IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE
SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

FILED
2008 MAR -7 PM 4:03
JOHN A.W. BRATCHER
CLERK AND MASTER

STATE OF TENNESSEE, ex rel. ROBERT E. COOPER, JR., ATTORNEY GENERAL and REPORTER,	)	
Plaintiff,	)	
v.	)	
	)	No. 08-0053MI
CHRISTOPHER MOUNTRY, a/k/a OTT MOUNTRY,	)	Trial Judge - Corlew
Defendant.	)	

STATE OF TENNESSEE'S MOTION FOR DEFAULT JUDGMENT

Plaintiff, the State of Tennessee, by and through Robert E. Cooper, Jr., Tennessee Attorney General and Reporter ("State") pursuant to Rule 55.01 of the Tennessee Rules of Civil Procedure, hereby moves this Court for an Order granting Plaintiff a default judgment.

In support of this Motion, the State asserts to the Court that the Defendant has failed to plead or otherwise defend this action as provided by the Tennessee Rules of Civil Procedure. The State filed its Complaint on January 11, 2008 and Defendant Christopher Mountry was personally served by investigator Charlie Shinn on January 11, 2008. Defendant has failed to file a response or otherwise plead to the State of Tennessee's Complaint.

To the State's knowledge, Defendant is not in military service and is not an infant or incompetent.

WHEREFORE, the State moves that this Court enter a Default Judgment in favor of the State for the relief sought in the Complaint:

1. That this Court adjudge and decree that Defendant Christopher Mountry a/k/a Ott Mountry has engaged in acts or practices which violate the Tennessee Unauthorized Practice and Improper Conduct statutes, Tenn. Code Ann. § 23-3-101 *et seq.*;

2. That this Court adjudge and decree that Defendant Christopher Mountry a/k/a Ott Mountry has engaged in acts or practices which violate the Tennessee Consumer Protection Act of 1977, Tenn. Code Ann. § 47-18-101 *et seq.*;

3. That this Court permanently enjoin and restrain Defendant Christopher Mountry a/k/a Ott Mountry from holding himself out as a "State License Assistant Attorney," or similar term or phrase from engaging in the "practice of law," and from performing legal services for persons within the State of Tennessee as defined in Tenn. Code Ann. § 23-3-101 *et seq.* that violate the Unauthorized Practice and Improper Conduct statutes;

4. That this Court permanently enjoin Defendant Christopher Mountry a/k/a Ott Mountry, from soliciting and/or promoting that Defendant can provide legal services;

5. That this Court permanently enjoin Defendant Christopher Mountry a/k/a Ott Mountry, from procuring of or assisting in the drawing of legal documents for a valuable consideration;

6. That this Court permanently enjoin Defendant Christopher Mountry a/k/a Ott Mountry, from advising or counseling consumers for a valuable consideration regarding secular laws;

7. That this Court permanently enjoin Defendant Christopher Mountry a/k/a Ott Mountry, from failing to disclose, clearly and conspicuously, that Defendant is not a licensed attorney in the State of Tennessee nor affiliated with any law firm unless and until he becomes licensed to practice law in the State of Tennessee and continues in good standing;

8. That this Court permanently enjoin Defendant Christopher Mountry a/k/a Ott Mountry, from engaging in the "practice of law" without having been duly licensed, in violation of Tenn. Code Ann. § 23-3-103(a);

9. That this Court adjudge and decree that Defendant Christopher Mountry a/k/a Ott Mountry, is liable to the State for the reasonable costs and expenses of the investigation and prosecution regarding the Defendant's conduct, including attorney's fees, expert and other witness fees, as provided by Tenn. Code Ann. § 23-3-103(c)(1) and Tenn. Code Ann. § 47-18-108(b);

10. That this Court adjudge and decree that Defendant Christopher Mountry a/k/a Ott Mountry, pay civil penalties of not more than ten thousand dollars ($10,000.00) per violation to the State as provided by Tenn. Code Ann. § 23-3-103(c)(1), for a total of six thousand dollars ($6,000.00);

11. That this Court adjudge and decree that Christopher Mountry a/k/a Ott Mountry pay civil penalties of not more than one thousand dollars ($1,000.00) per violation to the State of Tennessee as provided by Tenn. Code Ann. § 47-18-108(b)(3) for a total of six thousand dollars ($6,000.00).

