

Multiple Documents

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2	Declaration of Farrah R. Berse
3	Exhibit A to Declaration of Farrah R. Berse: Paul, Weiss Attorneys' Fees So
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8	Declaration of David G.H. Brackett
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COMMON CAUSE GEORGIA, as an
organization,

Plaintiff,

v.

Case No. 18-cv-05102-AT

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State of
Georgia,

Defendant.

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
PLAINTIFF COMMON CAUSE GEORGIA’S SPECIAL
MOTION FOR AN AWARD OF ATTORNEYS’ FEES**

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I. INTRODUCTION

Plaintiff Common Cause Georgia (“Common Cause”) filed this lawsuit to protect Georgia voters’ rights in light of documented security vulnerabilities in the State’s voter registration system and the State’s inadequate approach to counting provisional votes. Common Cause achieved the relief it sought, obtaining a Temporary Restraining Order (“TRO”) from this Court on November 12, 2019—one week after this lawsuit was filed. In order to obtain the TRO, Common Cause’s lawyers—many of whom have extensive voting rights litigation experience—worked hundreds of hours, and in the course of one week, filed a Complaint, seven briefs, and eighteen declarations from fact and expert witnesses, and argued Common Cause’s Motion for a Temporary Restraining Order and Expedited Discovery (the “TRO Motion”) in this Court. The relief Common Cause obtained was, just months later, permanently codified into law.

Common Cause is thus a prevailing party entitled by law to recover its reasonable legal fees and litigation expenses. While Common Cause is likely entitled to *all* of its attorneys’ fees and litigation expenses for this entire case, in order to narrow the areas of disagreement, Common Cause seeks reimbursement only of (a) its fees and expenses up through the Court’s Order granting the TRO; and (b) fees and expenses in connection with preparing this Special Motion for an

Award of Attorneys' Fees ("the "Fee Motion"). For the reasons discussed below, Common Cause is entitled to \$139,480 in legal fees and \$4,527.59 in litigation expenses in connection with the TRO Motion, and legal fees in an amount to be determined later in connection with this Fee Motion.

II. SUMMARY OF FACTS

A. Relevant Background

As alleged in the Complaint, in the lead-up to the November 6, 2018 general election, Georgia's voter registration systems were vulnerable to serious security breaches. Compl. ¶¶ 9–24. These vulnerabilities increased the risk that eligible voters would be impermissibly removed from the State's election rolls or that their registration information would be unlawfully manipulated in a way that would prevent them from casting a regular ballot. The only recourse for voters whose names could not be found on the voter registration list was to cast a provisional ballot. Order Granting in Part Pl.'s Mot. for TRO & Expedited Disc. & Den. Def.'s Mot. to Strike Decls. ("Order") at 2, ECF No. 62. But under the State's then-existing provisional balloting scheme, such ballots would be rejected if election officials could not find the voters' names on the very registration server that was vulnerable to manipulation. *Id.* The risk that voter registration records

would be tampered with was heightened by Defendant's decision to publicize the security vulnerabilities in the days prior to the election. Compl. ¶¶ 20–23, 25–29.

In response to these circumstances, on November 5, 2018, Common Cause filed a Complaint against then-Secretary of State (now-Governor) Brian Kemp. The day after the election, Common Cause filed the TRO Motion to enjoin the rejection of any provisional ballots cast on the basis that the voter's name was not found on the voter registration list. Common Cause also sought expedited discovery of: (1) the number of provisional ballots cast per county, and the reason for each; (2) guidance provided by the Secretary to county officials regarding counting provisional ballots or assessing the eligibility of provisional voters; and (3) all coding sheets or similar documents used in review of provisional ballots and ascertaining the eligibility of voters who voted by provisional ballots.

Over the next five days, Common Cause filed seven briefs and eighteen declarations from witnesses, including an expert who noted that the change in the ratio of provisional ballots to total ballots from 2014 to 2018 was unusually high in particular counties and opined that this indicated systemic issues within these counties.¹ This Court also heard argument on the TRO Motion.

¹ ECF Nos. 15-1; 15-11; 15-12; 25; 26; 27; 28; 29; 30; 31; 35; 36; 37; 46; 47; 48; 49; 50; 53; 55; 56; 58; 59; 60; 60-1; 60-2.

Five days after the motion was filed, this Court granted the TRO Motion in large part, ordering the Secretary of State to (1) immediately establish and publicize a hotline or website where provisional voters could determine if their ballots were counted and if not, the reason why; (2) direct county election superintendents to do the same; and (3) upon the receipt of certified returns from county superintendents, (a) direct county superintendents to engage in a good faith review of the eligibility of voters issued provisional ballots coded PR using all available registration documentation, or (b) conduct an independent review of the same. Order at 52–53. The Defendant later agreed to comply with the relevant requirements in the Order in connection with the December 2018 run-off election. *See* Joint Prelim. Report & Disc. Plan at 1, ECF No. 71.

B. Enactment of H.B. 316 and H.B. 392

Following the Order, the parties continued to litigate the case by seeking and taking discovery from each other. In addition, Common Cause served non-party subpoenas on 18 Georgia counties, as well as on a number of state agencies that might have relevant information. July 22, 2019 Declaration of Farrah R. Berse (“Berse Decl.”) ¶ 15. As the parties were engaged in this discovery process, Georgia’s legislature was, in parallel, considering potential amendments to the State’s election laws.

On April 2, 2019, House Bill 316 was signed into law. H.B. 316 amended Georgia's provisional ballot counting laws in ways that are relevant to this litigation. *See* Joint Stipulation at 2, ECF No. 116.

- Section 37 provides: “At the earliest time possible after the casting of a provisional ballot, the election superintendent shall notify the Secretary of State that an elector cast a provisional ballot, whether such ballot was counted, and, if such ballot was not counted, the reason why such ballot was not counted.” *Id.* at 2.
- Section 38 requires that county officials make good faith efforts to determine whether a person casting a provisional ballot was entitled to vote in the election. Those efforts include “a review of all available voter registration documentation, including registration information made available by the electors themselves and documentation of modifications or alterations of registration data showing changes to an elector’s registration status.” Additional information sources “may include, but are not limited to, information from the Department of Driver Services, Department of Family and Children Services, Department of Natural Resources, public libraries, or any other agency of government, but not limited to, other county election and registration offices.” It also requires

county election officials to notify persons whose provisional ballots were rejected because the county could not determine if the individual timely registered or if the individual voted in the wrong precinct, “[a]t the earliest time possible after a determination is made regarding a provisional ballot.” *Id.* at 2–3.

- Section 40 extended the counties’ election certification deadline and gives Defendant authority to further extend the deadline to complete a precertification audit of the election. *Id.* at 3.

On May 2, 2019, House Bill 392 was signed into law to provide additional protections for the security of the state’s voter registration system.

Specifically, it directs Defendant to:

promulgate a regulation that establishes security protocols for voter registration information maintained and developed by the Secretary of State pursuant to Code Section 21-2-211 and 52 U.S.C. Section 21083. The regulation shall be generally consistent with current industry security standards, and in promulgating the regulation, the secretary of state shall consider those security standards issued by the National Institute of Standards and Technology, the Center for Internet Security, and the federal Election Assistance Commission. The Secretary of State shall, at least annually, certify that the State of Georgia has substantially complied with the requirements of the regulation promulgated pursuant to this Code section[.]

Id. at 3.

C. **Dismissal of the Case and Subsequent Fees Litigation**

In light of these measures, the parties agreed that this case should be dismissed. Pursuant to the parties' June 14, 2019 stipulation, this Court dismissed the litigation, and set a briefing schedule for this motion.²

III. **ARGUMENT**

A. **Identification of the Judgment and Relevant Statute upon Which Common Cause Is Entitled to Attorneys' Fees**

Common Cause achieved the objectives of this lawsuit by obtaining the Order, which, among other things, ordered: (1) Defendant to establish a hotline or website for provisional voters to determine if their ballots were counted, and to direct county superintendents to do the same; (2) Defendant to direct county election officials to remit certified returns and engage in a good faith review of the eligibility of provisional ballot voters; and (3) required that this review use all available documentation, not merely eNet registration information, as well as any audit trails documenting modifications or alternations of registration data. Order at 52–53. As detailed above, these provisions were, in large part, permanently

² The Court's schedule, consistent with the parties' stipulation, dispensed with the default, two-step process for an attorneys' fees petition in this district. N.D. Ga. Civ. R. 54.2(A)(2). Instead, the parties agreed that Common Cause would file all of its moving papers at one time. *See* Joint Stipulation at 3. The briefing schedule was later amended. *See* Order Approving Extension of Time at 2, ECF No. 118.

codified into law by H.B. 316. Common Cause is entitled to attorneys' fees and costs under 42 U.S.C. § 1988(b), which applies to prevailing plaintiffs in 42 U.S.C. § 1983 civil rights actions.³

B. Common Cause Is a Prevailing Party and Is Thus Entitled to an Award of Attorneys' Fees and Litigation Expenses.

Section 1988, which permits prevailing plaintiffs to recover attorneys' fees and costs in actions such as this, "is a tool that ensures the vindication of important rights, even when large sums of money are not at stake, by making attorney's fees available under a privilege attorney general theory." *Williams v. City of Atlanta*, No. 1:17-cv-1943-AT, 2018 WL 2284374, at *3 (N.D. Ga. Mar. 30, 2018) (quoting *Farrar v. Hobby*, 506 U.S. 103, 122 (1992) (O'Connor, J., concurring)). Courts routinely apply this fee-shifting framework to actions brought to enforce voting rights statutes, including HAVA. *See, e.g., Ga. State Conference of the NAACP v. Kemp*, No. 1:17-cv-1397-TCB, 2018 WL 2271244, at *1, *4 (N.D. Ga. Apr. 11, 2018) (awarding attorneys' fees and costs for a claim brought

³ The Fourteenth Amendment to the U.S. Constitution and the Help America Vote Act, 52 U.S.C. § 20901 *et seq.*, which formed the basis for Common Cause's successful claims, create rights enforceable under 42 U.S.C. § 1983. Common Cause is also entitled to expert fees under 52 U.S.C. § 10310(a), which applies to prevailing parties in actions to enforce the voting guarantees of the Fourteenth and Fifteenth Amendments.

pursuant to 52 U.S.C. § 20510(c)); Order Establishing Entitlement to Attorney Fees at 2, 7, *Fla. Democratic Party v. Hood*, No. 4:04-cv-395 (N.D. Fla. May 9, 2005), ECF No. 82 (holding that plaintiff was entitled to attorneys' fees for injunction obtained under HAVA).

When considering a motion for attorneys' fees in a voting rights action, a court must first determine whether the plaintiff is a "prevailing party." *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). The "touchstone" of the prevailing party inquiry under § 1988 "is the material alteration of the legal relationship of the parties in a manner which Congress sought to promote in the fee statute." *Sole v. Wyner*, 551 U.S. 74, 82 (2007) (citation omitted). The Eleventh Circuit has repeatedly held that a party does not need to obtain a final judgment in its favor in order to obtain attorneys' fees and that "a preliminary injunction on the merits . . . entitles one to prevailing party status and an award of attorney's fees." *Common Cause/Ga. v. Billups*, 554 F.3d 1340, 1356 (11th Cir. 2009) (ellipsis in original).⁴ Moreover, courts have broad discretion in determining whether a party

⁴ Courts in the Eleventh Circuit treat temporary restraining orders and preliminary injunctions as the same in the context of the prevailing party inquiry. See, e.g., *Bird v. Sumter Cty. Bd. of Educ.*, No. 1:12-CV-76 (WLS), 2014 WL 1340677, at *3 (M.D. Ga. Apr. 3, 2014); *Camp v. Cason*, No. 1:06-CV-1586-CAP, 2006 WL 5440436, at *2 (N.D. Ga. Nov. 9, 2006).

has prevailed for purposes of an attorneys' fees motion, and "a party who has not prevailed in the traditional sense through a court judgment on the merits may still be deemed a prevailing party." *Williams*, 2018 WL 2284374, at *3.

Common Cause is a prevailing party with respect to its claims under the Fourteenth Amendment and HAVA § 302(a). In connection with ruling on the TRO Motion, the Court found that "the combination of the statistical evidence and witness declarations," including expert witness evidence, "persuasively demonstrates the likelihood of Plaintiff succeeding on its claims." Order at 41. The Court also held that Common Cause had "shown a substantial likelihood of proving that the Secretary's failure to properly maintain a reliable and secure voter registration system has and will continue to result in the infringement of the rights of the voters to cast their vote and have their votes counted." Order at 41–42.

In the Order, the Court enjoined the certification of election results, required Defendant to establish a hotline or website for provisional ballot voters, required Defendant's hotline or website to explain why provisional ballots were not counted, required Defendant to direct county election officials to remit certified returns and engage in a good faith review of the eligibility of provisional ballot voters, and required that this review use all available documentation, not merely

eNet registration information, as well as any audit trails documenting modifications or alternations of registration data. Order at 52–53.

In other words, the TRO granted Common Cause what it had asked for: “preventing the final rejection of provisional ballots for the narrow class of persons who had registration problems” in a matter that would wrongfully disenfranchise voters who had been properly registered. Tr. Hr’g Mot. TRO at 8:8–10. Common Cause’s TRO Motion thus “materially alter[ed]” the legal relationship between provisional ballot voters and Defendant, ensuring that Georgia citizens whose votes might have otherwise been rejected were counted.

The Order effected a change in Georgia law—how ballots are counted, and how voters are notified of whether their ballots are counted—that was subsequently codified into Georgia law. This change put in place new standards governing how provisional ballots are counted and certified in Georgia, both in the aftermath of the general election and in the December 2018 run-off election. By requiring Georgia to count and certify provisional ballots in this manner, the Order represented a “material alteration in the legal relationship” between the parties carrying “judicial imprimatur.” *Common Cause/GA*, 554 F.3d at 1356 (citations omitted). The Order also represents “the benefit [Plaintiff] sought in bringing

suit.” *Hensley*, 461 U.S. at 433 (citation omitted). Common Cause is therefore a prevailing party entitled to an award of attorneys’ fees.

C. **Common Cause Should Be Awarded Attorney’s Fees and Litigation Expenses in Connection with Obtaining the Order.**

When a court determines that the plaintiff is a “prevailing party,” the plaintiff “should ordinarily recover an attorney’s fee unless special circumstances would render such an award unjust.” *Hensley*, 461 U.S. at 429 (citation omitted). “The court would be justified in denying a fee award only ‘where the plaintiff[’s] success on a legal claim can be characterized as purely technical or *de minimus* [sic].” *Williams*, 2018 WL 2284374, at *4 (quoting *Smalbein ex rel. Estate of Smalbein v. City of Daytona Beach*, 353 F.3d 901, 907 n.7 (11th Cir. 2003)). The substantial success that Common Cause obtained—a delay in the certification of the election, an order that the state comply with HAVA’s hotline requirements, a change in the way ballots are counted in Georgia, and a change in Georgia’s laws—cannot fairly be characterized as technical or *de minimis*.

The first step in determining the amount of attorneys’ fees that should be reimbursed is for the Court to determine the “lodestar,” *i.e.*, the number of hours reasonably spent on the litigation, multiplied by a reasonable hourly rate. *ACLU of Ga. v. Barnes*, 168 F.3d 423, 427 (11th Cir. 1999). The Court must then determine whether awarding the lodestar is reasonable. *Bivins v. Wrap It Up, Inc.*, 548 F.3d

1348, 1350 (11th Cir. 2008) (per curiam). Here, the lodestar is \$139,480, which is based on a total of 244.4 hours billed by Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”) attorneys, at hourly rates ranging from \$250 to \$700; and 88.2 hours billed by attorneys from The Brennan Center for Justice (“Brennan Center”) attorneys, at hourly rates ranging from \$400 to \$600.⁵ July 22, 2019 Declaration of Myrna Pérez (“Pérez Decl.”) ¶ 14; Berse Decl. ¶ 24.⁶

While there is a “strong presumption” that the lodestar yields a reasonable fee award, *Bivins*, 548 F.3d at 1350, the Court must evaluate the reasonableness of the fee application in the context of the particular case. *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 553–54 (2010) (“The lodestar method was never intended to be conclusive in all circumstances. . . . [The] presumption may be overcome in those rare circumstances in which the lodestar does not adequately take into account a factor that may properly be considered in determining a

⁵ Common Cause’s counsel expended a total of well over an additional 1,000 hours litigating this case after the Court entered the Order. Pérez Decl. ¶ 12; Berse Decl. ¶ 26. However, Common Cause is not seeking (a) fees after the entry of the Order (other than fees incurred in connection with this Motion), or reimbursement of *any* of their local counsels’ fees or expenses.

⁶ Common Cause’s total expenses incurred up through the date of the Order are \$4,527.59. These include fees associated with court filings and reporting services, cost of travel to attend the TRO hearing, and expert fees. Additional details are set forth in the accompanying declarations. Pérez Decl. ¶¶ 17–18; Berse Decl. ¶¶ 28–29.

reasonable fee.”); *Williams*, 2018 WL 2284374, at *11 (“There is no precise rule or formula the Court must follow in determining what is a reasonable fee award.”).

Although not dispositive, the Eleventh Circuit looks to the twelve factors set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), to determine whether a fee application is reasonable.⁷ A number of these factors weigh strongly in favor of finding that Common Cause’s fee application is reasonable. Of these factors, courts “give special heed to the time and labor involved, the customary fee, the amount involved and the result obtained, and the experience, reputation and ability of counsel.” *Saizan v. Delta Concrete Prods. Co.*, 448 F.3d 795, 800 (5th Cir. 2006) (citation omitted).

(a) Time and Labor

The time and labor spent on a case is a “necessary ingredient to be considered,” *Johnson*, 488 F.2d at 717, and the “most useful starting point for

⁷ The twelve *Johnson* factors are: (1) the time and labor required, (2) the novelty and difficulty of the questions involved, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the “undesirability” of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases. *Id.* at 717–19.

determining the amount of a reasonable fee,” *Hensley*, 461 U.S. at 433. Attorneys are obligated to exercise “billing judgment” in seeking a fee award. *Id.* at 434 (citation omitted).

While Common Cause is seeking reimbursement of attorneys’ fees incurred by a number of attorneys, totaling a significant number of attorney hours, this was necessitated by the complex, emergency, and time-sensitive nature of this matter. In the context of this case and the deadlines imposed by Georgia law, the number of attorneys involved is reasonable and not inefficient. Common Cause filed a Complaint, seven briefs and eighteen fact and expert declarations in the span of one week, leading to a 56-page Order granting, in large part, the TRO Motion. Moreover, as noted above and as demonstrated by the declarations, Common Cause has taken steps to avoid seeking any fees that might be deemed excessive: (1) Common Cause is *not* seeking reimbursement of the approximately \$683,700 in fees incurred after the Order (excluding fees incurred in connection with this Motion); (2) Common Cause’s local counsel is *not* seeking reimbursement of any fees; and (3) in the interest of billing judgment, Common Cause’s counsel has excluded time that was deemed duplicative, excessive, insufficiently documented, or primarily administrative. Pérez Decl. ¶ 12; Berse Decl. ¶¶ 20–21.

