

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JENNIFER J. TAYLOR,)	
<i>Plaintiff,</i>)	
v.)	Case No. 1:12cv523
)	(GBL-IDD)
REPUBLIC SERVICES, INC., <i>et al.</i> ,)	
<i>Defendants.</i>)	
)	

DECLARATION OF CRAIG C. REILLY

CRAIG C. REILLY, being duly sworn, deposes and states as follows:

1. I am over 21 years of age and otherwise competent to make this declaration. I have personal knowledge of the statements contained herein. The statements herein are true and correct to the best of my knowledge, information, and belief.

2. I am a member in good standing of the Virginia State Bar (VSB # 20942) and am admitted to practice before this Court.

3. I have been asked to serve as an expert for Plaintiff, Jennifer J. Taylor, in support of her application for an award of attorneys' fees. I am being compensated for the time I have spent formulating my opinions and preparing this declaration. My compensation is not contingent in any way upon the Court's decision. In particular, I have been asked to opine about the hourly rates charged by attorneys in the Northern Virginia market for legal services similar to those provided in this case by Plaintiff's counsel ("Charlson Bredehoff").

I. QUALIFICATIONS

4. A true copy of my resume is attached as Exhibit 1. Pertinent to the pending fee application, I summarize my qualifications as follows:

5. I am a 1981 graduate of the University of Virginia School of Law. I served as a law clerk to the Supreme Court of Virginia from 1982 – 1983. I have been a licensed member of the Virginia bar since 1981, and a licensed member of the bar of the District of Columbia since 1984. I have been admitted to practice before, and have appeared in, the state courts (trial and appellate) and federal courts (bankruptcy, district, and appellate) of both jurisdictions. In 2005, I was admitted to practice before the United States Supreme Court.

6. The vast majority of my legal work over the last thirty years has been civil litigation, most of that being in the United States District Court for the Eastern District of Virginia, Alexandria Division.

7. In the course of my practice, I have appeared in a wide variety of civil litigation cases, including employment and discrimination cases (representing both plaintiffs and defendants). Based on this experience, I am aware of the hourly rates charged by attorneys in Alexandria in particular, and Northern Virginia generally, for civil litigation in federal court, including employment cases.

8. Furthermore, in the course of my litigation practice, I have applied for, or opposed, numerous fee applications under fee-shifting statutes, rules, and contractual provisions. Through that fee litigation I also have become familiar with the hourly rates charged for federal civil litigation in Alexandria, and Northern Virginia generally, and with the case law formulae and factors to be applied in determining the reasonableness of attorneys' fees.

9. Finally, I have presented evidence as an expert witness on attorneys' fees in several cases, including three recent cases in this Court and the Fairfax County Circuit Court:

Mantech Int'l Corp. v. Analex Corp., No. 2008-5845 (Fairfax Cir. June 10, 2011) (order);

Vienna Metro LLC v. Pulte Home Corp., No. 1:10cv502 (GBL) (E.D. Va. Aug. 24, 2011) (Doc. 263) (fee award); and

Tureson v. Open Sys. Sciences of Va., Inc., No. CL-2012-323 (Fairfax Cir. May 31, 2013) (letter opinion).

In each of these cases, my opinions about the reasonableness of hourly rates and fees were adopted by the court. In the two Fairfax Circuit Court cases, moreover, I gave testimony, was cross-examined, and was found qualified as an expert on legal fees in Northern Virginia.¹

II. MATERIALS CONSIDERED

10. In forming my opinions, I considered materials and information from several sources. First, I interviewed Carla D. Brown, Esq., counsel for Plaintiff. Second, I reviewed the Docket Sheet and read the Court's *Memorandum Opinion* (Doc. 288). Third, I reviewed the Plaintiff's fee petition brief and supporting declarations. Fourth, I reviewed the biographies of the principal lawyers for Plaintiff.

