

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Laura Boustani, Mutsuyo Okumura Unger,	)	
Chia-Min T. Chen, Mary Savas, Efty	)	
Simakis, Sophia Loizos, Paramjit Singh,	)	
Joseph Hajjar, Catherine Ma, Sagarika	)	
Nayak, Eduardo A. Romero, Karil	)	
Bialostosky, Dagmar Celeste, Ali AlHaddad	)	
MD, Sawsan Alhaddad MD, Gia Hoa Ryan,	)	
Margaret Wong, P.S. Murthy, Asian	)	
American Bar Association of Ohio, The	)	
Federation of India Community Association,	)	
Service Employees International Union	)	
District 1199, American-Arab Anti-	)	Civil Action No. 06-2065
Discrimination Committee, Greater Toledo	)	
Association of Arab Americans, Council on	)	
American-Islamic Relations Ohio,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
J. Kenneth Blackwell,	)	
	)	
Defendant.	)	

**STIPULATION RE. MOTION FOR ATTORNEY’S FEES AND COSTS**

This Court having entered judgment on October 26, 2006, Plaintiffs' motion for attorneys' fees and related expenses is presently due on November 9, 2006. In order to allow time to negotiate a potential settlement of attorney's fees, expenses, and costs, Plaintiffs and Defendants hereby stipulate and request that this Court order that the date for Plaintiffs' filing a motion for attorney's fees and costs and an application for costs be extended up to and including December 15, 2006.

Respectfully submitted,

/s/ Meredith Bell-Platts  
Meredith Bell-Platts (OH 72917)  
Laughlin McDonald  
Neil Bradley  
ACLU Voting Rights Project  
2600 Marquis One Tower  
245 Peachtree Center Avenue  
Atlanta, GA 30303  
(404) 523-2721  
(404) 653-0331 (facsimile)  
[mbell@aclu.org](mailto:mbell@aclu.org)  
[lmcdonald@aclu.org](mailto:lmcdonald@aclu.org)  
[nbradley@aclu.org](mailto:nbradley@aclu.org)

Subodh Chandra (OH 69233)  
2275 Chestnut Hills Drive  
Cleveland, OH 44106-4602  
(216) 965-6463  
(216) 721-4008 (facsimile)  
[Subodh.Chandra@StanfordAlumni.org](mailto:Subodh.Chandra@StanfordAlumni.org)

Carrie L. Davis (OH 77041)  
ACLU of Ohio  
4506 Chester Ave  
Cleveland, OH 44103  
(216) 472-2220  
(216) 472-2210 (facsimile)  
[cdavis@acluohio.org](mailto:cdavis@acluohio.org)

Daniel P. Tokaji  
The Ohio State University, Moritz College of Law  
55 W. 12th Ave.  
Columbus, OH 43210  
(614) 292-6566  
(614) 688-8422 (facsimile)  
[tokaji.1@osu.edu](mailto:tokaji.1@osu.edu)

\* Institutional affiliation provided for purposes of identification only

Jon M. Greenbaum  
Benjamin J. Blustein  
Lawyers' Committee for Civil Rights under Law  
1401 New York Avenue, NW, Suite 400  
Washington, DC 20005  
(202) 662-8315  
(202) 662-8600 (facsimile)  
[jgreenbaum@lawyerscommittee.org](mailto:jgreenbaum@lawyerscommittee.org)  
[bblustein@lawyerscommittee.org](mailto:bblustein@lawyerscommittee.org)

Wendy Weiser  
Justin Levitt  
Brennan Center for Justice at NYU School of Law  
161 Avenue of the Americas, 12<sup>th</sup> Floor  
New York, NY 10013  
(212) 998-6730  
(212) 995-4550 (facsimile)  
[wendy.weiser@nyu.edu](mailto:wendy.weiser@nyu.edu)  
[justin.levitt@nyu.edu](mailto:justin.levitt@nyu.edu)

*Counsel for Plaintiffs*

JIM PETRO, ATTORNEY GENERAL OF OHIO

/s/ Richard G. Lillie  
Richard G. Lillie (390023744)  
Special Counsel for Secretary of State Blackwell

Gretchen A. Holderman (390058508)  
Lillie & Holderman  
75 Public Square, Suite 1313  
Cleveland, OH 44113  
(216) 861-1313  
(216) 861-1314 (facsimile)  
[lillie13@sbcglobal.net](mailto:lillie13@sbcglobal.net)

*Counsel for Defendant*

**Certificate of Service**

This is to certify that a copy of the foregoing was served upon all counsel of record via electronic filing on this 8th day of November, 2006.

/s/ Meredith Bell-Platts  
Meredith Bell-Platts (0072917)  
ACLU Voting Rights Project  
2600 Marquis One Tower  
245 Peachtree Center Avenue  
Atlanta, GA 30303  
(404) 523-2721  
(404) 653-0331 (facsimile)  
[mbell@aclu.org](mailto:mbell@aclu.org)