

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

\_\_\_\_\_  
**In re BLACK FARMERS DISCRIMINATION  
LITIGATION**  
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)  
) **Misc. No. 08-mc-0511 (PLF)**  
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**This document relates to**

**ALL CASES**  
\_\_\_\_\_

**SUPPLEMENTAL FILING IN SUPPORT OF CLASS COUNSEL'S  
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

Class Counsel respectfully submit the attached Supplemental Declarations of James S. Farrin and Gregorio A. Francis in support of Class Counsel's Updated Motion for an Award of Attorneys' Fees and Expenses. (Docket No. 306). These declarations reflect that the Law Offices of James Scott Farrin and the firm of Morgan & Morgan, P.A. collectively have incurred in excess of \$18,000,000 in out of pocket expenses and obligations in connection with this case. In addition to the expenses incurred by just these two firms, the other firms serving as Class Counsel in this matter have also incurred substantial expenses in connection with this case. Moreover, it bears emphasis that Class Counsel will continue to incur expenses in connection with this case, and will continue to devote substantial time on behalf of the Class, until all of the Settlement Funds have been distributed in accordance with this Court's orders.

Respectfully submitted,

/s/ Henry Sanders

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/s/ Andrew H. Marks

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/s/ Gregorio A. Francis

Gregorio A. Francis  
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Dated: July 8, 2013

**CERTIFICATE OF SERVICE**

I certify that on July 8, 2013, I served a copy of the above on all counsel of record by filing a copy via the ECF system.

/s/ Andrew H. Marks

Andrew H. Marks

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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**In re BLACK FARMERS  
DISCRIMINATION LITIGATION**

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**Misc. No. 08-mc-0511 (PLF)**

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**SUPPLEMENTAL DECLARATION OF JAMES S. FARRIN**

I, James S. Farrin, being duly sworn, declare as follows:

1. I am an attorney licensed to practice law in the state of North Carolina, and am President of the Law Offices of James Scott Farrin. I am one of the class counsel in this case, and previously filed a Declaration in connection with the Reply Brief in Support of Class Counsel's Updated Motion for Award of Attorneys' Fees and Expenses. I make this Supplemental Declaration to update my earlier Declaration, and to provide additional detail.

2. My firm has been working on this matter since 2007. We have committed a huge amount of attorney and paralegal time, as well as cash expenses, over those years. All of this investment, both time and hard cash, was made on a contingent basis, and all would have been lost if the case had been unsuccessful. As the Court is aware, the case could have been unsuccessful for litigation reasons, but also for legislative reasons. These investments have been carried at risk for over five years.

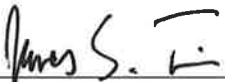
3. This firm has incurred (to date) \$13,149,388.25 in out of pocket expenses in this case. Categories of expenses include client communications, legislative persuasion activities, public relations campaigns, legal fees for outside counsel not working on a contingent basis,

finance charges, miscellaneous expenses, and in expenses related to the claims administration process. I believe these expenses were vital in fueling this successful litigation.

4. These expenses do not include millions of dollars in additional payroll and overhead expenses related to this litigation for the last five-plus years. To date, this firm alone has dedicated 23,132 of attorney and professional hours to this case, and 92,787 paraprofessional hours.

\* \* \* \* \*

I declare that the foregoing declaration is true and correct to the best of my personal knowledge, information, and belief.

  
\_\_\_\_\_  
James S. Farrin

7/3/13  
Date

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF COLUMBIA**

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**DECLARATION OF GREGORIO A. FRANCIS**

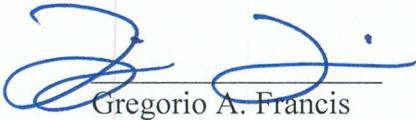
I, Gregorio A. Francis, being duly sworn, declare as follows:

1. I am an attorney licensed to practice law in the state of Florida and am the Managing Partner of Morgan & Morgan, P.A., Mississippi. I am one of the lead class counsel in this case. I have not previously filed a Declaration with this Court. Therefore, I make this Declaration to provide the Court insight into the risk incurred by this Firm.
2. My firm has been working on this matter since 2008. We have committed a tremendous amount of attorney and paralegal time, as well as cash expenses, to this matter over this time frame. All of this investment, both in time and in hard cash, was made on a contingent basis, and all would have been lost if the case had been unsuccessful. As the Court is aware, the case could have been unsuccessful for litigation reasons, but also for legislative reasons. The firm's investments in this matter have been carried at risk for over four years.
3. This firm has incurred \$5,281,510.90 to date in out of pocket expenses and obligations in this case. Categories of expenses included in this figure are client communications, legislative persuasion activities, public relations campaigns, legal fees for outside counsel not working on a contingent basis, finance charges, miscellaneous expenses, and in expenses related to the claims administration process. I believe these expenses were vital in fueling this successful litigation. These expenses do not include additional payroll and overhead expenses related to regular employees of the firm who have been assigned to work on this case for the last four-plus years.

4. With respect to the amount of professional time invested by this firm, we have expended approximately 947 additional hours of attorney time and 674 additional hours of paralegal time since Co-lead Counsel last reported to the Court the aggregate number of hours expended by Class Counsel in the "Updated" Motion for Fees filed in September of 2012.
  
5. In addition to the foregoing, as one of the three Co-lead Class Counsel appointed by the Court in this matter, I have had the responsibility of overseeing and monitoring the work of more than 20 other law firms and the numerous other lawyers appointed as Class Counsel. In this role, I am aware that, like my firm, these other firms have advanced significant costs throughout the life of this case, and have invested hundreds of additional attorney and paralegal hours since the last time Co-lead Counsel reported total hours expended to this Court.
  
6. The work of Co-lead counsel continues as we work with the Neutrals, the Claims Administrator, the Ombudsman and the Court to implement the final stages of the claims administration process. As Co-lead counsel I stand ready to continue work on this case well beyond the payment to qualified claimants and until such time as all actions and issues have been resolved cognizant that additional time and costs will be incurred.

\* \* \* \* \*

I declare that the foregoing declaration is true and correct to the best of my personal knowledge, information, and belief.

  
\_\_\_\_\_  
Gregorio A. Francis

  
\_\_\_\_\_  
Date