III. THE METHODOLOGY

11. In analyzing the reasonableness of the fees, I understand that the Court will apply the Fourth Circuit's three-step formula.² Under the Fourth Circuit's formula, the first step is to determine a "lodestar" figure by multiplying the number of reasonable hours expended times a reasonable hourly rate. In deciding what constitutes a reasonable number of hours and a reasonable rate, the Court also would analyze any applicable *Johnson/Barber* factors.³ In the second step, the Court would subtract fees for hours spent on unsuccessful claims that are

¹ I also have provided a declaration as an expert in support of the fee award in another case in this Court, which is still pending. *Carlucci v. Han*, No. 1:12cv451-JCC-TCB (E.D. Va. Mar. 26, 2013) (Doc. 141-2) (declaration). And I recently provided an opposing expert declaration in an ERISA case pending in this Court, which (I understand) was settled without a decision on the fee award. *Hsieh Lewis v. Kratos Def. & Sec. Solutions, Inc.*, No. 1:12cv1012 (TSE-TCB) (E.D. Va. June 25, 2013) (Doc. 195-3) (declaration).

² See *Grissom v. Mills Corp.*, 549 F.3d 313, 320-21 (4th Cir. 2008); *Robinson v. Equifax Info. Serv., LLC*, 560 F.3d 235, 243-44 (4th Cir. 2009) (explaining the three steps of *Grissom* test).

³ See *Barber v. Kimbrell's*, 577 F.2d 216, 226 (4th Cir. 1978) (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974)).

unrelated to the successful ones for which fees are being awarded. Finally, in the third step, the Court may adjust the potential award depending upon the degree of success attained.

12. The *Johnson/Barber* factors are: (1) the time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney's opportunity costs in pressing the instant litigation; (5) the customary fee for like work; (6) the attorney's expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount in controversy and the results obtained; (9) the experience, reputation and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between attorney and client; and (12) attorneys' fees awards in similar cases.

13. The principal determinants in the analysis are the time reasonably expended and the appropriate hourly rates, which are multiplied to calculate the lodestar amount.⁴ Because I am only opining on the reasonableness of the hourly rates, I will focus on *Johnson/Barber* factors (3), (5), (9), and (12), which figure in the determination of the appropriate hourly rates.

14. The regular hourly rates charged by Plaintiff's counsel, Charlson Bredehoft, and that were charged in this action, are stated in the table attached hereto as Exhibit 2.

15. Determining "a market rate in the legal profession is inherently problematic, as wide variations in skill and reputation render the usual laws of supply and demand largely inapplicable."⁵ Based on my analysis, and as explained below, it is my opinion that the Charlson Bredehoft rates are appropriate and reasonable in light of the skills and experience of the

⁴ *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983).

⁵ *Grissom*, 549 F.3d at 321 (citations omitted).

Charlson Bredehoft attorneys, and those rates are within “the prevailing market rates in the [Northern Virginia market] for the type of work for which [Plaintiff] seeks an award.”⁶

IV. THE APPROPRIATE HOURLY RATES

A. THE TYPE OF WORK AND RELEVANT MARKET

16. The Plaintiff, an executive-level female employee, sued her former employer, asserting federal law claims for gender discrimination, sexual harassment, hostile work environment, and retaliation, as well as state law claims that often are asserted with those federal claims (such as wrongful termination and intentional infliction of emotional distress). The defendant is a large, national corporation. The events at issue involved alleged misconduct by several other executive-level employees, which took place over several years prior to Plaintiff’s termination. The remedies sought included back pay, front pay, compensatory damages, and punitive damages—totaling well in excess of \$1 million. The defendant denied liability and vigorously defended the action.

17. Not all of the originally asserted claims survived through trial. The case was ultimately tried to the Court, over the course of five days, on the hostile work environment and retaliation claims, as well as Plaintiff’s damages. The Court issued a 60-page decision, finding for Plaintiff on her retaliation claim and awarding \$377,734 in back pay, \$804,791 in front pay, and \$50,000 in compensatory damages.

18. Given the nature of the causes of action, the triable issues of fact, the amount of damages sought, the legal framework governing these sorts of claims, and the corporate size of the defendant, this case was complicated, and I would categorize it as high-stakes employment litigation. Plaintiff needed highly skilled counsel to prosecute her claims

⁶ *Id.* (citations omitted).