The time spent by Common Cause’s counsel on each stage for which Common Cause is seeking reimbursement is as follows:

<u>Phase of Case</u>	<u>Firm</u>	<u>Number of Hours</u>
Preparing complaint	Paul, Weiss	46.9
	Brennan Center	24.6
Preparing and filing TRO Motion and accompanying materials	Paul, Weiss	75.2
	Brennan Center	14.0
Preparing for and participating in oral argument (including preparing declarations requested by the Court)	Paul, Weiss	45.8
	Brennan Center	23.0
Post-Argument Briefing	Paul, Weiss	76.5
	Brennan Center	26.6

Common Cause’s counsel asked David G.H. Brackett, a partner with Atlanta’s Bondurant Mixson & Elmore LLP to review the reasonableness of the time Common Cause’s counsel spent working on this matter, and the hourly rates claimed by Common Cause’s counsel. Mr. Brackett graduated from Georgetown University Law School in 1996, has been a member of the Georgia bar since 1998, and has been a partner with Bondurant Mixson & Elmore LLP since 2006. Brackett Decl. ¶¶ 3–4. Mr. Brackett has extensive experience in complex commercial litigation and voting rights matters, as well as experience on both sides of claims for attorneys’ fees and expenses. *Id.* ¶ 4.

Mr. Brackett reviewed the facts and circumstances of the litigation, from the first filing to this motion. *Id.* ¶ 13. As a result of his review, and in light of all of the circumstances, it is Mr. Brackett’s opinion that both the tasks performed by Common Cause’s counsel, and the number of hours expended to perform them, were necessary and reasonable. *Id.* ¶ 26.

(b) Results Obtained

The results obtained by a litigation are an “important factor” in assessing the reasonableness of attorneys’ fees. *Hensley*, 461 U.S. at 434. Common Cause’s counsel obtained outstanding results for Georgia voters by ensuring that provisional ballots would be counted and that voters had a mechanism to verify that their votes were counted. These results also included obtaining a delay in the certification of the election, an order that the state comply with HAVA’s hotline requirements, and a change in the way ballots are counted in Georgia. This and other relief sought by Common Cause was ultimately enshrined into law with the passage of H.B. 316 and H.B. 392, which will benefit all Georgians and instill greater security and confidence in future elections. As a result, the parties signed a stipulation that said these new laws “make further litigation of this matter unnecessary.” *See* Joint Stipulation at 3.

(c) Novelty and Difficulty of the Questions

This case involved complex state and federal issues, both statutory and constitutional. Particularly challenging were the technical questions regarding election security and the vulnerability of Georgia's voter registration database, which required expert analysis and extensive investigation by Common Cause's counsel. This was also the first case challenging Georgia's provisional balloting scheme following the revelation of the election security issues facing Georgia's voter registration database.

(d) Experience, Reputation, and Ability of the Attorneys

Common Cause's litigation team was led by the Brennan Center's Myrna Pérez and Max Feldman, along with Paul, Weiss's Robert Atkins and Farrah Berse, all experienced attorneys with years of complex litigation experience, including in the voting rights area. Pérez Decl. ¶¶ 3–4; Berse Decl. ¶¶ 3–6. In particular, the Brennan Center is a nonpartisan, nonprofit organization that has litigated voting rights cases for more than two decades, including various challenges to state election laws and practices under the U.S. Constitution and federal voter registration laws. In addition, the Brennan Center has published numerous nationally recognized reports on election security and election

administration and its staff have testified on these issues before the U.S. Congress and state legislative bodies across the country. Pérez Decl. ¶¶ 3–6.

Mr. Atkins, who serves as Co-Chair of the Board of the Brennan Center, and Ms. Berse regularly litigate voting rights cases, including *Women Voters of Florida v. Detzner*, No. 4:11-cv-00628 (N.D. Fla.), and *League of Women Voters of Florida v. Scott*, No. 4:16-cv-00633 (N.D. Fla.). Berse Decl. ¶¶ 4, 6. Mr. Atkins and Ms. Berse also have deep experience in complex litigation matters. *Id.* The remaining members of the Paul, Weiss team—three Associates and two Law Clerks—have experience in complex commercial disputes, class actions, and internal investigations. *Id.* ¶¶ 7–12.

Ms. Pérez leads the Brennan Center’s Voting Rights and Elections Program, and she has served as counsel in numerous voting rights cases, at both the trial and appellate level. She has also authored several nationally recognized reports and articles on voting rights and election administration, and has testified before Congress and state legislatures on a variety of voting rights issues. Pérez Decl. ¶ 3. Mr. Feldman has significant litigation experience, including cases related to voting and elections, as well as complex commercial disputes. *Id.* ¶ 4.

In forming his opinion, Mr. Brackett noted the skill and experience of Common Cause’s counsel, including their expertise in voting rights litigation,

complex litigation, and their track record of collaborating on litigation matters across the country. Brackett Decl. ¶¶ 11–12. He opined that these factors enabled them to work quickly on a compressed time schedule to obtain positive results. *Id.* ¶ 19.

(e) Time Limitations Imposed by the Circumstances

On November 3, 2018, a lawyer representing Defendant was notified of potential vulnerabilities in Georgia’s election system website, including its voter registration server and its public-facing election database. Compl. ¶¶ 22–23. Defendant publicized these warnings in two press releases on November 4, 2018. *Id.* ¶ 12. With the vulnerability of Georgia’s election systems and provisional balloting scheme becoming more widely known just two days before the election, Common Cause’s counsel had to act quickly to file this lawsuit and its TRO Motion to ensure that provisional ballots were properly counted, prior to a rapidly approaching November 13, 2018 deadline (mandated by Georgia law) for counties to certify their election returns—one week after the election. Within the span of less than a week, Common Cause’s counsel investigated the relevant issues, spoke with fact and expert witnesses, filed a complaint, seven briefs, and eighteen declarations, and participated in a hearing on the TRO Motion.

(f) The Hourly Rates Sought Are Reasonable.

Courts normally assess a rate's reasonableness by looking to "prevailing market rates" charged by lawyers with comparable capabilities, experience, and reputation "in the relevant community." *Blum v. Stenson*, 465 U.S. 886, 895 & n.11 (1984). The relevant legal community is generally where the case is filed. *Cullens v. Ga. Dep't of Transp.*, 29 F.3d 1489, 1494 (11th Cir. 1994).

The following charts show the names, bar admission dates, customary hourly rates, and hourly rates being sought for each lawyer whose time is included in Common Cause's fee application, as well as the number of hours included in this fee application:

Attorney	Year of Bar Admission	Hours Incl. in Motion	Customary Hourly Rate	Reduced Rate Sought	Total
Robert Atkins (PW) ⁸	1988	3.6	\$1,560	\$700	\$2,520
Myrna Pérez (BC)	2003	34.6		\$600	\$20,760
Farrah Berse (PW)	2003	43.7	\$1,160	\$600	\$26,220
Maximillian Feldman (BC)	2014	19.9		\$400	\$7,960
Sean Morales-Doyle (BC)	2007	9.0		\$550	\$4,950

⁸ All attorneys included in this fee application are admitted to the New York Bar, unless otherwise indicated. Next to each attorney's name, is an indication of whether the attorney works for Paul, Weiss ("PW") or the Brennan Center ("BC"). Because the Brennan Center litigates entirely on a pro bono basis, it does not charge a customary hourly rate.

Attorney	Year of Bar Admission	Hours Incl. in Motion	Customary Hourly Rate	Reduced Rate Sought	Total
Lawrence Norden (BC)	1997	24.7		\$600	\$14,820
Makiko Hiromi (PW)	2012 ⁹	58.5	\$920	\$400	\$23,400
William Freeland (PW)	2016	18.1	\$920	\$400	\$7,240
Melina Meneguini Layerenza (PW)	2017	29.7	\$735	\$300	\$8,910
Jessica Fuhrman (PW)	2019	43.2	\$640	\$250	\$10,800
Kyle Sieber (PW)	Not yet admitted	47.6	\$640	\$250	\$11,900
TOTAL		335.7			\$139,480

Mr. Brackett has extensive practice experience and personal knowledge of the billing and collection rates and practices of his firm, Bondurant Mixson & Elmore LLP, and a number of other Atlanta law firms. Brackett Decl. ¶ 9. In addition to his deep familiarity with the hourly rates of Atlanta law firms, Mr. Brackett has reviewed a number of orders from courts in this District in which attorneys' fees were awarded. *Id.* ¶ 10. For several of these cases, Mr. Brackett knew or had first-hand experience with the work of the attorneys involved. *Id.* Based on his experience and research, it is Mr. Brackett's opinion that the rates

⁹ Admitted in Massachusetts. Also admitted in New York (2015).

sought by Common Cause in this fee motion are within the range of reasonable metro Atlanta market rates. *Id.* ¶ 17.

* * *

In sum, the lodestar (\$139,480) is a reasonable amount to award given the circumstances of this case, including the results obtained, the time-sensitive nature of the matter, the experience of the lawyers involved, and the rates being sought. *See generally* Brackett Decl.

D. Common Cause Should Also Receive Attorneys’ Fees in Connection with Bringing This Motion.

An attorney may also recover fees for time spent litigating a § 1988 fee application. *See Thompson v. Pharmacy Corp. of Am.*, 334 F.3d 1242, 1245 (11th Cir. 2003) (“We have said that an attorney may recover fees for time spent litigating the award of a section 1988 fee.”); *Jackson v. State Bd. of Pardons & Paroles*, 331 F.3d 790, 799 (11th Cir. 2003) (“It is well-settled that fees-on-fees are permitted under § 1988 even though Congress did not explicitly provide for fees-on-fees therein.”); *Williams*, 2018 WL 2284374, at *14 (“It is well established that Plaintiffs’ counsel may recover for time spent in conjunction with a fee petition.”). “[T]he measure of reasonable hours is determined by the profession's judgment of the time that may be conscionably billed and not the least time in

which it might theoretically have been done.” *Norman v. Hous. Auth. of Montgomery*, 836 F.2d 1292, 1306 (11th Cir. 1988).

With its reply brief, Common Cause’s counsel will submit a reasonable estimate of the hours spent litigating this Motion through the date of that brief.

IV. CONCLUSION

For the foregoing reasons, Common Cause respectfully requests that the Court award it attorneys’ fees in the amount of \$139,480.00 and litigation expenses in the amount of \$4,527.59 in connection with the TRO Motion and its fees in an amount to be determined later in connection with the Fee Motion.

Respectfully submitted,

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Attorneys for Plaintiff

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF COMMON CAUSE GEORGIA'S SPECIAL MOTION FOR AN AWARD OF ATTORNEYS' FEES was prepared double-spaced in 14-point Times New Roman pursuant to Local Rule 5.1(C).

/s/ F. Skip Sugarman
F. Skip Sugarman
Sugarman Law LLP

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2019, I served the within and foregoing MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF COMMON CAUSE GEORGIA'S SPECIAL MOTION FOR AN AWARD OF ATTORNEYS' FEES with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties to this matter via electronic notification or otherwise.

This 22nd day of July, 2019.

/s/ F. Skip Sugarman
F. Skip Sugarman
Sugarman Law LLP

Plaintiff Common Cause Georgia (“Common Cause”) for the award of attorneys’ fees and expenses in this case.

2. I am a Counsel at Paul, Weiss, which is co-lead counsel for Common Cause in this lawsuit, along with the Brennan Center for Justice at New York University School of Law (the “Brennan Center”). I have been the Paul, Weiss lawyer with day-to-day responsibility for managing this matter since Paul, Weiss was retained on approximately November 5, 2018, one day before the lawsuit was filed. Since that time, I have been responsible for, among other things, helping to formulate and direct Common Cause’s case strategy, research and analyze legal issues, and draft and edit the complaint and motion for a temporary restraining order and expedited discovery (the “TRO Motion”) filed by Common Cause. I also presented oral argument to the Court in connection with the TRO Motion, along with co-counsel Myrna Pérez of the Brennan Center. Paul, Weiss Partner Robert Atkins supervised the matter, and we were supported by three associates, two law clerks (graduates of law school who were not yet admitted to the bar during the relevant time period), a visiting lawyer, and other support professionals.

Biographical Information for the Paul, Weiss Team

3. I graduated from New York University School of Law in 2002. I was admitted to the New York bar in 2003, and I have been a member in good standing

ever since. I am also a member of the bars of the United States Supreme Court, the U.S. Courts of Appeals for the Second, Fifth, Ninth, and Eleventh Circuits, and the bars of the U.S. District Courts for the Eastern and Southern Districts of New York, and the Northern District of Florida. After law school, I clerked for Judge Richard Owen of the United States District Court for the Southern District of New York for one year. I joined Paul, Weiss as an Associate in 2003 and was promoted to Counsel in 2011.

4. At Paul, Weiss, I specialize in complex litigation and anti-corruption matters. I currently serve as a Deputy Chair of the Firm's Anti-Corruption & FCPA Practice Group. My pro bono work over the years has focused heavily on voting rights work. Among other voting rights work, I was a senior member of the teams that successfully obtained preliminary injunctions in *League of Women Voters of Florida v. Detzner*, No. 4:11-cv-00628 (N.D. Fla.), and *League of Women Voters of Florida v. Scott*, No. 4:16-cv-00633 (N.D. Fla.).

5. Robert Atkins received his J.D. degree from New York University School of Law in 1987. He was admitted to the New York bar in 1988. He is also a member of the bars of the United States Supreme Court, the U.S. Courts of Appeals for the Second, Third, Fourth, Fifth, Seventh, and Eleventh Circuits, and the bars of the U.S. District Courts for the Eastern and Southern Districts of New

York, the Northern District of Florida, the Eastern District of Michigan, the District of Colorado, and the District of Nevada. Mr. Atkins joined Paul, Weiss in 1987, and is a Partner and Co-Chair of the Firm's litigation department.

6. Mr. Atkins regularly litigates voting rights cases and constitutional challenges to voter registration and identification laws, and he serves as a Co-Chair of the Board of the Brennan Center, a nonpartisan and nonprofit law and policy institute. Among other voting rights work, Mr. Atkins served as lead counsel on teams that successfully obtained preliminary injunctions in *League of Women Voters of Florida v. Detzner*, No. 4:11-cv-00628 (N.D. Fla.), and *League of Women Voters of Florida v. Scott*, No. 4:16-cv-00633 (N.D. Fla). In addition, Mr. Atkins handles litigations in a wide range of matters, including antitrust and product liability class actions, mass tort actions, false advertising lawsuits, and trademark and copyright infringement actions.

7. As noted earlier, we have been assisted in this case by three Associates, Makiko Hiromi, William Freeland, and Melina Meneguín Layerenza, and two Law Clerks, Jessica Fuhrman and Kyle Sieber (collectively, the "Associates").

8. Makiko Hiromi received her J.D. degree from Columbia Law School in 2012. She was admitted to the Massachusetts bar in 2012 and the New York bar

in 2015. She joined Paul, Weiss in 2013, and is now a fourth-year Associate in the Firm's litigation department. As an intern at Children's Rights during law school, Ms. Hiromi worked on *D.G. v. Yarbrough*, No. 4:08-cv-00074-GKF-FHM (N.D. Okla.), a class action against the state of Oklahoma on behalf of children in foster care in the state. Since joining Paul, Weiss, she has worked on a variety of matters including multinational regulatory and internal investigations, and a bankruptcy court adversary proceeding involving foreign debtors and domestic and foreign creditors.

9. William Freeland received his J.D. degree from New York University School of Law in 2015. He was admitted to the New York bar in 2016. He is also a member of the bar of the U.S. Court of Appeals for the Ninth Circuit, and the bars of the U.S. District Courts for the Eastern and Southern Districts of New York. He joined Paul, Weiss in 2015, and is now a fourth-year Associate in the Firm's litigation department. Since joining Paul, Weiss, he has worked on a variety of matters including complex commercial litigations, multistate class actions, and internal investigations.

10. Melina Meneguini Layerenza received her J.D. degree from New York University School of Law in 2017. She was admitted to the New York bar in 2017. She is also a member of the bars of the U.S. Courts of Appeals for the First,

Third, and Ninth Circuits, and the bars of the Eastern and Southern Districts of New York. She joined Paul, Weiss in 2017, and is now a second-year Associate in the Firm's litigation department. Since joining Paul, Weiss, she has worked on a variety of matters including complex civil litigations, appeals, internal investigations, and government investigations. Ms. Meneguín Layerenza's background in voting rights includes her participation in drafting amicus briefs in partisan gerrymandering cases before the United States and Pennsylvania Supreme Courts (*Gill v. Whitford*, No. 16-1161 (U.S.), *League of Women Voters of Pa. v. Commonwealth*, No. 159 MM 2017 (Pa.), *Rucho v. Common Cause*, No. 18-422 (U.S.), and *Lamone v. Benisek*, No. 18-726 (U.S.)), an amicus brief in the 2020 Census case before the United States Supreme Court (*Dep't of Commerce v. New York*, No. 18-966 (U.S.)), and legal strategy memoranda for litigation and voting rights reform initiatives. Before law school, Ms. Meneguín Layerenza was a litigation assistant at Altshuler Berzon, where she worked in a paralegal capacity on election and voting rights litigation in California and Ohio.

11. Jessica Fuhrman received her J.D. degree from New York University School of Law in 2018 and joined Paul, Weiss later that year. At the time of the TRO Motion, Ms. Fuhrman, who was not yet admitted to the bar, was a Law Clerk at the Firm. In 2019, Ms. Fuhrman was admitted to the New York bar, and she is

now a first-year Associate in the Firm's litigation department. Since joining Paul, Weiss, she has worked on a variety of matters including complex civil litigations and internal investigations. Ms. Fuhrman's background in voting rights includes her work with the Lawyers' Committee for Civil Rights Under Law in 2018. Ms. Fuhrman was previously the Director of Compliance and Finance Manager of the Democratic Governors Association, and in 2016 she volunteered with the Hillary Clinton presidential campaign to provide voter protection services.

12. Kyle Sieber received his J.D. degree from Duke University School of Law in 2018. He joined Paul, Weiss in 2018, and is a Law Clerk in the Firm's litigation department. Since joining Paul, Weiss, he has worked on a variety of matters including bankruptcy-related investigations and complex civil litigation matters. Mr. Sieber also worked on an amicus brief in *Department of Commerce v. New York*, No. 18-966 (U.S.), the 2020 Census case before the United States Supreme Court.

