

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

JOHN L. PADGETT

Plaintiff,

v.

GEORGIA REPUBLICAN PARTY, INC

Defendant.

CIVIL ACTION FILE

NO: 2021CV354612

AFFIDAVIT OF ALEX B. KAUFMAN

Personally appeared Alex B. Kaufman, Esq., before the undersigned officer duly authorized by law to administer oaths, who, after being duly sworn, states that the facts contained in the following *Affidavit* are true and correct.

1. My name is Alex B, Kaufman. I am of legal age, of sound mind, and competent to testify regarding the matters set forth herein. I am a partner and member at the law firm Chalmers, Adams, Backer & Kaufman, LLC (“Chalmers Adams”). Prior to joining Chalmers Adams, I was a partner and shareholder at the law firm of Hall Booth Smith (“HBS”). I am familiar with Chalmers Adams and HBS’ billing methods and records.
2. I have personal knowledge of the facts set forth herein. This *Affidavit* is given in support of the GOP’s Motion for Attorneys’ Fees and Costs with Brief in Support Thereof.
3. I am a 2009 graduate of Emory University School of Law.
4. I have been practicing law in Georgia since 2009.
5. I am admitted to practice law in Arizona, D.C., Georgia, New York, and Massachusetts.
6. I am the outside general counsel for the Georgia Republican Party, Inc. (the “GAGOP”) and serve as lead counsel for the GAGOP in this action.

7. My standard hourly rate is Five Hundred and No/100 dollar (\$500) per hour. However, for this matter, my hourly rate at Chalmers Adams is Four Hundred and No/100 dollars (\$400) per hour. Juan S. Patino is my associate, and his rate is Three Hundred and Fifty and No/100 dollars (\$350) per hour. The other attorneys' rates at my firm range between \$275-\$600 per hour. I am familiar with the billing rates for attorneys in similar types of cases. It is my opinion that the legal fees incurred in this matter are reasonable and necessary.
8. I personally supervised all of the work and effort and worked "elbow to elbow" with all attorneys involved at HBS and Chalmers Adams in researching and drafting appropriate filings in this matter. The time spent by me, my associates, and legal staff, is reasonable and the hourly rates are customary and reasonable in Metro-Atlanta for someone of my, my associates', and legal staff's education, experience, skill and knowledge in these legal areas, the complexity of the issues involved.
9. The GAGOP incurred \$20,117.50 in attorneys' fees related to Plaintiff's failure to produce documents and services related to compelling documents from Plaintiff.
10. I arrived at the above-stated figure by reviewing my firm's and HBS' billing statements for services rendered in connection with this matter. It is in the regular course of business for the firm and HBS to make and keep such business records. A true and correct copy of the invoice and billing statements are attached as **Exhibit 1** and substantiate the bills made in this matter to date.
11. The attorneys' fees and expenses incurred by the GAGOP in this action have been necessary for the defense of this action and are reasonable given the nature of the proceedings.

12. The GAGOP will incur additional fees and costs in this matter, including preparation for a hearing and oral arguments before the Court related to their Motion for Attorneys' Fees and Cost under O.C.G.A. § 9-11-37(a)(4).

FURTHER AFFIANT SAYETH NAUGHT

This 13 day of November 2023.


Alex B. Kaufman

Sworn to and subscribed before me
This 13 day of November 2023


Notary Public

My Commission Expires 06/12/2027



EXHIBIT 1



HALL BOOTH SMITH, P.C.

191 Peachtree St, NE
Suite 2900
Atlanta, GA 30303-1775
P:404-954-5000 F:404-954-5020
Federal ID: 58-1852659

Georgia Republican Party, Inc.
P.O. Box 550008
Atlanta, GA 30355
Attention: **Ryan Caudelle**

October 7, 2022
Client: 013393
Matter: 000002
Invoice #: 91660086

Page: 1

RE: Padgett, John L. v. Georgia Republican Party, Inc.

