

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

GEORGE DULIN

PLAINTIFF

VS.

CIVIL ACTION NO. 4:07-CV-194-SA

**BOARD OF COMMISSIONERS OF THE
GREENWOOD LEFLORE HOSPITAL**

DEFENDANT

**PLAINTIFF'S MOTION FOR ATTORNEYS' FEES
AND EXPENSES**

COMES NOW Plaintiff George Dulin, by and through counsel, as the prevailing party in this action, and moves this Court for an award of reasonable attorneys' fees and expenses. The following exhibits support this motion:

1. Itemization of expenses and time expended by Waide & Associates, P.A., attached hereto as Exhibit "A";
2. Memorandum Opinion in the case styled *Cliff Hardy v. City of Tupelo, Mississippi*; U.S.D.C. No. 1:08-cv-28-SA, attached hereto as Exhibit "B";
3. Joint Affidavit of Jim Waide, Ron L. Woodruff, Rachel Pierce Waide, and Luther C. Fisher, IV, attached hereto as Exhibit "C";
4. Declaration of Taylor B. Smith, attached hereto as Exhibit "D";
5. Affidavit of Armin J. Moeller, Jr., attached hereto as Exhibit "E";
6. Laffey Matrix, categorizing attorneys' fees based upon number of years in practice, attached hereto as Exhibit "F";
7. Declaration of Chris H. Deaton, attached hereto as Exhibit "G"; and
8. Declaration of M. Lee Dulaney, attached hereto as Exhibit "H."

A memorandum brief in support of this motion is being filed simultaneously herewith.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that this Court enter an Order granting this motion and awarding unto Plaintiff reasonable attorneys' fees, in an amount to be decided by this Court, and out-of-pocket expenses in the amount of \$8,091.10.

RESPECTFULLY SUBMITTED, this the 4th day of December, 2012.

GEORGE DULIN, Plaintiff

By: /s/ Rachel Pierce Waide
Jim Waide, MS Bar No. 6857
Ron L. Woodruff, MS Bar No. 100391
Rachel Pierce Waide, MS Bar No. 100420
WAIDE & ASSOCIATES, P.A.
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing **Plaintiff's Motion for Attorneys' Fees and Expenses** with the Clerk of the Court, utilizing the federal court electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

Susan Fahey Desmond, Esquire
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This will further certify that undersigned counsel for Plaintiff has this day served a true and correct copy of the above and foregoing **Plaintiff's Motion for Attorneys' Fees and Expenses** via electronic mail to the following counsel, who requires manual noticing:

Daisy Gurdían Kane, Esquire
Jackson Lewis LLP
650 Poydras Street, Suite 1900
New Orleans, LA 70130-7209
gurdiand@jacksonlewis.com

THIS, the 4th day of December, 2012.

/s/ Rachel Pierce Waide

Rachel Pierce Waide