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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

STEVE KELLY and CLARICE
DREYER,

Plaintiffs,

V.

LINDA McCULLOCH, in her
official capacity as Secretary of
State of the State of Montana,

Defendant.

[illegible]

Civil No. CV-08-25-BU-SEH

Plaintiffs' Motion for Costs and Attorney's Fees

Plaintiffs, as prevailing parties, move the Court pursuant to 42 U.S.C. §§

1973l(e) and 1988, for an award of costs and attorney's fees. As appears more fully from the attached declarations of Laughlin McDonald, Bryan Sells, Jonathan Sherman, and Elizabeth Griffing, which contain detailed summaries of hours and expenses, plaintiffs request attorney's fees in the amount of \$203,040.50, for the following number of hours expended in this case by the attorneys noted, at the rates indicated:

<u>Attorney</u>	<u>Attorney Hours</u>	<u>Hourly Rate</u>	<u>Amount</u>
Laughlin McDonald	108.15	\$450	\$48,667.75
Bryan Sells	362.25	\$350	\$126,787.75
Jonathan Sherman	40.5	\$250	\$10,125.00
Elizabeth Griffing	87.3	\$200	\$17,460.00
Total:			\$203,040.50

Plaintiffs also request an award of paralegal fees in the amount of \$3,463.75 for the following number of hours expended in this case by the paralegal noted, at the rate indicated:

<u>Paralegal</u>	<u>Paralegal Hours</u>	<u>Hourly Rate</u>	<u>Amount</u>
Katie O'Connor	40.75	\$85	\$3,463.75

The total requested amount in attorney and paralegal fees is \$206,504.25.

Plaintiffs also request an award of expenses in the amount of \$20,321.80, of which \$4,769.45 is included in plaintiffs Bill of Costs.

WHEREFORE, plaintiffs respectfully pray that this Court enter an award of attorney's fees and expenses in the amount of \$226,826.05.

Respectfully submitted,

/s/Laughlin McDonald

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