Paul, Weiss's Work in Connection with This Matter

13. I am familiar with the legal work that Paul, Weiss performed in this case on behalf of Common Cause. Based on my experience in complex litigation and other voting rights matters, I believe that the work that we performed in this case was reasonable and appropriate.

14. Much of the work that Paul, Weiss did in this case was performed in an extraordinarily short time period between our initial retention on or about November 5, 2018 through the Court's Order on the TRO Motion on November 12, 2018—just one week later. This work was done under unusual and substantial time pressure given the November 6, 2018 general election and the November 13, 2018 deadline for the certification of those election results.

15. During that short time period, our work included research for and drafting of the complaint and research for and drafting of the TRO Motion and related submissions. In total, during that time period, we drafted and filed a Complaint, seven briefs, and eighteen declarations from fact and expert witnesses.¹

¹ Compl., ECF No. 1; Pl.'s Mem. of Law in Supp. of Mot. for a TRO & Expedited Disc., ECF No. 15-1; Pl.'s First Set of Reqs. for the Produc. of Docs. and Things to Def. Brian Kemp, ECF No. 15-11; Berse Decl., ECF No. 15-12; Morris Decl., ECF No. 25; Geltzer Decl., ECF No. 26; Wood Decl., ECF No. 27; Grant Decl., ECF No. 28; Henderson Decl., ECF No. 29; Flanagan Decl., ECF No. 30; Owens Decl., ECF No. 31; Wallach Decl., ECF No. 35; Barry Decl., ECF No. 36; Pl.'s Mem. of Law re. Standing in Further Supp. of Pl.'s Mot. for a TRO, ECF No. 37; McDonald Decl., ECF No. 46; Suppl. Submission of Pl. Common Cause Georgia, ECF No. 47; Cortes Decl., ECF No. 48; Lamb Decl., ECF No. 49; Morris Decl., ECF No. 50; Pl.'s Opp'n to Def.'s Mot. to Strike the Decls. of Michael McDonald, Edgardo Cortes, and Kevin Morris, ECF No. 53; Pl.'s Suppl. Submission in Supp. of Mot. for a TRO, ECF No. 55; Henderson Suppl. Decl., ECF No. 56; Morris Suppl. Decl., ECF No. 58; Pl.'s Resp. to Def.'s Sunday Suppl. General Submission, ECF No. 59; Pl.'s Suppl. Submission re. Standing,

In addition, we prepared for and attended the hearing in this Court on November 8, 2018. Following the Order largely granting the TRO, we continued litigating this case, including serving non-party subpoenas on 18 Georgia counties, as well as a number of state agencies.

16. The assistance of the Associates was necessary to accomplish all of this work on the extraordinarily compressed schedule. The Associates conducted factual and legal research in advance of drafting the complaint, all of which occurred in one day; they also conducted factual and legal research in connection with the TRO Motion, the related filings, and preparing for the hearing.

17. Specifically, Ms. Fuhrman and Mr. Sieber conducted factual research regarding reported vulnerabilities in Georgia's election systems and reports of Georgia voters encountering difficulties at the polls; drafted portions of the complaint summarizing those allegations; and conducted legal research in connection with the TRO motion and supplemental briefing on standing. They also ensured that all documents filed were in compliance with local rules, and coordinated electronic filings with the Court. Mr. Freeland, Ms. Hiromi, and Ms. Meneguini Layerenza each drafted sections of the complaint and TRO brief. Ms.

ECF No. 60; Richter Decl., ECF No. 60-1; Willingham Decl., ECF No. 60-2.

Hiroimi also attended the TRO hearing and assisted in the preparation and filing of the various declarations for the TRO, and Mr. Freeland and Ms. Meneguini Layerenza were responsible for the initial draft of the briefing on standing (ECF No. 37).

18. Paul, Weiss took on the representation of Plaintiff in this case on a *pro bono* basis, with the understanding that, as is customary in cases of this kind, it would retain the right to petition this Court for recovery of its fees and costs in the event that Plaintiff prevailed on its claims, pursuant to 42 U.S.C. § 1988(b), should it choose to do so.

19. In accordance with Paul, Weiss's normal business practice, the Paul, Weiss attorneys and support staff who worked on this case tracked the time that they worked on this matter to the nearest tenth of an hour. Following the Firm's customary practice, the attorneys, law clerks, and other timekeepers working on this matter entered detailed descriptions of the work they performed on this matter into the Firm's electronic time-recordkeeping system.

20. Attached as Exhibit 1 is a chart which details the time spent by Paul, Weiss timekeepers who worked on this case between November 5 and 11, 2018 for which the Firm is seeking to recover fees. This chart is an excerpt from the electronic timekeeping and billing system used by Paul, Weiss in the regular and

ordinary course of business, edited, in the exercise of billing judgement, to remove privileged information and to remove duplicative time, insufficiently documented time, or time that was deemed excessive or primarily administrative. It is the regular practice of Paul, Weiss to prepare and keep such records; these records were made and kept by individuals with personal knowledge of the accuracy of the entries; and the entries were made on or about the date reflected in the chart.

21. This chart does not contain anywhere near all the time charged by all Paul, Weiss personnel who worked on this matter. I have carefully reviewed the Firm's time entries, and as noted above, removed entries for which I thought reimbursement was not appropriate in the exercise of billing judgement. For example, the Firm determined that some entries reflected duplicative or inefficient time, or reflected work that was more administrative in nature. In total, we removed 23.1 hours of time billed by the seven timekeepers described above between November 5 and 11, 2019.

22. Additionally, Exhibit 1 does not list, and Paul, Weiss does not seek to recover any time for, Fred Snowball, a visiting lawyer from the United Kingdom who assisted significantly in research for this matter, and billed a total of 18 hours between November 5 and 11, 2018, or for the time of our paralegal, Monica Calce,

or other support staff, who collectively billed a total of 35.6 hours between November 5 and 11, 2018.

23. Other than the edits described above, the time records and work descriptions contained in Exhibit 1 are, to the best of my personal knowledge, a true and accurate reflection of the services performed by Paul, Weiss personnel who worked on this case, the dates on which they rendered those services, and the time that they billed to those services. I believe that all of the time and services reflected in Exhibit 1 were reasonably necessary to provide Common Cause with effective representation in this case.

24. For the Court's convenience, the following table lists each of the Paul, Weiss personnel for whom Paul, Weiss is seeking to recover fees. The table provides the total number of hours that we are seeking to have reimbursed for each attorney, the hourly rate the Firm is seeking for their time, and the total amount that the Firm is seeking for their work. The table also includes the customary hourly rate for each individual.

Fee Request

<u>Attorney</u>	<u>Year of Bar Admission</u> ²	<u>Hours Included in Fee Motion</u>	<u>Customary Hourly Rate</u>	<u>Reduced Hourly Rate Sought</u>	<u>Total</u>
Robert Atkins	1988	3.6	\$1,560	\$700	\$2,520
Farrah Berse	2003	43.7	\$1,160	\$600	\$26,220
Makiko Hiromi	2012 ³	58.5	\$920	\$400	\$23,400
William Freeland	2016	18.1	\$920	\$400	\$7,240
Melina Meneguini Layerenza	2017	29.7	\$735	\$300	\$8,910
Jessica Fuhrman	2019	43.2	\$640	\$250	\$10,800
Kyle Sieber	Not yet admitted	47.6	\$640	\$250	\$11,900
<u>TOTAL</u>		244.4			\$90,990

25. As is evident from the above table, the rates sought by the Paul, Weiss lawyers are far below the standard rates that the Firm ordinarily charges for the work of these individuals. I am informed and I believe that the reduced rates sought are consistent with reasonable hourly rates for lawyers at major firms in the

² All attorneys included in this fee application are admitted to the New York Bar, unless otherwise indicated.

³ Admitted in Massachusetts. Also admitted in New York (2015).

Atlanta area with the skills and experience comparable to the Paul, Weiss lawyers involved in this case. Brackett Decl. ¶ 17.

26. The hours reflected in this chart are also far below the total number of hours shown on the Firm's billing records for the entirety of this matter. Up through June 18, 2019, the Firm's records show that Robert Atkins billed 3.8 hours to this case; Farrah Berse billed 120.3 hours to this case; Makiko Hiromi billed 181.4 hours to this case; William Freeland billed 78.2 hours to this case; Melina Meneguini Layerenza billed 152.6 hours to this case; Jessica Fuhrman billed 209.9 hours to this case; and Kyle Sieber billed 168.3 hours to this case. In addition, other lawyers and support staff, in total, billed 372.8 hours to this case. In total, using the Firm's standard rates, the Firm's records reflect a total value of \$941,565.00 for 1287.3 hours in billable time devoted to this case through June 18, 2019—over ten times the \$90,990 for which we are seeking an award. Of that time, 956.2 hours were billed after the TRO order but before our work relating to the application for fees.

27. For the Court's convenience, we also prepared the below chart summarizing how the time for which we seek recovery was spent:

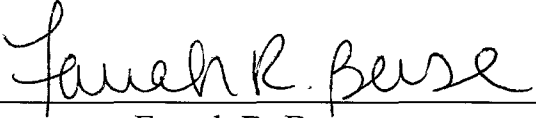
	<u>Phase of Case</u>	<u>Number of Hours</u>	<u>Amount Sought</u>
Phase 1	Preparing and drafting complaint	46.9	\$16,775.00
Phase 2	Preparing and filing TRO Motion	75.2	\$26,930.00
Phase 3	Oral Argument (including preparation and filing of declarations requested by the Court)	45.8	\$21,140.00
Phase 4	Post-Argument Briefing	76.5	\$26,145.00

28. Attached as Exhibit 2 is a chart itemizing each of the out-of-pocket expenses incurred and paid by Paul, Weiss in connection with this litigation for which the Firm is seeking reimbursement. This chart is a summary based upon the electronic records maintained by Paul, Weiss in the ordinary course of business. Also included in Exhibit 2 are the receipts and other back up information with respect to the expenses for which the Firm is seeking reimbursement.

29. The total amount of expenses the Firm is seeking is \$3,423.54. The Firm is seeking reimbursement for three categories of expenses: (1) fees associated

with filings and court reporting services in this case, which total \$892.10; (2) travel expenses associated with travel to Atlanta to participate in a hearing on Plaintiff's motion for a temporary restraining order and expedited discovery, which total \$1,306.44; and (3) fees incurred by experts in connection with the TRO motion, which total \$1,225.00.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on July 22, 2019, at New York, New York.



Farrah R. Berse

Exhibit A

Common Cause Georgia v. Raffensperger
Case No. 18-cv-05102-AT
Paul, Weiss Attorney's Fees Sought

Date	Name	Narrative	Hours Included in Fee Application	Amount Sought
11/5/2018	Berse, Farrah R.	Worked on complaint and filed same; numerous communications with PW team and co-counsel re same.	5.2	\$3,120.00
11/5/2018	Hiroimi, Makiko	Drafting of relief section of complaint, review of draft complaint	10.8	\$4,320.00
11/5/2018	Freeland, William E.	Research and drafting for complaint	10	\$4,000.00
11/5/2018	Meneguín Layerenza, Melina M.	Conducted fact research in connection with drafting complaint.	0.8	\$240.00
11/5/2018	Meneguín Layerenza, Melina M.	Drafted and subsequently revised civil cover sheet.	0.5	\$150.00
11/5/2018	Meneguín Layerenza, Melina M.	Reviewed the draft complaint and proposed line edits to reflect evolving facts.	0.7	\$210.00
11/5/2018	Meneguín Layerenza, Melina M.	Telephone conference with Jess Fuhrman re precedent Complaints.	0.1	\$30.00
11/5/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Billy Freeland re factual allegations in the draft complaint.	0.1	\$30.00
11/5/2018	Fuhrman, Jessica B.	Meeting with F. Berse re: draft Georgia complaint	0.4	\$100.00
11/5/2018	Fuhrman, Jessica B.	Conducted research and drafted facts section of Georgia complaint	8.6	\$2,150.00
11/5/2018	Sieber, Kyle T.	Factual research in connection with drafting complaint; helped draft fact section of Complaint.	9.7	\$2,425.00
11/6/2018	Hiroimi, Makiko	Drafting of outline of TRO motion, including research on Help America Votes Act related precedent.	13.1	\$5,240.00
11/6/2018	Meneguín Layerenza, Melina M.	Researched and drafted TRO brief sections on the standard for a preliminary injunction/TRO, irreparable harm, balance of the equities, and public interest.	3.3	\$990.00
11/6/2018	Meneguín Layerenza, Melina M.	Meetings with members of PW team re drafting a motion for a temporary restraining order.	0.5	\$150.00
11/6/2018	Fuhrman, Jessica B.	Meeting with Georgia team for research for potential motion	0.4	\$100.00
11/6/2018	Fuhrman, Jessica B.	Researched and wrote section of motion	5.7	\$1,425.00
11/6/2018	Sieber, Kyle T.	Meet with PW team to discuss TRO motion. Research legal issues and draft brief sections, for potential TRO/PI to be filed.	6.8	\$1,700.00
11/7/2018	Berse, Farrah R.	Drafting, revising and filing TRO papers; prepare for hearing on same.	10.8	\$6,480.00
11/7/2018	Hiroimi, Makiko	Drafting of TRO notice of motion and proposed order; review of draft complaint and coordination of cite checking, coordination of collection of exhibits to Berse declaration; revisions to TRO memo to reflect client comments; coordination of filing of TRO motion, drafting of amended complaint; legal research in connection with TRO motion.	12.7	\$5,080.00
11/7/2018	Meneguín Layerenza, Melina M.	Revised TRO brief sections on the standard for a preliminary injunction/TRO, irreparable harm, balance of the equities, and public interest.	1.8	\$540.00
11/7/2018	Meneguín Layerenza, Melina M.	Conducted fact research in connection with TRO motion.	0.7	\$210.00
11/7/2018	Meneguín Layerenza, Melina M.	Cite-checked brief in support of motion for a temporary restraining order.	1.3	\$390.00
11/7/2018	Meneguín Layerenza, Melina M.	Together with Jess Fuhrman, revised, added authorities to, and cite-checked the Berse Declaration in Support of Motion for Temporary Restraining Order.	1.4	\$420.00
11/7/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Makiko Hiroimi re brief and exhibits in support of motion for temporary restraining order.	0.3	\$90.00
11/7/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Jess Fuhrman re brief and exhibits in support of motion for temporary restraining order.	0.3	\$90.00
11/7/2018	Fuhrman, Jessica B.	Updated legal section for motion	1.3	\$325.00
11/7/2018	Fuhrman, Jessica B.	Worked on the motion for TRO	6.2	\$1,550.00
11/7/2018	Fuhrman, Jessica B.	Meeting with F. Berse re: filing	0.5	\$125.00
11/7/2018	Sieber, Kyle T.	Meet with team to discuss TRO to file today. Edit and citecheck brief in support of TRO motion. Create and edit document request to file. Research fact issues in connection with TRO motion	8.1	\$2,025.00
11/8/2018	Atkins, Robert	Emails and telecons re witnesses, affidavits and hearing.	1.4	\$980.00
11/8/2018	Berse, Farrah R.	Continued prep for and attend TRO hearing; drafting and revising additional filings; travel to and from Atlanta for hearing.	16.5	\$9,900.00
11/8/2018	Hiroimi, Makiko	Drafting of amended complaint; travel to Atlanta for TRO hearing; attended TRO hearing; work on declarations in connection with TRO hearing, including coordination of filing	21.9	\$8,760.00
11/8/2018	Freeland, William E.	Research and drafting for standing brief	5	\$2,000.00
11/8/2018	Meneguín Layerenza, Melina M.	Conducted research on standing issues.	3.1	\$930.00
11/8/2018	Meneguín Layerenza, Melina M.	Discussions with declarant re declaration for TRO motion.	0.3	\$90.00
11/8/2018	Meneguín Layerenza, Melina M.	Telephone conference with Max Feldman and Billy Freeland re strategy for briefing on standing.	0.2	\$60.00
11/8/2018	Meneguín Layerenza, Melina M.	Meeting with Billy Freeland and Jess Fuhrman re search for standing brief precedents and research tasks.	0.2	\$60.00
11/8/2018	Meneguín Layerenza, Melina M.	Call with client, Farrah Berse, and Billy Freeland re updates from the hearing and forthcoming brief on standing issues.	0.4	\$120.00

Common Cause Georgia v. Raffensperger
Case No. 18-cv-05102-AT
Paul, Weiss Attorney's Fees Sought

