

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., et al.,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee, et
al.,

Defendants.

Civil No. 3:19-cv-365
Hon. Aleta A. Trauger

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES

As the representatives of the prevailing parties in this litigation, undersigned counsel Hogan Lovells US LLP, Lawyers' Committee for Civil Rights Under Law, Burch, Porter & Johnson, PLLC, and Bromberg Law PLLC (collectively, "Plaintiffs' Counsel"), respectfully move this Court under 28 U.S.C. § 1988 and other authority for an award of attorneys' fees, costs, and expenses. The attorneys' fees requested are \$724,415.50. The amount of costs and expenses to be reimbursed is \$5,274.04. As demonstrated in the supporting memorandum, which is incorporated by reference, the amounts requested are reasonable and justified by established law and indeed substantially understate the fees and expenses actually incurred.

As set forth more fully in Plaintiffs' Memorandum in Support of their Motion for Attorneys' Fees and Costs and supporting declarations, Plaintiffs have already exercised considerable billing judgment and should be entitled to recover all of the fees and expenses claimed in this matter.

Dated: December 21, 2020

Respectfully submitted,

/s/ Taylor Cates

Taylor A. Cates, BPR No. 20006
Burch, Porter & Johnson, PLLC
130 N. Court Avenue
Memphis, TN 38103
(901) 524-5165
tcates@bpjlaw.com
wirvine@bpjlaw.com

Ira M. Feinberg*
Hogan Lovells US LLP
390 Madison Avenue
New York, NY 10017
(212) 918-3509
irafeinberg@hoganlovells.com

Allison M. Ryan*
Madeline Gitomer*
Hogan Lovells US LLP
555 Thirteenth Street, NW
Washington, DC 20004
(202) 637-5600
allison.ryan@hoganlovells.com
carrie.delone@hoganlovells.com
madeline.gitomer@hoganlovells.com

Ezra D. Rosenberg*
Pooja Chaudhuri*
Lawyers' Committee for Civil Rights Under Law
1500 K Street, NW, Suite 900
Washington, D.C. 20005
(202) 662-8600
erosenberg@lawyerscommittee.org
ihouk@lawyerscommittee.org
nehaudhuri@lawyerscommittee.org

Yael Bromberg*
Bromberg Law LLC
The Andrew Goodman Foundation
10 Mountainview Road
Upper Saddle River, NJ 07458
(201) 995-1808
yaelbromberglaw@gmail.com

Attorneys for Plaintiffs

*admitted *pro hac vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 21, 2020 a copy of the foregoing Motion for Attorneys' Fees, Costs, and Expenses has been served via the Court's CM/ECF electronic case filing system to:

ALEXANDER S. RIEGER
ANDREW B. CAMPBELL
KELLEY L. GROOVER
Tennessee Attorney General's Office
P.O. Box 20207
Nashville, TN 37202
(615) 741-2408
(615) 532-0356
(615) 741-2408
alex.rieger@ag.tn.gov
andrew.campbell@ag.tn.gov
kelley.groover@ag.tn.gov

JOHN L. RYDER
STEVEN DOUGLASS
Harris, Shelton, Hanover & Walsh, PLLC
40 S. Main Street, Suite 2700
Memphis, TN 38103
(901) 525-1455
jlr@harrishelton.com
sdouglass@harrishelton.com

21st day of December, 2020.

/s/ Taylor Cates
Taylor Cates