

EXHIBIT 3

**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 Nos. 3:19-cv-365; 3:19-cv-385
Judge Aleta A. Trauger

LEAGUE OF WOMEN VOTERS OF
TENNESSEE, *et al.*,

Plaintiffs,

v.

TRE HARGETT, *et al.*,

Defendants.

DECLARATION OF THERESA J. LEE

Pursuant to 28 U.S.C. § 1746, I, Theresa J. Lee, hereby declare as follows:

1. The national American Civil Liberties Union (“ACLU”), ACLU of Tennessee (“ACLU-TN”), Campaign Legal Center (“CLC”), Fair Elections Center (“FEC”), and Sherrard, Roe, Voigt & Harbison, PLC, were retained in 2017 to represent the League of Women Voters of Tennessee Plaintiffs in this matter.

2. The ACLU is a nationwide, nonprofit, nonpartisan organization with over 1,600,000 members dedicated to defending the principles embodied in the U.S. Constitution and our nation’s civil rights laws. The ACLU Foundation is a national nonprofit organization under

section 501(c)(3) of the Internal Revenue Code and educates the public about civil liberties and employs lawyers who provide legal representation free of charge in cases involving civil liberties. The ACLU Voting Rights Project was established in 1965 – the same year that the historic Voting Rights Act (VRA) was enacted – and has litigated more than 350 cases since that time, including numerous voting rights cases in the U.S. Supreme Court, including: *Trump v. New York*, No. 20-366 (U.S. 2020); *Dep’t of Commerce v. New York*, 139 S. Ct. 2551 (2019); *Ohio A. Philip Randolph Institute v. Husted*, 138 S. Ct. 1833 (2018); *Shelby County, Ala. v. Holder*, 570 U.S. 529 (2013); *Arizona v. Inter Tribal Council of Arizona, Inc.*, 570 U.S. 1 (2013); *Nw. Austin Mun. Util. Dist. No. One v. Holder*, 557 U.S. 193 (2009); *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181 (2008); and *Abrams v. Johnson*, 521 U.S. 74 (1997).

3. Over the years, the ACLU Voting Rights Project has represented plaintiffs in jurisdictions across the country bringing lawsuits challenging laws that unlawfully restrict access to the ballot and political participation under the U.S. Constitution.

Qualifications of ACLU Staff Working on the Case

4. In this section, I will describe the qualifications and expertise of the staff of the ACLU Voting Rights Project for whose time we seek to collect fees.

5. I am a Staff Attorney with the ACLU Voting Rights Project and have been in this position since April 17, 2017. My practice with the Voting Rights Project is devoted exclusively to the protection and expansion of voting rights.

- a. I obtained a Bachelor of Arts degree in Communications and Media Studies, with a focus on Writing and Journalism, with minors in Mathematics and Sociology from Fordham University in 2004. I obtained a Master’s Degree in Historical

Studies from the New School for Social Research in 2007. I earned my Juris Doctorate from Yale Law School in 2011.

- b. From August 2011 through August 2012, I served as an Associate Research Scholar in Law, San Francisco Affirmative Litigation Project Fellow, and Lecturer in Law at Yale Law School, teaching a legal clinic and litigating with the San Francisco City Attorney's Office.
- c. From August 2012 through August 2013, I served as a law clerk to the Honorable Rosemary S. Pooler of the United States Court of Appeals for the Second Circuit.
- d. From October 2013 through May 2016, I practiced law as an associate at Zuckerman Spaeder LLP. From May 2016 through March 2017, I practiced law as an associate at Bracewell LLP.
- e. I was admitted to the practice of law in the State of New York in April 2012.
- f. I am admitted to practice in the following federal courts: the Southern District of New York (2014); the Eastern District of New York (2014); the Second Circuit Court of Appeals (2016); the Fifth Circuit Court of Appeals (2019); the Sixth Circuit Court of Appeals (2019); and the United States Supreme Court (2017). I have also been admitted *pro hac vice* in several other United States District Courts and state courts.
- g. From April 2017 through the present, I have worked full-time with the ACLU Voting Rights Project as a Staff Attorney. I have litigated voting rights and election law cases, including *American Civil Liberties Union v. Trump*, No. 17-cv-1351 (D.D.C.); *Casey v. Gardner*, No. 19-cv-149 (D.N.H.); *League of Women Voters of Michigan v. Benson*, No. 353654 (Mich. Ct. of Appeals); *League of*

Women Voters of Virginia v. Virginia Board of Elections, No. 20-cv-0024 (W.D. Va.); *NAACP Minnesota-Dakotas Area State Conference v. Simon*, No. 62-cv-20-3625 (Minn. Dist. Ct.); *Ocasio v. Comision Estatal de Elecciones*, No. 20-cv-1432 (D.P.R.); *Ohio A. Philip Randolph Institute v. Householder*, No. 18-cv-357 (S.D. Ohio); *Ohio A. Philip Randolph Institute v. Husted*, 138 S. Ct. 1833 (2018); *Oppenheim v. Watson*, No. 25CH1:20-cv-00961 (Miss. Chancery Ct.); *Schroeder v. Simon*, No. 62-CV-19-7440 (Minn. Dist. Ct.); *Thomas v. Andino*, No. 20-cv-1552 (D.S.C.); and *Trump v. New York*, No. 20-366 (U.S.). I have also drafted amicus briefs concerning voting rights issues for cases in the U.S. Supreme Court and multiple U.S. Courts of Appeals.