Date	Name	Narrative	Hours Included in Fee Application	Amount Sought
11/8/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Billy Freeland re Plaintiff's brief on standing.	0.3	\$90.00
11/8/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Jess Fuhrman re Plaintiff's brief on standing.	0.1	\$30.00
11/8/2018	Meneguín Layerenza, Melina M.	Telephone conference with Max Feldman, Billy Freeland, Jess Fuhrman, and Kyle Sieber re Plaintiff's brief on standing.	0.7	\$210.00
11/8/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Kyle Sieber re Plaintiff's brief on standing.	0.5	\$150.00
11/8/2018	Meneguín Layerenza, Melina M.	Telephone conference with Max Feldman, Jess Fuhrman, and Kyle Sieber re research on standing.	0.3	\$90.00
11/8/2018	Fuhrman, Jessica B.	Helped prepare for TRO hearing	6	\$1,500.00
11/8/2018	Fuhrman, Jessica B.	Worked on supplemental brief on standing	5.8	\$1,450.00
11/8/2018	Sieber, Kyle T.	Legal research re issue of standing. Compile research for standing brief requested by the court today at hearing. Revise, edit, and citecheck standing brief for filing.	12.1	\$3,025.00
11/9/2018	Berse, Farrah R.	Continued drafting, revising and filing documents in support of TRO motion.	5.5	\$3,300.00
11/9/2018	Freeland, William E.	Research and drafting for standing brief	2.5	\$1,000.00
11/9/2018	Meneguín Layerenza, Melina M.	Cite-checked and incorporated edits into Plaintiff's Supplemental Submission in response to the Court's November 9, 2018 Order to submit testimony from a statistician.	1.6	\$480.00
11/9/2018	Meneguín Layerenza, Melina M.	Revised, incorporated edits, and supervised the filing of Plaintiff's Memorandum of Law Regarding Standing in Further Support of Plaintiff's Motion for a Temporary Restraining Order.	3.3	\$990.00
11/9/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Max Feldman re Plaintiff's Memorandum of Law on Standing.	0.1	\$30.00
11/9/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Billy Freeland re Plaintiff's Memorandum of Law on Standing.	0.7	\$210.00
11/9/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Jess Fuhrman re Plaintiff's Memorandum of Law on Standing.	0.2	\$60.00
11/9/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Billy Freeland re Plaintiff's Supplemental Submission.	0.5	\$150.00
11/9/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Makiko Hiromi re Plaintiff's Supplemental Submission.	0.1	\$30.00
11/9/2018	Meneguín Layerenza, Melina M.	Telephone conferences with Kyle Sieber re Plaintiff's Supplemental Submission.	0.1	\$30.00
11/9/2018	Fuhrman, Jessica B.	Worked on motion re: standing	3.7	\$925.00
11/9/2018	Fuhrman, Jessica B.	Emailed and corresponded with team re: motion to strike	0.2	\$50.00
11/9/2018	Sieber, Kyle T.	Review Defendant's filing and affidavits submitted. Review the expert statistician reports. Review Defendant's Motion to Strike. Search for updated news reports relevant to motion.	4	\$1,000.00
11/10/2018	Atkins, Robert	Attn to supplemental submissions and telecons w/team re same.	1.4	\$980.00
11/10/2018	Berse, Farrah R.	Continued working on papers in support of TRO motion.	3.5	\$2,100.00
11/10/2018	Freeland, William E.	Attention to team emails and documents	0.6	\$240.00
11/10/2018	Meneguín Layerenza, Melina M.	Reviewed filings for compliance with local rules, prepared necessary certificates, and coordinated with Managing Attorney's Office for the filing of Plaintiff's Supplemental Submission in Support of Motion for a Temporary Restraining Order and of the Supplemental Declaration of Sara Henderson.	2.1	\$630.00
11/10/2018	Fuhrman, Jessica B.	Worked on supplemental motion for the court	3.6	\$900.00
11/10/2018	Sieber, Kyle T.	Assist with editing, formatting, and filing of declarations, exhibits, and supplemental filing in support of TRO.	3.8	\$950.00
11/11/2018	Atkins, Robert	Attn to supplemental submissions.	0.8	\$560.00
11/11/2018	Berse, Farrah R.	Continued work on papers in support of TRO motion.	2.2	\$1,320.00
11/11/2018	Meneguín Layerenza, Melina M.	Reviewed filings for compliance with local rules and coordinated with Managing Attorney's Office for the filing of declarations in further support of Plaintiff's Motion for a Temporary Restraining Order.	1.5	\$450.00
11/11/2018	Meneguín Layerenza, Melina M.	Cite-checked and revised supplemental submission on standing for compliance with local rules, reviewed declarations, and coordinated with Managing Attorney's Office for filing.	1.6	\$480.00
11/11/2018	Fuhrman, Jessica B.	Correspondence re: filings	0.8	\$200.00
11/11/2018	Sieber, Kyle T.	Assist with editing, formatting, and filing of declarations, exhibits, and supplemental brief regarding standing. Prepare documents declarants to sign. Review defendant's supplemental filing. Search for news articles relevant to motion.	3.1	\$775.00
TOTAL			244.4	\$90,990.00

Exhibit B

Date	Amount	Narrative
11/5/2018	\$400.00	U.S. District Court, Northern District of Georgia case commencement filing
11/7/2018	\$1,194.69	Flights to Atlanta for TRO hearing (Makiko Hiromi)
11/8/2018	\$55.17	Car services re trip to Atlanta for TRO hearing (M. Hiromi - to LGA Airport)
11/8/2018	\$14.64	Car services in Atlanta for TRO hearing (Local counsel's offices to NDGA)
11/8/2018	\$21.77	Car service in Atlanta for TRO hearing (NDGA to ATL airport)
11/8/2018	\$20.17	Car service from LaGuardia Airport (M. Hiromi - LGA Airport to home)
11/9/2018	\$147.60	Vendor: Shannon R. Welch - Reporting Services Inv# 20180530 Date: 11/09/2018 - for transcript of TRO Hearing
11/9/2018	\$344.50	Vendor: Court Support, Inc. - for Service of Summons, Complaint, Civil Cover and Order to Defendant's counsel
11/9/2018	\$1,225.00	Fees paid to expert (Dr. Michael McDonald) in connection with TRO
TOTAL	\$3,423.54	

Conniff, Daniel

From: notification@pay.gov
Sent: Monday, November 5, 2018 11:40 PM
To: Conniff, Daniel; Brodine, Nicolas
Subject: Pay.gov Payment Confirmation: GAND CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact If this payment was made in error, please refer to our website: www.gand.uscourts.gov/refund-paygov For all other inquiries, please contact Kathy Sewell at (404) 215-1630.

Application Name: GAND CM ECF
Pay.gov Tracking ID: 26DB701L
Agency Tracking ID: 113E-8254855
Transaction Type: Sale
Transaction Date: Nov 5, 2018 11:40:08 PM

Account Holder Name: Daniel Conniff
Transaction Amount: \$400.00
Card Type: AmericanExpress
Card Number: *****1000

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Travel arrangements for **HIROMI/MAKIKO BARBARA**

Agency Locator: **PVXZHM**

Client Reference: **06813-98004-030**

ITINERARY VERSION 1 OF 1 - NOV 08, 2018

View your itinerary in our app: [iPhone](#) or [Android](#)


From / To	Flight / Vendor	Departure / Arrival	
Thu Nov 08, 2018 Flight La Guardia, New York, NY(LGA) - Atlanta Hartsfield Jackson(ATL)	Delta Air Lines DL1447	6:00 AM-8:20 AM	Check in
Thu Nov 08, 2018 Flight Atlanta Hartsfield Jackson(ATL) - La Guardia, New York, NY(LGA)	Delta Air Lines DL2652	6:30 PM-8:48 PM	Check in

Links	
>	Traveler Benefits
>	Feedback
>	Blog
>	Facebook
>	LinkedIn

[Print version](#)

DL 1447 NEW YORK CITY La Guardia, New York, NY (LGA)		ATLANTA Atlanta Hartsfield Jackson (ATL)	
Departure	Thu Nov 08, 2018 6:00 AM	Arrival	Thu Nov 08, 2018 8:20 AM
Departure terminal	T-D	Arrival terminal	T-S
Class	ECONOMY	Airline check in ID	F6IE2A
Meal	No meal service	Status	Confirmed
Duration	02:20	Ticket number	0067222297814
Seat	20F	Frequent flyer	
Equipment	Airbus A321	Air miles	761
<input checked="" type="checkbox"/> Check in		More flight information	



 DL 2652	ATLANTA Atlanta Hartsfield Jackson (ATL)		NEW YORK CITY La Guardia, New York, NY (LGA)
Departure	Thu Nov 08, 2018 6:30 PM	Arrival	Thu Nov 08, 2018 8:48 PM
Departure terminal	T-S	Arrival terminal	T-D
Class	ECONOMY	Airline check in ID	F6IE2A
Meal	No meal service	Status	Confirmed
Duration	02:18	Ticket number	0067222297814
Seat	34E	Frequent flyer	
Equipment	Airbus A321	Air miles	761
Remarks	CENTER SEAT CONFIRMED. NO AISLE OR WINDOW AVAILABLE.		
<input checked="" type="checkbox"/> Check in	More flight information		

Invoice/ticket information for MAKIKO BARBARA HIROMI

Client Reference: 06813-98004-030

Total Invoiced Amount:	\$1,194.69
Ticket:	0067222297814 Invoice: 0150196 Amount: \$1,149.69
Payment:	AXXXXXXXXXXXXX1009 Date: 07-Nov-2018
Service Fee:	8900758016629 Date: 07-Nov-2018 Amount: \$45.00
Description:	AIR TICKET
Payment:	AXXXXXXXXXXXXX1009

Information specific to this trip

- You have purchased a fully refundable fare on Delta Air Lines.

Travel Assistance Contact Information

For travel assistance 24 hours a day, please call your dedicated number at 212-373-3599. After business hours, weekends and holidays, you will have the option to be transferred to our after hours travel team. To reach our after hours team directly in case of emergency, you may call 844-397-4289. Your access code is IH72.

Other information and remarks

- Please notify us of any trip cancellation so your tickets may be refunded or logged for future use
- Some hotels may impose a penalty for early checkout
- Download GO Lawyers Travel, our complimentary mobile application, to view and manage itineraries, receive flight alerts, check-in online and more. Register with your business email address so this trip will automatically appear in the My Trips section of the app. [iPhone](#) or [Android](#)

Important Health Advisory

CDC has issued travel notices for people traveling to regions where Zika virus transmission is ongoing.

For more information, please visit www.cdc.gov/zika.

Feedback

We value your input and welcome you to provide your feedback [here](#).

[View your complete itinerary online >](#)

10/2



Thanks for riding with Clement!

November 8, 2018 at 4:04 AM

Ride Details

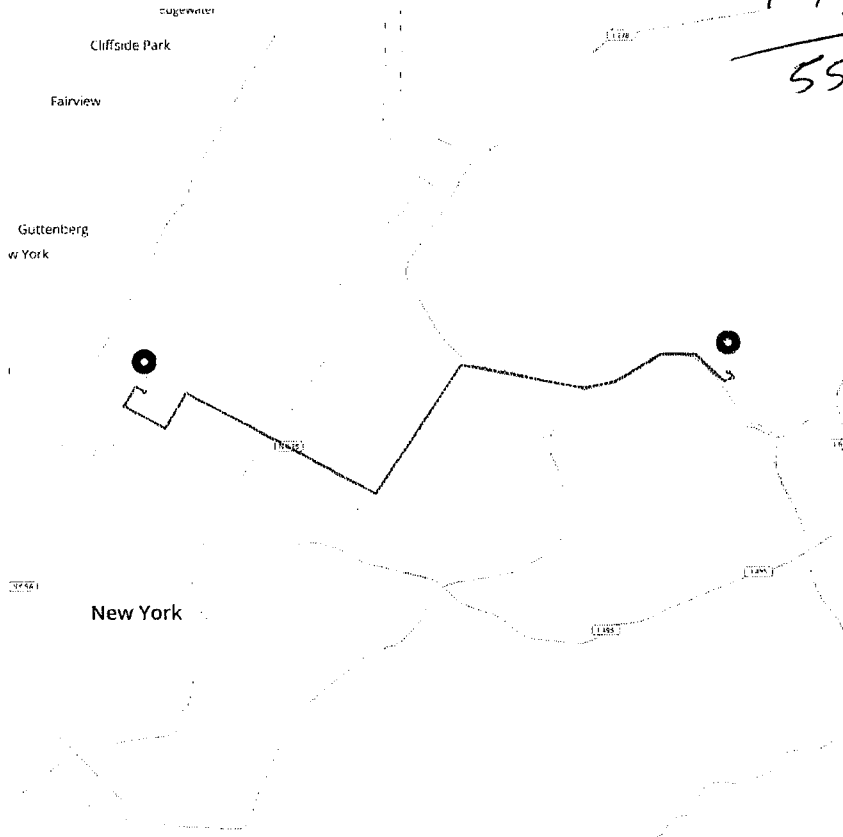
Lyft fare (8.72mi, 26m 52s)	\$29.95
Black Car Fund Surcharge	\$0.92
New York Sales Tax	\$2.66
Tip	\$7.00

VISA Visa *1281

\$40.53

+ 14.64

55.17 ✓



4:04

PickupAM
331 W
55th St,
New York,
NY

Jeff

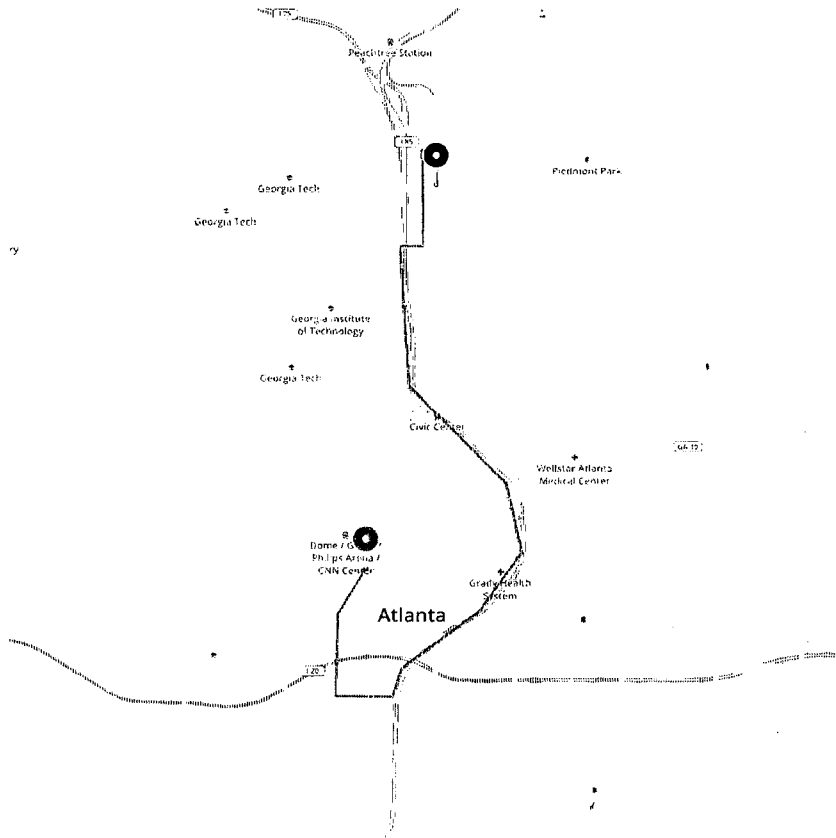


Thanks for riding with William!

November 8, 2018 at 1:49 PM

Ride Details

Lyft fare (5.52mi, 19m 58s)	\$10.64
Tip	\$4.00
<hr/>	
VISA Visa *1281	\$14.64



1:49

Pickup PM
1180 W
Peachtree
St NE,
Atlanta,
GA

Drop- 2:09
off PM

18/2

Gomez, Ligia

From: Hiromi, Makiko
Sent: Monday, November 12, 2018 8:28 PM
To: Gomez, Ligia
Subject: FW: Your Thursday evening trip with Uber

Makiko Hiromi | Associate
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas | New York, NY 10019-6064
+1 212 373 2668 (Direct Phone) | +1 646 304 0375 (Direct Fax)
mhiromi@paulweiss.com | www.paulweiss.com

From: Makiko Hiromi <makiko.hiromi@gmail.com>
Sent: Monday, November 12, 2018 2:15 PM
To: Hiromi, Makiko <mhiromi@paulweiss.com>
Subject: Fwd: Your Thursday evening trip with Uber

----- Forwarded message -----

From: **Uber Receipts** <uber.us@uber.com>
Date: Thu, Nov 8, 2018 at 5:55 PM
Subject: Your Thursday evening trip with Uber
To: <makiko.hiromi@gmail.com>

Uber

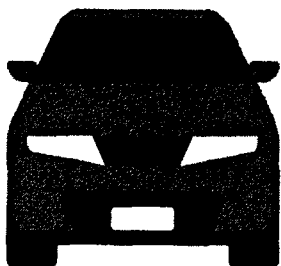
Total: \$21.77
Thu, Nov 08, 2018

✓

Thanks for riding, Makiko

We hope you enjoyed your ride this evening.

2 of 2



Total

\$21.77 ✓

Trip fare

\$21.77

Subtotal

\$21.77

Amount Charged

•••• 4571 Switch

\$21.77

[Download PDF](#)
Download link expires 12/8/18

You rode with Tae

19/2

Gomez, Ligia

From: Hiromi, Makiko
Sent: Monday, November 12, 2018 8:28 PM
To: Gomez, Ligia
Subject: FW: Your Thursday evening trip with Uber

Hi Ligia,

I'm forwarding two uber receipts. Both are for the Georgia thing, for which we now have a C: 095297-001.

Thanks!

Makiko Hiromi | Associate
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas | New York, NY 10019-6064
+1 212 373 2668 (Direct Phone) | +1 646 304 0375 (Direct Fax)
mhiromi@paulweiss.com | www.paulweiss.com

From: Makiko Hiromi <makiko.hiromi@gmail.com>
Sent: Monday, November 12, 2018 2:16 PM
To: Hiromi, Makiko <mhiromi@paulweiss.com>
Subject: Fwd: Your Thursday evening trip with Uber

----- Forwarded message -----
From: **Uber Receipts** <uber.us@uber.com>
Date: Thu, Nov 8, 2018 at 10:43 PM
Subject: Your Thursday evening trip with Uber
To: <makiko.hiromi@gmail.com>



Total: \$20.17 ✓
Thu, Nov 08, 2018

Thanks for riding, Makiko

We hope you enjoyed your ride this evening.

20/2



Total

\$20.17 ✓

Trip fare	\$20.17
-----------	---------

Subtotal	\$20.17
----------	---------

Before Taxes	\$18.12
--------------	---------

Sales Tax (8.875%)	\$1.60
--------------------	--------

NY State Black Car Fund (2.5%)	\$0.45
--------------------------------	--------

Amount Charged

.... 4571 Switch	\$20.17
------------------	---------

Affiliated with GRUN LLC (B02765)

ST44 Rev. 04/18
Derived from A044 Rev. 04/18

**UNITED STATES DISTRICT COURT
For the Northern District of Georgia**

INVOICE NO.: 20180530

**Farrah R. Berse
Paul Weiss Rifkind Wharton & Garrison
1285 Avenue of the Americas
New York, NY 10019
(212) 373-3000**

MAKE CHECKS PAYABLE TO:
**Shannon R Welch, RMR, CRR
Official Court Reporter
2394 United States Courthouse
75 Ted Turner Drive, Southwest
Atlanta, GA 30303
(404) 215-1383
shannon_welch@gand.uscourts.gov**

CRIMINAL CIVIL

DATE ORDERED: **11-09-2018**

DATE DELIVERED: **11-09-2018**

In the matter of: **1:18-CV-5102, COMMON CAUSE GEORGIA v KEMP
TRANSCRIPT OF THE 11/8/18 HEARING ON TRO HEARD BEFORE JUDGE TOTENBERG**

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary										
14-Day										
Expedited										
3-Day										
Daily										
Hourly				123	1.20	147.60				147.60
Realtime										
Misc.	Misc. Charges									
	Subtotal									147.60
	Less Discount for Late Delivery									
	Tax (If Applicable)									
	Less Amount of Deposit									
	Total Refund									
	Total Due									147.60

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:
Shannon R. Welch

DATE:
11-13-2018

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181 Hillside Avenue, Williston Park, NY 11596
113629812

Phone 516-742-7455 -- FAX 516-742-7484

Attn: Nicholas La Forge
Paul, Weiss, Rifkind, Wharton & Garrison
1285 Avenue Of The Americas
New York, NY 10019

Invoice Date: 11/9/2018
Invoice #: 1432423
Job#: 1432423
Client File#:

TOTAL INVOICE AMOUNT DUE
\$344.50

All Major Credit Cards Accepted - Any Advanced Fees must be paid upon receipt of this Invoice

Job #: 1432423 Your #: Recipient: Date Received:
Plaintiff: COMMON CAUSE GEORGIA, as an organization, BRIAN KEMP, IN HIS OFFICIAL 11/7/2018
Defendant: BRIAN KEMP, in his official capacity as Secretary of State Person Served: Completed:
Civil Action # 18-cv-05102-AT C. Ryan Germany 11/7/2018
Documents: Summons, Complaint, Civil Cover Sheet, Order 2 MLK JR. DR., SUITE 802 WEST TOWER, ATLANTA, GA

Description	Qty	Fee	Total Fee
Service Fee @ 214 State Capitol, Atlanta, GA	1	\$328.00	\$328.00
Copy Cost	66	\$0.25	\$16.50
Client Please File Affidavit(s) Electronically	1	\$0.00	\$0.00
C/M # is pending (F. Berse)	1	\$0.00	\$0.00
Job Total Due =			\$344.50

TOTAL INVOICE CHARGES: \$344.50
TOTAL INVOICE PAYMENTS:
TOTAL INVOICE AMOUNT DUE: \$344.50

Michael McDonald

7101 NW 42nd Ln
 Gainesville, FL 32606
 703-772-1440

INVOICE

INVOICE #1
 DATE: NOVEMBER 11, 2018

TO:

Myrna Pérez
 Director, Voting Rights and Elections Project
 Deputy Director, Democracy Program
 Brennan Center for Justice at NYU School of Law
 120 Broadway
 Suite 1750
 New York, NY 10271

DATE	DESCRIPTION	HOURS	AMOUNT
11/9/2018	Write Declaration	3.5	\$1,225.00
TOTAL DUE			\$1,225.00

Please make checks payable to Michael McDonald

If you have any questions concerning this invoice, contact Michael McDonald, 703-772-1440,
 dr.michael.p.mcdonald@gmail.com

Cause Georgia's ("Common Cause's") motion for the award of attorneys' fees and expenses in this case.

