.

SUPPLEMENTAL 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 am a partner in the law firm of Cherry Fieger & Cherry, P.C. 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. This affidavit is designed to supplement my affidavit that was filed on December 21, 2012.

3. The Staffieris' attorneys' fees and expenses incurred for services rendered by my firm since November 1, 2012 through March 28, 2013, were as follows:

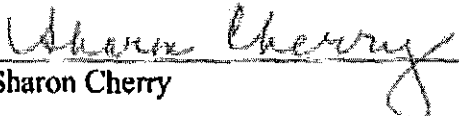
Service Provider	Attorneys' Fees	Expenses	Total
Sharon Cherry, Esquire	\$7450.00		\$7450.00

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 404 hours and 50 minutes 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.

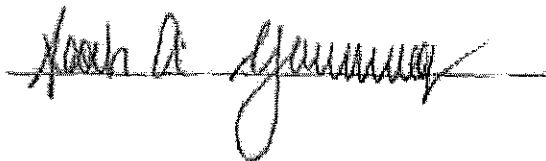
5. The fees and costs were and will be incurred in successfully prosecuting the above-captioned litigation. The successful litigation included and will include services in communicating with the clients, conducting research regarding the Staffieris' claims, drafting pleadings, settlement efforts, meeting with retained experts, significant discovery, pretrial briefing, a two-day trial, post-trial briefing, further briefing on the instant fee petition, and an 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: March 28, 2013

Sworn and subscribed to before me
this 28th day of March, 2013.



COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
SARAH A. YOUNG, NOTARY PUBLIC
EAST GOSHEN TWP., CHESTER COUNTY
MY COMMISSION EXPIRES JULY 27, 2013

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 # 3

BILLING ATTORNEY SMC

BILLING DATE 2/10/2013

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

Billing date 11/1/2012 - 3/26/2013

	Hours	Minutes
11/5/2012 review motion reargument		45
11/7/2012 phone call J. Wolcott , review Order		10
11/13/2012 phone call J. Wolcott, email J. Wolcott		15
11/15/2012 review email J. Wolcott		5
11/16/2012 phone call J Wolcott, email J. Wolcott		10
11/30/2012 phone call J. Wolcott, email J. Wolcott		5
12/3/ 2012 phone call J. Wolcott , email J. Wolcott		10
12/4/2012 phone call J. Wolcott , email J. Wolcott		45
12/5/2012 email J. Wolcott		5
12/10/2012 phone call J. Wolcott		5
1/4/2013 Review Blacks wherewilltheyapark.com website, phone call J. Wolcott		50
1/11/2013 phone call J. Wolcott		5
1/14/2013 phone call J. Wolcott		10

1/16/2013	phone call J. Wolcott		5
1/23/2013	phone call J. Wolcott, review of Black's Supreme Court brief		55
1/24/2013	phone call J. Wolcott		5
1/28/2013	draft Motion Affirm	3	40
1/29/2013	phone call J. Wolcott		10
1/30/2013	phone call J. Wolcott		5
1/31/2013	phone call J. Wolcott		10
2/8/2013	phone call J. Wolcott		15
2/12/2013	phone call J. Wolcott, preparation of Supreme Court brief	7	20
2/13/2013	phone call J. Wolcott, preparation of Supreme Court brief	6	45
2/14/2013	phone call J. Wolcott		15
2/18/2013	legal research motion dismiss, phone call J. Wolcott	1	10
3/7/2013	phone calls J. Wolcott (2)		15
Total this Bill	24 hours 50 minutes		\$7,450.00
Previous Balance			\$113,999.00
Balance Due			\$121,449.00

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GARY STAFFIERI and
ADRIA CHARLES STAFFIERI

Plaintiffs,

v.

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.

C.A. No. 7439-VCL

[PROPOSED] FINAL ORDER AND JUDGMENT

On this _____ day of _____, 2013, having considered certain affidavits submitted by Plaintiffs Gary Staffieri and Adria Charles Staffieri (the "Plaintiffs") in support of an award of attorneys' fees and costs as awarded in this Court's October 24, 2012 Post-Trial Order (the "Decision"), it is HEREBY ORDERED as follows:

1. Judgment is entered in favor of Plaintiffs and against Defendants Henry Black, Mary Lou Black, Raymond Buchta, Scott Black, Blackball Properties, LLC, Paul Miller, and Candy Miller in the amount of \$184,320.47.
2. Post-judgment interest is awarded at the legal rate from the date of this Order to the date of satisfaction.
3. The Register in Chancery shall forthwith forward to the Prothonotary of the Superior Court of the State of Delaware in and for New Castle County a certified copy of this Final Order and Judgment to be entered by the Prothonotary in the same amount and form and in the same books and indexes as judgments and orders in accordance with 10 *Del. C.* § 4734.

4. This judgment may be supplemented with any additional attorneys' fees and costs incurred by Plaintiffs in the above-captioned litigation, in any appeal of a decision in the above-captioned action or of this Order as well in any remand from the Delaware Supreme Court, unless this Court's award of attorneys' fees and costs has been reversed.

IT IS SO ORDERED.

The Honorable J. Travis Laster