

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

AF HOLDINGS, LLC	:	
	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	2:12-cv-00262-WCO
	:	
RAJESH PATEL,	:	
	:	
Defendant.	:	

Declaration of Blair Chintella

1. On August 21, 2013, I called Jacques Nazaire on both numbers and left voicemails that I have for him to determine why Mark Lutz did not attend his deposition but as of September 5, 2013 I have yet to receive a response. I have sent multiple e-mails seeking to talk about discovery in general but have not received a response.

2. I have been licensed to practice law since approximately June of 2009.

3. It states on my retainer agreement(s) with Mr. Patel that my hourly rate is \$200.

4. I spent 2.1 hours in preparing this motion, including creating a rough draft, proofreading, revising, and drafting and doing the same for all attachments.

5. I spent .4 hours converting the documents to PDF format and preparing them to be filed via the CM/ECF system.

6. I spent .2 hours logging into the CM/ECF system to file the

documents.

7. I spent a total of 8.6 hours preparing for Mr. Lutz's deposition, including:
 - a. 4.5 hours – drafting sample questions, which includes an initial draft, revising and proofreading, categorizing so the questions flow topic-to-topic, revising again, and creating a compacted outline by major topics to supplement the multi-page list of specific questions to ask; rehearsing.
 - b. 2.1 hours – reviewing court documents (especially the deposition of AF Holdings's representative Paul Hansmeier) in the California Action described in Defendant's motion for sanctions (ECF #16) for prior depositions or testimony regarding AF Holdings or Mark Lutz;
 - c. 1 hour – reviewing Mr. Lutz's purported affidavits filed in cases such as the Sunlust Action and California Action).
 - d. 1 hour – time travelling to and from the State Bar of Georgia where the deposition was to be held, and including the time spent waiting for the deponent to attend.
 - e. The following are some but not all of the expenses associated with scheduling and attempting to conduct the deposition of Mr. Lutz:
 - i. \$108.70 – Wheeler Reporting Company Court reporter.

