

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

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C.A. No. 15-525

Declaration of Rhiannon S. Huffman

I, Rhiannon S. Huffman, subscribe as true under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am an associate attorney at Strauss, Factor, Laing & Lyons (“Strauss Factor”), with an office at One Davol Square, Suite 305, Providence, RI. I am a 2008 graduate of Roger Williams University School of Law. I have been admitted to the Rhode Island Bar since 2011, the Massachusetts Bar since 2011, the United States District Court for the District of Rhode Island since 2013, the Court of Appeals for the First Circuit since 2014, and the United States Supreme Court since 2019.
2. I am currently the Co-Chair of the Rhode Island Bar Association Technology in the Practice Committee, a member of the Rhode Island Bar Association E-Filing Working Group, a member of the Rhode Island Bar Association Superior Court Bench/Bar Committee, and a member of the Rhode Island Bar Association Federal Court Bench/Bar Committee.
3. Strauss Factor began representing Plaintiff in November 2015 and has represented him continuously in this matter through the appeal in 2020.

4. Since November 2020, I have worked on the following matters in connection with the successful due process claim in this lawsuit, among others:

- Drafting the complaint and amended complaint
- Preparing the preliminary injunction motion
- Reviewing numerous settlement communications
- Preparing written discovery
- Attending the depositions of Chief Reynolds and Capt. Lafferty
- Attending other conferences with the Court
- Frequent communications with Plaintiff, Defendants' counsel and the Court
- Preparing the summary judgment motion and related memoranda that resulted the favorable decision on due process in Caniglia v. Strom, 396 F.Supp.3d 227

(D.R.I. 2019)

5. The time I spent on this case was fair, reasonable and necessary for the prosecution of the Plaintiff's due process claim.

6. The time I devoted to this case reduced the time I could have devoted to representation of other clients.

Signed this 5th day of May, 2020.



Rhiannon S. Huffman