

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT  
IN AND FOR CHARLOTTE COUNTY, FLORIDA  
CIVIL ACTION

WELLS FARGO BANK, NA

Plaintiff,

CASE NO.: 08 2010 CA 001092

vs.

DIVISION:

PETER J. GADUS et al,

Defendant(s),

AFFIDAVIT AS TO REASONABLE ATTORNEYS FEES

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

Before me, the undersigned authority, personally appeared John Cullaro, who upon first being duly sworn on oath, deposes and says:

1. I am an attorney at law duly authorized to practice in the State of Florida and have been active in the practice of law in Florida since January 1, 1996. I am personally familiar with the fees usually allowed Plaintiffs for the services of their attorneys in suits of the kind and nature in which this affidavit is to be filed.

2. I am familiar with Rule 4-1.5(b) of the Rules Regulating the Florida Bar, and have taken into consideration the factors set forth in such Rule for the determination of reasonable attorney's fees.

3. I am also familiar with and have considered the dictates of the Florida Supreme Court in the case of Florida Patient's Compensation Fund vs. Rowe, 472 So.2d 1145 (Fla 1985) for the determination of reasonable attorney's fees.

4. In arriving at my opinion of the value of reasonable attorney's fees in this action, I have utilized and considered the following criteria:

- a. The time and labor required, the novelty, complexity and difficulty of the questions involved, and the skill requisite to perform the legal services properly.
- b. The likelihood that the acceptance of the particular employment will preclude other employment by the lawyer.
- c. The fee or rate of fee customarily charged in the locality for services of a comparable or similar nature.
- d. The amount involved and the results obtained.
- e. The time limitations imposed by the client or by the circumstances.
- f. The nature and length of the professional relationship with the client.
- g. The experience, reputation and ability of the lawyer or lawyers performing the services.
- h. Whether the fee is fixed or contingent.

5. Florida Default Law Group, P.L., (FDLG, P.L.) does not keep records of its time while it represents the Plaintiff pursuant to a flat fee arrangement; therefore, I have reviewed no specific time keeping records.

6. It is my opinion that a review of the actual file in this case would be unnecessary and futile. In my opinion, the specific steps and requirements for filing and litigating a mortgage foreclosure action in the State of Florida dictate that under no circumstance could the fee charged by FDLG, P.L. be unreasonable; therefore, I have not reviewed the actual file in this case.

7. Based upon my review as set forth, it is my opinion that a reasonable attorney's fee and paralegal fee is \$1,500.00.

FURTHER AFFIANT SAYETH NAUGHT.

\_\_\_\_\_  
JOHN CULLARO

The foregoing instrument was subscribed and sworn to before me this 11 day of JUNE, 2010, by John Cullaro who is personally known to me.

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NOTARY PUBLIC, State of Florida

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Notary Public, State of Florida

Expires December 18, 2011