

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

SHELBI HINDEL, <i>et al.</i>,	:	Case No. 2:15-cv-3061
	:	
Plaintiffs,	:	Judge George C. Smith
	:	
v.	:	Magistrate Judge Kimberly
	:	A. Jolson
	:	
JON A. HUSTED,	:	
OHIO SECRETARY OF STATE,	:	
	:	
Defendant.	:	

PLAINTIFFS’ MOTION FOR ATTORNEYS’ FEES AND COSTS

Pursuant to Fed. R. Civ. P. 54(d) and S.D. Ohio Civ. R. 54.2, Plaintiffs Shelbi Hindel, Barbara Pierce, Marianne Denning, and the National Federation of the Blind, Inc. move the Court for an award of reasonable attorneys’ fees and costs incurred in pursuing the present action. Plaintiffs received partial judgment in their favor in this litigation resulting in the Court ordering the Ohio Secretary of State to make his website accessible to Plaintiffs. For these reasons Plaintiffs respectfully submit this Motion for Attorneys’ Fees.

Plaintiffs have, however, appealed this Court’s denial of their accessible absentee voting claim to the United States Court of Appeals for the Sixth Circuit. Therefore, an Agreed Motion to Stay Briefing on Attorneys’ Fees and Costs Pending Appeal is being filed contemporaneously with this Motion.

Respectfully submitted,

s/ Jason C. Boylan
 Jason C. Boylan (0082409)
 Trial Attorney
 Kristen Henry (0082382)
 Disability Rights Ohio

50 West Broad Street, Suite 1400
Columbus, Ohio 43215
Tel: (614) 466-7264
Fax: (614) 644-1888
jboylan@disabilityrightsohio.org
khenry@disabilityrightsohio.org

Daniel F. Goldstein (admitted pro hac vice)
Jessica P. Weber (admitted pro hac vice)
BROWN, GOLDSTEIN & LEVY LLP
120 E. Baltimore Street, Suite 1700
Baltimore, Maryland 21202
Tel: (410) 962-1030
Fax: (410) 385-0869
dfg@browngold.com
jweber@browngold.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this the 24th day of February, 2017, a copy of the foregoing Plaintiffs' Motion for Attorneys' Fees and Costs was served on all counsel of record via the Court's electronic filing system.

/s/ Jason C. Boylan

Jason C. Boylan (0082409)

Trial Attorney