

**Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned
(e.g., puts, calls, warrants, options, convertible securities)**

1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of Derivative Security	3. Transaction Date (Month/Day/Year)	3A. Deemed Execution Date, if any (Month/Day/Year)	4. Transaction Code (Instr. 8)		5. Number of Derivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5)		6. Date Exercisable and Expiration Date (Month/Day/Year)		7. Title and Amount of Securities Underlying Derivative Security (Instr. 3 and 4)		8. Price of Derivative Security (Instr. 5)	9. Number of derivative Securities Beneficially Owned Following Reported Transaction(s) (Instr. 4)	10. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	11. Nature of Indirect Beneficial Ownership (Instr. 4)
				Code	V	(A)	(D)	Date Exercisable	Expiration Date	Title	Amount or Number of Shares				
Stock Option (right to buy)	\$4.94	07/20/2000		A ⁽¹⁾		2,500		07/20/2001	07/20/2004	Class A Common Stock	2,500	\$0	2,500	D	
Stock Option (right to buy)	\$5.98	02/08/2002		A ⁽²⁾		20,000		02/08/2003	02/08/2012	Class A Common Stock	20,000	\$0	22,500	D	
Stock Option (right to buy)	\$4.94	07/19/2004		M ⁽¹⁾			2,500	07/20/2001	07/20/2004	Class A Common Stock	2,500	\$0	20,000	D	

Explanation of Responses:

- Grant to reporting person of option to buy shares of common stock under the Rock of Ages 1994 Stock Plan in a transaction exempt under Rule 16b-3. The option vests in 1/3 increments on 07/20/01, 07/20/02 and 07/20/03, respectively.
- Grant to reporting person of option to buy shares of common stock under the Rock of Ages 1994 Stock Plan in a transaction exempt under Rule 16b-3. The option vests in 20% increments on 02/08/03, 02/08/04, 02/08/05, 02/08/06 and 02/08/07, respectively.

/s/ Michael Tule

** Signature of Reporting Person

07/19/04

Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

* If the form is filed by more than one reporting person, see Instruction 4 (b)(v).

** Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.