

Exhibit N  
Fee Affidavits

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

AARON GOINS et al.,	)	
	)	
Plaintiffs/Counter Defendants,	)	
	)	
v.	)	
	)	Civil Action No. 19-cv-489
	)	
TITLEMAX OF VIRGINIA, et al.,	)	
	)	
Defendants/Counter Claimants.	)	

DECLARATION OF AMIEL J. ROSSABI

Amiel J. Rossabi, declares under penalty of perjury that the following is true and correct of his own knowledge, information and belief:

1. I am an attorney licensed to practice law in North Carolina. I am over 18 and otherwise competent to provide this declaration.
2. The contents of this declaration are within my own personal knowledge.
3. I have been practicing civil litigation in Greensboro, NC for more than 30 years.
4. I charge \$600/hour for my time.
5. I have had several cases against Andrew Brown and have found him to be very intelligent and a very skilled litigator.

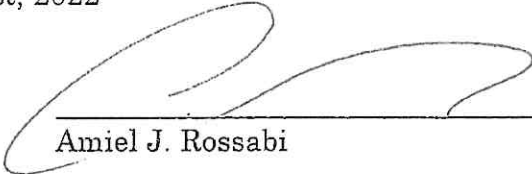


6. I know him to have been a lawyer in the Greensboro area for twenty (20) years who is more than competent as a litigator and appears to have significant demands for his time.

6. Even though I have no social relationship with Mr. Brown, his name has been mentioned to me on at least a handful of occasions when I have spoken to potential clients who are deciding whether to hire my law firm or another firm.

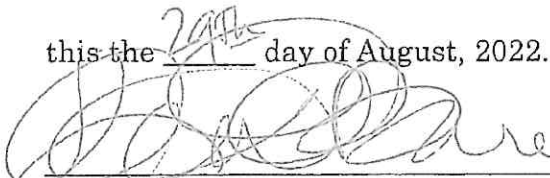
7. For a lawyer of his skill and experience, \$500/hour is an appropriate and reasonable rate for his time in this market.

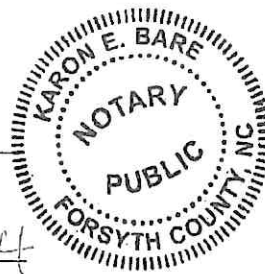
This the 29<sup>th</sup> day of August, 2022

  
Amiel J. Rossabi

Sworn to and subscribed before me

this the 29<sup>th</sup> day of August, 2022.

  
Notary Public



My Commission expires: 2/29/2024

**AFFIDAVIT IN SUPPORT OF ATTORNEY FEE REQUEST**

Benjamin E. Klein, having been first duly sworn, deposes and says:

1. I am over the age of 18 and otherwise competent to provide this affidavit.

All statements herein are within my personal knowledge.

2. I am aware that this affidavit will be submitted in support of attorney fee requests by James Faucher.

3. I am an attorney licensed to practice law in North Carolina. I hold a B.S. from Wofford College and a J.D. from Elon University School of law. I have continuously practiced law in the triad area of North Carolina, with a focus on civil litigation, since 2010.

4. My practice includes representing parties in state court, federal court, and arbitration proceedings. I handle a variety of types of civil litigation in all courts in North Carolina.

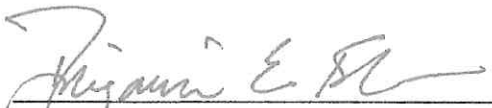
5. I am familiar with the rates that litigation attorneys in Greensboro, North Carolina charge for legal services on consumer claims and other types of civil litigation.

6. Mr. Faucher's hourly rate of \$425 to \$450 per hour is well within the customary range for similar services in Greensboro, North Carolina.

7. I am personally aware of Mr. Faucher's good reputation as an attorney in our community and the demand for his time.

END OF AFFIDAVIT.

*SIGNATURE APPEARS ON FOLLOWING PAGE*

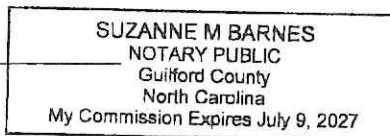
  
Benjamin E. Klein

NORTH CAROLINA  
GUILFORD COUNTY

I, Suzanne M Barnes, Notary Public of the above State and County, do hereby certify that Benjamin E. Klein, who, after having been duly sworn according to law, said that he/she is the affiant in the foregoing Affidavit, which he/she did execute; that he//she has read and fully understood its contents and effects; that the matters and things therein stated are true of his/her own personal knowledge..