2. I am Director of the Voting Rights and Elections Program at the Brennan Center, which is co-lead counsel for Common Cause in this lawsuit, along with Paul, Weiss, Rifkind, Wharton and Garrison LLP ("Paul, Weiss"). I have overseen this matter for the Brennan Center since its inception. I have been responsible for, among other things, helping to formulate and direct Common Cause's case strategy, research and analyze legal issues, and draft and edit the complaint and motion for a temporary restraining order and expedited discovery (the "TRO Motion") filed by Common Cause. I also presented oral argument to the Court in connection with the TRO Motion, along with co-counsel Farrah Berse of Paul, Weiss. Other Brennan Center personnel also worked on this matter. Maximillian Feldman managed the matter on a day-to-day basis. Sean Morales-Doyle managed the day-to-day during a critical part of the case, in Mr. Feldman's absence. Lawrence Norden contributed his extensive expertise regarding election security matters. In addition, Kevin Morris, a quantitative researcher, provided significant, expert analysis of the data produced by Defendant, in support supported of Common Cause's legal claims.

Biographical Information For the Brennan Center Team

3. I have been a member of the Bar of the State of Texas since 2003, a member of the Bar of the State of New York since 2011, and a member of several federal court bars. The bulk of my career has been focused on voting rights litigation, advocacy, and research. I currently serve as Director of the Voting Rights and Elections Program at the Brennan Center for Justice at NYU School of Law (the “Brennan Center”).¹ I previously served as Deputy Director of the Democracy Program, Senior Counsel and Counsel at the Brennan Center. During my tenure at the Brennan Center, I have served as counsel in numerous voting rights cases, at both the trial and appellate level. For example, I currently serve as lead counsel in a federal court challenge to Indiana’s voter purge practices and as a co-lead counsel in a federal court challenge to Florida SB 7066, which prohibits returning citizens from registering to vote unless they pay off all legal financial obligations imposed by a court pursuant to a felony conviction. I have previously served as lead counsel in federal and state court challenges to Colorado’s purge practices, and a state court challenge to Indiana’s voter identification law, among numerous other cases. In addition, I have co-authored amicus briefs in several voting rights cases, including in the U.S. Supreme Court in the *NAMUDNO v.*

¹ For most of this matter, my title was Deputy Director of the Democracy Program and Director of the Voting Rights and Elections Project. On June 3, 2019, I was promoted to my current title. During the entire period of the case, however, I have led the Brennan Center’s voting rights work.

Holder and *Shelby County v. Holder* cases. I have also authored several nationally recognized reports and articles on voting rights and election administration, including *Election Day Long Lines: Resource Allocation* (Sept. 2014) and *If Section 5 Falls: New Voting Implications* (June 2013), and my work has been featured in media outlets across the country, including *The New York Times*, *The Wall Street Journal*, and MSNBC, among others. I have testified before several state legislatures on a variety of voting rights issues. And I serve as a lecturer-in-law at Columbia Law School, where my teaching focuses on complex civil rights litigation and civil rights policy. In addition, I previously served as the Chair of the Election Law Committee of the City of New York Bar Association. I started my legal career as a law clerk for a judge of the U.S. District Court for the Eastern District of Pennsylvania and for a judge of the U.S. Court of Appeals for the Third Circuit.

4. Maximillian Feldman has been a member of the Bar of the State of New York since 2014 and a member of the Bar of the State of California (currently inactive) since 2014. He is also admitted to several federal court bars. Mr. Feldman is Counsel in the Voting Rights and Elections program at the Brennan Center, where he focuses on voting rights and election administration. At the Brennan Center, Mr. Feldman has served as co-counsel for parties and amici in several

elections and public records cases in both state and federal courts. He has also co-authored reports regarding voting laws and litigation in the states. Prior to joining the Brennan Center, Mr. Feldman was a litigation associate in private practice. His practice focused on complex commercial litigation, and he represented clients in a variety of industries, in both state and federal court. He started his legal career as a law clerk for a judge of the U.S. Court of Appeals for the First Circuit.

5. Sean Morales-Doyle has been a member of the Bar of the State of Illinois since 2007, a member of the Bar of the State of New York since 2018, and he is admitted to several federal court bars. Mr. Morales-Doyle is Senior Counsel in the Voting Rights & Elections Program at the Brennan Center, where he focuses on voting rights and election administration.² Mr. Morales-Doyle has extensive experience litigating civil rights and constitutional matters. Prior to joining the Brennan Center, Mr. Morales-Doyle was a shareholder at Despres, Schwartz & Geoghegan, Ltd., in Chicago. There, he litigated cases involving voting rights, gerrymandering, free speech, police misconduct, race discrimination, and sexual harassment. He has experience in both state and federal courts and in virtually every aspect of complex litigation, including trials, oral arguments, and

² For most of this matter, Mr. Morales-Doyle's title was Counsel. He was promoted to Senior Counsel on June 26, 2019.

preliminary injunction and temporary restraining order hearings. He has repeatedly been appointed class counsel in class action litigation. In addition, he has served as an Assistant Attorney General for the State of Illinois, and as a law clerk to a judge of the U.S. District Court for the Northern District of Illinois.

6. Lawrence Norden has been a member of the Bar of the State of New York since 1997, and he is a member of several federal court bars. He currently serves as Director of the Election Reform Program at the Brennan Center, and he previously served as Deputy Director of the Democracy Program, Senior Counsel, and Counsel at the Brennan Center.³ During his tenure at the Brennan Center, he has authored several nationally recognized reports and articles on election security, including *Securing Elections from Foreign Interference* (June 2017) and *America's Voting Machines at Risk* (September 2015). He was the lead author of the book *The Machinery of Democracy: Protecting Elections in an Electronic World* (Academy Chicago Press). He is a member of the U.S. Election Assistance Commission's Board of Advisors and he serves as Vice Chair of its Election Security Committee. In 2009, Mr. Norden served as Chair of the Ohio Secretary of State's bipartisan Election Summit and Conference, authoring a report to the State

³ For most of this matter, Mr. Norden's title was Deputy Director of the Democracy Program. On June 3, 2019, he was promoted to his current title. During the entire period of the case, however, he has led the Brennan Center's election security work.

of Ohio for the purpose of improving that state's election laws. He has testified before Congress on election security issues twice in the last three years. In addition, he has substantial litigation experience in voting and elections cases.

The Brennan Center's Work in Connection With This Matter

7. I am familiar with the legal work that the Brennan Center performed in this case on behalf of Common Cause. Based on my experience in voting rights litigation, I believe that the work that we performed in this case was reasonable and appropriate.

8. Much of the work that the Brennan Center did in this case was performed in an extraordinarily short time period between the inception of the case on or about November 5, 2018 through the Court's Order on the TRO Motion on November 12, 2018—just one week later. This work was done under unusual and substantial time pressure given the November 6, 2018 general election and the November 13, 2018 deadline for the certification of those election results.

9. During that short time period, our work included developing the theory of the case, locating fact and expert witnesses, working with Paul, Weiss to research and drafting the complaint, the TRO Motion, and related submissions, and arguing the TRO motion before this Court. In total, during that time period, we drafted and filed a Complaint, seven briefs, and eighteen declarations from fact and

expert witnesses.⁴ In addition, we prepared for and participated in the hearing in this Court on November 8, 2018.

10. The Brennan Center accepts voting rights cases on behalf of clients, such as the plaintiffs in this case, who are unable to pay for the legal services required to litigate their claims and vindicate their rights. We therefore do not generally bill clients for our legal services, and we will not do so in this case; accordingly, we will obtain no compensation in this case absent a fee recovery.

11. Attached as Exhibit 1 is a chart which details the time spent by Brennan Center timekeepers who worked on this case from November 5-11, 2018

⁴ Compl., ECF No. 1; Pl.'s Mem. of Law in Supp. Of Mot. for a TRO and Expedited Disc., ECF No. 15-1; Pl.'s First Set of Reqs. for the Produc. of Docs. and Things to Def. Brian Kemp, ECF No. 15-11; Berse Decl., ECF No. 15-12; Morris Decl., ECF No. 25; Geltzer Decl., ECF No. 26; Wood Decl., ECF No. 27; Grant Decl., ECF No. 28; Henderson Decl., ECF No. 29; Flanagan Decl., ECF No. 30; Owens Decl., ECF No. 31; Wallach Decl., ECF No. 35; Barry Decl., ECF No. 36; Pl.'s Mem. of Law re. Standing in Further Supp. Of Pl.'s Mot. for a TRO, ECF No. 37; McDonald Decl., ECF No. 46; Suppl. Submission of Pl. Common Cause Georgia, ECF No. 47; Cortes Decl., ECF No. 48; Lamb Decl., ECF No. 49; Morris Decl., ECF No. 50; Pl.'s Opp'n to Def.'s Mot. to Strike the Decls. of Michael McDonald, Edgardo Cortes, and Kevin Morris, ECF No. 53; Pl.'s Suppl. Submission in Supp. of Mot. for a TRO, ECF No. 55; Henderson Suppl. Decl., ECF No. 56; Morris Suppl. Decl., ECF No. 58; Pl.'s Resp. to Def.'s Sunday Suppl. General Submission, ECF No. 59; Pl.'s Suppl. Submission re. Standing, ECF No. 60; Richter Decl., ECF No. 60-1; Willingham Decl., ECF No. 60-2.

for which the Brennan Center is seeking to recover fees. The itemization is based on contemporaneous records of the activities in the case.

12. This chart does not contain anywhere near all the time charged by all Brennan Center personnel who worked on this matter. For example, it excludes entirely time expended by Wendy Weiser, a Vice President of the Brennan Center, and Makeda Yohannes, a Research and Program Associate who worked on this matter. In addition, I have carefully reviewed the Brennan Center's time entries and removed entries for which I thought reimbursement was not appropriate – in particular, for work that was more administrative in nature. And we have excluded all time billed after November 11, 2019: approximately 74.5 hours.

13. Other than the edits described above, the time records and work descriptions contained in Exhibit 1 are, to the best of my personal knowledge, a true and accurate reflection of the services performed by Brennan Center personnel who worked on this case, the dates on which they rendered those services, and the time that they billed to those services. I believe that all of the time and services reflected in Exhibit 1 were reasonably necessary to provide Common Cause with effective representation in this case.

14. For the Court's convenience, the following table lists each of the Brennan Center personnel for whom the Brennan Center is seeking to recover fees.

The table provides the total number of hours that we are seeking to have reimbursed for each employee, the hourly rate the Brennan Center is seeking for their time, and the total amount that the Brennan Center is seeking for their work.

Fee Request

<u>Personnel</u>	<u>Year of Bar Admission</u>	<u>Hours Included in Fee Motion</u>	<u>Hourly Rate Sought</u>	<u>Total</u>
Myrna Pérez	2003	34.6	\$600	\$20,760
Maximillian Feldman	2014	19.9	\$400	\$7,960
Sean Morales-Doyle	2007	9.0	\$550	\$4,950
Lawrence Norden	1997	24.7	\$600	\$14,820
<u>TOTAL</u>		88.2		\$48,490

15. I am informed and I believe that the rates sought are consistent with reasonable hourly rates for lawyers at major firms in the Atlanta area with the skills and experience comparable to the Brennan Center lawyers involved in this case. *See* Decl. of David G.H. Brackett ¶¶ 12-19.

16. For the Court's convenience, we also prepared the below chart summarizing how the time for which we seek recovery was spent:

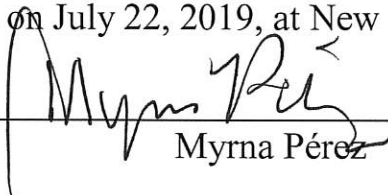
	Phase of Case	Number of Hours	Amount
Phase 1	Preparing and drafting complaint	24.6	\$13,450
Phase 2	Preparing and filing TRO Motion	14.0	\$8,280
Phase 3	Oral Argument (including preparation and filing of declarations requested by the Court)	23.0	\$12,840
Phase 4	Post-Argument Briefing	26.6	\$13,920

17. Attached as Exhibit 2 is a chart itemizing each of the out-of-pocket expenses incurred and paid by the Brennan Center in connection with this litigation for which the Brennan Center is seeking reimbursement. This chart is a summary based upon the electronic records maintained by the Brennan Center in the ordinary course of business. Also included in Exhibit 2 are the receipts or other back up information with respect to the expenses for which the Brennan Center is seeking reimbursement.

18. The total amount of expenses the Brennan Center is seeking is \$1,104.05. The Firm is seeking reimbursement for two categories of expenses: (1)

travel expenses associated with travel to Atlanta to participate in a hearing on Plaintiff's motion for a temporary restraining order and expedited discovery, which total \$194.05; and (2) fees incurred by expert Edgardo Cortés, which totals \$910.00.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on July 22, 2019, at New York, New York.



Myrna Pérez

Exhibit 1

Myrna Pérez				
Description	Start Date	Time	Amount	Phase
Emails with Lawrence Norden re: remedy	11/5/2018	0.2		1
Emails with Jenny Flanagan re: complaint	11/5/2018	0.2		1
Email with L. Norden and Wendy Weiser re: similar lawsuit in Georgia	11/5/2018	0.1		1
Email with L. Norden and W. Weiser re: complaint	11/5/2018	0.2		1
Email with J. Flanagan and Sara Henderson re: plaintiffs standing	11/5/2018	0.1		1
Emails with J. Flanagan re: complaint and similar lawsuit filed	11/5/2018	0.2		1
Email with F. Berse and M. Feldman re: drafting of statement of facts	11/5/2018	0.1		1
Email with M. Feldman, Katelyn Dooley, and Anna Singer re: plaintiffs standing	11/5/2018	0.1		1
Review draft complaint	11/5/2018	0.2		1
Email with W. Weiser re: draft relief sought	11/5/2018	0.1		1
Email with F. Berse, M. Feldman, William Freeland, Makiko Hiromi re: draft complaint	11/5/2018	0.1		1
Email with S. Henderson re: other potential plaintiffs	11/5/2018	0.1		1
Email with W. Freeland, F. Berse, M. Feldman, M. Hiromi, and L. Norden re: evidence for complaint	11/5/2018	0.1		1
Email with K. Dooley and M. Feldman re: plaintiff interest for complaint	11/5/2018	0.1		1
Email with K. Morris re: provisional ballot data for complaint	11/5/2018	0.1		1
Email with M. Hiromi, M. Feldman, and F. Berse re: evidence for complaint	11/5/2018	0.1		1
Email with M. Yohannes and M. Feldman re: complaint	11/5/2018	0.2		1
Email with K. Dooley re: plaintiff interest for complaint	11/5/2018	0.1		1
Review draft complaint and relief sought	11/5/2018	0.8		1
Email with W. Weiser and L. Norden re: draft complaint and relief sought	11/5/2018	0.1		1
Email with S. Henderson, J. Flanagan, and Susannah Goodman re: potential additional plaintiffs	11/5/2018	0.1		1
Draft introduction to draft complaint	11/5/2018	0.3		1
Emails with W. Weiser and L. Norden re: introduction of draft complaint	11/5/2018	0.2		1
Email with M. Hiromi, F. Berse, and M. Feldman re: draft relief sought	11/5/2018	0.1		1
Email with F. Berse re: draft complaint	11/5/2018	0.1		1
Email with K. Morris re: draft relief sought	11/5/2018	0.1		1
Review draft complaint	11/5/2018	0.7		1
Emails with W. Freeland, F. Berse, M. Feldman, and M. Hiromi re: facts for draft complaint	11/5/2018	0.2		1
Email with L. Norden and Edgardo Cortes re: draft complaint	11/5/2018	0.1		1
Email with W. Weiser and L. Norden re: revisions to complaint	11/5/2018	0.1		1
Emails with L. Norden re: facts for complaint	11/5/2018	0.1		1
Email with S. Morales-Doyle, Michael. Li, Dan Weiner, M. Feldman, and K. Morris re: statistical evidence for complaint	11/5/2018	0.1		1
Confer with M. Feldman re: revised draft complaint	11/5/2018	0.1		1
Emails with M. Feldman re: revised relief sought	11/5/2018	0.1		1
Email with L. Norden re: facts for complaint	11/5/2018	0.1		1
Emails with S. Henderson, J. Flanagan, and S. Goodman re: plaintiffs interest for complaint	11/5/2018	0.2		1
Email with W. Freeland, F. Berse, M. Feldman, and M. Hiromi re: local counsel and draft complaint	11/5/2018	0.1		1
Email with L. Norden re: draft complaint	11/5/2018	0.1		1
Email with L. Norden and E. Cortes re: facts in complaint	11/5/2018	0.1		1
Email with K. Morris re: draft complaint	11/5/2018	0.1		1
Email with L. Norden re: draft complaint	11/5/2018	0.1		1
Email with K. Morris and M. Feldman re: methodology used for facts in complaint	11/5/2018	0.1		1
Email with M. Feldman re: plaintiffs interest for complaint	11/5/2018	0.1		1
Email with W. Freeland re: draft complaint	11/5/2018	0.1		1
Emails with M. Feldman and K. Morris re: methodology used for facts in complaint	11/5/2018	0.2		1
Review draft relief sought	11/5/2018	0.3		1
Email with M. Feldman re: draft relief sought	11/5/2018	0.2		1
Email with M. Feldman re: plaintiffs interest for complaint	11/5/2018	0.2		1
Email with B. Sutherland and Ashley Wilson Clark re: draft complaint	11/5/2018	0.2		1
Email with S. Morales-Doyle, W. Weiser, and M. Feldman re: theory for complaint	11/5/2018	0.1		1
Email with B. Sutherland and A. Wilson Clark re: draft complaint	11/5/2018	0.1		1
Email with W. Freeland re: local counsel and facts	11/5/2018	0.1		1
Email with M. Feldman, W. Weiser, and S. Morales-Doyle re: draft complaint	11/5/2018	0.1		1
Emails with W. Freeland re: draft complaint	11/5/2018	0.2		1
Email with M. Feldman re: draft complaint	11/5/2018	0.1		1
Email with M. Feldman, F. Berse, M. Hiromi, W. Freeland, W. Weiser, L. Norden, and E. Cortes re: draft complaint	11/5/2018	0.1		1
Email with L. Norden, E. Cortes, and W. Weiser re: complaint review	11/5/2018	0.1		1
Email with M. Feldman, J. Flanagan, S. Henderson, Allegra Chapman, and S. Goodman re: draft of complaint	11/5/2018	0.1		1
Email with F. Berse, W. Freeland, M. Feldman, M. Hiromi, W. Weiser, L. Norden, E. Cortes, and R. Atkins re: review of draft complaint	11/5/2018	0.1		1
Email with K. Morris re: methodology included in complaint	11/5/2018	0.1		1
Email with W. Weiser and K. Morris re: statistical modeling used for complaint	11/5/2018	0.1		1
Email with M. Feldman re: draft complaint	11/5/2018	0.1		1

