

03/13/2015

VERONICA HANDY, ESQUIRE
CLERK OF THE COURT

IN THE SUPREME COURT OF THE VIRGIN ISLANDS

FAHTI YUSUF,

Appellant/Defendant,

v.

MOHAMMAD HAMED, et al.

Appellees/Plaintiffs.

S. Ct. Civ. No. 2015-0001

**Re: Super. Ct. Civ. No. 370/2012
(STX)**

Consolidated Cases

S. Ct. Civ. No. 2015-0001

S. Ct. Civ. No. 2015-0009

DECLARATION OF JOEL H. HOLT

I, Joel H. Holt, declare, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am co-counsel of record for the Appellee in the above captioned appeal.
2. Attached is the excerpt from the bill sent by me to my client for legal work related solely to the jurisdictional issues raised in this appeal, which totaled \$12,300.00 and has already been paid in full. I should note that I did not bill for 3.0 hours incurred on February 24, as that time was spent working on several jurisdictional issues that I anticipated the Appellant raising that were not in fact raised in the Appellant's opposition memorandum.
3. I also billed for other time related to this appeal on issues such as the motion to stay, which is not included in this request, as my client is not seeking reimbursement for these expenses since only the jurisdictional issue was addressed by this Court in dismissing this appeal.
4. I have billed \$600 per hour or more for various hourly billing clients who have retained me since 2010 and have an agreement with my client in this case to bill him \$600 per hour in this case, which I have done.
5. While I am lead counsel on this appeal, I did have co-counsel, Carl Hartmann, who actively participated in the research as well as the drafting and editing of the jurisdictional motion raised in this appeal. As such, he has submitted a separate declaration regarding his fees for the time he billed the client for his work related to just the jurisdictional issue as well. His work was not duplicative of mine, as he did research on the jurisdictional issues early on after the appeal was filed so we would be prepared for addressing this jurisdictional issue. Moreover, on the days that we did both work on the jurisdiction motion and reply, his help was needed due to the tight deadlines that we were working under.



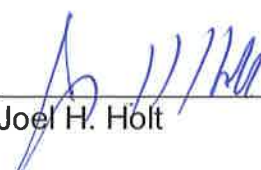
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Declaration of Joel H. Holt
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6. The client was also billed for some costs as well as the time expended by one paralegal who worked on editing the motion, but reimbursement of those items are not being sought.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 13th day of March, 2015.



Joel H. Holt

03/13/2015

VERONICA HANDY, ESQUIRE
CLERK OF THE COURT

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ATTORNEY FEE APPELLATE BILLING - HAMED		
Date	Description of Services	Time
02/13/2015	Work on research for appellate jurisdiction/review motion for stay filed by Yusuf in Supreme Court re jurisdictional cases cited/start draft of jurisdictional motion.	2.50
02/21/15	Work on jurisdictional motion.	4.50
02/22/15	Finalize and file jurisdiction motion.	6.75
02/24/15	Work on jurisdiction issues/draft of reply (reduced).	3.75
02/25/15	Finalize of reply re jurisdiction.	3.00
	Total Time: 20.50 hrs x \$600/hr	\$12,300.00