DECLARATION OF CATHERINE HARCHMAN IN SUPPORT OF PLAINTIFFS’ MOTION FOR ATTORNEYS’ FEES
DECLARATION OF CATHRINE J. HARSHMAN

I, Cathrine Harshman, declare the following based upon my personal knowledge:

1. I am a partner in the law firm of Hunter, Carnahan, Shoub, Byard & Harshman, and am one of the attorneys for the Plaintiffs in the above captioned matter. I make this declaration in support of Plaintiffs’ Motion for Attorney’s Fees.

2. In 2005, I began as an associate with Hunter, Carnahan, Shoub & Byard in Columbus, Ohio, where I had previously clerked for a year during law school. In 2011, I joined labor and employment law. My own practice also includes election and campaign finance law in the representation of labor organizations, non-profits, and political entities statewide. Currently, my practice consists of approximately thirty (30) percent election and campaign finance related work with the remainder traditional labor and employment law. I represent several of the Plaintiffs in the NEOCH and SEIU Local 1 litigation on an ongoing and regular basis, including representing them in election and campaign finance matters. I have represented clients in state and federal courts, in addition to federal agencies such as the Equal Employment Opportunity Commission (EEOC), the National Labor Relations Board (NLRB), and the Federal Elections Commission (FEC)), state agencies, and at arbitration. I have also edited the Ohio Voter Protection Laws 2012 in a Nutshell published by the Advancement Project. I am currently licensed to practice law in the State of Ohio, Supreme Court registration number 0079373. I am also admitted in and practiced before the United States Court of Appeals for the Sixth Circuit, the United State District Court for the Southern District of Ohio, and the United State District Court for the Northern District of Ohio. I graduated from the Ohio State University Moritz College of Law in Columbus, Ohio in May of 2005. I have been licensed to practice law in Ohio since November of 2005 and am currently in good standing with the Ohio Supreme Court. The
reasonable rate for the type of litigation involved in this matter is $300.00 per hour, considering my experience, the complexity of the litigation, and the seriousness of the issues at stake.

3. I am also familiar with the qualifications of my law partner, Michael Hunter, who also worked on this case.

4. Michael Hunter began his law career at Cloppert, Portman, Sauter, Latanick and Foley as an associate attorney and later became partner with that firm. In 1996, he established Hunter, Carnahan & Shoub in Columbus, Ohio. He has represented clients before state and federal courts, in addition to federal agencies (such as the Equal Employment Opportunity Commission (EEOC), the National Labor Relations Board (NLRB), state agencies and at arbitration proceedings. While election law has not been a substantial focus of his practice prior to my participation in the above referenced cases subject to this declaration, he has previously participated in the preparation of amicus briefs in a number of cases involving state and federal election law. Mr. Hunter is licensed to practice law in the State of Ohio. His Ohio Supreme Court registration number is 0018756. He is also admitted to, and has practiced before, the United States District Court for the Southern District of Ohio, the United State District Court for the Northern District of Ohio, the United States Court of Appeals for the Sixth Circuit, and the United States Supreme Court. He is also admitted to the District of Columbia Court of Appeals, but has inactive status at the present time. He has practiced on a pro hac vice basis before the United States District Court for the Eastern District of Kentucky, the United States District Court for the Western District of Pennsylvania, and the United States District Court for the Central District of California. Mr. Hunter graduated magna cum laude from Capital University School of Law in Columbus, Ohio in 1985. He has been licensed to practice law in Ohio since 1985 and is currently in good standing with the Ohio Supreme Court. He has an “AV” peer review rating
from Martindale-Hubble. A reasonable rate for this type of litigation is $450.00 per hour, which considering his experience, the complexity of the litigation and the seriousness of the issues at stake.

5. I have personally reviewed our firm’s time entries in our PCLaw billing system. Time records for cases in our firm are entered into the PCLaw billing system contemporaneously with the services being performed and are billed to clients at the end of each month. Attached hereto and marked as Exhibit A is a true and accurate copy of our firm’s billing records in this matter. These entries reflect a contemporaneous discounting of research and review time. All hours submitted with this request for fees were actually billed to a paying client at rate significantly reduced from the market rate. I have reviewed the hours to eliminate any excessive or redundant time or time spent on claims for which we did not obtain relief. Further, I have separated the Firm’s hours into categories to ensure the time included was directly related to this litigation, including the Motion to Modify (total of $2,535.00), Opposition to Request to Vacate (total of $21,405.00), Motion to Enjoin (total of $13,575.00), and Motion to Intervene (total of $9,780.00). I have edited or redacted a limited number of entries regarding communications with clients in order to maintain attorney-client privilege and to avoid revealing attorney work product information, such as strategies and avenues of research. I also reviewed the time entries to ensure that each task was billed to the correct case. We do not bill for computer assisted legal research expenses, secretarial or other clerical time, phone charges or in-house copying. As such, those expenses were not billed to a paying client and the recovery of such expenses has not been requested.
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 8th day of November in Columbus, Ohio.

s/ Cathrine J. Harshman
CERTIFICATE OF SERVICE

I certify that on December 12, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the counsel of record in this case.

/s/ Stephen P. Berzon

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