12. That this Court adjudge and decree that Defendant Christopher Mountry a/k/a Ott Mountry, pay the costs and expenses of the prosecution and investigation of this matter, including attorneys' fees and costs as provided by Tenn. Code Ann. § 23-3-103(c)(1) for a total of $13,201.45, as supported by the Affidavit of Anne Dodd, Affidavit of Cynthia Kinser Mills, Affidavit of Jeffrey L. Hill, Affidavit of Jennifer E. Peacock, Affidavit of Donna Baldwin, Affidavit of Jeremy Harwell, and Affidavit of Charlie Shinn, attached as Collective Exhibit A;

13. That pursuant to Tenn. Code Ann. §§ 23-3-103(c)(1) and 47-18-108(b)(1), this

Court adjudge and decree that Defendant Christopher Mountry a/k/a Ott Mountry is liable to for a judgment for restitution for ascertainable losses suffered by any known and unknown person as a result of the violations engaged in by Defendant Mountry, including statutory interest and payment of the costs of distributing and administrating the restitution program.

14. That all costs in this cause be taxed against Defendant Christopher Mountry a/k/a Ott Mountry; and

15. That this Court grant Plaintiff such other and further relief as this Court deems just and proper.

In support of this Motion, the State relies upon the record, Affidavit of Anne Dodd, Affidavit of Cynthia Kinser Mills, Affidavit of Jeffrey L. Hill, Affidavit of Donna Baldwin, Affidavit of Jeremy Harwell, and Affidavit of Charlie Shinn and the State's Complaint and attached Exhibits.

Respectfully submitted,

ROBERT E. COOPER, JR.
Attorney General and Reporter
B.P.R. No. 010934

ANNE DODD
Assistant Attorney General
B.P.R. No. 026272
Office of the Tennessee Attorney General
Consumer Advocate & Protection Division
P.O. Box 20207
Nashville, Tennessee 37202
Telephone: (615) 741-4657
Facsimile: (615) 532-2910

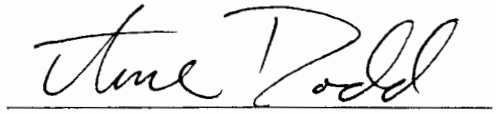
NOTICE OF HEARING:

THIS MOTION WILL BE HEARD ON THE 28TH DAY OF MARCH, 2008 AT 8:00 A.M.

115108

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion and attached exhibits were sent by certified mail to Christopher Mountry at 113 Mary Jo Martin Dr., La Vergne, TN 37086, on the 7th day of March, 2008.



ANNE DODD
Assistant Attorney General

FILED
2008 MAR -7 PM 4:04
JOHN A. W. BRATCHER
CLERK AND MASTER

COLLECTIVE EXHIBIT A

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*	)	
ROBERT E. COOPER, JR., ATTORNEY	)	
GENERAL and REPORTER,	)	
	)	
Plaintiff,	)	
	)	**No. 08-0053MI**
v.	)	
	)	**Trial Judge - Corlew**
	)	
CHRISTOPHER MOUNTRY, a/k/a	)	
OTT MOUNTRY,	)	
	)	
Defendant.	)	

AFFIDAVIT OF ANNE DODD, ASSISTANT ATTORNEY GENERAL

STATE OF TENNESSEE

COUNTY OF DAVIDSON

I, Anne Dodd, after first being duly sworn according to law, depose and say:

1. I have personal knowledge of the facts contained herein and swear that this statement is true and accurate to the best of my knowledge.

2. I am employed as an Assistant Attorney General with the Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General. I graduated from Vanderbilt University Law School in May 2007 and have been employed by the Office of the Tennessee Attorney General since September 2007.

3. As part of my duties, I investigate and prepare complaints and other filings for the

Initials AD

Tennessee courts if an individual is allegedly engaged in the unauthorized practice of law, in violation of Tenn. Code Ann. § 23-3-103.

4. On January 11, 2008, the State filed its Complaint against Christopher Mountry. The Complaint and Summons was personally served on Christopher Mountry by Charlie Shinn, an Investigator with the Investigative Services Unit, Tennessee Attorney General's Office.

5. In the instant case, I investigated, interviewed consumers and prepared and filed the Complaint which has been previously filed with this Court.

7. At minimum, I spent thirty (30) hours investigating, interviewing consumers and preparing and filing the Complaint. I have claimed a conservative amount of time for the actual services rendered in the described categories of work. This estimate is based on a reconstruction of the time spent on this matter.

8. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable claim of time for services rendered.

9. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $150.00 per hour for my services pertaining to this case. I believe that $150.00 an hour is a reasonable rate in light of prevailing market rates for attorneys of similar experience, qualifications and skills. This rate is the billing rate that has been approved by the Attorney General and Reporter's Office for the State of Tennessee for my services as an Assistant Attorney General in the Consumer Advocate & Protection Division. The total for 30 hours of my work described herein at $150.00 per hour is $4,500.00.

10. There are specific additional costs which the State respectfully requests. The State

has paid for the mailing of a certified return receipt request letter to the Defendant ($5.21). The State also has paid for translation services in connection to consumer affidavits ($1,086.24).

11. Based on the foregoing, the State of Tennessee is seeking reimbursement of $5,591.45 for my attorney's fees for my services and costs. Additional recovery for the time and expenses associated with others work is being sought by the State's Motion.

FURTHER THE AFFIANT SAITH NOT.

ANNE DODD, B.P.R. 26272
Assistant Attorney General

Sworn to and subscribed before me this the 7th day of March 2008.

NOTARY PUBLIC

My commission expires: Aug. 23, 2011

EMILY KNIGHT
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY, TENN.
My Commission Expires AUG. 23, 2011

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*	)	
ROBERT E. COOPER, JR., ATTORNEY	)	
GENERAL and REPORTER,	)	
	)	
Plaintiff,	)	
	)	**No. 08-0053MI**
v.	)	
	)	**Trial Judge - Corlew**
	)	
CHRISTOPHER MOUNTRY, a/k/a	)	
OTT MOUNTRY,	)	
	)	
Defendant.	)	

AFFIDAVIT OF CYNTHIA E. KINSER (MILLS)

STATE OF TENNESSEE

COUNTY OF DAVIDSON

I, Cynthia E. Kinser (Mills), after first being duly sworn according to law, depose and say:

1. I have personal knowledge of the facts contained herein and swear that this statement is true and accurate to the best of my knowledge.

2. I am currently employed as a Deputy Attorney General for the State of Tennessee and work in the Consumer Advocate and Protection Division for the Office of the Attorney General. I have been employed with the Office of the Attorney General since March 1, 1990. Prior to joining the Attorney General's Office, I served as a judicial clerk to Judge Steve Daniel. I obtained a license to practice law in Tennessee on April 19, 1990. I attended Vanderbilt University undergraduate and was awarded a Bachelor of Science, *cum laude* in August of 1985. I received my Juris Doctorate, *cum laude* from Stetson University in July of 1988.

3. I assisted in the investigation and prosecution of the above referenced case.

4. At minimum, I spent two (2) hours assisting with the drafting of the complaint and the investigation in general. I have claimed a conservative amount of time for the actual services rendered in the described categories of work. I have spent additional time on this matter but have not included those hours because they involved my oversight as a supervisor. This estimate is based on a reconstruction of the time spent on this matter.

8. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable claim of time for services rendered.

9. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $300.00 per hour for my services pertaining to this case. I believe that $300.00 an hour is a reasonable rate in light of prevailing market rates for attorneys of similar experience, qualifications and skills. This rate is the billing rate that has been approved by the Attorney General and Reporteris Office for the State of Tennessee for my services as an Deputy Attorney General in the Consumer Advocate & Protection Division. The total for 2 hours of my work described herein at $300.00 per hour is $600.00.

10. Based on the foregoing, the State of Tennessee is seeking reimbursement of $600.00 for my attorney's fees for my services and costs. Additional recovery for the time and expenses associated with others work is being sought by the State's Motion.

FURTHER THE AFFIANT SAITH NOT.

Cynthia E. Kinser (Mills)

CYNTHIA E. KINSER (MILLS), B.P.R. 13533
Deputy Attorney General

Sworn to and subscribed before me this
the 5th day of March, 2008.

Janice J. Tomlinson

NOTARY PUBLIC

My commission expires: _____

JANICE J. TOMLINSON
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY, TENN.
My Commission Expires JULY 5, 2011

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was sent by certified mail to Christopher Mountry at 113 Mary Jo Martin Dr., La Vergne, TN 37086, on the ____ day of _____, 2008.

