

RONALD HARDGE and THE STRAP INC.;  
d/b/a PRINTING TO GO GRAPHIC  
DESIGN,

Plaintiffs,

v.

EIRE 1350 S. DIXIE, LLC,

Defendant.

IN THE COUNTY COURT OF THE  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE NO.: COCE -17-013649-54

**PLAINTIFF'S ATTORNEY FEE REQUEST FOR ADMISSIONS TO DEFENDANT**

COMES NOW, the Plaintiff, RONALD HARDGE and THE STRAP INC.; d/b/a PRINTING TO GO GRAPHIC DESIGN, by and through undersigned counsel and pursuant to Rule 1.370, Florida Rules of Civil Procedure, and hereby requests the Defendant, Federated National Insurance Company, to admit the following:

1. Admit that \$500.00 per hour would be a reasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.
2. Admit that \$450.00 per hour would be a reasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.
3. Admit that \$400.00 per hour would be a reasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.
4. Admit that \$350.00 per hour would be a reasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.
5. Admit that \$300.00 per hour would be a reasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.

6. Admit that \$250.00 per hour would be a reasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.
7. Admit that \$200.00 per hour would not be an unreasonable hourly rate for time spent by Michael P. McCahill, Esq. in litigating this case.
8. Admit that the Plaintiff is entitled to taxable costs incurred in the prosecution of this case.
9. Admit that Plaintiff's counsel has expended more than 20 hours in attorney time litigating this case through the determination of Plaintiff's entitlement to attorney's fees.
10. Admit that Plaintiff's counsel has expended more than 15 hours in attorney time litigating this case through the determination of Plaintiff's entitlement to attorney's fees.
11. Admit that Plaintiff's counsel has expended more than 10 hours in attorney time litigating this case through the determination of Plaintiff's entitlement to attorney's fees.
12. Admit that Plaintiff's counsel has expended more than 7.5 hours in attorney time litigating this case through the determination of Plaintiff's entitlement to attorney's fees.
13. Admit that Plaintiff's counsel has expended more than 5 hours in attorney time litigating this case through the determination of Plaintiff's entitlement to attorney's fees.
14. Admit that Plaintiff's counsel is entitled to at least \$10,000.00 in attorney's fees.
15. Admit that Plaintiff's counsel is entitled to at least \$7,500.00 in attorney's fees.
16. Admit that Plaintiff's counsel is entitled to at least \$5,000.00 in attorney's fees.

**THE REMAINDER IS INTENTIONALLY LEFT BLANK**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by email and/or ePortal this Monday, October 23, 2017 to: **Mark Spillane as Registered Agent** for Defendant 1350 Eire, LLC; 4181 NW 1<sup>st</sup> Avenue, Suite 10, Boca Raton, FL 33431.

By: /s/ **Michael P. McCahill**  
Michael P. McCahill, Esq.  
Fla. Bar No.: 29226  
**Place & McCahill, LLC**  
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