Email with W. Weiser, L. Norden, F. Berse, M. Feldman, M. Hiromi, W. Freeland, and E. Cortes re: facts for complaint	11/5/2018	0.1	1
Review draft complaint	11/5/2018	0.5	1
Email with M. Feldman re: draft complaint	11/5/2018	0.1	1
Email with L. Norden re: draft complaint	11/5/2018	0.1	1
Email with M. Yohannes re: draft complaint	11/5/2018	0.1	1
Email with J. Flanagan re: legal partners	11/5/2018	0.1	1
Email with W. Freeland re: revisions of draft complaint	11/5/2018	0.2	1
Email with F. Berse and M. Feldman re: filing of complaint	11/5/2018	0.1	1
Email with F. Berse and R. Atkins re: judge reassignment of case	11/6/2018	0.1	1
Email with L. Norden re: same	11/6/2018	0.1	1
Email with F. Berse, Christopher Campbell, and Jody Rhodes re: judge reassignment of case	11/6/2018	0.1	1
Call with court re: next steps	11/6/2018	0.1	2
Email with F. Berse re: proceedings after complaint filed	11/6/2018	0.1	2
Call with F. Berse re: next steps	11/6/2018	0.1	2
Email with F. Berse and R. Atkins re: next steps	11/7/2018	0.1	2
Email with J. Flanagan re: complaint	11/7/2018	0.1	1
Email with W. Weiser, L. Norden, and F. Berse re: similar lawsuit filed and motion for temporary restraining order	11/7/2018	0.1	2
Email with F. Berse and R. Atkins re: similar lawsuit filed	11/7/2018	0.1	2
Email with W. Weiser, L. Norden, and M. Feldman re: similar lawsuit filed and motion for temporary restraining order	11/7/2018	0.1	2
Review of relief sought in similar lawsuit filed	11/7/2018	0.1	2
Email to J. Flanagan re: similar lawsuit filed	11/7/2018	0.1	2
Call with Larry Schwartzol re: similar lawsuit filed	11/7/2018	0.1	2
Email with L. Schwartzol and W. Weiser re: motion for preliminary injunction and temporary restraining order	11/7/2018	0.1	2
Review motion for temporary restraining order	11/7/2018	0.6	2
Email with W. Weiser, L. Norden, and M. Feldman re: review of motion for temporary restraining order brief	11/7/2018	0.1	2
Email with J. Flanagan re: draft of motion for temporary restraining brief	11/7/2018	0.1	2
Email with F. Berse and M. Feldman re: draft temporary restraining order brief	11/7/2018	0.1	2
proposed order	11/7/2018	0.1	2
Email with M. Feldman and L. Norden re: revisions on motion for temporary restraining order brief	11/7/2018	0.1	2
Review draft declaration of F. Berse	11/7/2018	0.2	2
Email with F. Berse, R. Atkins, M. Hiromi, M. Feldman, W. Weiser, and L. Norden re: document requests to defendant	11/7/2018	0.1	2
Review draft motion and proposed order	11/7/2018	0.4	2
and proposed order	11/7/2018	0.1	2
Email with M. Feldman, W. Weiser, and L. Norden re: declaration	11/7/2018	0.1	2
Email with F. Berse, R. Atkins, M. Hiromi, M. Feldman, W. Weiser, and L. Norden re: review of declaration	11/7/2018	0.2	2
order	11/7/2018	0.1	2
Review motion for temporary restraining order and expedited discovery	11/7/2018	0.8	2
Email with F. Berse, R. Atkins, M. Hiromi, M. Feldman, L. Norden re: motion for temporary restraining order and expedited discovery	11/7/2018	0.5	2
Email with J. Flanagan and S. Goodman re: memo for temporary restraining order and expedited discovery	11/7/2018	0.1	2
Email with W. Weiser, F. Berse, Ms. Rhodes, M. Hiromi, C. Campbell, J. Bailey, C. Welch, M. Feldman, L. Norden, and R. Atkins re: draft of memo for temporary restraining order and expedited discovery	11/7/2018	0.1	2
Email with M. Feldman re: proposed document requests	11/7/2018	0.1	2
Email with W. Weiser re: motion for temporary restraining order	11/7/2018	0.1	2
Email with S. Henderson re: hearing	11/7/2018	0.1	3
Email with F. Berse re: motion for temporary restraining order	11/7/2018	0.1	2
Email with F. Berse, R. Atkins, L. Norden, M. Feldman, and W. Weiser re: notice of relatedness in similar lawsuit filed	11/7/2018	0.1	1
Email with W. Weiser, M. Feldman, L. Norden, and K. Morris re: hearing	11/7/2018	0.1	3
Email with F. Berse and J. Flanagan re: witness	11/7/2018	0.1	2
Email with W. Weiser and Ms. Flangan re: witness	11/7/2018	0.1	2
Email with L. Norden re: witness	11/7/2018	0.1	2
Email with L. Norden re: declaration	11/7/2018	0.1	2
Email with W. Weiser and R. Atkins re: witness	11/7/2018	0.1	2
Email with J. Flanagan regarding witness search	11/8/2018	0.2	3
Email with F. Berse regarding declaration of J. Flanagan	11/8/2018	0.2	3
Email with M. Feldman, F. Berse, W. Weiser, L. Norden, R. Atkins, and M. Hiromi regarding declaration of S. Henderson	11/8/2018	0.1	3
Email with S. Henderson, J. Flanagan, and C. Battles regarding potential witness	11/8/2018	0.1	3
Email with W. Weiser, L. Norden, J. Flanagan, S. Henderson, and C. Battles regarding witness	11/8/2018	0.1	3
Email with W. Weiser, L. Norden, and M. Feldman regarding declarations and affidavits	11/8/2018	0.1	3
Email with E. Cortes, Natalie Tennant, L. Norden, and M. Feldman regarding preparation for hearing	11/8/2018	0.1	3
Email with M. Feldman regarding standing in similar case filed	11/8/2018	0.1	3
Email with W. Weiser regarding witness search	11/8/2018	0.1	3

Emails with L. Norden and M. Feldman regarding witness search	11/8/2018	0.1	3
Email with A. Chapman regarding witnesses	11/8/2018	0.1	3
Email with S. Henderson, W. Weiser, L. Norden, M. Feldman, and J. Flanagan regarding search for witnesses and evidence	11/8/2018	0.1	3
Emails with Stephan Fee and F. Berse regarding witness search	11/8/2018	0.1	3
Email with F. Berse regarding request for expedited discovery order	11/8/2018	0.1	2
Email with M. Feldman and W. Weiser regarding revised declaration of S. Henderson	11/8/2018	0.1	3
Email with M. Feldman regarding supplemental declaration in response to temporary restraining order	11/8/2018	0.1	3
Email with S. Henderson, W. Weiser, L. Norden, M. Feldman, and J. Flanagan regarding search for witnesses	11/8/2018	0.1	3
Emails with L. Norden regarding drafting of declaration of Dan Wallach	11/8/2018	0.2	3
Email with M. Feldman and R. Atkins regarding witness	11/8/2018	0.1	3
Email with M. Hiromi regarding declarations	11/8/2018	0.1	3
Email with M. Feldman, F. Berse, and M. Hiromi regarding declaration of Joshua Geltzer	11/8/2018	0.1	3
Confer with J. Geltzer re: same	11/8/2018	0.1	3
Email with M. Hiromi regarding draft opening statement for hearing on motion for temporary restraining order	11/8/2018	0.5	3
Emails with W. Weiser and M. Hiromi regarding declaration of Harrison Wood	11/8/2018	0.1	3
Email with W. Freeland, M. Feldman, and W. Weiser regarding local counsel.	11/8/2018	0.1	1
Email with M. Feldman and F. Berse regarding brief on standing	11/8/2018	0.1	3
Emails with K. Morris and W. Weiser regarding provisional ballot data	11/8/2018	0.3	3
Review draft brief on standing	11/8/2019	0.5	3
Hearing on Motion for Temporary Restraining Order	11/8/2018	3	3
Tele confer with Michael Waldman, M. Yohannes, S. Fee, W. Weiser, L. Norden, M. Feldman, K. Morris, J. Brater, W. Freeland, M. Hiromi, E. Cortes, S. Morales-Doyle, C. Campbell, and R. Atkins	11/8/2018	0.5	3
Emails with W. Weiser, M. Feldman, and F. Berse regarding brief on standing and affidavits	11/8/2018	0.2	4
Emails with M. Feldman regarding brief on standing	11/9/2018	0.4	4
Emails consulting counsel in similar lawsuit filed	11/9/2018	0.2	4
Email with M. Yohannes, S. Morales-Doyle, and Peter Egziabher regarding evidence	11/9/2018	0.1	4
Email with W. Weiser, F. Berse, L. Norden, R. Atkins, and K. Morris regarding litigation strategy	11/9/2018	0.1	4
Emails with M. Yohannes regarding recounts	11/9/2018	0.2	4
Draft declaration of Logan Lamb	11/9/2018	0.1	4
Confer with L. Lamb re: same	11/9/2018	0.2	4
Review and revise re: same	11/9/2018	0.2	4
Emails with S. Morales-Doyle and K. Morris regarding declaration of M. McDonald	11/9/2018	0.2	4
Email with M. Yohannes regarding Georgia voter registration database	11/9/2018	0.1	4
Email with F. Berse, L. Norden, W. Weiser, and M. Feldman regarding supplemental submission	11/9/2018	0.1	4
Email with M. Yohannes regarding formatting rules for declaration	11/9/2018	0.1	4
Email with M. McDonald, K. Morris, and S. Morales-Doyle regarding court order for affidavit from a qualified statistician	11/9/2018	0.1	4
Email with J. Flanagan, W. Weiser, S. Henderson, and S. Goodman regarding potential witnesses	11/9/2018	0.1	4
Emails with F. Berse and K. Morris regarding supplemental submission	11/9/2018	0.4	4
Review declaration of K. Morris	11/9/2018	0.3	4
Confer with S. Morales-Doyle and K. Morris re: same	11/9/2018	0.2	4
Review draft supplemental submission	11/9/2018	0.2	4
Email correspondence with F. Berse, W. Weiser, L. Norden, and M. Feldman regarding affidavit of M. McDonald	11/9/2018	0.1	4
Emails with F. Berse and M. Hiromi regarding declarations of K. Morris, L. Logan, and M. McDonald	11/9/2018	0.4	4
Confer with M. McDonald and K. Morris re: same	11/9/2019	0.1	4
Emails with S. Morales-Doyle regarding Defendant's reply brief	11/9/2019	0.1	4
Emails with F. Berse, Kyle Sieber, W. Freeland, Jessica Fuhrman, M. Hiromi, R. Atkins, M. Layerenza regarding response to motion to strike affidavits	11/9/2018	0.3	4
Email with E. Cortes and L. Norden regarding motion to strike declarations	11/9/2018	0.1	4
Email with law clerk Holly Cole regarding order	11/9/2018	0.1	4
Email correspondence with W. Weiser, E. Cortes, L. Norden, and S. Morales-Doyle regarding order	11/9/2018	0.1	4
Review response to defendant's motion to strike declarations	11/9/2018	0.1	4
Tele confer with S. Morales-Doyle, M. Yohannes, S. Henderson, J. Flanagan, David Vance, and W. Weiser re: declarants	11/9/2018	0.5	4
Emails with S. Morales-Doyle regarding response to defendant's motion to strike declarations	11/9/2018	0.2	4
Emails with F. Berse regarding response to defendant's motion to strike declarations	11/10/2018	0.2	4
Email with S. Morales-Doyle regarding hearing transcript	11/10/2018	0.1	3
Email with M. McDonald regarding methodology	11/10/2018	0.2	4
Emails with F. Berse regarding supplemental declarations	11/10/2018	0.2	4
Email with S. Morales-Doyle regarding supplemental declaration of S. Henderson	11/10/2018	0.1	4
Email correspondence with S. Henderson regarding witnesses	11/10/2018	0.7	4
Email with W. Freeland regarding declaration	11/10/2018	0.1	4
Email correspondence with W. Weiser regarding witnesses	11/10/2018	0.1	4
Emails with E. Cortes, K. Morris, and S. Morales-Doyle regarding evidence for updated complaint	11/10/2018	0.4	4

Email with S. Morales-Doyle, F. Berse, M. Layerenza, R. Atkins, M. Hiromi, W. Freeland, K. Sieber, J. Fuhrman, M. Feldman, L. Norden, and W. Weiser regarding declaration of Rudolph Richter	11/11/2018	0.3	4
Email with F. Berse regarding supplemental declarations	11/11/2018	0.2	4
Email correspondence with F. Berse regarding defendant's supplemental submission	11/11/2018	0.1	4
Email correspondence with S. Henderson regarding defendant's submission	11/11/2018	0.1	4
Emails with S. Henderson and S. Morales-Doyle regarding witness and declaration of Eugenia Lea Willingham	11/11/2018	0.3	4
Email with J. Flanagan regarding declaration of R. Richter	11/11/2018	0.1	4
Review declaration of Eugenia Lea Willingham	11/11/2018	0.1	4
Email with F. Berse regarding declarations	11/11/2018	0.3	4
Email with local affiliate regarding declaration of R. Richter	11/11/2018	0.1	4
Email with J. Flanagan regarding temporary restraining order	11/11/2018	0.1	4
Emails with S. Henderson regarding declaration of R. Richter and E. Willingham	11/11/2018	0.1	4
Email with F. Berse, S. Henderson, and F. Sugarman regarding substitution of counsel	11/12/2018	0.3	1
Email with H. Cole regarding order	11/12/2018	0.1	4
Emails with J. Flanagan, S. Henderson, W. Weiser, L. Norden, M. Waldman, R. Atkins, and F. Berse regarding order	11/12/2018	0.1	4
	Total	34.6	

\$20,760

Lawrence Norden			
Description	Start Date	Time	
Emails to M. Perez regarding remedy	11/5/2018	0.4	1
emails to E. Cortez and expert re Georgia security	11/5/2018	0.2	1
Emails to client Susannah Goodman regarding complaint	11/5/2018	0.2	1
Email to client J. Flanagan re same	11/5/2018	0.1	1
Email to M. Perez and W. Weiser regarding attorney in Georgia	11/5/2018	0.1	1
Emails to M. Perez regarding complaint	11/5/2018	0.3	1
Review draft complaint	11/5/2018	0.7	1
edits to facts in complaint	11/5/2018	0.4	1
Email to W. Freeland, F. Berse, M. Feldman, M. Hiromi, and M. Perez regarding evidence for complaint	11/5/2018	0.1	1
call with expert re Georgia security	11/5/2018	0.3	1
Email to W. Weiser and M. Perez regarding draft complaint and relief sought	11/5/2018	0.1	1
Email to S. Henderson, J. Flanagan, and S. Goodman regarding additional clients	11/5/2018	0.1	1
Draft introduction to draft complaint	11/5/2018	0.2	1
Emails to W. Weiser and M. Perez regarding introduction of draft complaint	11/5/2018	0.2	1
review of intro of draft complaint	11/5/2018	0.2	1
Emails to M. Perez and E. Cortez regarding draft complaint	11/5/2018	0.1	1
Email to M. Perez regarding facts for complaint	11/5/2018	0.1	1
Emails to M. Perez regarding draft complaint	11/5/2018	0.3	1
Email to M. Perez and E. Cortez regarding facts in complaint	11/5/2018	0.1	1
Email to E. Cortez, and W. Weiser regarding complaint review	11/5/2018	0.1	1
e-mail to W. Freedland, W. Weiser, M. Perez and other regarding facts in complaint	11/5/2018	0.1	1
email to W. Freedland re facts in complaint	11/5/2018	0.1	1
emails to W. Freedland and E. Cortez re facts in the complaint	11/5/2018	0.3	1
emails to expert re georgia security issues	11/5/2018	0.3	1
calls with expert re Georgia Security Issues	11/5/2018	0.3	1
call with W. Freedland discussing edits to complaint	11/5/2018	0.3	1
e-mails with expert re security issues in Georgia	11/5/2018	0.2	1
Review and edit temporary restraining order brief	11/7/2018	0.5	2
Emails with W. Weiser, M. Perez, and M. Feldman regarding review of temporary restraining order brief	11/7/2018	0.3	2
call with expert re Georgia security issues	11/7/2018	0.3	2
calls with D. Wallach re affidavit	11/7/2018	1.5	2
emails with D. Wallach re affidavit	11/7/2018	0.3	2
Draft of D. Wallach affidavit	11/7/2018	4	2
call with E. Cortez re temporary restratining order	11/7/2018	0.2	2
Review draft motion and proposed order	11/7/2018	0.1	2
Emails with F. Berse, R. Atkins, M. Hiromi, M. Feldman, W. Weiser, and M. Perez regarding review of declaration	11/7/2018	0.2	2
Emails with M. Hiromi, F. Berse, R. Atkins, M. Feldman, W. Weiser regarding draft of motion and proposed order	11/7/2018	0.2	2
Emails with F. Berse, R. Atkins, M. Feldman, and M. Perez regarding notice of relatedness	11/7/2018	0.2	1
Draft of D. Wallach affidavit	11/8/2018	3	3
call with fact witness re affidavit	11/8/2018	0.4	3
e-mails with M. Yohanes re affidavits	11/8/2018	0.3	3
e-mails with W. Weiser re affidavits	11/8/2018	0.1	3
call with expert re Georgia security issues	11/8/2018	0.3	3
draft of fact witness affidavit	11/8/2018	1.2	3
call with expert re Georgia security issues	11/8/2018	0.3	3
e-mail with F. Berse and M. Perez re declarations	11/8/2018	0.1	3
e-mails with M. Perez, M. Hiromi and W. Weiser re declarations	11/8/2018	0.3	3

e-mails with M. Feldman re declarations	11/8/2018	0.2	3
calls with E. Cortes re declaration	11/9/2018	0.8	3
drafts of E. Cortes declaration	11/9/2018	2.8	3
emails with F. Berse re Cortes Declaration	11/9/2018	0.2	3
e-mails with K. Morris re Cortes Declaration	11/9/2018	0.2	3
e-mails with M. Yohanes re affidavits	11/9/2018	0.3	3
e-mails with M. Perez, W. Weiser and F. Berse re complaint	11/9/2018	0.3	1
email to R. Atkins, W. Weiser, M. Feldman re litigation	11/10/2018	0.1	4
email to W. Weiser, M. Perez, E. Cortes re litigation	11/10/2018	0.1	4
	Total	24.7	

