No: 12-15738

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

Karla Vanessa Arcia, *et al.*,

Plaintiffs-Appellants,

v.

Florida Secretary of State,

Defendant-Appellee.

Case No. 12-15738-EE

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA (NO. 12-22282-CIV-ZLOCH)

PLAINTIFFS-APPELLANTS' REPLY IN SUPPORT OF THEIR MOTION FOR ATTORNEYS' FEES

Arcia, et al. v. Fla. Sec'y of State, No. 12-15738-EE, C1 of 3

CERTIFICATE OF INTERESTED PERSONS

Pursuant to 11th Circuit Rule 26.1-1, Appellants, Karla Vanessa Arcia, Melande Antoine, 1199SEIU United Healthcare Workers East, National Congress for Puerto Rican Rights, and Florida Immigrant Coalition, Inc. furnish a complete list of the following persons that have an interest in the outcome of this case:

Advancement Project – Attorneys for Appellants

Amunson, Jessica Ring – Attorney for Appellants

Antoine, Melande – Appellant

Arcia, Karla Vanessa – Appellant

Cartagena, Juan – Attorney for Appellants

Carvin, Michael A. – Attorney for Appellee

Culliton-Gonzalez, Katherine – Attorney for Appellants

Davis, Ashley E. – Attorney for Appellee

De Leon, John – Attorney for Appellants

Detzner, Ken, Florida Secretary of State – Appellee

Fair Elections Legal Network – Attorneys for Appellants

Flanagan, Catherine M. – Attorney for Appellants

Florida Immigrant Coalition, Inc. – Appellant

Florida New Majority, Inc. – Plaintiff

Friedman, Joshua N. – Attorney for Appellants

Gandy Jr., W. Eugene – Attorney for Appellee

Goldman, Marc A. – Attorney for Appellants

Gore, John M. – Attorney for Appellee

Hair, Penda – Attorney for Appellants

Hovland, Ben – Attorney for Appellants

Jenkins, Marina K. – Attorney for Appellants

Jenner & Block LLP – Attorneys for Appellants

Jones Day – Attorneys for Appellee

Kanter Cohen, Michelle – Attorney for Appellants

Kaplan, Lindsay Eyler – Attorney for Appellants

Katsas, Gregory G. – Attorney for Appellee

LatinoJustice PRLDEF – Attorneys for Appellants

Law Offices of Chavez & De Leon – Attorneys for Appellants

Masters, Lorelie S. – Attorney for Appellants

National Congress for Puerto Rican Rights – Appellant

Nkwonta, Uzoma – Attorney for Appellants

Nordby, Daniel E. – Attorney for Appellee

Perez, Jose – Attorney for Appellants

Postman, Warren D. – Attorney for Appellee

Project Vote – Attorneys for Appellants

Ramamurti, Bharat R. – Attorney for Appellants

Roberson-Young, Katherine – Attorney for Appellants

Rogers, Kristen M. – Attorney for Appellants

Sen, Diana – Attorney for Appellants

Vail, Jason – Attorney for Appellee

Veye Yo – Plaintiff

Zloch, The Honorable William J. – U.S. District Court Judge

1199SEIU United Healthcare Workers East – Appellant

INTRODUCTION

Plaintiffs-Appellants Arcia, *et al.* ("Plaintiffs") won a complete victory in this suit challenging Florida's effort to systematically remove individuals from the voter rolls on the eve of two federal elections in violation of the National Voter Registration Act ("NVRA"). That victory did not come easily and it did not come without significant procedural hurdles caused by the looming general election and by the district court's errors of law in permitting Defendant to proceed with its effort to purge its voter rolls. The exigencies of the circumstances and the importance of the rights at stake demonstrate the reasonableness of Plaintiffs' request for fees as modified herein. Plaintiffs are the prevailing parties and have met their burden.

ARGUMENT

I. Plaintiffs are Prevailing Parties

Defendant, relying on inapposite case law, contends that Plaintiffs' motion is premature and that they have not yet prevailed because, at the time Defendant filed its opposition, the district court has not yet entered judgment in response to this Court's mandate. Opp. at 7-9.

