

**EXHIBIT D**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLANDALBERT SNYDER,  
Plaintiff

v.

FRED W. PHELPS, SR.,  
JOHN DOES, JANE DOES, and  
WESTBORO BAPTIST CHURCH, INC.  
Defendants

Civil Action No. 06-CV-1389 RDB

**UNSWORN DECLARATION FOR SEAN E. SUMMERS, ESQUIRE**

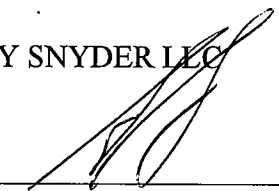
Sean E. Summers, Esquire, hereby represents and testifies to the Court that:

1. I expended 16.2 hours to prepare the Motion for Alternative Service, at a rate of \$190.00 an hour, for total fees of \$3,078.
2. I expended 12.5 hours to prepare the Motion for Costs and Fees Pursuant to Federal Rule of Civil Procedure 4(d), at a rate of \$190.00 an hour, for total fees of \$2,375.
3. The rate sought and the hours spent are reasonable for federal litigation in the District of Maryland.
4. I have eight years of experience as a litigation attorney and have previously litigated numerous cases in federal, state and military courts.

I, Sean E. Summers, Esquire, an attorney of Barley Snyder LLC, counsel for plaintiff in the foregoing action, hereby affirm that the facts and matters set forth in the foregoing declaration are true and correct, and based upon personal knowledge. I understand that the statements made herein are made subject to the penalties of 28 U.S.C. § 1746 relating to unsworn declarations under penalty of perjury.

BARLEY SNYDER LLC

By:



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