6. **Sophia Lin Lakin** is the Deputy Director of the ACLU Voting Rights Project and has been in this position on February 3, 2020. Prior to becoming the deputy director, she was a Staff Attorney with the ACLU Voting Rights Project. Her practice with the Voting Rights Project is devoted exclusively to the protection and expansion of voting rights.

- a. Ms. Lakin obtained a Bachelor of Arts degree in Political Science and Master of Science degree in Management Science & Engineering from Stanford University in 2004. She earned a Juris Doctor degree from Stanford Law School in 2012.
- b. From August 2013 to October 2014, Ms. Lakin served as a law clerk to the Honorable Carol Bagley Amon of the Eastern District of New York. From January 2014 to January 2015, she served as a law clerk to the Honorable Raymond J. Lohier, Jr., of the Second Circuit Court of Appeals. For the three months in between these clerkships, she worked as a volunteer staff attorney with the ACLU Voting Rights Project.

- c. Ms. Lakin was admitted to the practice of law in the State of New York in 2013.
- d. Ms. Lakin is admitted to practice in the following federal courts: U.S. District Court for the Eastern District of Wisconsin (2015); U.S. Court of Appeals for the Fourth Circuit (2016); U.S. Court of Appeals for the Tenth Circuit Court of Appeals (2016); U.S. Court of Appeals for the Eighth Circuit (2016), U.S. Court of Appeals for the Sixth Circuit (2017); U.S. Court of Appeals for the Eleventh Circuit (2017); U.S. Court of Appeals for the Fifth Circuit (2017); U.S. Court of Appeals for the Seventh Circuit (2018); U.S. Court of Appeals for the Third Circuit (2020); and the United States Supreme Court (2017). She has also been admitted *pro hac vice* in several other U.S. District Courts and state courts.
- e. From February 2015 through the present, Ms. Lakin has worked full-time with the ACLU Voting Rights Project, first as a Legal Fellow, then, from February 2016 to February 2020, as a Staff Attorney, and, since February 2020, as the Deputy Director. In her current role, she supervises and participates directly in the ACLU's docket of voting rights litigation throughout the country, including: *Fish v. Schwab*, 957 F.3d 1105 (10th Cir. 2020), *cert denied*, Dec. 14, 2020; *Common Cause v. Lawson*, No. 1:17-cv-3936, 2020 WL 4934271 (S.D. Ind. Aug. 24, 2020), *appeal filed*, Sept. 21, 2020; *Donald J. Trump for President, Inc. v. Boockvar*, No. 4:20-CV-02078, 2020 WL 6821992 (M.D. Pa. Nov. 21, 2020), *aff'd*, 2020 WL 7012522 (3d Cir. Nov. 27, 2020) (representing voters and civic organizations as intervenor-defendants); *Hotze v. Hollins*, No. 4:20-cv-03709, 2020 WL 6327668 (S.D. Tex. Nov. 2, 2020) (representing voters and civic organizations as intervenor-defendants); *Missouri State Conference NAACP v.*

Missouri, 607 S.W.3d 728 (Mo. 2020); *Trump v. New York*, No. 20-366 (U.S.), and *New York v. Trump*, No. 20-CV-5770-RCWPWHJMF, 2020 WL 5422959 (S.D.N.Y. Sept. 10, 2020) (three-judge court) (representing non-governmental organizations); *Missouri State Conference of the NAACP v. Ferguson-Florissant School District*, 894 F.3d 924 (8th Cir. 2018), *cert denied*, 139 S. Ct. 826 (2019); *Georgia Muslim Voter Project v. Kemp*, 918 F.3d 1262 (11th Cir. 2020); *Ohio A. Philip Randolph Institute v. Husted*, 138 S. Ct. 1833 (2018); and *North Carolina NAACP v. North Carolina*, 831 F.3d 204 (4th Cir. 2016), *cert. denied*, 137 S. Ct. 1399 (2017). Ms. Lakin has also drafted amicus briefs concerning voting rights issues for cases in the U.S. Supreme Court, multiple U.S. Courts of Appeal, and state supreme courts.

- f. Ms. Lakin has given presentations and continuing legal education classes concerning voting rights for various organizations, including the Practising Law Institute, the National Asian Pacific American Bar Association, the South Asian Bar Association of North America, and the National Association for the Advancement of Colored People, and at universities and law schools, including Harvard Law School, Yale Law School, Columbia Law School, Stanford Law School, and Loyola University in New Orleans.

7. **Davin Rosborough** is a Senior Staff Attorney with the ACLU Voting Rights Project and has been in this position since December 1, 2017. His practice is devoted exclusively to the protection and expansion of voting rights and related issues.