First, the district court has since entered final judgment, *see* Judgment, *Arcia v. Fla. Sec'y of State* (S.D. Fla.) (ECF No. 150), and Defendant's argument is thus moot. Second, the argument was wrong in any event and cannot support an effort

by Defendant to get a second bite at the apple to oppose Plaintiffs' fee request in addition to its "preliminary response." Unlike the cases cited by Defendant where the plaintiffs were not yet considered prevailing parties because there had been no decision on the merits, *see Hanrahan v. Hampton*, 446 U.S. 754, 758-59 (1980) and *Sweitlowich v. County of Bucks*, 620 F.2d 33, 34-35 (3d Cir. 1980), here, this Court unequivocally gave Plaintiffs a full victory on the merits, and nothing about the district court's ministerial task of entering judgment to that effect forestalled Plaintiffs' prevailing party status. *See Litman v. Mass. Mutual Life Ins. Co.*, 825 F.2d 1506, 1511 (11th Cir. 1987) ("When an appellate court issues a specific mandate it is not subject to interpretation; the district court has an obligation to carry out the order."). Moreover, this Court required Plaintiffs to file their motion for fees within three days of the Court's entry of the mandate, *see* Order, May 12, 2014.

II. Plaintiffs' Request for Fees is Reasonable.

A. Plaintiffs' Requested Hourly Rates Are Reasonable.

Plaintiffs' requested hourly rates are reasonable and supported by competent evidence. Plaintiffs submitted the affidavit of Randall C. Marshall, the former Legal Director of the American Civil Liberties Union of Florida, who attested to Plaintiffs' counsels' qualifications and to the prevailing market rates in the Southern District of Florida, based on his experience and based on other cases in

which fees were awarded in this district. Defendant submits no counter-affidavit or proposal of a reasonable rate, and its arguments against Mr. Marshall's analysis miss the mark.

Defendant states that it obtained representation for a $30,000 flat rate. But that is irrelevant. As Defendant concedes, prevailing party fees are determined based upon the lodestar method, *i.e.*, hours multiplied by hourly rate. *See* Opp. at 8. The *flat* rate Defendant negotiated says nothing about a reasonable hourly rate, and Defendant does not even disclose the number of hours its private attorney expended or the number of hours its own internal attorneys expended on the case. Even if Defendant had done so, its attorneys' charge would be still be irrelevant.

> [T]he hourly rate at which opposing counsel was paid is of little or no relevance. Opposing counsel represented a governmental entity. We have recognized in the past that private attorneys often charge lower rates to the government because of counterbalancing benefits such as repeat business, and where the facts show this, the fee charged by a government attorney is simply irrelevant to the establishment of a reasonable hourly rate for a plaintiff's civil rights lawyer.

Brooks v. Georgia State Bd. of Elections, 997 F.2d 857, 860 (11th Cir. 1993).[1]

Next, Defendant takes issue with Plaintiffs' evidence in support of its requested rates. *See* Opp. at 10-11. But while it suggests that Mr. Marshall's

[1] Indeed, the flat fee charged to Florida is far below the normal rate Florida's outside counsel charges, and is thus irrelevant. When Florida's counsel, Michael Carvin, represented the New York State Senate in its redistricting process in 2011, he was paid $700 per hour, a discount from his then-usual rate of $825 per hour. *See Favors v. Cuomo*, No. 11-cv-5632 (E.D.N.Y.) Mar. 9, 2011 Letter from M. Carvin to D. Lewis, Counsel to the Majority Leader, at 2 (ECF No. 671-3).

affidavit is insufficient evidence of the prevailing rates in the market, Defendant does not provide any alternative. Mr. Marshall attested to his experience with Plaintiffs' counsel, his familiarity with the market for legal services in the Southern District of Florida, and rates requested in other cases in the market. *See Duckworth v. Whisenant*, 97 F.3d 1393, 1396 (11th Cir. 1996) ("Contrary to Defendant' supposition, this circuit has recognized that a movant may meet his burden by producing either direct evidence of rates charged under similar circumstances *or opinion evidence* of reasonable rates." (emphasis in original)). Defendant responds that Mr. Marshall does not reveal his own rate, *see* Opp. at 11, but does not explain how that is relevant to his conclusion about the market. Nor does Defendant even question Mr. Marshall's familiarity with the market or the accuracy of any of his specific conclusions. And Defendant's portrayal of this case as a simple matter of statutory interpretation departs from its portrayal of the issue in its briefing, in which it characterized the statute as "by no means a model of drafting clarity." Appellees' Br. at 4. Moreover, the case involved important issues of standing and mootness and was further complicated by the timeline of the impending elections.