_____
Anne Dodd
Assistant Attorney General

115655

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*	)	
ROBERT E. COOPER, JR., ATTORNEY	)	
GENERAL and REPORTER,	)	
	)	
Plaintiff,	)	
	)	**No. 08-0053MI**
v.	)	
	)	**Trial Judge - Corlew**
	)	
CHRISTOPHER MOUNTRY, a/k/a	)	
OTT MOUNTRY,	)	
	)	
Defendant.	)	

AFFIDAVIT OF JEFFREY L. HILL, SENIOR COUNSEL, FILED IN SUPPORT OF STATE'S REQUEST FOR ATTORNEY FEES

STATE OF TENNESSEE

COUNTY OF DAVIDSON

I, Jeffrey L. Hill, after first being duly sworn according to law, depose and say:

1. I have personal knowledge of the facts contained herein and swear that this statement is true and accurate to the best of my knowledge.

2. I am employed as Senior Counsel with the Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General. I graduated from the University of Tennessee College of Law in 1994 and have been employed by the Office of the Tennessee Attorney

General since November 1994.

3. As part of my duties, I investigate and litigate if an individual is allegedly engaged in the unauthorized practice of law, in violation of Tenn. Code Ann. §23-3-103 and for violations of the Consumer Protection Act §47-18-101.

4. On January 11, 2008, the State filed its Complaint against Christopher Mountry.

5. I was involved in the investigation and litigation of the above referenced case.

7. At minimum, I spent ten (10) hours working on this case by gathering information and drafting documentation. I have claimed a conservative amount of time for the actual services rendered in the described categories of work. This estimate is based on a reconstruction of the time spent on this matter.

8. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable claim of time for services rendered.

9. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $250.00 per hour for my services pertaining to this case. I believe that $250.00 an hour is a reasonable rate in light of prevailing market rates for attorneys of similar experience, qualifications and skills. This rate is the billing rate that has been approved by the Attorney General and Reporter for the State of Tennessee for my services as Senior Counsel/Team Leader in the Consumer Advocate & Protection Division. The total for ten hours of my work described herein at $250.00 per hour is $2500.00.

11. Based on the foregoing, the State of Tennessee is seeking reimbursement of $2500.00 for attorney's fees for my services. Additional recovery for the time and expenses associated with others work is being sought by the State's Motion.

FURTHER THE AFFIANT SAITH NOT.

JEFFREY L. HILL, B.P.R. 16731
Senior Counsel

Sworn to and subscribed before me

this the 13 day of March, 2008.

NOTARY PUBLIC

My commission expires: July 5, 2011

DONNA BALDWIN
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY, TENN.
My Commission Expires JULY 5, 2011

115656

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*	)	
ROBERT E. COOPER, JR., ATTORNEY	)	
GENERAL and REPORTER,	)	
	)	
Plaintiff,	)	
	)	**No. 08-0053MI**
v.	)	
	)	**Trial Judge - Corlew**
	)	
CHRISTOPHER MOUNTRY, a/k/a	)	
OTT MOUNTRY,	)	
	)	
Defendant.	)	

AFFIDAVIT OF JENNIFER E. PEACOCK, ASSISTANT ATTORNEY GENERAL, FILED IN SUPPORT OF STATE'S REQUEST FOR ATTORNEY FEES

STATE OF TENNESSEE

COUNTY OF DAVIDSON

I, Jennifer E. Peacock, after first being duly sworn according to law, depose and say:

1. I have personal knowledge of the facts contained herein and swear that this statement is true and accurate to the best of my knowledge.

2. I am employed as an Assistant Attorney General with the Consumer Advocate and Protection Division of the Office of the Attorney General for the State of Tennessee. I graduated

Initials JEP

from the University of Kentucky College of Law in May 2002 and have been employed by the Office of the Attorney General since December 2002.

3. As part of my duties, I investigate and prepare complaints and other filings for the Tennessee courts if an individual is allegedly engaged in the unauthorized practice of law, in violation of Tenn. Code Ann. § 23-3-103.

4. On January 11, 2008, the State filed its Complaint against Christopher Mountry. The Complaint and Summons was personally served on Christopher Mountry by Charlie Shinn, an Investigator with the Investigative Services Unit, Tennessee Attorney General's Office.

5. In the instant case, I investigated, interviewed consumers, and assisted in the preparation of the Complaint which has been previously filed with this Court.

7. At minimum, I spent eight (8) hours investigating, interviewing consumers, and assisting in the preparation of the Complaint. I have claimed a conservative amount of time for the actual services rendered in the described categories of work. This estimate is based on a reconstruction of the time spent on this matter.

8. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable claim of time for services rendered.

9. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $225.00 per hour for my services pertaining to this case. I believe that $225.00 an hour is a reasonable rate in light of prevailing market rates for attorneys of similar experience, qualifications and skills. This rate is the billing rate that has been approved by the Attorney General and Reporter's Office for the State of Tennessee for my services as an Assistant Attorney General in the Consumer

Advocate & Protection Division. The total for eight (8) hours of my work described herein at $225.00 per hour is $1,800.00.

10. Based on the foregoing, the State of Tennessee is seeking reimbursement of $1,800.00 for attorney's fees for my services. Additional recovery for the time and expenses associated with others' work is being sought by the State's Motion.

FURTHER THE AFFIANT SAITH NOT.

JENNIFER E. PEACOCK, B.P.R. 22227
Assistant Attorney General

Sworn to and subscribed before me this the 5th day of March, 2008.

NOTARY PUBLIC

My commission expires July 5, 2011.

DONNA BALDWIN
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY, TENN.
My Commission Expires JULY 5, 2011

Initials

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was sent by certified mail to Christopher Mountry at 113 Mary Jo Martin Dr., La Vergne, TN 37086, on the ____ day of _____, 2008.

_____
ANNE DODD
Assistant Attorney General

115726

IN THE CHANCERY COURT OF RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*,	)	
ROBERT E. COOPER, JR., ATTORNEY	)	
GENERAL and REPORTER,	)	
	)	
Plaintiff,	)	
	)	
	)	**No. 08-0053MI**
	)	
	)	
CHRISTOPHER MOUNTRY, a/k/a	)	**Trial Judge - Corlew**
OTT MOUNTRY	)	
	)	
Defendant.	)	

AFFIDAVIT OF DONNA BALDWIN

STATE OF TENNESSEE)

DAVIDSON COUNTY)

I, Donna Baldwin, do hereby depose and aver as follows:

1. I am an adult resident of Tennessee and am competent to testify to the matters stated herein.

2. I make this affidavit on personal knowledge and understand that it may be used in legal proceedings.

3. I swear that the facts contained herein are true and accurate to the best of my knowledge.

4. I am employed as a paralegal with the Consumer Advocate and Protection

Initials

Division of the Office of the Tennessee Attorney General. I have been employed in this capacity since February 2003.

5. I have been assisting in the investigation and prosecution of *State of Tennessee v. Christopher Mountry aka Ott Mountry*.

6. At minimum, I have spent 20 hours investigating, reviewing consumer complaints, reviewing documents, compiling data, speaking with consumers, traveling, participating in calls, preparing correspondence related to this case and assisting in the preparation of the pleadings. I have claimed a conservative amount of time for the actual services rendered. This estimate is based on a reconstruction of time spent on this matter.

7. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $70.00 per hour for my services pertaining to this case. I believe that $70.00 an hour is a reasonable rate in light of prevailing market rates for paralegals of similar experience, qualifications and skills. This billing rate has been approved by the Attorney General and Reporter for the State of Tennessee for my services as a Paralegal in the Consumer Advocate and Protection Division.

8. The total for 20 hours of my work described herein at $70.00 per hour $1,400.00 (One Thousand, Four Hundred Dollars).

9. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable and conservative claim of time for services rendered.

10. Based on the foregoing, the State of Tennessee is seeking reimbursement for paralegal fees for my services in the amount of $1,400.00 for my services pertaining to the

investigation and prosecution of the above case. The State is also seeking fees and costs associated with other employees who worked on this case.

FURTHER AFFIANT SAITH NOT.

DONNA BALDWIN
Paralegal

Sworn to and subscribed before me
this 5th day of March, 2008.

NOTARY PUBLIC

My commission expires:

Aug. 23, 2011

115662

Initials

IN THE CHANCERY COURT OF RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*, ROBERT E. COOPER, JR., ATTORNEY GENERAL and REPORTER,	)	
Plaintiff,	)	
v.	)	**No. 08-0053MI**
CHRISTOPHER MOUNTRY, a/k/a OTTO MOUNTRY	)	**Trial Judge - Corlew**
Defendant.	)	

AFFIDAVIT OF JEREMY HARWELL

STATE OF TENNESSEE)

DAVIDSON COUNTY)

I, Jeremy Harwell, do hereby depose and aver as follows:

1. I am an adult resident of Tennessee and am competent to testify to the matters stated herein.

2. I make this affidavit on personal knowledge and understand that it may be used in legal proceedings.

3. I swear that the facts contained herein are true and accurate to the best of my knowledge.

4. I am employed as a paralegal with the Consumer Advocate and Protection

Initials JH

Division of the Office of the Tennessee Attorney General. I have been employed in this capacity since August of 2007.