19. The relevant market for legal services in this sort of high-stakes employment litigation is not simply defined by geographic borders or jurisdictional boundaries. When searching for capable counsel for this sort of case against a large, national corporate employer, an executive-level plaintiff would likely consider retaining premier firms from Virginia, as well as the adjacent jurisdiction of the District of Columbia, that specialize in representing employees in discrimination cases. Similarly, large corporate defendants may retain lawyers from either Virginia or the District of Columbia as defense counsel. In this sort of case, therefore, the relevant market for legal services includes both jurisdictions, and so consideration of billing rates from the District of Columbia may be appropriate in determining the reasonable hourly rates, even though the law firm retained by Plaintiff, Charlson Bredehoft, is from Northern Virginia. Thus, in my opinion, the Adjusted Laffey Matrix warrants consideration (but not dispositive weight) in this analysis.

B. APPLYING THE JOHNSON/BARBER FACTORS

Factor 3: The Skill Required to Properly Perform the Legal Services Rendered

20. This factor is important to my analysis. In employment litigation in the Northern Virginia legal market, most lawyers and law firms will represent a mix of plaintiffs and defendants; despite having a mix, lawyers and law firms tend to specialize in serving as counsel to *either* plaintiff-employees *or* defendant-employers. Nonetheless, the employment lawyer prosecuting an individual plaintiff's discrimination and retaliation case against a large, corporate employer must possess legal skills, experience, and litigation capabilities at least equal to those of the lawyers and law firms that the defendant-employer is likely to engage.

21. In this region, large, national (and international) companies regularly retain top-of-the-line lawyers from major national (and international) law firms to defend them in complex

and high-stakes employment cases. National firms like McGuire Woods LLP, Greenberg Traurig LLP, and Hunton & Williams LLP, to name only a few, have “labor and employment” departments whose attorneys specialize in defending large, corporate employers in employment discrimination cases brought by individuals in Northern Virginia.

22. When an executive-level plaintiff from Northern Virginia sues a large, national corporation in a high-stakes discrimination case, defense firms of the highest-caliber are likely to appear as defense counsel, as occurred here. The defense firms in this action (“Seyfarth Shaw” and “Ogletree Deakins”), have premier employment law practices with lawyers who specialize in representing corporate employers. Seyfarth Shaw markets itself as a “Complex Employment Litigation Powerhouse,” with 380 employment lawyers.⁷ Ogletree Deakins has 700 lawyers, all of whom practice employment law.⁸ Significantly, the defense lawyers in this action were not from Northern Virginia, but from other jurisdictions, who were brought in to defend the corporate defendant. Retaining foreign counsel to defend a case like this is not uncommon.

23. Charlson Bredehoft, by contrast, specializes in representing plaintiff-employees, and has developed the skills, trial experience, and litigation capabilities to successfully prosecute plaintiff’s discrimination and employment claims against large corporate defendants. Most of the firm’s cases are in Northern Virginia, and often the firm is pitted against defense lawyers from large, national law firms, as occurred here. This underscores my conclusion that the skill required by plaintiff’s counsel must match that of defense counsel. Charlson Bredehoft possesses those skills, that experience, and those litigation capabilities—which have been proven over and over again in million dollar verdicts against large corporate defendants.

⁷ See www.seyfarth.com/labor-employment (visited 9/26/2013).

⁸ See www.ogletreedeakins.com/practice-areas (visited 9/26/2013).

24. That, in turn, warrants consideration of the hourly rates charged by defense counsel when determining whether Charlson Bredehoff’s rates are reasonable in the market. Since the skills, experience, and litigation capabilities necessary to prosecute a discrimination case against a large corporate employer are the same as those needed to defend the action, there should be some parity between the billing rates on both sides of the case.

Factor 5: The Customary Fee for Like Work

25. This factor has several levels. First, employment litigation customarily is billed on an hourly basis by plaintiff’s counsel (knowing that any fee award from the Court will be on an hourly basis). Second, in this case, “like work” is high-stakes employment litigation. Third, as I point out above, the skills involved in high-stakes employment litigation are the same for plaintiff and defense counsel, and there should be parity between the billing rates on both sides.

