

**DECLARATION OF ABRAM J. PAFFORD, ESQUIRE**

I, Abram J. Pafford, Esquire hereby swear and depose as follows:

1. I make this declaration pursuant to 28 U.S.C. § 1746.
2. I am a member of the Virginia Bar.
3. I am an attorney in Lynchburg, Virginia.
4. Based upon my experience, I believe that a reasonable hourly rate is \$250 per hour in Lynchburg, Virginia for attorneys and \$75 per hour for paralegals.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 28, 2014

/s/Abram J. Pafford