Witness my hand and official seal, this the 13th day of March, 2024.  
(Official Seal)

Suzanne M Barnes  
\_\_\_\_\_, Notary Public  
My Commission Expires:  
July 9, 2027



THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

<b>IN RE:</b>  <b>AUTO MONEY NORTH LLC,</b>  <b>DEBTOR.</b>	<b>CHAPTER 11</b>  <b>CASE NO.: 22-03309</b>
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**AFFIDAVIT OF MICHAEL MONTECALVO IN SUPPORT OF DEBTOR'S  
APPLICATION TO EMPLOY WOMBLE BOND DICKINSON (US) LLP  
AS NORTH CAROLINA LITIGATION SPECIAL COUNSEL**

I, Michael Montecalvo, do solemnly depose and declare as follows:

1. I am a Partner of Womble Bond Dickinson (US) LLP (the "Firm"), a law firm that maintains offices in Winston-Salem, North Carolina and elsewhere. I am admitted to practice before all state and federal courts in North Carolina.

2. I am fully familiar with the facts hereinafter stated and submit this affidavit (the "Montecalvo Affidavit") in support of the *Debtor's Application to Employ Womble Bond Dickinson (US) LLP as North Carolina Litigation Special Counsel* (the "Application"), pursuant to §§ 327(e), 331, and 507 of the Bankruptcy Code and Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure.

3. To the extent that any information disclosed herein requires amendment or modification upon the Firm's receipt of additional information or as additional information becomes available, a supplemental affidavit will be submitted to the Court.

4. As evidence of its disinterestedness, the Firm discloses as follows:

- a. The Firm represented the Debtor in the North Carolina Litigation prior to the initiation of the bankruptcy case by the Debtor and has not withdrawn or sought to withdraw from its appearances in the North Carolina courts.



- a. Preparing all necessary notices of appearances, motions, applications, answers, orders, reports, and other papers in connection with representing the Debtor in the North Carolina Litigation;
- b. Representing the Debtor at any hearings in the North Carolina Litigation to protect the interests of the Debtor; and
- c. Performing other necessary legal services for and on behalf of the Debtor that may be necessary or appropriate to represent the Debtor in the North Carolina Litigation.

10. The Firm intends to apply for compensation for professional services rendered in connection with this chapter 11 case, subject to this Court's approval and in compliance with the applicable provisions of the Bankruptcy Code, the Local Rules, Orders of this Court, and the Guidelines of the Office of the United States Trustee, on an hourly basis plus reimbursement for actual, necessary expenses and other charges that the Firm incurs. The Firm will charge a rate customary to the scope and complexity of this bankruptcy case and in line with what I believe other firms in the area charge.

11. The Firm believes its rate is comparable to those charged by attorneys of similar experience and expertise for engagements of similar scope and complexity to this case and are reasonable. The Firm anticipates charging the following hourly rate:

Name	Position	Hourly Rate
Michael Montecalvo	Partner	\$607.75
Jesse Schaefer	Partner	\$493
Scott D. Anderson	Associate	\$412.50
Brian Castro	Associate	\$391.00

reasonable terms and conditions are those charged by the Firm to its clients on a regular basis in a competitive market for legal services. Therefore, the Debtor and the Firm have agreed that the Firm shall be paid the rate set forth herein and shall be reimbursed according to the Firm's customary reimbursement policies.

15. The foregoing is intended to constitute the Firm's statements pursuant to, *inter alia*, §§ 327, 331, and 507 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure.

16. Unless otherwise stated in this Affidavit, I have personal knowledge of the facts set forth herein. To the extent any information disclosed herein requires amendment or modification upon the Firm's completion of further review or as additional information becomes available to it, a supplemental affidavit will be submitted to the Court reflecting such amended or modified information.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct to the best of my information, knowledge, and belief.

Executed this 14<sup>th</sup> day of April, 2023.

/s/ Michael Montecalvo  
NC State Bar No. 24943  
Michael Montecalvo