

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PRENDA LAW, INC.,)	Case No. 1:13-cv-04341
)	
)	Removed from:
Plaintiff,)	
)	The Circuit Court of St. Clair County, IL
v.)	Case No. 13-L-0075
)	
PAUL GODFREAD, ALAN COOPER)	Consolidated with 1:13-cv-01569
and JOHN DOES 1-10,)	
)	
Defendants.)	

DECLARATION OF ERIN K. RUSSELL IN SUPPORT OF
DEFENDANTS' ITEMIZATION OF ATTORNEY'S FEES

I, Erin K. Russell, do hereby swear and say as follows:

1. I am an attorney licensed to practice in the States of Illinois and Georgia, and admitted to practice in the United States District Courts for the Northern District of Illinois, Central District of Illinois, Southern District of Illinois, Eastern District of Wisconsin, Western District of Wisconsin, Northern District of Georgia, Middle District of Georgia and the District of Colorado. I have been licensed to practice law since November of 2004 (Georgia) and have been engaged the practice of law in the area of complex civil litigation for the duration of my time as an attorney.
2. Attached to Defendants' Itemization of Attorney's Fees are true and correct copies of the invoices reflecting the work I performed from April of 2013 through the present pertaining to counsel and investigation regarding this matter as relates to the removal/remand issues that are the subject of the Court's Order sanctioning Prenda Law, Inc. and Paul Duffy dated February 3, 2014. [ECF No. 60] including but not limited to conferring with Defendants and co-counsel; conferring with opposing counsel; attending court proceedings relating to the remand and sanctions issues; researching and drafting the opposition to Plaintiff's remand motions; researching and drafting a reply to Plaintiffs' opposition to Defendants' sanctions motion; and retaining and conferring with local counsel in St. Clair County to clarify and memorialize the investigation revealing the circumstances surrounding the filing of Plaintiff's alleged amended complaint.
3. My standard billing rate is \$400.00 per hour. I devoted 54.6 hours to the matters that are the subject of Defendants' Motion for Sanctions and the Court's Order pertaining to those activities.

4. The total amount of attorney's fees, costs and expenses incurred by my firm related to the aforementioned matters in this case total \$22,894.20.
5. I am informed and believe that Plaintiff's attorney is not an infant and is not incompetent, nor is he an active member of the military.

I declare under penalty of perjury and under the laws of the United States of America that the foregoing is true and correct.

This the 7th day of February, 2014.



Erin K. Russell