26. In the *Vienna Metro* case (*see* ¶ 9 above), I researched and created a matrix of hourly rates for complex civil litigation in Northern Virginia, which was adopted by the Court in that case (“*Vienna Metro* matrix”). Those rates for 2011 are as follows:

2011 Range of Hourly Rates in Northern Virginia⁹

Paralegal	1-3	4-7	8-10	11-19	20+
\$130 – 350	\$250 – 435	\$350 – 600	\$465 – 640	\$520 – 770	\$505 – 820

Those rates have subsequently been applied by other courts in other types of complex, multi-million dollar litigation (*see* cases identified in ¶ 9 above). The *Mantech* case, for example, was a multi-million dollar theft of trade secrets case arising from the actions of an executive-level

⁹ Prior to the economic slow down, law firm hourly rates had climbed steadily on an annual basis. Since 2011, however, rates have remained the same or increased only slightly. *See* THE NATIONAL LAW JOURNAL, 2012 Billing Survey, p. 1, 9-11 (Dec. 17, 2012) (hourly rates for 2012 varied only slightly from 2011—up only by 3 to 5 percent). Accordingly, in my opinion, the rates in this table would be valid comparables for 2012 and 2013.

employee who left the plaintiff corporation to join a competitor corporation. That sort of complex litigation is typically handled by employment law specialists, like the firms on both sides of this case. Similarly, the Court used those rates as comparative rates in another recent employment law case.¹⁰ Privately negotiated rates for complex litigation do not, in and of themselves, define the “prevailing market rate” for “like work,” but “the rates charged in private representations may afford relevant comparisons” for determining the “prevailing market rate” under federal fee-shifting statutes.¹¹

27. In my opinion, the rates stated in the *Vienna Metro* matrix are valid comparables that should be considered when determining whether the rates charged by Charlson Bredehoff are reasonable—that is, whether they are within “the prevailing market rates in the [Northern Virginia market] for the type of work for which [Plaintiff] seeks an award,” which work is high-stakes employment litigation. The rates charged by Charlson Bredehoff are within or lower than the rates in the *Vienna Metro* matrix.

28. Similarly, as I explained above, the relevant market for legal services in this sort of litigation crosses jurisdictional lines, and so the Adjusted Laffey Matrix rates for the District of Columbia also are valid comparable rates in this analysis (but not determinative).¹² The Adjusted Laffey Matrix rates also are comparables for analyzing the Charlson Bredehoff rates.

29. In light of these comparable rates, in my opinion, the hourly rates charged by Plaintiff’s counsel are reasonable and within the prevailing market rates in Northern Virginia for this sort of high-stakes employment litigation, in which an executive-level plaintiff is suing a

¹⁰ *Tech Systems, Inc. v. Pyles*, No. 1:12cv374 (GBL/JFA), 2013 U.S. Dist. LEXIS 110636, *19-20 & n.4 (E.D. Va. Aug. 6, 2013).

¹¹ *Blum v. Stenson*, 465 U.S. 886, 895 n.11 (1984).

¹² See <http://laffeymatrix.com/see.html> (visited 9/26/2013).

large, national corporation for discrimination and seeking well over a million dollars in damages and other remedies.

Factor 9: The Experience, Reputation and Ability of the Attorney

30. The Charlson Bredehoft firm has earned the reputation, confirmed by the results that the firm has obtained time and again, as the premier employment firm which specializes in representing plaintiffs in Northern Virginia. The firm's lawyers, and particularly Ms. Bredehoft, have vast jury trial experience, and the firm has a proven track record against corporate defendants represented by large law firms. Therefore, this factor is also strongly supports the reasonableness of the hourly rates charged by Charlson Bredehoft, which are within or below the comparable rates charged by typical defense firms in high-stakes employment litigation.

Factor 12: Attorneys' Fees Awards in Similar Cases

31. In my opinion, the *Mantech* and *Tech Systems* cases are "similar cases" for the purpose of comparable fee awards. In both of those employment law cases, the judges used the rates stated in *Vienna Metro* matrix as comparables. I also am of the opinion that the hourly rates approved in *Grissom* for this same law firm in similar litigation are **not** comparable and should **not** be used as a benchmark here. In *Grissom*, the plaintiff failed to provide evidence of the applicable hourly rate through expert evidence from other lawyers who were familiar with the prevailing hourly rates. As a result, the appellate court devised its own table of applicable hourly rates. No such default in proof has occurred here. Instead, the facts presented herein show that the prevailing hourly rates in this market for this sort of high-stakes employment litigation are comparable to those used in the "similar cases" of *Mantech* and *Tech Systems*, and that Charlson Bredehoft's hourly rates are within or below the prevailing hourly rates charged for

“like work” in the Northern Virginia market by employment lawyers having similar skills, experience, and litigation capabilities.

