

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

RELIGIOUS TECHNOLOGY CENTER, §
a California corporation, §
§
Plaintiff, §
§
v. §
DELL LIEBREICH, Individually and as §
Personal Representative of the Estate of §
Lisa McPherson, §
§
Defendant. §

Civil Action No. 6:OOCV503
Judge Hannah

DECLARATION OF JOHN F. (JACK) WALKER, III

I, JOHN F. (JACK) WALKER, III, hereby declare as follows:

1. I am a partner in the law firm of Sammons & Parker, located at 218 North College, Tyler, Texas, 75702. I have personal knowledge of the facts set forth below, and if called to do so, could and would competently testify thereto.
2. I received my Bachelor of Arts degree in Economics from the University of Texas at Austin in 1988, a Juris Doctorate degree from South Texas College of Law in 1992. I was admitted to the Texas Bar on November 6, 1992, and have been a member thereof in good standing continuously. I am also admitted to practice before the United States District Courts for the Northern and Eastern Districts of Texas. I am further admitted to practice before the United States Court of Appeals for the Fifth Circuit.
3. I concentrate my practice primarily in the areas of civil defense litigation. I am board

certified in Personal Injury Trial Law by the Texas Board of Legal Specialization. I received this certification in December of 1999. At the time of the certification I had tried over 25 cases as a first chair lawyer.

4. I was engaged to represent the Plaintiff, Religious Technology Center (“RTC”) as local counsel in this particular litigation. Serving as local counsel I had several responsibilities which included consulting with all counsel regarding the prosecution of this matter. These duties also included consulting with plaintiff’s other counsel as to the local rules and procedures in the Eastern District of Texas. I also had trial responsibility in the preparation and prosecution of this case including jury selection and presentation of expert witnesses. I was the sole attorney in my firm to work on this particular matter. I was assisted by my paralegals, Mary Skeeters and Holly Hamilton, whose time is also reflected in my bills which are attached to this Declaration. The bills that are attached hereto reflect time that was kept contemporaneous to the work done and directly input into our computer billing program. The fees which RTC seek for services performed by my firm total \$47,785.00 , as of 2/28/02. Attached hereto as Exhibit A are copies of the bills for my firm for our work on this case, redacted to eliminate certain charges not properly recoverable as fees in this case. The hourly rate charged by me in this case is \$200.00 an hour for all time up through December 31, 2001. After December 31, 2001, my fee increased across the board in my firm for the type of work being performed in this case. My rate as of January 1, 2002 for this case increased to \$225.00 an hour, which is reflected in the bills.

5. On its application, RTC also seeks reimbursement of \$1,273.78 for expenses and disbursements made by my firm while acting as trial counsel in the instant action and posted in my firm’s books as of February 28, 2002. Certain copy costs and other costs items are not included in

this fee application because they are part of the bill of costs.

6. Although no bill has yet been generated or rendered to RTC for my firm's post-February 28, 2002 services, the records of my firm reflect the following time billed to this matter after that date, all of which will, in due course, be billed to RTC:

March 1, 2002	-	\$ 720.00
March 8, 2002	-	\$ 45.00
March 12, 2002	-	\$ 97.50
March 13, 2002	-	\$ 45.00
Total	-	\$ 907.50

Copies of these time sheets are attached hereto as Exhibit B.

7. In addition, disbursements posted post-February 28, 2002 to RTC for this matter, all of which will be billed in due course are:

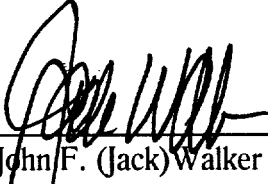
Telephone	-	\$ 1.48
Federal Express	-	\$ 821.28
Total	-	\$ 822.76

8. The fees being requested are reasonable rates for attorneys with comparable experience, education and background. Respecting the expenses and disbursements incurred by my firm and billed to RTC, they are all reasonable and consistent in both kind and amount to those my firm regularly and customarily bills to our clients.

I declare under penalty of perjury under the laws of the United States that the foregoing is

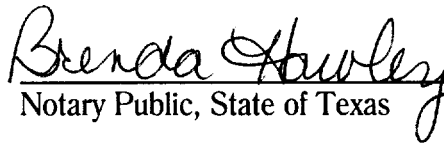
true and correct.

SIGNED this 18th day of March, 2002 in Tyler, Texas.



John F. (Jack) Walker

SWORN TO AND SUBSCRIBED to me by John F. (Jack) Walker on this the 18th day of March, 2002.



Notary Public, State of Texas