For Professional Services Rendered Through September 30, 2022

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
08/01/22	Peter Skaliy	Review and analysis of updated file to determine discovery issues, assessment of law regarding supplementation of discovery, and draft and prepare good faith letter to the Plaintiff's counsel.	2.00	275.00	550.00
08/03/22	Peter Skaliy	Review and analysis of filing with Court, review and analysis of correspondence from Court, confer with Court regarding requested next steps, and assessment of file to address Court's concerns.	0.80	275.00	220.00
08/04/22	Peter Skaliy	Confer with Fisher & Phillips regarding non-party document request, and expense related to same.	0.40	275.00	110.00
08/05/22	Peter Skaliy	Review and analysis of Order executed by Judge extending discovery deadline.	0.40	275.00	110.00
08/09/22	Alex Kaufman	Correspondence with P. Skaily re deposition dates for Padgett.	0.10	425.00	42.50
08/16/22	Peter Skaliy	Review and analysis of ongoing discovery dispute, draft and prepare Motion to compel Discovery, and prepare exhibits to accompany filing.	3.10	275.00	852.50
08/17/22	Peter Skaliy	Confer with Plaintiff's counsel regarding discovery dispute.	0.30	275.00	82.50

Date	Person	Description of Services	Hours	Rate	Amount
08/17/22	Peter Skaliy	Supplement Motion to Compel Discovery to include conversation and issues discussed during same into Motion.	0.50	275.00	137.50
08/17/22	Peter Skaliy	File Motion with Court, and assessment of next steps related to discovery.	0.20	275.00	55.00
08/19/22	Peter Skaliy	Receipt and review of filings with Court.	0.10	275.00	27.50
08/31/22	Alex Kaufman	Review discovery responses	0.40	425.00	170.00
08/31/22	Alex Kaufman	Review of Fisher Phillips 3rd party discovery production.	1.00	425.00	425.00
09/01/22	Peter Skaliy	Review [REDACTED] [REDACTED] [REDACTED] [REDACTED]	1.00	275.00	275.00
09/01/22	Peter Skaliy	Receipt and review of correspondences from Jefferson Allen.	0.30	275.00	82.50
09/01/22	Alex Kaufman	Deposition scheduling.	0.10	425.00	42.50
09/02/22	Alex Kaufman	Conference with co-counsel re Padgett deposition and exhibits to be used for deposition and strategy. Correspondence with opposing counsel.	0.50	425.00	212.50
09/05/22	Peter Skaliy	Review and analysis of pro se Plaintiff's Motion to Dismiss.	0.50	275.00	137.50
09/16/22	Peter Skaliy	Draft and prepare notice of deposition for Plaintiff, and file same.	0.40	275.00	110.00
09/16/22	Peter Skaliy	Receipt and review of correspondence regarding deposition.	0.10	275.00	27.50
09/18/22	Peter Skaliy	Review and analysis of [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	3.70	275.00	1,017.50
09/19/22	Peter Skaliy	Draft and prepare extensive deposition outline, assess impeachment evidence, and needed additional discovery for future handling of claim and for forthcoming Padgett deposition.	5.80	275.00	1,595.00
09/20/22	Peter Skaliy	Review and analysis of new evidence regarding Vanessa Dewberry. and Prepare final exhibits (including extensive amount of pleadings, billing records, discovery responses, and emails) prior to forthcoming deposition.	6.90	275.00	1,897.50
09/20/22	Alex Kaufman	Prepare for deposition. Review file. Conference with P. Skaliy. Prepare outline	2.50	425.00	1,062.50

Date	Person	Description of Services	Hours	Rate	Amount
09/21/22	Alex Kaufman	Deposition of Padgett. Call with Chairman. Conference with opposing counsel.	7.00	425.00	2,975.00
09/21/22	Juan Patino	Travel to and From Depo. Attended Depo of Padgett.	7.50	275.00	2,062.50
Total Professional Services			45.60		\$14,280.00

PERSON RECAP

Timekeeper	Title	Hours	Rate	Total
Alex Kaufman	Partner	11.60	\$425.00	\$4,930.00
Peter Skaliy	Associate	26.50	\$275.00	\$7,287.50
Juan Patino	Associate	7.50	\$275.00	\$2,062.50

Total Services	\$	14,280.00
Total Disbursements	\$	0.00
AMOUNT DUE THIS INVOICE	\$	<u>14,280.00</u>

Total Fees Billed to Date:	\$	35,492.50
Total Costs Billed to Date:	\$	25.90

Outstanding Prior Balance



HALL BOOTH SMITH, P.C.

191 Peachtree St, NE
Suite 2900
Atlanta, GA 30303-1775
P:404-954-5000 F:404-954-5020
Federal ID: 58-1852659

Georgia Republican Party, Inc.
P.O. Box 550008
Atlanta, GA 30355
Attention: Ryan Caudelle

October 7, 2022
Client: 013393
Matter: 000002
Invoice #: 91660086

RE: Padgett, John L. v. Georgia Republican Party, Inc.