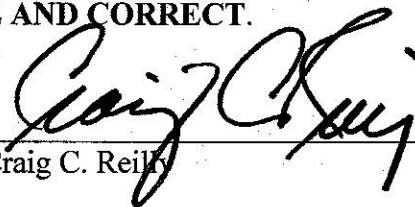
32. Moreover, applying the *Grissom* hourly rates in this case would under-compensate Plaintiff for the legal fees she incurred. Plaintiff’s counsel must possess the same skills, the same experience, and the same litigation capabilities as defense counsel. The billing rates for plaintiff’s counsel should be in parity with defense counsel’s rates, which also reflect the prevailing market rate for “like work” in this market.

33. Accordingly, in my opinion, the rates charged by Charlson Bredehoft are within the prevailing market rates in Northern Virginia for this sort of high-stakes employment litigation.

34. Finally, it is settled that fees may be awarded for work done by paralegals.¹³ As shown in the *Vienna Metro* matrix, the rates charged for work performed by the Charlson Bredehoft paralegals are consistent with rates charged in Northern Virginia for paralegals of comparable experience (*i.e.*, between \$130 and \$350 per hour depending on years of experience).

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING
STATEMENTS ARE TRUE AND CORRECT.**

Dated: September 30, 2013



Craig C. Reilly

¹³ See *Priestley v. Astrue*, 651 F.3d 410, 416 (4th Cir. 2011) (under federal fee-shifting statutes, “reimbursement of attorneys fees includes authorization for reimbursement for work performed not only by attorneys but also by persons doing ‘tasks traditionally performed by an attorney and for which the attorney would customarily charge the client,’ regardless of whether a licensed attorney, *paralegal*, or law clerk performed them.”) (emphasis added).

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ADMITTED: State and Federal Courts: Virginia (1981)
District of Columbia (1984)

EDUCATION: University of Virginia School of Law: J.D., 1981
Amherst College: B.A., 1976 (English)

EMPLOYMENT:
2008 - Solo Practitioner
Alexandria, Virginia
1983-08 Richards McGettigan Reilly & West, P.C. (Shareholder 1987-08)
Alexandria, Virginia
1982-83 Law Clerk, Supreme Court of Virginia
Richmond, Virginia
1981-82 Associate, Craig T. Redinger, P.C.
Charlottesville, Virginia

PROFESSIONAL ASSOCIATIONS AND MEMBERSHIPS:

American Bar Association (1981-)
Virginia State Bar (1981-)
Virginia Bar Association (1981-)
District of Columbia Bar (1984-)
Federal Bar Association, Northern Virginia Chapter (1994-)
Alexandria Bar Association (1983-)

LITIGATION EXPERIENCE:

General Civil Litigation: Over 25 years of experience in a wide variety of civil litigation in state and federal court, including contracts, business torts, products liability and personal injury, trade secret and employment disputes, landlord-tenant and real estate, and commercial law.

Intellectual Property: Numerous patent litigation matters involving such diverse arts as artificial intraocular lenses, catheter guide wires, metal alloys, flexible flashlights, chemical catalysts, antiperspirant chemicals, data terminals, tape storage systems, tape drive assemblies, gas detectors, modems, computer encryption, telecommunications, and florescent lights. Five jury trials and one bench trial in patent cases, plus numerous dispositive motions. Trademark litigation and domain name cases, including preliminary injunction motions.

Complex Federal Litigation: Civil and criminal cases involving RICO, bribery, and government procurement fraud; antitrust; securities fraud class actions (plaintiff and defense); ERISA class action and ERISA fraud, securities fraud, bribery, and breach of fiduciary duty.