\$14,820

Maximillian Feldman			
Description	Start Date	Time	
Email correspondence with P. Dunphy regarding complaint (.1)	11/5/2018	0.1	1
Email correspondence with M. Perez regarding complaint (.3)	11/5/2018	0.3	1
Email correspondence with J. Brater and S. Morales-Doyle regarding complaint (.1)	11/5/2018	0.1	1
Email correspondence with M. Perez and J. Brater and S. Morales-Doyle regarding complaint (.2)	11/5/2018	0.2	1
Email correspondence with M. Perez and M. Yohannes regarding complaint (.1)	11/5/2018	0.1	1
Email correspondence with M. Yohannes and K. Dooley regarding Georgia state law (.1)	11/5/2018	0.1	1
Email correspondence with K. Dooley regarding complaint (.3)	11/5/2018	0.3	1
Email correspondence with M. Perez and K. Morris regarding complaint (.1)	11/5/2018	0.1	1
Email correspondence with W. Weiser, M. Perez, and S. Morales-Doyle regarding complaint (.1)	11/5/2018	0.1	1
Email correspondence with co-counsel regarding complaint (.5)	11/5/2018	0.5	1
Email correspondence with client regarding complaint (.1)	11/5/2018	0.1	1
Email correspondence with K. Morris regarding complaint (.1)	11/5/2018	0.1	1
Draft complaint and research regarding same (4.3)	11/5/2018	4.3	1
Review Berse declaration and email correspondence with co-counsel regarding same (.1)	11/7/2018	0.1	1
Edit TRO brief and email correspondence with M. Perez regarding same (.2)	11/7/2018	0.2	2
Email correspondence with client regarding TRO brief (.1)	11/7/2018	0.1	2
Email correspondence with K. Morris regarding provisional ballots (.3)	11/7/2018	0.3	2
Email correspondence with co-counsel regarding hearing prep (.1)	11/7/2018	0.1	3
Draft hearing prep outline (.3)	11/7/2018	0.3	3
Email correspondence with co-counsel regarding declarations (.2)	11/7/2018	0.2	3
Draft outline for declaration and email correspondence with co-counsel and client regarding same (1.4)	11/7/2018	1.4	3
Email correspondence with local counsel regarding potential fact witnesses (.1)	11/8/2018	0.1	3
Email correspondence with M. Perez regarding declaration (.1)	11/8/2018	0.1	3
Email correspondence with L. Norden regarding Lamb declaration (.1)	11/8/2018	0.1	3
Email correspondence with J. Brater regarding sovereign immunity (.1)	11/8/2018	0.1	3
Email correspondence with client and W. Weiser regarding declaration (.1)	11/8/2018	0.1	3
Email correspondence with co-counsel regarding declarations (.1)	11/8/2018	0.1	3
Draft declarations and email correspondence with co-counsel and witnesses regarding same (1.5)	11/8/2018	1.5	3
Email correspondence with K. Morris regarding declaration (.1)	11/8/2018	0.1	3
Email correspondence with client regarding declaration (.1)	11/8/2018	0.1	3
Team telephone conference regarding court hearing (.5)	11/8/2018	0.5	3
Email correspondence with J. Brater regarding standing brief (.1)	11/8/2018	0.1	4
Draft standing brief and email correspondence and telephone conferences with co-counsel regarding same (7.9)	11/8/2018	7.9	4
	Total	19.9	

\$7,960

Sean Morales-Doyle			
Description	Start Date	Time	
editing complaint	11/5/2018	0.2	1
drafting K. Morris declaration	11/9/2018	0.3	4
confs with K. Morris re: analysis of statistical significance and election results	11/9/2018	0.5	4
drafting M. McDonald decl	11/9/2018	0.4	4
teleconf with clients re resp to mtn to strike	11/9/2018	0.2	4
drafting resp to mtn to strike	11/9/2018	1.5	4
conf with M Perez re resp to mtn to strike	11/9/2018	0.2	4
teleconf with M Perez, Paul Weiss attorneys re plans for getting voter declarations	11/10/2018	0.4	4
teleconf with M Perez, Paul Weiss attorneys re plans for getting voter declarations	11/10/2018	0.3	4
teleconf with Sara Henderson re elections with close margins potentially impacted by registration issues	11/10/2018	0.4	4
teleconf with potential fact witness re watching counts and outstanding ballots	11/10/2018	0.4	4
drafting declaration for S. Henderson re provisional ballots being potentially outcome determinative	11/10/2018	0.5	4
teleconfs with K. Morris re increase in absentee ballot counts	11/10/2018	0.2	4
drafting decl for K. Morris re changes in absentee ballot counts	11/10/2018	0.3	4
email to co-counsel attaching and explaining K. Morris declaration	11/10/2018	0.1	4
emails with S. Henderson re decl, outstanding provisionals, and making contact with potential fact witness	11/10/2018	0.2	4

emails with co-counsel re intelligence gathered on outstanding provisional ballots	11/10/2018	0.2
teleconf with Eugenia Willingham, witness who was purged from rolls re declaration	11/11/2018	1
drafting decl for E. Willingham	11/11/2018	0.5
email to E. Willingham attaching declaration	11/11/2018	0.1
drafting decl for K. Morris re changes in absentee ballot counts	11/11/2018	0.2
teleconf with co-counsel re plans for supplemental filings and declarations	11/11/2018	0.1
drafting paragraphs for supplemental standing submission	11/11/2018	0.2
emails to experts re Court's order	11/12/2018	0.1
reviewing and preparing summary of Court's ruling to share with clients and others	11/12/2018	0.5
	Total	9

\$4,950

4
4
4
4
4
4
4
4
4

	M. Pérez	L. Norden	M. Feldman	S. Morales-Doyle	Total
Phase 1	\$ 6,900.00	\$ 3,840.00	\$ 2,600.00	\$ 110.00	\$ 13,450.00
Phase 2	\$ 3,480.00	\$ 4,560.00	\$ 240.00	\$ -	\$ 8,280.00
Phase 3	\$ 4,620.00	\$ 6,300.00	\$ 1,920.00	\$ -	\$ 12,840.00
Phase 4	\$ 5,760.00	\$ 120.00	\$ 3,200.00	\$ 4,840.00	\$ 13,920.00
				Total:	\$ 48,490.00

	M. Pérez	L. Norden	M. Feldman	S. Morales-Doyle	Total
Phase 1	11.5	6.4	6.5	0.2	24.6
Phase 2	5.8	7.6	0.6	0	14
Phase 3	7.7	10.5	4.8	0	23
Phase 4	9.6	0.2	8	8.8	26.6
				Total:	88.2

Exhibit 2

Date	Expense	Business Purpose	Amount
11/8/2018	Taxi	Taxi from LGA to home following trip to Atlanta for trial	\$134.76
11/8/2018	Taxi	Lyft to airport for flight to Georgia for trial	\$59.29
11/20/2018	Expert services	Edgardo Cortés expert services	\$910.00
			\$1,104.05

TAXI SVC 41-25 36TH ST (Bank of
Montreal MasterCard Corporate Card
CBCP - US - 4230)



TAXI SVC 41-25 36TH ST
LONG IS CITY, NY

Diners Club

TRANSACTION DATE: Thursday, November 08, 2018

POSTED DATE: Monday, November 12, 2018

CREDIT CARD#: xxxx4230

Transaction Amount

\$134.76


Ref #: 00000000000001111645890


From: [Myrna Perez](#)
To: [Peter Dunphy](#)
Subject: Fwd: Your ride with Tenjin on November 8
Date: Sunday, November 18, 2018 9:58:24 AM

Sent from my iPhone

Begin forwarded message:


From: Lyft Ride Receipt <no-reply@lyftmail.com>
Date: November 9, 2018 at 4:45:12 AM EST
To: myrnaperez@aya.yale.edu
Subject: Your ride with Tenjin on November 8

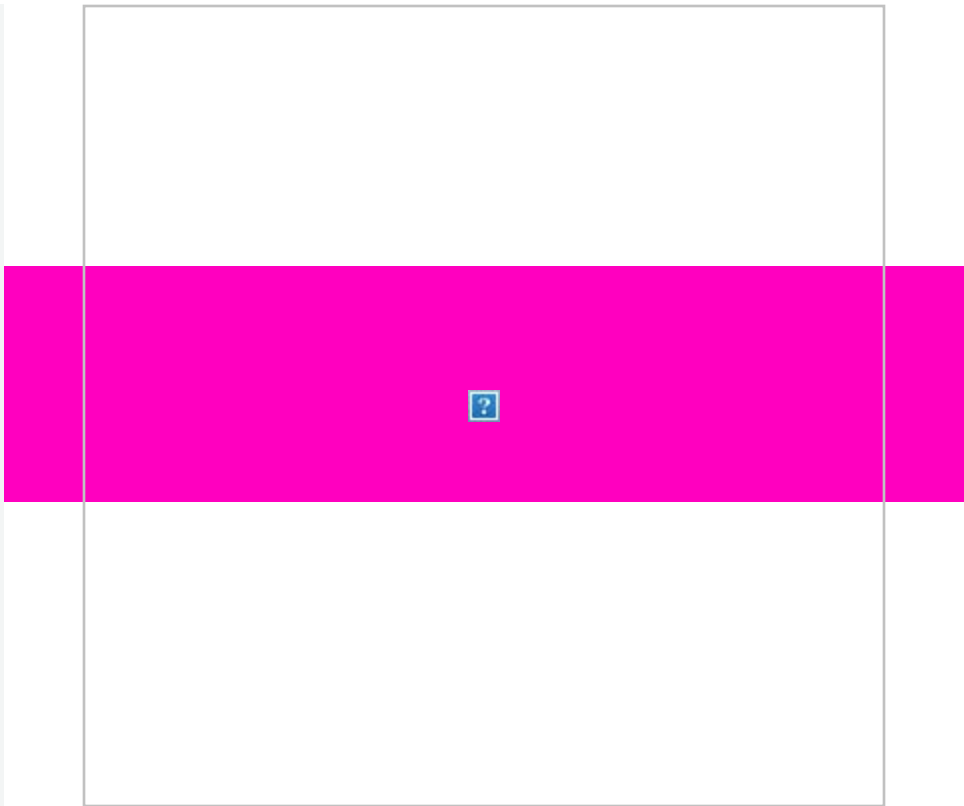




Thanks for riding with Tenjin!
November 8, 2018 at 4:10 AM

Ride Details

Lyft fare (16.34mi, 32m 46s)	\$59.29
 Discover *6821	\$59.29



Pickup 4:10 AM



Drop-off 4:43 AM
, New York, NY

**This and every ride is
carbon neutral**



[Learn more](#)



Make expensing business rides easy

Enable business profile on Lyft to make expensing rides quick and easy.

[Get Business Profile](#)

Tip driver

Find lost item

Request review

To protect against unauthorized behavior, you may see [an authorization hold](#) on your bank statement. This is to verify your payment method and will not be charged.

Help Center

Receipt #1199857890319509924

We never share your address with your driver after a ride.

[Learn more](#) about our commitment to safety.

Map data © [OpenStreetMap](#) contributors



[Become a Driver](#)

© Lyft 2018
185 Berry Street, Suite 5000
San Francisco, CA 94107

Cortes Consulting Group, LLC

[REDACTED]
[REDACTED]
[REDACTED]

INVOICE

BILL TO

Lawrence Norden

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

INVOICE # 1026

DATE 12/04/2018

DUE DATE 12/14/2018

TERMS Net 10

DATE	DESCRIPTION	QTY	RATE	AMOUNT
11/20/2018	[REDACTED]	[REDACTED]	70.00	[REDACTED]
		[REDACTED]		[REDACTED]

Detailed Time Report

Cortes Consulting Group, LLC

Timeframe **10/20/2018 — 11/19/2018**
 Total [REDACTED]

1 Client **Brennan Center for Justice**
 1 Project **Election Security Advisor**
 Categories [REDACTED]
 Team [REDACTED]

Client	Project	Task	Roles	Person	Hours
[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Client	Project	Task	Roles	Person	Hours
Brennan Center for Justice	Election Security Advisor <i>GA update call</i>	Conference Call	N/A	Edgardo Cortes	0.25
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/09/2018					[REDACTED]
Brennan Center for Justice	Election Security Advisor <i>re GA litigation</i>	Research	N/A	Edgardo Cortes	3.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/10/2018					1.25
Brennan Center for Justice	Election Security Advisor <i>GA election issues</i>	Research	N/A	Edgardo Cortes	1.25
11/12/2018					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0.25
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Brennan Center for Justice	Election Security Advisor <i>GA court opinion</i>	Document Review	N/A	Edgardo Cortes	1.50

[REDACTED] [REDACTED]

Client	Project	Task	Roles	Person	Hours
[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					[REDACTED]

[REDACTED] [REDACTED]

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

COMMON CAUSE GEORGIA, as an
Organization,

Plaintiff,

v.

BRAD RAFFENSPERGER,
SECRETARY OF STATE OF
GEORGIA, et al.,

Defendants.

Case No. 18-cv-05102-AT

DECLARATION OF DAVID G.H. BRACKETT

I, David G. H. Brackett, Esq., being duly sworn, declare as follows:

1. My name is David G.H. Brackett. I am over the age of twenty-one (21) years of age and am fully competent to execute this Declaration. I have knowledge of the facts recited here, which are true and correct and unless otherwise noted are based on my personal knowledge and my review of records relating to the litigation matter styled as, *Common Cause Georgia v. Brad Raffensperger Secretary of State of Georgia*, Civil Action No. 18-cv-05102-AT (hereinafter, “*Common Cause* litigation”).

I. My Background

2. I make this Declaration in support of the motion for attorneys' fees and litigation expenses filed by the Plaintiff.

3. I am a 1996 graduate of the Georgetown University Law Center and a member in good standing of the State Bar of Georgia since 1998. Among other Courts, I am admitted to the United States District Courts for the Northern District of Georgia and Middle District of Georgia, and I am admitted to the United States Court of Appeals for the Eleventh Circuit and the Supreme Court of the United States.

4. I have practiced law with the Atlanta, Georgia law firm of Bondurant Mixson & Elmore LLP since I began my private practice of law in 1998. Prior to that, I clerked for the Honorable Duross Fitzpatrick, United States District Court Judge, who was then Chief Judge for the Middle District of Georgia. I became a partner in the firm effective January 1, 2006. I have extensive experience in representing both plaintiffs and defendants in complex commercial litigation matters. I have been counsel in cases involving claims for attorneys' fees and litigation expenses in which I represented fee claimants and, conversely in which I defended against a request for fees by opposing counsel. My biography found on the Bondurant Mixson & Elmore, LLP website, is attached hereto as Exhibit A.

5. Over the course of my career, I have worked on a number of public interest lawsuits including *Jane Kidd v. Cathy Cox*, Civ. Action No. 1:06-CV-0997-BBM (N.D.Ga.) (challenge to redistricting); *Blum et al. v. Schrader, et al.*, Civ. Action No. SU-06-CV-1153-S (Superior Court of Clarke County) (challenge to redistricting); *Common Cause Georgia v. Evon Billups, et al.*, Civ. Action No. 4:05-cv-201-HLM (N.D. Ga.) (challenge to photo ID requirement for in-person voting); *Democratic Party of Georgia v. Sonny Perdue, et al.*, Civ. Action No. 2008-cv-151081 (Superior Court of Fulton County, Georgia) (challenge to photo ID requirement for in-person voting); *Michelle Conlon v. Karen Handel*, Civ. Action File No. 2008CV154358 (Superior Court of Fulton County) (challenge to denial of independent candidate's petition to appear on ballot); *Favors v. Stewart Finance Co.*, Civil Action No. 2002-CV-55526 (Superior Court of Fulton County) (representing senior citizens asserting claims against payday loan company); *Kenny A. v. Deal*, Civ. Action No. 1:02-CV-1686-TWT (N.D. Ga.) (representing class of foster children in monitoring compliance with Consent Decree); *Selman v. Cobb County School District*, Civ. Action No. 1:02-CV-2325-CC (N.D. Ga.) (challenge to sticker placed in science textbooks regarding theory of evolution); and *Williams v. Whitworth*, Civ. Action No. 1:91-CV-179-RWS (N.D. Ga.) (seeking to enforce consent decree regarding conditions in State Prison barber

shops). Some of these cases have involved applications to the Court for attorneys' fees and litigation expenses.

II. Opinion on Reasonableness of Fees

6. I have been asked by Plaintiffs' counsel to review the reasonableness of the attorneys' fees they are claiming in the motion for attorneys' fees and litigation expenses and to offer an opinion as to the reasonableness of such fees.

7. The Eleventh Circuit requires that a reasonableness analysis begin with a lodestar calculation. The lodestar is calculated by multiplying the number of hours reasonably expended on the litigation by a reasonable hourly rate.