Other fee awards in the Miami market confirm the reasonableness of Plaintiffs' request. For example, in *Hermosilla v. Coca-Cola Co.*, No. 10-21418-CIV, 2011 WL 9364952, at *12-13 (S.D. Fla. July 15, 2011), the court awarded a

blended rate of $425 for all partners, $225 for associates, and $125 for paralegals. And the court noted that this rate reflected that the legal market at the time (2011) was "at best weak or at worst depressed" and that the case involved "basic . . . principles that are well worn in federal litigation in this district." *Id.* at *13. Here, the market conditions had improved when the appellate litigation took place and the case involved an issue of first impression, the exigency of a pending election, and the need to overcome two contrary district court decisions including one in a case brought by the Department of Justice, *see* Pl. Br. At 8-9, yet the requested rates are only slightly higher for the partners and on average almost the same for the associates and paralegals as in *Hermosilla*.

Moreover, Plaintiffs' attorneys' rates are not unreasonable simply because this case involved civil rights litigation rather than business litigation. *See* Opp. at 10. "[C]ivil rights litigants may not be charged with selecting the nearest and cheapest attorney." *Johnson v. Univ. Coll. of. Ala. in Birmingham*, 706 F.2d 1205, 1208 (11th Cir. 1983) (internal quotation marks omitted). Plaintiffs have put forth competent evidence attesting that the requested rates reflect "the prevailing market rate in the relevant legal community for similar services by lawyers of reasonably comparable skills, experience, and reputation." *Duckworth*, 97 F.3d at 1396. Nothing more is required. But here the importance of the result further justifies the reasonableness of the rates and hours. *See* Pl. Br. at 8-9.

B. Plaintiffs' Requested Hours Are Reasonable.

The number of hours requested by Plaintiffs is reasonable. To further increase the reasonableness of their request, Plaintiffs agree to withdraw their request for fees related to *amici* and to reduce their requested expenses as indicated in Defendant's response. Defendant's other arguments about hours are without merit.

1. Plaintiffs Should Be Awarded Fees for Their First Appeal.

Plaintiffs should be awarded fees for their first appeal. Defendant says otherwise, pointing to *Loranger v. Stierheim*, 10 F.3d 776, 782 & n7 (11th Cir. 1994), but there the court excluded hours spent on an altogether separate case in state court. That is a far cry from this case, where the first appeal was part of the same litigation. As even Defendant acknowledges, courts routinely award fees for the entire course of litigation where a party ultimately prevails. Opp. at 13. That is so even where that party loses an appeal along the way. *See Alizadeh v. Safeway Stores, Inc.*, 910 F.2d 234, 237-38 (5th Cir. 1990). Moreover, here, the first appeal was not a case of "lost motion or false starts." Opp. at 24. Plaintiffs withdrew the appeal only after the district court entered final judgment and after the appeal had served its purpose by: (1) avoiding the high risk that inaction would render the case moot, *see, e.g.*, *Newdow v. Roberts*, 603 F.3d 1002 (D.C. Cir. 2010) (holding plaintiffs' claim failed to qualify for exception to mootness doctrine because

"plaintiff's failed to appeal the district court's denial of their preliminary injunction motion."), and (2) resulting in a representation by Defendant that it would not purge voters prior to the 2012 general election and an order from this Court that effectively bound Defendant to that representation. *See* Order, *Arcia v. Fla. Sec'y of State*, No. 12-15220 (10/16/2012) (relying on representation to deny Plaintiffs' motion to expedite the appeal).[2]

In short, Defendant's "proposed bifurcated definition of the prevailing party is lacking in logical force. Regardless of how many courts consider this matter, it is only one lawsuit with only one prevailing party." *Clymore v. Far-Mar-Co, Inc.*, 576 F. Supp. 1161, 1164 (D. Mo. 1983).