LECTURES:

A Practical Guide to Federal Court Rules & Procedures in Virginia
(NBI, Dec. 7, 1995)

Intellectual Property Litigation: Patent Litigation in the "Rocket Docket"
(Alexandria Bar, Feb. 13, 1996)

Federal Court Litigation: Motions Practice in Federal Court
(Alexandria Bar, May 8, 1996)

Intellectual Property Litigation: Injunctions and Protective Orders
(Alexandria Bar, Feb. 11, 1997)

Federal Court Litigation: Winning without Trial: Summary Judgment and Settlement
(Alexandria Bar, May 21, 1997)

Intellectual Property Litigation: Markman Hearings, Spoliation, Computer Discovery
(Alexandria Bar, Feb. 10, 1998)

Federal Court Litigation: The Law and Procedures of Privileges During Civil Discovery
(Alexandria Bar, May 19, 1998)

Intellectual Property Litigation: Fighting Back: Patent Misuse and Antitrust Counterclaims
(Alexandria Bar, Feb. 11, 1999)

Federal Court Litigation: Personal Jurisdiction-Beyond the Basics
(Alexandria Bar, May 18, 1999)

Intellectual Property Litigation: Trademark Litigation in the "Rocket Docket"
(Alexandria Bar, Feb. 15, 2000)

Federal Court Litigation: Jurisdiction, Removal, and Remand
(Virginia Trial Lawyers Assoc., Mar. 31, 2000)

Federal Court: Navigating the "Rocket Docket"
(Fairfax Bar Assoc., May 11, 2000)

Federal Court Litigation: Protective Orders
(Alexandria Bar, May 16, 2000)

Intellectual Property Litigation: Trade Secret Litigation in State and Federal Courts
(Alexandria Bar, Feb. 15, 2001)

Federal Court Litigation: New Discovery Rules
(Alexandria Bar, May 8, 2001)

Federal Court Litigation: Practice Before United States Magistrate Judges and Civil Discovery
(Alexandria Bar, Sept. 23, 2003)

Federal Court Litigation: Expert Witness Practice
(Alexandria Bar, Sept. 28, 2004)

Federal Court Litigation: Protective Order Practice and Sealing of Court Records
(Alexandria Bar, Oct. 26, 2005)

Federal Court Bench-Bar: Federal Civil Discovery Practices (FBA-No.Va., May 2008)

Federal Court Bench-Bar: Federal Civil Motions Practice (FBA-No.Va., May 2009)

Difficult Depositions
(Alexandria Bar, Oct. 2009)

Federal Court Bench-Bar: Federal and State Court Injunction Practices (FBA-No.Va., Jan. 2010)

Federal Law of Sanctions: Rules 16, 26, 30, 37 and 45 (FBA-No.Va., Mar. 2010)

Federal Court Bench-Bar: Federal Protective Order Practice (FBA-No.Va., May 2010)

Federal Law of Sanctions: Rules 11 & 56, 28 U.S.C. § 1927, and Inherent Authority (FBA-No.Va., Feb. 2011)

- PUBLICATIONS:** *Flight Training for Patent Litigation in the “Rocket Docket”*
INTELLECTUAL PROPERTY LITIGATION, Vol. VII, No.3 (ABA Fall 1995)
- Interlocutory Orders: Getting it Right the Second Time*
LITIGATION, Vol. 22, No.2 at 43 (ABA Winter 1996)
- Forum Non Conveniens: You Can Get There From Here*
LITIGATION, Vol. 24, No.1 at 36 (ABA Fall 1997)
- The Eastern District of Virginia - Alexandria Division*
THE JOURNAL (VTLA Fall 1999)
- The Truth About Lying*
LITIGATION, Vol. 29, No.4 at 40 (ABA Summer 2003)
(reprinted in THE LITIGATION MANUAL (ABA 1st Supp. 2007)
- Ashcraft v. Conoco, Inc. and Local Civil Rule 5(C): Ten Years Later*
THE ROCKET DOCKET NEWS (FBA-No.Va. June 2010)

EXHIBIT 2

**CHARLSON BREDEHOFT
TIMEKEEPER RATE TABLE**

LAWYERS	<i>Experience (in years)</i>	<i>Actual Rate</i>
Elaine C. Bredehoft	29	\$550-600
Carla D. Brown	14	\$475
Brian A. Scotti	9	\$425
Heather A. Jones	11	\$450
Kathleen Z. Quill	17	\$400
Daphne S. Gebauer	6	\$375-400
Aseil Abu-Baker	3	\$325
PARALEGALS		
Kathy M. Baker	30	\$250
Leslie A. Hoff	23	\$250
Alexandra C. Bredehoft	1	\$135