A. Hourly Rates

8. The Eleventh Circuit has held that a reasonable hourly fee is the prevailing market rate in the relevant legal community for similar services by lawyers of reasonably comparable skills, experience and reputation. *See Norman Housing v. Housing Authority, City of Montgomery*, 836 F.2d 1292, 1299 (11th Cir. 1988).

9. Based on my experience in over 20 years in private law practice, I have a high level of familiarity with the hourly rates that law firms in Atlanta of similar skill and reputation to Plaintiff's counsel charge clients for complex

litigation matters, whether they involve civil rights or other areas of substantive law.

10. In connection with my review of the Plaintiffs' motion for attorneys' fees and litigation expenses in this matter, I also reviewed a number of cases and orders in the United States District Court for the Northern District of Georgia, Atlanta Division, in which the Court has made attorneys' fee awards in recent years. These cases included: *WEY, Inc. d/b / a Follies, et al., v. Dekalb County Georgia* , Civil Action No. 1: 14-cv-00253, LJV:llv1 (N.D. Ga. June 1, 2018) (finding that the following hourly rates were reasonable: \$500/hour for partner with 18 years of experience in litigating civil rights cases involving law enforcement, \$450/hour for attorney with a decade of prosecution experience plus 7 years of experience in litigation civil rights cases, \$425/hour for attorney with over 20 years' experience in First Amendment and Civil rights cases, and \$250/hour for an associate; and \$110-\$125/hour for paralegals); *Fabian Williams a.k.a. "Occasional Superstar" et al., v. City of Atlanta, Georgia*, Civil Action No. 1:17-cv- 1943-AT (N.D. Ga. March 30, 2018) (finding that rates of \$520/hour for partner with 25 years of experience, and \$325/hour for an associate with less than a year's experience in a matter challenging the constitutionality of a Public Arts Ordinance were reasonable); *Andrews v. Autoliv Japan Ltd.*, Civ. No. 1:14-CV-

3432-WSD (N.D. Ga. July 28, 2017) (finding that the customary hourly rates of attorneys with Atlanta's Alston and Bird of \$715 and \$575, which were billed at a 15% voluntary reduction in that litigation, were reasonable rates for a partner and senior associate in the Atlanta metro legal market); *WA. Griffin v. General Mills*, 157 F.Supp.3d 1350 (N.D. Ga. 2016) (finding that \$650/hour for a senior partner, \$455/hour for an associate and \$170/hour in an ERISA case were reasonable rates in the Atlanta market); *Moore v. Cook*, Civ. No. 1:07-CV-631-TWT (N.D. Ga. Oct 31, 2012) (finding hourly rate of \$475 for civil rights attorney, Gerald Weber, in 2012 to be reasonable); *Purchasing Power, LLC. v. Bluestem Brands, Inc.*, 2016 WL 1389607, *2 (N.D. GA. April 6, 2016), *reversed on other grounds*, 851 F.3d 1218 (11th Cir. 2017) (finding hourly rates in 2016 of \$650 for partners, \$350 for associates and \$225 for paraprofessionals to be "consistent with those charged by competent and experienced counsel for litigation of this type in the Atlanta metropolitan area."); *Georgia Advocacy Office v. Reese*, Civ. No. 1:15-CV-03372 (N.D. Ga. May 30, 2017) (awarding hourly rate of \$520 to civil-rights attorney Gerry Weber); and the Declaration of Roy E. Barnes *In re: Arby's Restaurant Group, Inc. Data Security Litigation*, Case No. 1:17-cv-1035-WMR (N.D. GA. May 17, 2019) (reporting hourly rates of \$550-\$750/hour for partners, \$350/hour for an associate and \$165/hour for a paralegal). I know and have first-hand

experience with the work of the attorneys involved in several of the applications noted above.

11. I am familiar with the advocacy work of the Brennan Center for Justice. I have followed several of their cases involving voting rights and redistricting and have used the Brennan Center as a resource for some of my work in these areas. In addition, my partners have worked directly with attorneys from the Brennan Center in litigation in these areas. Through its Democracy Program, the Brennan Center offers an exceptional level of expertise in the areas of voting rights, voting systems and redistricting. In my experience, the lawyers at the Brennan Center are uniformly highly skilled.

12. I am also familiar with the law firm of Paul Weiss both by reputation and from working with lawyers from the firm in complex commercial litigation. In my experience, Paul Weiss attorneys are highly skilled advocates who specialize in analyzing and presenting complex issues in litigation. In my experience, I have found lawyers at Paul Weiss to be highly skilled and very professional. Of note here is the track record of collaboration between Paul Weiss and the Brennan Center in litigation throughout the country. Among the cases in which a team of Paul Weiss attorneys led by Robert Atkins has worked with lawyers from the Brennan Center are *Evenwel v. Abbot*, No. 14-940 (U.S.) (amicus brief); *Florida*

NAACP v. Browning, No. 4:07-cv-00402 (N.D. Fla.), No. 07-15932 (11th Cir.); *Shapiro v. McManus*, No. 1:13-cv-3233 (D. Md.) (amicus brief); *League of Women Voters of Florida v. Detzner*, No. 4:11-cv-00628 (N.D. Fla.); and *League of Women Voters of Florida v. Scott*, No. 4:16-cv-00633 (N.D. Fla.). Ms. Berse was also involved in *League of Women Voters of Florida v. Detzner*, and *League of Women Voters of Florida v. Scott*. These cases have established important precedent in areas such as voting rights.

13. In connection with the preparation of this declaration, I have reviewed the following pleadings prepared by the Plaintiff's counsel in the *Common Cause* Litigation: the Complaint (ECF No. 1), the Plaintiff's Notice of and Motion for a Temporary Restraining Order and Expedited Discovery (ECF No. 15.0), Plaintiff's Memorandum of Law in Support of Motion for a Temporary Restraining Order and Expedited Discovery (ECF No. 15.01), Plaintiff's Memorandum of Law Regarding Standing in Further Support of Plaintiff's Motion for a Temporary Restraining Order (ECF No. 37), the Supplemental Submission of Plaintiff Common Cause Georgia (ECF No. 47.1), Plaintiff's Supplemental Submission in Support of Motion for a Temporary Restraining Order (ECF No. 55), Plaintiff's Response to Defendant's Sunday Supplemental General Submission (ECF No. 59), and Plaintiff's Supplemental Submission Regarding Standing (ECF No. 60.1). I

have also reviewed the Transcript of Hearing on Motion for Temporary Restraining Order Proceedings (Nov. 8, 2018), the briefing submitted by Defendant's counsel (ECF Nos. 32, 44, 57), the Court's Orders of November, 12 & 14, 2018 (ECF Nos. 62, 65, 66, 67), the Joint Stipulation and Dismissal (ECF No. 116), H.B. 316 (Act 24), and H.B. 392 (Act 75).

14. Plaintiffs' counsel in the *Common Cause* litigation have informed me that they are seeking attorneys' fees for their work at the following hourly rates based upon their experience and years of practice (year of bar admission appears in parentheses):

Attorneys from the Brennan Center for Justice at NYU School of Law:

Lawrence Norden (1997) \$600

Myrna Pérez (2003) \$600

Sean Morales-Doyle (2007) \$550

Maximillian Feldman (2014) \$400

Paul Weiss Attorneys:

Robert Atkins (1988) \$700

Farrah Berse (2003) \$600

Makiko Hiromi (2012) \$400

William Freeland (2016) \$400

Melina M. Meneguini Layerenza (2017) \$300

Jessica Fuhrman (2019) \$300

Kyle Sieber (not yet admitted) \$250

15. In forming my opinion, I have relied upon the following biographical information provided to me by Plaintiff's counsel and the information set forth in detail in the Declaration of Farrah R. Berse and the Declaration of Myrna Perez: Robert Atkins is the co-chair of the Paul Weiss litigation department with over thirty years of experience (including the cases listed in Paragraph 12, above). Farrah Berse is the Deputy Chair of her firm's Anti-Corruption and FCPA Practice Group, a former law clerk to a United States District Court Judge and has over sixteen years of experience in litigation. And the Paul Weiss associates who worked on this case, Makiko Hiromi, William Freeland, Melina M. Meneguini Layerenza, Jessica Fuhrman and Kyle Sieber, all have impressive educational credentials. As for the lawyers from the Brennan Center, Myrna Perez is the Director of the Voting Rights and Elections Program, who has earned a reputation as an expert in the area of voting rights. After graduating from Columbia Law School, Ms. Perez clerked for a Judge on the U.S. District Court for the Eastern District of Pennsylvania and then for a Judge on the U.S. Court of Appeals for the Third Circuit. Lawrence Norden is the Director of the Election Reform Program at

the Brennan Center, who has earned a reputation as an expert on election security. Mr. Norden also has extensive experience litigating voting and elections cases. Maximillian Feldman is a graduate of New York University School of Law, where he was elected to the Order of the Coif, a former law clerk to a Judge on the First Circuit, and prior to joining the Brennan Center, worked as an associate in private practice. And Sean Morales-Doyle is a former law clerk to a judge on the U.S. District Court for the Northern District of Illinois, and a former Assistant Attorney General for the State of Illinois who has approximately twelve years of experience litigating a wide variety of civil rights and constitutional issues.

16. While Plaintiff's counsel all practice in New York, New York, and for those in private practice, their standard and customary market rates are significantly higher than what they seek here, they have elected to seek the prevailing rates in the Atlanta legal market.

17. Based on my experience, and my review of the materials and information referenced above, it is my opinion that the hourly rates requested by Plaintiff's counsel in the *Common Cause* litigation (listed in Paragraph 14, above) are within the range of reasonable metro Atlanta market rates for attorneys with comparable skills, experience, and reputation.

18. My reasons for reaching this conclusion include the complexity of this litigation and the experience in the area of voting rights of Mr. Atkins, Ms. Berse and the Brennan Center lawyers, the importance of the right the plaintiff sought to vindicate, and the expedited nature of the proceedings, which essentially forced counsel to put aside other matters and focus on this case during truncated briefing schedules and expedited proceedings.

19. The skill and experience of Plaintiff's counsel, including their expertise in voting rights litigation, allowed them to work very quickly in this matter on a compressed time schedule to obtain an outstanding result. This relief not only benefitted their client in the litigation but also many other Georgians.

B. Hours Expended

20. I have reviewed the billing records and time summaries attached to the Declaration of Farrah R. Berse and the Declaration of Myrna Perez.

21. At my request, Plaintiff's counsel provided the following summary of the time for which they seek fees separated by the phase of the case:

	Phase of Case	Paul Weiss Hours	Paul Weiss Amount	Brennan Center Hours	Brennan Center Amount
Phase 1	Preparing and drafting complaint	46.9	\$16,775.00	24.6	\$13,450

Phase 2	Preparing and filing TRO Motion	75.2	\$26,930.00	14.0	\$8,280
Phase 3	Oral Argument (including preparation and filing of declarations requested by the court)	45.8	\$21,140.00	23.0	\$12,840
Phase 4	Post-Argument Briefing	76.5	\$26,145.00	26.6	\$13,920

22. In light of all of the circumstances, it is my opinion that the tasks performed, and the number of hours expended to perform them, as described above and in the above referenced Declarations, were necessary and reasonable under all of the circumstances. While the plaintiff had several attorneys working at each stage of the case, I believe that such representation by more than one lawyer at certain points of the case (*e.g.*, the legal and fact research, drafting the complaint and briefs, and arguing for the TRO) is appropriate, and given the expedited nature of the proceedings, it was necessary for more than one lawyer to carry the laboring oar. The Declaration of Farrah R. Berse describes a reasonable division of labor among lawyers at her firm and her declaration and the attached time records (as well as the time records attached to the Declaration of Myrna Perez) also highlight the distinct contributions of each lawyer.

23. Also, I note that while a large number of time entries involve email communications with co-counsel, in my opinion, these time entries are reasonably included in the fee calculation. Based on my experience in cases of this type, such frequent email communication among co-counsel is essential to manage the tasks necessary for the litigation. It is also the most efficient means by which to share ideas and research.

24. I am familiar with the legal standard for determining a reasonable attorney fees award set forth in *American Civil Liberties Union of Georgia v. Barnes*, 168 F.3d 423 (11th Cir. 1999) and *Norman Housing*, 836 F.2d 1292 and the factors adopted in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974). I have followed and applied these standards in reaching my opinions expressed in this declaration. I note, that Plaintiff's counsel do not seek an adjustment from the lodestar calculation.

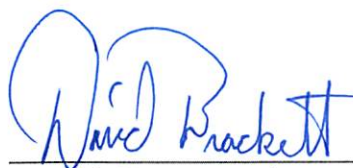
25. Several factors or considerations are encompassed within the "lodestar" analysis, including, the number of issues involved, the types of claims asserted, complexity of the litigation, and the results obtained in the case. I have considered these factors in reaching my opinion on the reasonableness of the fees sought by the plaintiffs. I note that the Eleventh Circuit has commented that the vindication of a constitutional right, such as the right to vote, is important, and that

vindication of class-wide rights are generally more significant than relief granted for an isolated violation of a constitutional right. *See Norman*, 836 F. 2d 1292, 1302. Here, the plaintiff sought a TRO to ensure the protection of voting rights of those forced to cast provisional ballots. This ruling had a statewide impact.

26. In summary, I conclude that a reasonable fee for plaintiffs' counsel is calculated based on the hours reflected in paragraph 21 above multiplied by the applicable hourly rates in paragraph 14. The total fee amounts to \$139,480.00. As set forth above, this lodestar calculation is derived from a reasonable hourly rate and hours reasonably expended. In my opinion the fee requested is reasonable.

27. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 22nd day of July, 2019.



David G. H. Brackett
BONDURANT MIXSON & ELMORE LLP

Exhibit A

BONDURANT MIXSON & ELMORE ^{LLP}



One Atlantic Center
1201 West Peachtree St. NW
Suite 3900
Atlanta, GA 30309

Education

Georgetown University Law Center, J.D., 1996, *cum laude*

- Articles Editor, *Law and Policy in International Business*
- Law Fellow (Teaching Assistant for the First Year Legal Writing Program)

Duke University, B.A., 1993

Previous Experience

Law Clerk, Judge Duross Fitzpatrick, U.S. District Court for the Middle District of Georgia, 1996-1998

Admissions

State Bar of Georgia
Supreme Court of the United States
U.S. Court of Appeals for the Eleventh Circuit
U.S. District Court for the Middle District of Georgia

David Brackett, Partner

☎ 404.881.4197 📠 404.881.4111 ✉ brackett@bmelaw.com

For over twenty years, David Brackett has resolved his clients' disputes through trial and appellate advocacy. He has served as litigation counsel for individuals and companies in courts across the nation. His extensive experience as counsel for both plaintiffs and defendants gives him important insight and perspective in his cases.

David's practice focuses on complex, high stakes litigation. He has significant experience in cases involving contract disputes, corporate governance, business torts, and RICO. David has also litigated several cases involving government procurement processes and local government law.

David is often called upon to represent other lawyers and their law firms in professional liability matters, and he has extensive experience assisting directors, officers, and special board committees with corporate governance disputes.

As an adjunct professor at Georgia State University's College of Law, David co-teaches a course on commercial arbitration.

Representative Work

Plaintiff cases

- Represented purchaser of over \$6 billion of mortgage backed securities in asserting fraud and RICO claims against three of the nation's largest banks. In the course of lengthy and hard-fought litigation, managed review of millions of pages of information produced by the Defendants and third parties. The cases concluded with a confidential settlement.
- Lead counsel in derivative action involving a Georgia corporation. Obtained increased percentage of proceeds from the sale of the company for minority shareholders whose ownership interest had been diluted by controlling shareholders.
- Lead counsel in arbitration (and eventual settlement of dispute) involving multi-million dollar contract claim in connection with the sale of a business.
- Lead counsel in representing a community bank. Obtained summary judgment on the bank's multi-million dollar contract claim and also obtained summary judgment in the bank's favor on the defendants' counterclaims.
- Lead counsel for clients who mistakenly signed a warranty deed. Obtained jury verdict canceling warranty deed and directed verdict on counterclaims.
- As lead counsel in litigation with the State Secretary of State, secured inclusion of client, an independent candidate for general assembly, on ballot in general election.
- Currently serving as co-lead counsel with lawyer from Children's Rights, Inc., representing a class of foster children in State custody in connection with ongoing monitoring of measures of systemic reform of State system pursuant to a Consent Decree.

Defense cases

- Obtained reversal of trial court's denial of summary judgment on claims of fraud and breach of fiduciary duty in case in which David was hired to handle appeal.

U.S. District Court for the
Northern District of Georgia
Supreme Court of Georgia
Georgia Court of Appeals

- Lead counsel in representation of owner of Broker-Dealer in litigation alleging securities fraud and negligent supervision. Compelled arbitration and obtained affirmance of order of trial court dismissing action in favor of arbitration. Then obtained dismissal of client from FINRA arbitration prior to final hearing.
- Obtained dismissal on behalf of former officer of corporation in action alleging misappropriation of trade secrets and breach of fiduciary duty.
- Obtained summary judgment on claims alleging fraud, conspiracy and violation of Georgia's RICO statute on behalf of a commercial real estate developer.
- Secured directed verdict on several claims seeking millions in damages at conclusion of month-long jury trial in Superior Court.
- Represented national teleservices corporation in defense of class actions filed in California and Ohio involving alleged violations of consumer protection laws.
- Representing the City of Atlanta in litigation and arbitration involving annexations and the validity of certain Local Constitutional Amendments.

Pro Bono

- Worked with Attorneys from the Atlanta Legal Aid Society in the successful representation of a group of senior citizens against a high interest loan company.
- Challenged Georgia's photo ID requirement for in-person voting, which caused the state to repeal and modify the law.
- Appointed by the United States Court of Appeals for the Eleventh Circuit and the United States District Court for the Northern District of Georgia to represent indigent litigants in several cases.
- Serving as a Board Member (former Chair) of Intown Collaborative Ministries, a non-profit organization striving to prevent and reverse homelessness and hunger in Intown Atlanta.
- Serving on the Southern Steering Committee of Children's Rights, Inc.
- Serving as a Board Member for Georgia Appleseed Center for Law & Justice.

Professional Activities

Member, Litigation Section, Atlanta Bar Association
Lawyers Club of Atlanta
Member, Evidence Committee of the State Bar of Georgia
Member, Election Committee of the State Bar of Georgia

Publications/Speaking Engagements

Investor & Consumer Protection Class Actions
Adjunct Professor, Georgia State University College of Law, Business Arbitration Seminar
Words Matter: Important Contract Language in Litigation - ACC Georgia

Honors & Awards

Georgia Rising Star, *Atlanta* Magazine
Georgia Local Litigation Star, Benchmark Plaintiff 2012, 2013, 2014