

DISTRICT COURT, JEFFERSON COUNTY, STATE OF COLORADO 100 Jefferson County Parkway Golden, CO 80401	<p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p>
<p><b>WILLIAM MONTGOMERY,</b></p> <p>Plaintiff,</p> <p>v.</p> <p><b>BEST BUY, L.P.,</b></p> <p>Defendant.</p>	
Attorneys for Best Buy, L.P.: Lori K. Bell, Reg. No. 31714 Stephanie E. Boutsicaris, Reg. No. 51297 Montgomery   Amatuzio 4100 East Mississippi Avenue, Suite 1600 Denver, CO 80246-3048 Telephone: 303-592-6600 <a href="mailto:lbell@mac-legal.com">lbell@mac-legal.com</a> <a href="mailto:sboutsicaris@mac-legal.com">sboutsicaris@mac-legal.com</a>	Case No.: 2023CV00226  Division: 6
<b>AFFIDAVIT OF STEPHANIE BOUTSICARIS CONCERNING ATTORNEY’S FEES</b>	

My name is Stephanie Boutsicaris, and I am over the age of 18. I have personal knowledge of the statements contained herein:

1. I am an attorney licensed to practice in Colorado.
2. On this particular case, Best Buy, L.P. was billed for my law firm’s services.
3. Upon reviewing billing records, billable employees at our firm worked the

following amount of hours on this case:

- a. **Lori K. Bell: 76.9 hours**
- b. **Katie I. Salazar (Paralegal): 4.3 hours**

- c. **Glenn D. Germany: 36.6 hours**
- d. **Jaime I. Gress (Paralegal): 1.6 hours**
- e. **Abigail L. Spohn (Paralegal): 5.1 hours**
- f. **Stephanie E. Boutsicaris: 36.3 hours**
- g. **Mary B. Pucelik: 7.2 hours**

4. **Exhibit A** provides additional detail on the tasks performed by each billable employee described above.

5. I, Stephanie Boutsicaris, have been licensed to practice law since 2017. I graduated from University of Virginia School of Law in 2017, and during my career as an attorney, I have tried more than twenty jury trials, often as a first chair. I am a senior attorney at Montgomery Amatuzio.

6. For purposes of this motion for attorney's fees, a reasonable market rate for an attorney in the Colorado with five to nine years' experience would be at least \$225 per hour. *See*, 2017 Economic Survey prepared by the Colorado Bar Association (2017), **Ex. B**, p. 52. However, I am aware of a federal court awarding attorney's fees for as much as \$450 per hour for a Denver-area attorney with less experience than myself. *See*, Order on Attorney's Fees, *Ahmed v. Lyft, Inc and Herrera*, 21-cv-00782-MEH (Colo. Dist. Aug. 24, 2021).

7. Therefore, reasonable attorney's fees for myself on this matter would total at least **\$8167.50**.

8. Glenn D. Germany has been practicing law since 2011. He obtained his bar license in California in 2011 and his bar license in Colorado in 2023. He graduated from Santa Clara University School of Law in 2011.

9. For purposes of this motion for attorney's fees, a reasonable market rate for an attorney in the Colorado with ten to nineteen years' experience would be at least \$250 per hour. *See*, 2017 Economic Survey prepared by the Colorado Bar Association (2017), **Ex. B**, p. 52. However, I am aware of a federal court awarding attorney's fees for as much as \$450 per hour for a Denver-area attorney with less experience than Mr. Germany. *See*, Order on Attorney's Fees, *Ahmed v. Lyft, Inc and Herrera*, 21-cv-00782-MEH (Colo. Dist. Aug. 24, 2021).

10. Therefore, reasonable attorney's fees for Mr. Germany on this matter would total at least **\$9150.00**.

11. Mary B. Pucelik has been practicing law since 1992. She was admitted to practice law in California in 1992. She was admitted to practice law in Oregon in 1993 and admitted to Colorado in 2013. Ms. Pucilek graduated from Lewis and Clark, Northwestern School of Law where she was on law review.

12. For purposes of this motion for attorney's fees, a reasonable market rate for an attorney in the Colorado with thirty to thirty-nine years' experience would be at least \$275 per hour. *See*, 2017 Economic Survey prepared by the Colorado Bar Association (2017), **Ex. B**, p. 52. However, I am aware of a federal court awarding attorney's fees for as much as \$450 per hour for a Denver-area attorney with less experience than Ms. Pucilek. *See*, Order on Attorney's Fees, *Ahmed v. Lyft, Inc and Herrera*, 21-cv-00782-MEH (Colo. Dist. Aug. 24, 2021).

13. Therefore, reasonable attorney's fees for Ms. Pucelik on this matter would total at least **\$1980.00**.

14. Lori K. Bell is an equity partner at our firm, and she has been licensed to practice law in Colorado since 1999. Ms. Bell graduated from University of Denver's Sturm College of Law in 1999 and during her career as an attorney, she has tried dozens of jury trials.

15. For purposes of this motion for attorney's fees, a reasonable market rate for a partner at a private law firm in Colorado would be at least \$295 per hour. *See*, 2017 Economic Survey prepared by the Colorado Bar Association (2017), **Ex. B**, p. 8. However, I am aware of a federal court awarding attorney's fees for as much as \$750 per hour for a Denver-area attorney with less half the level of experience as Ms. Bell. *See*, Order on Attorney's Fees, *Ahmed v. Lyft, Inc and Herrera*, 21-cv-00782-MEH (Colo. Dist. Aug. 24, 2021).

16. Therefore, reasonable attorney's fees for Ms. Bell on this matter would total at least **\$22,685.50**

17. For purposes of this motion for attorney's fees, a reasonable market rate for a paralegal would be between \$95 and \$125 per hour. *See*, 2017 Colorado Bar Association Economic Survey, **Ex. B**, p. 42. However, I am aware of a federal court awarding paralegal fees for as much as \$125 per hour for a Denver-area paralegal who also billed for clerical tasks. *See*, Order on Attorney's Fees, *Ahmed v. Lyft, Inc and Herrera*, 21-cv-00782-MEH (Colo. Dist. Aug. 24, 2021). Ms. Wolfe does not bill for strictly clerical tasks. Our firm has legal assistants for strictly clerical tasks, and they are not asked to keep track of hours by task or by case.

18. Based on the above hours, reasonable fees for the paralegal services of Ms. Salazar, Ms. Spohn, and Ms. Gress (totaling 11 hours) would amount to at least **\$1100.00**, based upon a rate of \$100 per hour.



**CERTIFICATE OF SERVICE**

I hereby certify that, on April 16, 2025, a true and correct copy of the foregoing was prepared for service to the following in the manner indicated below:

*Pro se Plaintiff:*

William Montgomery  
2443 S University Blvd #129  
Denver, CO 80210  
zoinbergs@gmail.com

U.S. Mail    Email    CCES

*s/ Stephanie Boutsicaris* \_\_\_\_\_