- a. He obtained a Bachelors of Arts degree from the University of Virginia in 2003, and a Juris Doctor, *summa cum laude* and Order of the Coif, from Washington University in St. Louis School of Law in 2010.
- b. He was admitted to the practice of law in the State of New York in 2011, in the Commonwealth of Virginia in 2013, and in the District of Columbia in 2019. He has been continuously engaged in the practice of law on a full-time basis since 2011, after serving as a judicial law clerk from 2010-2011. He is admitted to the following federal courts: U.S. District Courts for the Southern District of New York (2012); Eastern District of New York (2012); Eastern District of Virginia (2014); and Western District of Virginia (2014); U.S. Courts of Appeals for the Fourth (2015), Fifth (2011), and Sixth (2017) Circuits; and the United States Supreme Court (2019). Mr. Rosborough has also been admitted *pro hac vice* in several other U.S. District Courts and state courts.
- c. From 2010 to 2011, he worked as a law clerk for the Honorable Edward Prado on the U.S. Court of Appeals for the Fifth Circuit.
- d. From September 2011 to December 2013, he was a litigation associate at the law firm, Paul, Weiss, Rifkind, Wharton, & Garrison LLP (“Paul, Weiss”) in New York. From January 2014 to November 2017, he worked as an Associate at the law firm of Bowman and Brooke, LLP in Richmond, Virginia, and was elected Counsel to be effective in January 2018.
- e. From December 2017 to present, as a Staff Attorney and Senior Staff Attorney at the Voting Rights Project at the ACLU, he has litigated voting rights and election cases, including: *League of Women Voters of Mo. v. Ashcroft*, 336 F. Supp. 3d

998 (W.D. Mo. 2018); *Dep't of Commerce v. New York*, 139 S. Ct. 2551 (2019) and *New York v. Dep't of Commerce*, 351 F. Supp. 3d 502 (S.D.N.Y. 2019) (representing non-governmental organizations); *Hoge v. Padilla*, No. 2:19-cv-01985-MCE-AC (E.D. Cal. 2019); *Trump v. New York*, No. 20-366 (Sup. Ct.), and *New York v. Trump*, No. 20-CV-5770-RCWPWHJMF, 2020 WL 5422959 (S.D.N.Y. Sept. 10, 2020) (three-judge court) (representing non-governmental organizations); *League of Women Voters of Va. v. Va. State Bd. of Elections*, 6:20-CV-00024, 2020 WL 4927524 (W.D. Va. Aug. 21, 2020); *People First of Ala. v. Merrill*, No. 2:20-CV-00619-AKK, 2020 WL 4747641 (N.D. Ala. Aug. 17, 2020); and *Conn. NAACP v. Merrill*, No. 3:20-cv-00909 (D. Conn. 2020). He has also drafted amicus briefs concerning voting rights issues for cases in the U.S. Courts of Appeals for the Fifth and Ninth Circuits.

8. **Sarah Brannon** is a Managing Attorney with the ACLU Voting Rights Project and has been in this position since summer of 2018. Prior to becoming a Managing Attorney, she was a Senior Staff Attorney with the ACLU Voting Rights Project, having joined the ACLU in July 2017. Her practice with the Voting Rights Project is devoted exclusively to the protection and expansion of voting rights.

a. She received a Bachelor of Arts in 1994 from St. Mary's College of Maryland, and graduated from University of Maryland School of Law in 1999, where she was an associate editor of *The Business Lawyer* journal and a member of the Moot Court Board. She received the *G. Ridgely Sappington Prize for Civil Procedure* (best work in day division for the 1996-97 academic year).

- b. She was admitted to the practice of law in the State of Maryland in 1999 and is still a member of the Maryland Bar. She is also admitted to the United States District Court for the District of Maryland, United States Court of Appeals for the Fourth Circuit, and United States Court of Appeals for the Ninth Circuit.
- c. Ms. Brannon has also been admitted *pro hac vice* to a number of other U.S. District Courts.
- d. She was a law clerk to the Honorable Paul W. Grimm on the United States District Court for the District of Maryland from August 1999 – August 2000.
- e. Before joining the ACLU, she was the Litigation Director at Project Vote. Project Vote was a non-partisan, non-profit organization based in Washington D.C. Her work included being responsible for overseeing numerous complex federal voting rights litigation, including work that contributed to the following reported decisions: *Action v. Strach*, 2016 WL 6304731 (M.D.N.C. Oct. 27, 2016); *National Council of La Raza v. Cegavske*, 800 F.3d 1032 (9th Cir. 2015); *Delgado v. Galvin*, 2014 WL 1004108 (D. Mass. Mar. 14, 2014); and *Scott v. Schedler*, 771 F.3d 831 (5th Cir. 2014).
- f. She has 20 years of litigation experience, including experience handling numerous large complex litigations addressing civil rights, civil liberties, and election law claims. She was a litigation associate at the private firms of Law Offices of Peter G. Angelos; Salsbury, Clements, Bekman, Marder & Adkins, L.L.C., (now Bekman, Marder & Adkins), and Hogan & Hartson LLP (now Hogan Lovells).

- g. She was a *Voter Protection Manager* on President Barack Obama's 2007-2008 Presidential Primary Campaign. And a staff attorney with the Fair Elections Legal Network (now the Fair Elections Center) from 2008-2010.
- h. In her current role, she supervises and participates directly in the ACLU's docket of voting rights litigation, including *League of Women Voters of Mo. v. Ashcroft*, 336 F. Supp. 3d 998 (W.D. Mo. 2018); *Dep't of Commerce v. New York*, 139 S. Ct. 2551 (2019) and *New York v. Dep't of Commerce*, 351 F. Supp. 3d 502 (S.D.N.Y. 2019) (representing non-governmental organizations); *Hoge v. Padilla*, No. 2:19-cv-01985-MCE-AC (E.D. Cal. 2019); *Trump v. New York*, No. 20-366 (Sup. Ct.), and *New York v. Trump*, No. 20-CV-5770-RCWPWHJMF, 2020 WL 5422959 (S.D.N.Y. Sept. 10, 2020) (three-judge court) (representing non-governmental organizations); and *People First of Ala. v. Merrill*, No. 2:20-CV-00619-AKK, 2020 WL 4747641 (N.D. Ala. Aug. 17, 2020).

