

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

DEMOCRATIC NATIONAL COMMITTEE
and DEMOCRATIC PARTY OF WISCONSIN,

Plaintiffs,

v.

Case No. 20-cv-249-wmc

MARGE BOSTELMANN, JULIE M. GLANCEY, ANN S.
JACOBS, DEAN KNUDSON, ROBERT F. SPINDELL, JR.
and MARK L. THOMSEN,

Defendants,

and

REPUBLICAN NATIONAL COMMITTEE
and REPUBLICAN PARTY OF WISCONSIN,

Intervening Defendants.

SYLVIA GEAR, MALEKEH K. HAKAMI, PATRICIA
GINTER, CLAIRE WHELAN, WISCONSIN ALLIANCE
FOR RETIRED AMERICANS and LEAGUE OF WOMEN
VOTERS OF WISCONSIN,

Plaintiffs,

v.

Case No. 20-cv-278-wmc

MARGE BOSTELMANN, JULIE M. GLANCEY, ANN S.
JACOBS, DEAN KNUDSON, ROBERT F. SPINDELL, JR.,
MARK L. THOMSEN, and MEAGAN WOLFE,

Defendants.

REVEREND GREG LEWIS, SOULS TO THE
POLLS, VOCES DE LA FRONTERA, BLACK LEADERS
ORGANIZING FOR COMMUNITIES, AMERICAN
FEDERATION OF TEACHERS LOCAL, 212, AFL-CIO,
SEIU WISCONSIN STATE COUNCIL, and LEAGUE
OF WOMEN VOTERS OF WISCONSIN,

Plaintiffs,

v.

Case No. 20-cv-284-wmc

MARGE BOSTELMANN, JULIE M. GLANCEY, ANN S.
JACOBS, DEAN KNUDSON, ROBERT F. SPINDELL, JR.,
MARK L. THOMSEN, and MEAGAN WOLFE,

Defendants.

MOTION BY THE PLAINTIFFS IN *LEWIS, ET AL.*
V. KNUDSON, ET AL., 20-CV-284, FOR AN AWARD OF
ATTORNEYS' FEES, COSTS AND EXPENSES

The Plaintiffs in *Lewis, et al, v Knudson, et al.*, Case No. 20-CV-284 ("the *Lewis* Plaintiffs") by their undersigned attorneys, hereby move pursuant to 42 U.S.C. § 1988, the Civil Rights Attorneys' Fees Awards Act of 1976, for an award of attorneys' fees and expenses in the amount of \$324,552.56 to be assessed against the following Defendants in this matter: Marge Bostelmann, Julie M. Glancey, Ann S. Jacobs, Dean Knudson, Robert F. Spindell, Jr, and Mark L. Thomsen; all of whom were sued in the official capacities as members of the Wisconsin Elections Commission; as well as Megan Wolfe, who was sued in her official capacity as the administrator of the Wisconsin Elections Commission.

As grounds for this motion, the *Lewis* Plaintiffs respectfully represent that: (1) they are “prevailing parties” in this matter within the meaning of 42 U.S.C. § 1988, and thus are entitled to an award of costs and expenses, including reasonable attorneys’ fees; (2) their attorneys provided services that were reasonable and necessary to advance their claims in this matter; (3) the hours expended by their attorneys in this litigation and the hourly rates of those attorneys are reasonable; (4) the expenses incurred in the litigation of this case were reasonable and necessary; and (5) the fees are properly sought from the Defendants sued in their official capacities.

The grounds for this motion are more fully set forth in the following documents that are filed herewith: (a) the *Lewis* Plaintiffs’ brief in support of this motion; and (b) the declarations of Attorneys Lester A. Pines, Douglas M. Poland, Richard Saks, Jeff Scott Olson, Beth Kushner, and Walt Kelly.

Dated this 2nd day of July 2020.

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Wisconsin*