For Professional Services Rendered Through September 30, 2022.

Total Services	\$ 14,280.00
AMOUNT DUE THIS INVOICE	\$ <u>14,280.00</u>
Previous Balance Due	\$ <u> </u>
Total Amount Due	\$ <u><u>14,280.00</u></u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.

Chalmers, Adams, Backer & Kaufman, LLC
5805 State Bridge Road #G77
Johns Creek, GA 30097

INVOICE

Georgia Republican Party, Inc.
PO Box 55008
Atlanta, GA 30355

Invoice 27356

Date	Jun 19, 2023
Terms	Net 30
Service Thru	Jun 19, 2023

In Reference To: 3 - Padgett Litigation (Labor)

Date	By	Services	Hours	Rates	Amount
06/08/2023	JSP	Draft Notice to Continue Dep; Confirmed court reporter.	1.30	\$ 350.00/hr	\$ 455.00
06/09/2023	JSP	Filed Depo notice; Sent copy to opposing counsel.	0.30	\$ 350.00/hr	\$ 105.00
06/12/2023	JSP	Depo prep; Compiled Exhibits; Continued doc review	4.20	\$ 350.00/hr	\$ 1,470.00
06/13/2023	JSP	Continued reviewing supplemental response; Continued identifying Exhibits for Alex to use at Depo.	5.40	\$ 350.00/hr	\$ 1,890.00
06/14/2023	JSP	Travel to and from Continued Padgett Depo. Attended Depo of John Padgett.	5.20	\$ 350.00/hr	\$ 1,820.00
06/14/2023	ABK	RT travel. Deposition. Call with Chairman re update. Review correspondence from opposing counsel.	3.75	\$ 400.00/hr	\$ 1,500.00
06/14/2023	ABK	Prepare for deposition. Review file. Strategy conference with JPatino	3.00	\$ 400.00/hr	\$ 1,200.00
06/17/2023	JSP	Review of all Pleadings in prep for MSJ; Drafted outline for SMJ.	2.40	\$ 350.00/hr	\$ 840.00
06/18/2023	JSP	Completed initial draft of Fact Section for SMJ	3.50	\$ 350.00/hr	\$ 1,225.00
06/19/2023	JSP	Phone call to Johnathan Poole; Sent Johnathan Poole email re: Padgett litigation; Call to Kim Worth's office; Email to Kim Worth; Drafted Argument section of SMJ	5.00	\$ 350.00/hr	\$ 1,750.00
				Total Hours	34.05 hrs
				Total Labor	\$ 12,255.00

Chalmers, Adams, Backer & Kaufman, LLC
5805 State Bridge Road #G77
Johns Creek, GA 30097

INVOICE

Georgia Republican Party, Inc.
PO Box 55008
Atlanta, GA 30355

Invoice 27356

Date	Jun 19, 2023
Terms	Net 30
Service Thru	Jun 19, 2023

Total Invoice Amount \$ 12,255.00

Previous Balance \$ [REDACTED]

Balance (Amount Due) \$ [REDACTED]

Payment History:

Date	Type	Payment Description	Amount
06/05/2023	Payment - Check		[REDACTED]

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

JOHN L. PADGETT

Plaintiff,

v.

GEORGIA REPUBLICAN PARTY, INC

Defendant.

CIVIL ACTION FILE

NO: 2021CV354612

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing *Affidavit of Alex B. Kaufman* upon counsel for all parties by electronically filing the same with the Clerk of Court via the Court's electronic filing system, which will automatically send an e-mail notification of such filing to the following attorneys of record addressed as follow:

Jefferson M. Allen.
COHEN COOPER ESTEP & ALLEN, LLC
3330 Cumberland Boulevard, Suite 600
Atlanta, Georgia 30339
jallen@ccealaw.com
Counsel for Plaintiff

Respectfully submitted this 13th day of November 2023

**CHALMERS, ADAMS,
BACKER & KAUFMAN, LLC**
11770 Haynes Bridge Road
#205-219
Alpharetta, GA 30009-1968
akaufman@chalmersadams.com
jpatino@chalmersadams.com

**CHALMERS, ADAMS,
BACKER & KAUFMAN, LLC**

/s/ Alex B. Kaufman
Alex B. Kaufman
Georgia Bar No. 136097
Juan S. Patino
Georgia Bar No. 284280