Attorney Hourly Rates

9. My current hourly rate is \$700. Based on prevailing market rates in New York City, \$700 is a reasonable hourly rate for an attorney of my background and experience. However, in this matter, as an exercise of billing judgment, all counsel for the League of Women Voters-Plaintiffs are using the hourly rate scale used by our Nashville-based co-counsel, Sherrard Roe Voigt & Harbison, PLC ("SVRH"), in order to ensure the fees sought reflect "the prevailing market rates in the relevant community." *Blum v. Stenson*, 465 U.S. 886, 895 (1984). My hourly rate under the SVRH scale is \$410.

10. Ms. Lakin's current hourly rate is \$690 an hour. Based on my knowledge of prevailing market rates in New York City, \$690 is a reasonable hourly rate for an attorney of her

background and experience. However, in this matter as an exercise of billing judgment, all counsel for the League of Women Voters-Plaintiffs are using the hourly rate scale used by our Nashville-based co-counsel, SVRH. Her hourly rate under the SVRH scale is \$400 an hour.

11. Mr. Rosborough's current hourly rate is \$700 an hour. Based on my knowledge of prevailing market rates in New York City, \$700 is a reasonable hourly rate for an attorney of his background and experience. However, in this matter as an exercise of billing judgment, all counsel for the League of Women Voters-Plaintiffs are using the hourly rate scale used by our Nashville-based co-counsel, SVRH. His hourly rate under the SVRH scale is \$425 an hour.

12. Ms. Brannon's current hourly rate is \$700 an hour. Based on her knowledge of prevailing market rates in Washington DC, \$700 is a reasonable hourly rate for an attorney of her background and experience. However, in this matter as an exercise of billing judgment, all counsel for the League of Women Voters-Plaintiffs are using the hourly rate scale used by our Nashville-based co-counsel, SVRH. Her hourly rate under the SVRH scale is \$475 an hour.

13. The attorney hours spent on this case were reduced because of the assistance of ACLU support staff, including paralegals and legal interns.

- a. We seek reimbursement for time spent on this case by ACLU Voting Rights Project paralegal **Lila Carpenter**. The average rate for a paralegal under the SVRH scale is \$200, but we seek a rate of \$150 for Ms. Carpenter's work in deference to the greater experience of some of the paralegals who command higher rates under the SVRH scale.
- b. We do not seek compensation for any time spent on this case by legal administrative assistant **Juan Diaz** or any legal interns.

14. **Dale E. Ho**, Project Director of the ACLU Voting Rights Project, also spent time on this matter. However, as he spent only a limited number of hours on the matter, in the exercise of billing judgment, we do not seek compensation for any of his time.

Requested Attorneys' Fees

15. Below is a table summarizing all the time for which Plaintiffs are seeking fees in connection with this matter:

<i>Name (position)</i>	<i>Time Spent</i>	<i>Hourly Rate*</i>	<i>Billable Amount</i>
Theresa J. Lee (attorney)	215.06	\$410	\$88,172.60
Sophia Lin Lakin (attorney)	145.71	\$400	\$58,284.58
Davin Rosborough (attorney)	122.72	\$425	\$52,154.58
Sarah Brannon (attorney)	93.43	\$475	\$44,380.83
Lila Carpenter (paralegal)	33.67	\$150	\$5,050.88

SUM: \$248,043.47

16. Reasonable billing judgment was exercised to exclude hours that were not absolutely necessary, were duplicated by other attorneys, or are not adequately documented. In particular, we are not seeking compensation for the following:

- a. Hours spent on team calls which included another attorney from the ACLU Voting Rights Project who has documented that time instead;
- b. Hours spent participating in meet and confers which included another attorney from the ACLU Voting Rights Project who has documented that time instead;
- c. Certain hours spent drafting filings in this case;
- d. Hours spent preparing the fee petition in this case;
- e. Hours spent on administrative tasks related to the case; and
- f. Travel time.

17. In total, ACLU attorneys devoted 733.64 hours to this case; however, compensation is sought for only 610.59 hours. Likewise, the ACLU paralegal devoted 35.92 hours on this case, though compensation is only sought for 33.67 of her hours.

18. ACLU attorneys' and paralegal's time records were kept contemporaneously with the work performed. I have attached the detailed time records for the hours for which compensation is sought for each ACLU timekeeper as Attachment 1.

Reasonable Litigation Expenses and Costs

19. Plaintiffs also incurred \$1,500 in filing fees. The receipts are attached here as Attachment 2.

20. The ACLU also incurred \$2,428.49 in additional litigation expenses. I have attached our internal records documenting the litigation expenses incurred by the ACLU as Attachment 3.

21. These expenses were reasonably incurred in the course of providing effective representation to the Plaintiffs, and Plaintiffs' counsel made appropriate efforts throughout the litigation to reduce unnecessary expenses. Additionally, Plaintiffs do not seek reimbursement for other chargeable expenses, including phone charges, costs of photocopying, Lexis and Westlaw charges, and postage.

22. The hourly rates, hours, and expenses reflected in this affidavit and its attachments are customary and reasonable and were necessarily incurred in representing Plaintiffs in this matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 21, 2020.