5. I have been assisting in the investigation and prosecution of *State of Tennessee v. Mountry*.

6. At minimum, I have spent fifteen (15) hours investigating, reviewing consumer complaints, reviewing documents, compiling data, speaking with consumers, traveling to Rutherford County, preparing correspondence related to this case and assisting in the preparation of the pleadings. I have claimed a conservative amount of time for the actual services rendered. This estimate is based on a reconstruction of time spent on this matter.

7. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $70.00 per hour for my services pertaining to this case. I believe that $70.00 an hour is a reasonable rate in light of prevailing market rates for paralegals of similar experience, qualifications and skills. This billing rate has been approved by the Attorney General and Reporter for the State of Tennessee for my services as a Paralegal in the Consumer Advocate and Protection Division.

8. The total for fifteen (15) hours of my work described herein at $70.00 per hour is $1050.00.

9. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable and conservative claim of time for services rendered.

10. Based on the foregoing, the State of Tennessee is seeking reimbursement for paralegal fees for my services in the amount of $1050.00 for my services pertaining to the

investigation and prosecution of the above case.

FURTHER AFFIANT SAITH NOT.

JEREMY HARWELL
Paralegal

Sworn to and subscribed before me
this 3rd day of March, 2008.

NOTARY PUBLIC

EMILY KNIGHT
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY, TENN.
My Commission Expires AUG. 23, 2011

My commission expires:

Aug. 23, 2011

115665

IN THE CHANCERY COURT OF RUTHERFORD COUNTY, TENNESSEE
FOR THE SIXTEENTH JUDICIAL DISTRICT AT MURFREESBORO

STATE OF TENNESSEE, *ex rel.*	)	
ROBERT E. COOPER, JR.,	)	
ATTORNEY GENERAL and REPORTER,	)	
	)	**No. 08-0053MI**
Plaintiff,	)	
v.	)	**Trial Judge - Corlew**
	)	
CHRISTOPHER MOUNTRY, a/k/a	)	
OTTO MOUNTRY	)	
	)	
Defendants.	)	

AFFIDAVIT OF CHARLIE SHINN

STATE OF TENNESSEE)

DAVIDSON COUNTY)

I, Charlie Shinn, do hereby depose and aver as follows:

1. I am an adult resident of Tennessee and am competent to testify to the matters stated herein.

2. I make this affidavit on personal knowledge and understand that it may be used in legal proceedings.

3. I swear that the facts contained herein are true and accurate to the best of my knowledge.

4. I am assigned to the Investigative Services Section in the Administrative Division

Initials CJ

of the Office of the Tennessee Attorney General. I have been employed in this capacity since October 2007.

5. I have been assisting in the investigation and prosecution of *State of Tennessee v. Mountry*.

6. At minimum, I have spent seven (7) hours investigating, serving process, and taking pictures. I have claimed a conservative amount of time for the actual services rendered. This estimate is based on a reconstruction of time spent on this matter.

7. I request that the Office of the Attorney General be awarded a reasonable hourly rate of $80.00 per hour for my services pertaining to this case. I believe that $80.00 an hour is a reasonable rate in light of prevailing market rates for investigators of similar experience, qualifications and skills. This billing rate has been approved by the Attorney General and Reporter's Office for the State of Tennessee for my services as an Investigator in the Consumer Advocate and Protection Division.

8. The total for seven (7) hours of my work described herein at $80.00 per hour is five hundred and fifty-six dollars ($560.00).

9. In preparing this fee affidavit, I have attempted to use billing judgment in making a reasonable and conservative claim of time for services rendered.

10. Based on the foregoing, the State of Tennessee is seeking reimbursement for investigative fees for my services in the amount of five hundred and fifty-six dollars ($560.00) for my services pertaining to the investigation and prosecution of the above case. Additional recovery for the time and expenses associated with others work is being sought by the State's

Motion.

FURTHER AFFIANT SAITH NOT.

CHARLIE SHINN
Investigator

Sworn to and subscribed before me
this 5th day of ~~February~~ March, 2008.

NOTARY PUBLIC

My commission expires:

Aug. 23, 2011

EMILY KNIGHT
STATE OF TENNESSEE NOTARY PUBLIC
DAVIDSON COUNTY, TENN.
My Commission Expires AUG. 23, 2011

115668