

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Kevin Faile, Louis C. Roman, Alan R.)
DePalma, and Brian Scott Craton, all)
individually and on behalf of all)
other similarly situated individuals,)
)
Plaintiffs,)
)
vs.)
)
Lancaster County, South Carolina,)
)
Defendant.)
_____)

Civil Action No. 0:10-cv-2809-CMC

AFFIDAVIT OF LOUIS C. ROMAN

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)

PERSONALLY appeared before me Louis C. Roman, who, after being duly sworn, deposes and states the following:

1. My name is Louis C. Roman. I am older than eighteen years of age. The statements in this Affidavit are based upon my own personal knowledge.
2. I am one of the named Plaintiffs in the above-captioned case. I served as the chairman of the Plaintiffs' Steering Committee, which is comprised of the four named Plaintiffs and three other current or former employees of the Lancaster County EMS Department. The Steering Committee was formed through a consensus of employees of the EMS Department and was assigned the duty of serving as the representative group for all of the potential Plaintiffs in this case.
3. My colleague, Kevin Faile, and I have been the lead Plaintiffs in this action. We have

spent hundreds of hours of our own time in connection with this case since October 2010, from meeting and interviewing attorneys, organizing the Steering Committee, and coordinating the distribution of consent forms for opt-in Plaintiffs, to reviewing pleadings, assisting with the preparation of discovery responses, and preparing for depositions. Mr. Faile or I attended every deposition in this case with the exception of one witness, whose deposition conflicted with our work schedules. I have been the point of contact between our attorney, Mr. Rothstein, and the group of opt-in Plaintiffs and have done my best to keep the Committee and the opt-in Plaintiffs informed of any and all developments in this case.

4. The Plaintiffs Steering Committee regularly met with Mr. Rothstein to discuss the issues in the case as the litigation proceeded. I participated in both mediations in this case along with many of my colleagues on the Plaintiffs' Steering Committee.

5. I have reviewed the Settlement Agreement in this case, and it accurately reflects the terms of the settlement the Steering Committee voluntarily reached with the County in this case. The Settlement Agreement was achieved following a full-day of mediation with the County, where six of the seven members of the Steering Committee attended. The seventh member of the Committee was scheduled to work and could not find replacement coverage. All of the Committee Members unanimously voted in favor of the settlement. I believe that the settlement is fair and reasonable and in the best interest of the class of Plaintiffs as a whole.

6. We understand that by agreeing to settle this case, we are giving up our right to proceed to a trial in this matter; however, we are willing to compromise the value of the lawsuit some to avoid the uncertainties of a trial and to avoid the expense and delay of continuing the discovery and litigation of this case.

7. Mr. Rothstein has explained in great detail the legal and factual issues that are in dispute in this case. We understand that there are several unresolved questions of fact and law that could make the outcome of a trial uncertain. There is a very real risk that we could recover less than the amount of the settlement if we went to trial on this case, plus the additional costs of going forward would reduce our net recovery from a trial. Mr. Rothstein explained that the potential for appeals in this case could delay any recovery even further, by up to another 18 months to two years.

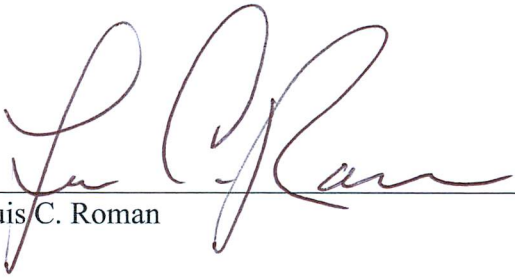
8. I am very satisfied with the legal services provided to us by our lawyer in this case, David Rothstein. I thoroughly researched a number of attorneys in South Carolina for this case, and Mr. Rothstein came very highly recommended. He has kept me and the Steering Committee fully informed about the progress of the case and has always been available to answer my questions throughout the case. I believe that Mr. Rothstein worked diligently throughout case, and his efforts certainly increased the value of this case.

9. The named Plaintiffs and I have agreed to pay Mr. Rothstein's law firm a contingency fee of one-third (33.33%) of any recovery he received on behalf of the Plaintiffs in this case, either by way of settlement or verdict, plus reimbursement of actual costs. We probably would not have been able to afford to file this lawsuit if we had to pay an attorney up front, by the hour, and had to advance the litigation costs up front. I believe that Mr. Rothstein's fees are fair and reasonable. I also believe that the expenses incurred by Mr. Rothstein's law firm appear to be reasonable.

10. I sincerely believe that the proposed settlement is in the best interest of the Plaintiff class in this case.

* * *

FURTHER AFFIANT SAYETH NOT.



Louis C. Roman

SWORN to and subscribed before me,

this 10TH day of January, 2012



(L.S.)
Notary Public for South Carolina

My commission expires: _____.

Embossed Hereon Is My
State of South Carolina Notary Public Seal
My Commission Expires December 4, 2016
DAVID E. SILLS