/s/ Theresa J. Lee
Theresa J. Lee

ATTACHMENT 1

Theresa Lee Hours		
Description	Date	Hours
Call w ACLU-TN, S Lakin, S Brannon	4/25/19	0.90
Call w S Lakin re TN voter reg issue	4/29/19	0.80
Meeting with S Lakin re lit memo/complaint	4/30/19	0.38
Review materials for call with AMAC	5/2/19	0.45
Call w AMAC and ACLU-TN	5/2/19	0.75
Call w LWV-TN and ACLU-TN	5/2/19	1.48
Call w ACLU-TN	5/2/19	0.85
Meeting w S Lakin re lit memo; research re HB Sororities and voter registration in TN	5/2/19	0.91
Outline complaint	5/2/19	2.08
Draft complaint	5/3/19	1.63
Call w ACLU-TN	5/3/19	0.00
Draft complaint	5/4/19	3.12
Draft complaint	5/5/19	3.43
Edit complaint	5/6/19	1.50
Call w ACLU-TN re complaint	5/6/19	0.78
Call w S Lakin and S Brannon; email S Brannon and D Rosborough re complaint	5/6/19	0.51
Review TN memos from CLC	5/6/19	0.63
Meeting w S Lakin re complaint and plan for counsel team call	5/6/19	0.23
Review Plaintiffs' fact submissions	5/6/19	0.29
Review and implement edits to the complaint	5/7/19	0.97
Review and edit NVRA letter	5/7/19	0.69
Review NVRA letter; email S Lakin, D Rosborough, and S Brannon re same	5/7/19	0.36
Review comments re claims; conversations w S Lakin re complaint	5/7/19	0.90
Edit complaint	5/8/19	2.05
Review comments re complaint and notice letter	5/8/19	0.47
Team phone call	5/8/19	1.03
Review and edit draft notice letter; email counsel team re same	5/8/19	1.50
Review edits to notice letter	5/8/19	0.58
Emails from team re round of edits to complaint; email team re notice letter	5/8/19	0.52
Revise complaint; email S Lakin, S Brannon, and D Rosborough re same	5/8/19	2.10
Proof and finalize complaint; email team re same	5/9/19	2.41
Team call re amendment and additional Plaintiffs	5/15/19	1.09
Revise retainer agreement	5/16/19	1.09
Review PHV motions; email L Carpenter re same	5/28/19	0.29
Team call re service and amending complaint	5/29/19	1.22
Meeting w S Lakin re TN complaint	6/3/19	0.60
Review MTD	6/7/19	0.81
Outline response in opposition to MTD	6/7/19	0.57
Review supplemental retainer agreement; email SLL re same	6/11/19	0.20
Draft complaint amendments	6/11/19	1.82
Review Judge Trauger rules	6/13/19	0.24
Review memo re complaint amendment	6/13/19	0.50
Draft complaint amendments	6/13/19	2.35

Theresa Lee Hours		
Description	Date	Hours
Draft complaint amendments	6/14/19	2.18
Revise amended complaint	6/14/19	0.20
Revise amended complaint; email team re same and re editing plan	6/15/19	0.97
Review STV Plaintiff coverage	6/18/19	1.24
Conversation w S Lakin re amendment	6/18/19	0.30
Convo w S Lakin re amendment; review STV withdrawal letter; email team re same	6/19/19	0.34
Edit amended complaint	6/20/19	4.02
Team call re amended complaint; edit amended complaint	6/20/19	2.92
Review and finalize amended complaint; e-mail T Castelli re filing; e-mail team re final amended complaint	6/21/19	3.00
Read LCCR opposition to MTD	6/24/19	0.48
Review Judge Trauger sample case management order; email team re same	6/24/19	0.35
Read LCCR opposition to MTD; draft opp outline	6/26/19	1.06
Review case management notice; email team re same	6/26/19	0.27
E-mail state re meet and confer; draft agenda for team call; email team	6/28/19	1.40
Team call re case management	6/28/19	1.03
Draft proposed court calendar; email team re same	6/28/19	1.15
Call w P Chaudhuri and S Lakin re case schedules	7/1/19	0.45
Prep team call outline	7/1/19	0.77
Post-call email team re meet-and-confer and case update; conversation w S Lakin re same	7/1/19	0.17
Meet-and-confer with state; email team update re same	7/2/19	0.27
E-mail team re opposition and CMC	7/8/19	0.63
Read MTD	7/8/19	1.10
Read MTD; meeting w L Carpenter re filing schedule	7/8/19	0.62
Outline Opp MTD	7/8/19	1.04
Caselaw research for Opp MTD	7/8/19	2.10
Caselaw research for Opp MTD	7/9/19	4.69
Draft Opp MTD	7/9/19	0.70
Legal research for Opp MTD; draft Opp MTD	7/9/19	2.64
Draft Opp MTD	7/10/19	5.17
Legal research for Opp MTD; draft Opp MTD	7/10/19	5.47
Draft Opp MTD; email team re same	7/11/19	4.39
Review edits from M Kanter Cohen and S Brannon to MTD Opp.	7/15/19	0.44
E-mail team re opp MTD; review D Rosborough edits	7/15/19	0.16
Review Opp MTD for length cuts	7/15/19	0.51
Edit Opp MTD	7/16/19	1.15
Edit Opp MTD; draft motion for additional pages; email team re same; email opposing counsel re consent	7/17/19	1.70
Finalize motion for additional pages; file motion	7/17/19	0.44
Edit Opp MTD	7/17/19	1.09
Edit Opp MTD; email team re same; email D Ho re review	7/17/19	3.41
Edit Opp MTD; email team re same; conversation w L Carpenter re cite check; conversation w S Lakin re status	7/18/19	3.30

