

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

RAE ANDREACCHIO

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:21-cv-00386-CWR-LGI

KAREN YAX

DEFENDANT

STATEMENT OF ATTORNEYS FEES AND COSTS

COMES NOW, the Plaintiff, by and through counsel, and submits the following statement of costs and attorney's fees in this matter.

1. Plaintiff seeks \$11,000.00 in attorney's fees to be levied against Mrs. Karen Yax.
2. Plaintiff is operating under a contingency fee/flat fee arraignment. As such, I, the undersigned counsel, have not been diligent in recording the actual time spent on this case. Nevertheless, I present the following estimates of his time in relation to the pleadings and emails I have prepared, and my time in court. It is my conviction that I spent more time on this case than what is reflected below because this does not include the time I spent reviewing Mrs. Yax's rather verbose pleadings.
3. I am claiming 45.8 billable hours in this matter from June 4, 2021, through May 25, 2023. My current hourly rate is \$275 per hour. Therefore, my computed charges would normally be \$12,595. However, I raised my hourly rate in April 2022 from \$250 per hour. And while my estimated hours are quite conservative as they are, they are estimated numbers, nonetheless. Therefore, to be fair to Ms. Yax, I am lowering my request to \$11,000.

4. Please note that 1.5 hours of this fee has already been assessed to Ms. Yax by way of the Court's previous order of contempt. However, since she has yet to pay this amount as ordered, I have included it in this charge nonetheless.

5. The computation of my time is listed below:

6/4/2021	Preparation and Filing of Complaint and Summons	2
6/7/2021	three emails to yax	0.3
6/11/2021	email to yax	0.1
6/22/2021	four emails to yax	0.4
7/12/2021	two emails to yax	0.1
8/2/2021	email to yax	0.1
8/3/2021	email to yax	0.1
8/6/2021	Preparation and Filing of Motion to Compel	0.5
8/6/2021	email to yax	0.1
8/9/2021	two emails to yax	0.2
8/10/2021	two emails to yax	0.2
8/13/2021	Preparation and Submission of Rule 26a disclosures	0.5
8/14/2021	Preparation and Filing of Supplemental Motion to Compel	0.5
8/14/2021	two emails to yax	0.1
8/23/2021	Preparation and Filing of Response to Motion to Dismiss and Brief	4
8/23/2021	two emails to yax	0.2
8/29/2021	three emails to yax	0.3
11/19/2021	three emails to yax	0.3
11/20/2021	email to yax	0.1
11/29/2021	email to yax	0.1
12/9/2021	email to yax	0.1
12/14/2021	Telephone Case Management Conference	0.2
1/21/2022	email to yax	0.1
3/1/2022	email to yax	0.1
3/13/2022	Response to Motion to Dismiss and brief	1
3/13/2022	email to yax	0.1
3/25/2022	email to yax	0.1
3/29/2022	email to yax	0.1
5/19/2022	Preparation of Discovery Requests and submission thereof	1
6/11/2022	email to yax	0.1
6/13/2022	email to yax	0.1
6/13/2022	response in opposition to protective order and brief	1
7/5/2022	email to yax	0.1
7/13/2022	two emails to yax	0.2

7/13/2022	response in opposition to motion to quash and brief	1
8/12/2022	email to yax	0.1
8/28/2022	email to yax	0.1
8/28/2022	response in opposition to motion for telephonic conference	0.5
8/29/2022	eight emails to yax	0.8
8/30/2022	two emails to yax	0.2
8/31/2022	five emails to yax	0.5
9/1/2022	one email to yax	0.1
10/12/2022	one email to yax	0.1
10/14/2022	one email to yax	0.1
10/18/2022	hearing	1.5
10/19/2022	one email to yax	0.1
10/20/2022	one email to yax	0.1
10/30/2022	one email to yax	0.1
10/30/2022	motion for sanctions and motionn for default judgment	0.5
10/30/2022	brief in support of motion for default judgment	1
10/30/2022	response to motion to show cause	2
3/19/2023	travel to jackson	3
3/20/2023	hearing	0.5
3/20/2023	return travel from jackson	3
5/22/2023	travel to and from jackson	6
5/22/2023	waiting for hearing	2
5/25/2023	travel to and from Jackson	6
5/25/2023	time at Court	2
		45.8

6. I declare under penalty of perjury that the foregoing costs and fees are correct as stated and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed.

Respectfully submitted this the 30th day of May 2023.

/s/Matthew D. Wilson

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this statement has been emailed to the Defendant at the following email address:

Karen Yax kaykaydoo2@gmail.com

Respectfully submitted this the 30th day of May 2023.

/s/Matthew D. Wilson

By: _____

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