2. Plaintiffs' Time Entries Reflect Reasonable Billing Judgment.

Defendant also raises a number of meritless objections to specific requests. It first objects to block billing. This Court has approved a ten percent reduction to account for block billing, *see Ceres Envt'l Servs., Inc. v. Col. McCrary Trucking, LLC*, 476 Fed App'x 198, 203 (11th Cir. Apr. 25, 2012), which, here, would equate to only about 5% because only about 50% of the fees requested were in entries that

[2] That appeal was supported by a good faith belief that the Court had jurisdiction to review the district court's denial of the motion for a preliminary injunction and summary judgment and was believed to be necessary in light of the pending 2012 elections. Although Plaintiffs had requested that the district court immediately enter a final judgment against them after it rejected their interpretation of the statute, the district court did not do so and Florida made no promise not to purge voters from the rolls.

were block billed. Goldman Decl. ¶ 13. But here no reduction is necessary because, (1) Plaintiffs submitted information allocating block billed entries to the greatest extent possible based upon the form required by this Court, and Defendant has not identified entries that it finds impossible to ascertain, and (2) Plaintiffs have already reduced the overall amount they requested by significantly more than 10%. *See* Goldman Decl. ¶ 10 (describing reduction in fees requested of more than $50,000 related to billing by non-core attorneys), ¶ 9 (describing additional reductions for work that seemed potentially duplicative or too high); Goldman Reply Decl. ¶ 6 (explaining that these additional reductions reduced the remaining fees by well over 10%).

Defendant also takes issue with the time spent on brief writing, wrongly assuming that the hour figure Plaintiffs input on the court-mandated form as associated with brief writing all related to just two briefs. In fact, Plaintiffs also included in this category the hours spent on the brief that was prepared though ultimately not filed in the first appeal, work on the motion to expedite and reply in the first appeal, work related to the Court's jurisdictional question in connection with the second appeal, work on a scheduling motion, responses to notices of supplemental authority, and work on the fee petition. *See id.* And Defendant cites no case suggesting it was improper to spread this work among multiple attorneys. Indeed, the time records reflect that the majority of the work was among a smaller

core group. This case in particular required more attorneys than might otherwise be customary because of the emergency nature of the relief requested in light of the election's timeline and the State's purge plans. And Plaintiffs endeavored to avoid duplication. Defendant also objects to Plaintiffs' request for fees related to argument time by anyone other Mr. Goldman who argued the case. But other attorneys conducted research and analysis to help Mr. Goldman prepare for argument — *saving* Defendant money ultimately by not having a partner with a higher billing rate conduct these tasks. They also prepared to participate – and then participated – in a moot court for which Plaintiffs have already excluded preparation time of judges who were not core participants in the case. Goldman Decl. ¶ 10. Defendant also objects that insufficient information is provided to ascertain whether Plaintiffs' counsels' meetings were necessary. Communication among co-counsel is, of course, necessary for effective litigation, Plaintiffs' time entries describe the general nature of the communications, and Plaintiffs are not, in any case, obliged to disclose the protected contents of those communications in order to receive fees. *Cf. Berberena v. Coler*, 753 F.2d 629, 632 (7th Cir. 1985) (upholding award of fees for conferences with co-counsel). Moreover, Plaintiffs already eliminated *all* of the time for most of the lawyers involved in large conference calls. Goldman Decl. ¶ 9.

Defendant also quibbles with specific entries regarding tasks involved with filing the brief and complying with this Court's local rules, *see* Opp. at 21-22, but these tasks are mandatory and Defendant mischaracterizes the work involved, which was not excessive. For example, Defendant's characterization of work responding to supplemental authority submissions as "non-substantive" makes scant sense—this task plainly requires legal research, analysis, and writing. That was particularly so here where, for example, Plaintiffs were responding to a complex submission by Defendant arguing that a recent Supreme Court decision rendered Plaintiffs' interpretation of the statute untenable on grounds of constitutional avoidance. *See* June 21, 2013 28(j) letter.

Finally, in the spirit of compromise and to show good faith and reasonable billing judgment, Plaintiffs withdraw requested fees related to time spent on *amici* matters and the expenses to which Defendant objected. After these further withdrawals, Plaintiffs reduced request is for $346,027.64 in fees. Goldman Reply Decl. ¶¶ 2-5.

CONCLUSION

Plaintiffs' motion for fees should be granted at the reduced amount of $346,027.64.

February 13, 2015

Respectfully submitted,

/s/ Marc A. Goldman

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Attorneys for Plaintiffs-Appellants

CERTIFICATE OF SERVICE

I hereby certify that, on the 13th day of February, 2015, a true and correct copy of the foregoing was served on all counsel of record via CM/ECF.