Theresa Lee Hours		
Description	Date	Hours
Review supplemental authority filings from NAACPTN case	7/19/19	0.26
Edit Opp MTD; finalize opposition; file Opposition	7/19/19	3.58
Review OH, GA, FL cases' preliminary injunction materials	7/29/19	2.37
Outline preliminary injunction	7/29/19	0.35
Review OH, GA, FL cases' preliminary injunction materials	7/30/19	1.02
Outline irreparable harm section	7/30/19	1.45
Outline irreparable harm section; research re same	7/30/19	1.35
Research re TN administrative rule-making	7/30/19	0.29
Case law research re irreparable harm	7/30/19	0.28
Outline preliminary injunction	7/30/19	0.84
Outline preliminary injunction	7/31/19	1.63
Finalize outline; email team re same and re filing plan	7/31/19	0.46
Review LCCR case status	8/1/19	0.24
Revise PI outline; email team re same	8/6/19	0.65
Draft memorandum in support of preliminary injunction	8/6/19	2.78
Draft memorandum in support of preliminary injunction	8/7/19	3.72
Draft memorandum in support of preliminary injunction	8/8/19	6.68
Draft memorandum in support of preliminary injunction; review and revise statement of facts from D Rosborough	8/8/19	2.21
Draft memorandum in support of preliminary injunction	8/9/19	1.13
Draft PI; email counsel team re same	8/9/19	1.55
Edit memorandum in support of preliminary injunction	8/20/19	4.56
Edit memorandum in support of preliminary injunction	8/21/19	0.81
Review Ott and MSPJC affidavits; email counsel team re same	8/21/19	1.49
Edit Mem. ISO PI	8/21/19	3.24
Edit Mem. ISO PI; edit MCLC and RTV declarations; email M Danahy re same	8/21/19	1.05
Edit Mem. ISO PI; email counsel team re same; email D Ho re review	8/21/19	0.79
Revise AMAC declaration; email D Rosborough re same	8/23/19	0.40
Review final LWV declaration	8/23/19	0.31
Edit memorandum in support of preliminary injunction	8/27/19	6.71
Edit memorandum in support of preliminary injunction	8/28/19	4.76
Edit Mem. ISO PI; email L Carpenter and A Scott re citecheck; email team re draft status	8/28/19	1.03
Edit Mem. ISO PI; review and finalize declarations; conversation w L Carpenter re citecheck	8/29/19	0.74
Draft cover motion for PI	8/29/19	0.30
Review and edit revised HeadCount declaration	8/29/19	0.41
Edit memorandum in support of preliminary injunction	8/29/19	1.69
Review cite check; edit Mem. ISO PI; add cites to declaration paragraph numbers	8/29/19	1.08
Review declaration cite check; edit Mem. ISO PI; email A Nicholas re cite check assignment	8/29/19	0.44
Edit Mem. ISO PI; finalize exhibits and cover motion	8/30/19	0.67
Proofread and finalize Mem. ISO PI; email counsel team re same	8/30/19	2.27
Read MTD denial order	9/9/19	3.08
Email LCCR; draft case management order; email counsel team re same	10/18/19	0.93
Revise draft case schedule; email team re same	10/22/19	0.77

Theresa Lee Hours		
Description	Date	Hours
Call w counsel team and LCCR re meet and confer and CMC	10/22/19	0.54
Review and edit proposed CMC order; email team re same	10/24/19	0.45
Meet and confer for CMC	10/29/19	0.60
Revise joint CMC order; email team re same	10/29/19	0.57
Call w S Lakin re case management agreement status	10/30/19	0.30
Emails w team re CMC; draft proposed revised joint filing; email state re same	10/30/19	0.70
Draft summary of CMC; email team re same	11/5/19	0.40
Draft 26a1 disclosures; email team re same	11/13/19	1.13
Team call re discovery; conversation w S Lakin and D Rosborough re same	11/13/19	0.47
Edit 26a1 disclosures	11/13/19	0.30
Discovery call w full Plaintiffs teams; emails to 19-cv-385 team re discovery assignments	11/15/19	0.80
Revise 26a1 disclosures	11/15/19	0.75
Finalize 26a1 disclosures	11/18/19	0.84
Conversation w S Lakin re open discovery issues	11/25/19	0.14
Review amended complaint; email team re same	12/2/19	0.59
Review and edit written discovery	12/2/19	2.34
Edit motion to amend; email team re same	12/3/19	0.45
Review and edit written discovery	12/4/19	0.38
Revise and file certificates of service; email team re same	12/5/19	0.53
Meeting w S Lakin re discovery	12/10/19	0.57
Call w NAACP-counsel team re discovery	12/10/19	0.20
Review discovery drafts; email team re same	12/11/19	1.12
Review and edit interrogatories	12/11/19	0.77
Review and edit RFPs; conversation w S Lakin re same; email internal team re same	12/11/19	0.72
Edit discovery; email team re same	12/12/19	1.57
Edit written discovery; email counsel teams re same	12/13/19	3.60
Finalize written discovery	12/13/19	0.34
Prepare and edit county subpoenas; e-mails w team re same; provide notice to Defendants re same	12/13/19	2.62
Prep subpoenas; contact process servers	12/16/19	1.08
Review service status; email team re same	12/18/19	1.10
E-mails w team re third party subpoena process	1/3/20	0.47
Call w S Lakin re discovery steps; email H Branstetter re same	1/3/20	0.15
Prep for discovery conferences; emails w team members re same; meeting w S Lakin and D Rosborough re same	1/8/20	0.65
Meet and confer w Jackson Cty; conversation w S Lakin and D Rosborough re same	1/8/20	0.67
Emails w team re status of Jackson Cty.; e-mail K Cantrell withdrawing current subpoena	1/8/20	0.50
E-mail subpoenas team update from Hamilton and Jackson Cty meet and confers	1/8/20	0.19
E-mails w team re discovery issues	1/10/20	0.32
E-mail discovery subgroup about reaching out to counties	1/10/20	0.13
Draft letters and emails to counties re subpoenas	1/14/20	1.52
Review open subpoena issues; email counsel teams re discovery status	2/7/20	0.44
Call w D Rosborough and S Lakin re Shelby discovery	2/11/20	0.18

