

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,  
Plaintiff

v.

ROBERT F. STROM as the Finance Director of  
THE CITY OF CRANSTON, et al.  
Defendants

C.A. No. 15-525

**AFFIDAVIT OF ATTORNEY SONJA L. DEYOE**


I, Sonja L. Deyoe, declare as follows:

1. I am disinterested counsel. I have no interest in the outcome of this case. I have no prior relationship with the plaintiff Jason Richer, other than being requested to review his motion for attorneys fees and cost, determine whether the requested rates for attorney time are reasonable and prevailing and whether the costs requested are reasonable.
2. I have been admitted to practice before all courts in the State of Rhode Island since November 1, 2000. I have 19 years of experience in litigation. In 2017, 2018 and 2019, my standard hourly rate was \$325.00 per hour.
3. I have substantial experience in representing plaintiffs in federal employment matters. I have prosecuted more than one hundred matters before this court, most dealing with civil rights and employment matter arising out of Title VII, the ADA and related state laws.
4. The firms of Strauss, Factor, Laing & Lyons ("Strauss Factor") and Labinger Law have requested, and I have agreed, to review and analyze their hourly rates and to provide an opinion as to the reasonableness of those rates.
5. In performing my responsibilities, I have acquainted myself with the nature and extent of the litigation and have reviewed billings of Strauss Factor, attached as an Exhibit.

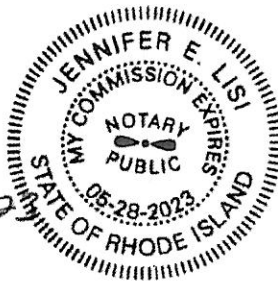
6. During my years of practice, I have had the opportunity to become familiar with prevailing hourly rates for attorneys practicing civil rights litigation in the state of Rhode Island.
7. I have reviewed the affidavit of Thomas Lyons of Strauss Factor. I find his requested hourly rate of \$350.00 per hour for his role as lead trial counsel and his substantive efforts on behalf of the Plaintiff, whom prevailed at trial. I find his requested rate to be reasonable, fair, and commensurate with prevailing rates in Rhode Island for an attorney of his skill and experience.
8. I have reviewed the affidavit of Rhiannon Huffman of Strauss Factor. I find her requested hourly rate of \$150.00 per hour for her role as associate counsel and her substantive efforts on behalf of the Plaintiff, whom prevailed at trial. I find her requested rate to be reasonable, fair, and commensurate with prevailing rates in Rhode Island for an attorney of her skill and experience.
9. Further, having reviewed the affidavits of the attorneys and the billing records, I believe the amounts sought are fair and reasonable based on the description of the activities set forth therein and the fact that Attorney Lyon's states that the bill was substantially reduced based on claims in which the Plaintiff was not successful.

Signed this 5<sup>th</sup> day of May, 2020.

  
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Sonja Deyoe

  
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Notary Public

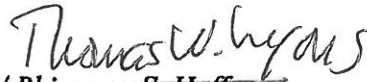
My commission expires: 05/28/2023





**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2020, a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

  
/s/ Rhannon S. Huffman