Washington, D.C.
February 13, 2015

By:

/s/ Marc A. Goldman
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No: 12-15738

UNITED STATES COURT OF APPEALS
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ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA (NO. 12-22282-CIV-ZLOCH)

DECLARATION OF MARC A. GOLDMAN

I, Marc A. Goldman, hereby declare as follows:

1. I am filing this Reply Declaration to explain further reductions in the amount of fees and expenses we are seeking and to provide further factual background in light of points raised in Defendant's opposition brief.

2. As noted, we will no longer seek fees related to work related to amicus briefs. The total amount of the entries in Jenner & Block LLP's ("Jenner") billing records that were not already excluded from entries in our fee petition and that

reference any work related to amicus briefs is $33,275. However, more than $24,000 of these entries are block billed entries in which the amicus work played a relatively small role. Many entries, for example, list multiple tasks related to Plaintiffs' own briefs but also contain some time related to individual calls to generate amicus support. Based on my sense of the tasks involved at the time, I have estimated the amount of time in these entries related to amicus briefs, erring on the side of an overestimation of this time. I have attached a spreadsheet of the entries related to amicus briefs and the amount of each entry I estimated was related to amicus work. This process suggests that approximately $16,850 in work was related to amicus work. When this amount is subtracted, the total amount requested by Plaintiffs is reduced to $346,572.42.

3. If, however, this Court determines that it should assume that every entry that refers to amicus briefs should be subtracted in full (providing one form of penalty for block billing), then the remaining amount requested by Plaintiffs would be $330,147.42.

4. In addition to voluntarily reducing our request for fees insofar as they related to amicus efforts, we also will voluntarily reduce our request for expenses by the amount Defendant suggests ($544.78).[1] That is not to say we agree with the

[1] This amount reflects the removal of the $220 change fee and fare difference, the $37.78 agent fee, a $50 reduction in dinner costs, a $37 reduction in cab costs, and a $200 reduction in hotel costs.

criticisms of the expenses submitted, many of which are unfounded. For example, Defendant says that the $98.66 Ms. Masters submitted for dinner "is excessive," while neglecting to mention that this was the bill for three attorneys – Ms. Masters, myself, and local counsel John DeLeon, who joined us for dinner to help prepare for argument. Goldman Decl. at 124.

5. With these reductions, the total that Plaintiffs are now seeking is $346,027.64.

6. Even prior to the above reductions, Plaintiffs' fee request already reflected a reduction of more than $50,000 in fees simply to reduce the number of attorneys for whom we are requesting fees as well as a substantial reduction in the remaining amount – including the fees billed by Lorie Masters and myself – of well over 10%.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