Theresa Lee Hours		
Description	Date	Hours
Review letter to Shelby Cty.; email S Lakin re same	2/11/20	0.17
Meeting w D Rosoborough and S Lakin re open county discovery issues	2/12/20	0.90
Meet and confer w Wilson Cty re subpoena	2/12/20	0.03
Call re protective orders and county subpoenas w NAACP counsel team	2/12/20	0.37
E-mail M Kanter Cohen re affirmative discovery; review Knox Cty agreement; call w D Rosborough re same	2/13/20	0.29
Prep 26(a)(1) supplement; e-mail co-counsel team re same	2/18/20	0.18
Review joint motion re Shelby Cty. subpoena; email S Lakin re same	2/18/20	0.17
Review bill materials; email LWV-TN re same	2/19/20	0.55
Conversation w S Lakin re TN bill; emails w team re same	2/19/20	0.28
Review HB2363; emails w team re same	2/19/20	0.33
E-mails w team re bill status update and related calls	2/19/20	0.40
Review bill status; email team re same	3/11/20	0.49
Team call re legislation	3/23/20	0.28
E-mails w team and NAACP counsel group re HB 2363-64	3/26/20	0.15
Call w co-counsel and NAACP counsel team; emails re subpoena compliance	3/27/20	0.51
Total		215.06

Sophia Lin Lakin Hours		
Description	Date	Hours
Call with ACLU TN re vote reg bill in TN	4/15/19	1.27
Case law research for TN voter reg issue + team call	4/16/19	1.66
Meeting with T Lee re TN voter reg issue	4/17/19	0.48
Case law research and review memos re TN voter reg issue	4/24/19	0.61
Team call re voter reg bill in TN	4/25/19	0.83
Review and research f/up on latest version of TN bill	4/28/19	1.78
Call with D Ho re challenge to TN voter reg issue	4/29/19	0.25
Call with T Lee re TN voter reg issue	4/29/19	0.80
Research and review memos re TN voter reg issue	4/29/19	1.05
Research re TN voter reg issue	4/29/19	0.93
Review and research f/up on latest version of TN bill	4/29/19	0.73
Meeting with T Lee re lit memo/complaint	4/30/19	0.38
Draft TN voter reg litigation memo	5/1/19	2.86
Draft TN voter reg litigation memo	5/2/19	1.12
Team call re voter reg bill in TN	5/2/19	0.61
Call with LWV TN re voter reg issue	5/2/19	1.50
Call with AMAC re voter reg issue and potential lawsuit	5/2/19	0.77
Draft TN voter reg litigation memo	5/2/19	0.56
Draft complaint	5/3/19	0.79
Draft co-counsel agreement	5/3/19	1.32
Draft TN voter reg litigation memo	5/3/19	2.91
Meeting with B Hauss re First Amendment claims	5/3/19	0.42
Call with D Lang at CLC re co-counsel agreement	5/3/19	0.26
Team call	5/3/19	0.71
Draft complaint	5/4/19	4.05
Review client materials/answer questions	5/4/19	0.28
Call with D Lang re claims/clients	5/4/19	0.29
Draft co-counsel agreement	5/4/19	0.23
Draft complaint	5/5/19	1.12
Draft complaint	5/5/19	3.80
Draft complaint	5/6/19	4.13
Case law research for complaint	5/6/19	0.51
Call with LWV TN and S Brannon and D Rosborough	5/6/19	0.85
Draft emails to cocounsel re claims	5/7/19	0.36
Review/revise complaint	5/7/19	0.97
Draft emails to co-counsel and clients re complaint	5/7/19	0.33
Review/revise complaint	5/8/19	1.16
Compile co-counsel edits to NVRA letter	5/8/19	1.96
Review/revise NVRA notice letter	5/8/19	0.05
compile edits to complaint	5/8/19	2.33
Draft emails to cocounsel re claims	5/8/19	0.08
Review LCCUL NVRA letter	5/15/19	0.10
Compile edits to client retainer	5/16/19	0.61