February 13, 2015

/s/ Marc A. Goldman
Marc A. Goldman

Date	Timekeeper	Hours	Description	Cost	Related to Amicus Work	Reduced Amt.
10/09/2012	MASTERS, LORELIE S.	1.50	Reviewed motion to expedite; worked re same; conference with M. Goldman re next steps; worked re appendix; telephone call to K. Flanagan re amicus briefs.	825.00	0.50	550.00
10/15/2012	GOLDMAN, MARC A.	6.50	Revised and shortened appellate brief; discussed 11th Circuit call; call re amicus support; took steps to organize getting brief done.	3,250.00	1.00	2,750.00
10/15/2012	MASTERS, LORELIE S.	9.00	Revised appeal brief to file in the 11th Circuit; various conferences with M. Goldman and others on Jenner Team re same; telephone conference with K. Flanagan, M. Goldman, and lawyer at Perkins helping with amicus effort.	4,950.00	1.00	4,400.00
10/17/2012	JENKINS, MARINA K.	1.25	Co-counsel teleconference re status of appeal, amicus, and press release.	250.00	0.50	150.00
10/17/2012	MASTERS, LORELIE S.	2.00	Worked re amicus and appeal issues; emails with J. Levitt and K. Sandstrom re amicus briefs.	1,100.00	2.00	-
10/18/2012	MASTERS, LORELIE S.	3.00	Worked re appeal and amicus briefs, expediting appeal, and appeal brief.	1,650.00	1.00	1,100.00
10/24/2012	MASTERS, LORELIE S.	3.00	Conference call with Arcia team re October 22 status conference, appeal issues, and State's compliance with settlement; worked re amicus briefs.	1,650.00	1.00	1,100.00
11/06/2012	MASTERS, LORELIE S.	1.00	Telephone conferences re amicus briefs.	550.00	1.00	-
11/14/2012	KAPLAN, LINDSAY EYLER	0.75	Conference with J. Friedman and M. Jenkins re returning call from DOJ; call with N. Pollock from DOJ re briefing schedule and amicus brief.	206.25	0.75	-
11/16/2012	GOLDMAN, MARC A.	1.00	Spoke to amicus about status; exchanged e-mails and calls re withdrawal of first appeal.	500.00	0.50	250.00
11/21/2012	GOLDMAN, MARC A.	1.00	Telephone call with Brennan Center re amicus brief.	500.00	1.00	-
11/27/2012	GOLDMAN, MARC A.	0.75	Spoke to L. Masters about amicus issues; exchanged e-mails with K. Flanagan on amicus issues.	375.00	0.75	-
11/29/2012	GOLDMAN, MARC A.	0.50	Spoke with DOJ about possible amicus brief; spoke with B. Ramamurti about appellate brief.	250.00	0.50	-
11/29/2012	KAPLAN, LINDSAY EYLER	0.25	Call with N. Pollock re DOJ filing an amicus brief.	68.75	0.25	-
12/03/2012	GOLDMAN, MARC A.	0.25	Spoke with DOJ about possible amicus brief.	125.00	0.25	-
12/05/2012	GOLDMAN, MARC A.	2.50	Spoke with amicus about election official brief; reviewed draft brief of election officials; spoke with DOJ about possible amicus; sent e-mail to associates about additional changes needed on brief; call with K. Sandstrom about possible amicus briefs.	1,250.00	2.50	-
12/05/2012	MASTERS, LORELIE S.	1.50	Worked re 11th Circuit appeal; telephone conferences and emails with J. Levitt re amicus briefs.	825.00	1.00	275.00
12/06/2012	GOLDMAN, MARC A.	2.75	Spoke with L. Masters about possible extension request and amicus issues; spoke to amicus about congressional brief; tried to determine need for extension through e-mails with co-counsel; e-mailed associates about need for additional changes to draft brief.	1,375.00	1.50	625.00
12/13/2012	MASTERS, LORELIE S.	5.00	Worked re appeal; conferred with M. Goldman re appeal; telephone conference with J. Levitt re amicus brief; reviewed legislative history for NVRA from K. Sandstrom; telephone conference with M. Jenkins re brief; email to A. Davis re consent to amicus; telephone conference with A. Davis re same.	2,750.00	2.00	1,650.00

Date	Timekeeper	Hours	Description	Cost	Related to Amicus Work	Reduced Amt.
12/17/2012	MASTERS, LORELIE S.	6.50	Worked re finalizing appeal brief; telephone conference with amicus counsel at Mayer Brown; conferences with M. Jenkins and L. Kaplan re brief; emails with M. Goldman re brief; various other emails and calls re same.	3,575.00	1.00	3,025.00
12/19/2012	GOLDMAN, MARC A.	5.25	Reviewed Brennan Center amicus brief and participated on calls about same.	2,625.00	5.25	-
12/19/2012	MASTERS, LORELIE S.	1.00	Telephone conferences with amici counsel; telephone conferences and emails re canceling conference call today; emails re amicus briefs.	550.00	1.00	-
12/20/2012	GOLDMAN, MARC A.	2.00	Various calls related to Brennan Center amicus brief; reviewed municipal officials' draft brief.	1,000.00	2.00	-
12/20/2012	MASTERS, LORELIE S.	2.00	Worked re amicus brief by Brennan Center; conferred with G. Hebert re same; conferred with M. Goldman and G. Hebert re same; emails with D. Smith re invoices; telephone conferences and emails with Mayer Brown re members brief; reviewed amicus brief for members of Congress.	1,100.00	2.00	-
12/21/2012	GOLDMAN, MARC A.	0.25	Exchanged e-mails about amicus briefs.	125.00	0.25	-
01/02/2013	GOLDMAN, MARC A.	1.50	Reviewed amicus briefs in case.	750.00	1.50	-
01/02/2013	MASTERS, LORELIE S.	2.00	Reviewed Jurisdictional Question submitted to us by court; emails and telephone conferences re amicus briefs and court's Jurisdictional Question; conference call with team re same.	1,100.00	1.00	550.00
				$ 33,275.00	**$ 33.00**	**$ 16,425.00**

Entries referencing work related to amicus briefs:	**$33,275.00**
Revised amount after removing amicus-related work:	**$16,425.00**
Amicus-related work:	**$16,850.00**