Sophia Lin Lakin Hours		
Description	Date	Hours
Compile edits to client retainer	5/17/19	0.38
Draft emails re plaintiffs/additional claim	5/20/19	0.38
Draft email to update clients	5/22/19	0.38
Review pro hac materials	5/28/19	0.44
Review potential client background materials	5/28/19	0.87
Review potential client background materials	5/29/19	0.15
Review potential client questions	6/3/19	0.38
Draft emails re potential amended complaint	6/3/19	0.46
Meeting with T Lee re potential amended complaint	6/3/19	0.67
Draft emails re potential clients	6/6/19	0.50
Review LCCR motion to dismiss	6/4/19	0.88
Review motion to dismiss	6/7/19	0.81
Draft emails re potential clients	6/10/19	0.09
Meeting with T Lee re potential amended complaint	6/10/19	0.21
Draft emails re amended complaint	6/10/19	0.12
Team call	6/10/19	0.78
Review/revise amended complaint	6/11/19	0.08
Draft emails re potential clients	6/11/19	0.08
Review and discuss RTV video with T Lee	6/11/19	0.23
Draft emails re potential clients	6/11/19	0.06
Draft email re supplemental retainer	6/11/19	0.39
Review/revise new plaintiff allegations	6/12/19	0.48
Review/revise amended complaint	6/13/19	0.16
Meeting with T Lee re amended complaint	6/17/19	0.19
Draft emails re amended complaint	6/19/19	0.27
Draft emails re amended complaint	6/20/19	0.07
Call with P Chaudhuri at LCCR re coordination	7/1/19	0.50
Review/revise MTD opposition	7/12/19	0.79
Review/revise MTD opposition	7/17/19	0.13
Review/revise MTD opposition	7/18/19	0.06
Review/revise MTD opposition	7/19/19	0.45
Call with Ezra and Pooja re moving for preliminary injunction and f/up on call with team	7/22/19	0.33
Draft emails to team re moving for preliminary injunction	7/23/19	0.71
Draft emails to team re moving for preliminary injunction	7/24/19	0.20
Meeting with T Lee re preliminary injunction brief	7/25/19	0.41
Case law research for preliminary injunction	7/31/19	0.18
Review/revise preliminary injunction brief	8/5/19	0.60
Case law research for preliminary injunction reply brief	9/8/19	0.58
Case law research for preliminary injunction reply brief	9/9/19	0.34
Review preliminary injunction opposition	9/9/19	0.90
Team discussion re PI reply in light of MTD order	9/9/19	0.95
Draft emails to team re MTD order	9/9/19	0.58
Review order denying MTD	9/9/19	1.26

Sophia Lin Lakin Hours		
Description	Date	Hours
Review/revise PI reply brief	9/10/19	1.00
Review/revise PI reply brief	9/11/19	3.01
Meeting with T Lee and D Rosborough re discovery/CMC next steps	9/16/19	0.49
Call with LCCR re cmp	10/29/19	0.52
Cmp meet and confer	10/29/19	0.50
Call w T Lee re case managment agreement status	10/30/19	0.30
Edits to CMP	10/30/19	0.14
Travel logistics for CMC	10/30/19	0.14
Travel home from Nashville	11/4/19	4.50
Pre CMC mtg with LCCR; CMC	11/4/19	1.50
Travel to Nashville for CMC	11/4/19	4.75
Discovery planning	11/12/19	0.03
Discovery planning	11/13/19	0.15
Review initial disclosures	11/18/19	0.24
Discovery planning	11/18/19	0.18
Review/revise seconded amended complaint	11/19/19	1.94
Draft Hargett discovery requests	11/19/19	0.71
Meeting with D Rosborough re amendment and written discovery for Hargett and related emails to team	11/19/19	0.35
Draft Hargett discovery requests	11/20/19	1.95
Draft emails to ACLU team re remaining issues in seconded amended complaint	11/20/19	0.17
Draft Hargett discovery requests	11/21/19	2.32
Draft Hargett discovery requests	11/25/19	3.68
Draft email responding to client question about case status	11/25/19	0.32
Review/revise amended complaint; email defs to obtain consent re amended complaint; draft hargett discovery requests	11/25/19	0.66
Draft email to team re seconded amended complaint	11/26/19	0.11
Consolidate edits to draft Hargett discovery requests	12/2/19	0.47
Review/edit county discovery requests	12/2/19	1.25
Draft email to opposing counsel re proposed seconded amended complaint and f/up re Mid South	12/2/19	0.30
Draft cover motion for second amended complaint	12/2/19	0.07
Second amended complaint filing logistics	12/2/19	0.35
Draft hargett discovery requests	12/2/19	0.24
Review/revise seconded amended complaint	12/2/19	0.09
Consolidate edits to draft hargett discovery requests	12/3/19	2.09
Draft emails re managing discovery	12/3/19	0.22
Draft email to opposing counsel re proposed seconded amended complaint and f/up re Mid South	12/3/19	0.19
Second amended complaint filing logistics	12/4/19	0.29
Consolidate edits to draft hargett discovery requests	12/4/19	0.52
Review/revise motion for leave to amend	12/4/19	0.22
Incorporate Hogan edits to Hargett RFPs	12/10/19	1.08
Meeting with T Lee regarding discovery management and timeline	12/10/19	0.23
Review/incorpoorate edits to Hargett RFP	12/10/19	0.18

Sophia Lin Lakin Hours		
Description	Date	Hours
Review/revise rogs to other defs	12/11/19	0.15
Incorporate Hogan edits to Hargett Rogs	12/11/19	0.86
Meeting with T Lee re discovery logistics	12/12/19	0.20
Review/revise and finalize Rogs/RFPs and county subpoenas	12/13/19	2.57
Subpoena sevice logistics	12/16/19	0.17
Draft emails to team re county discovery to-dos and scheduling f/up calls	1/5/20	0.23
Review county subpoenas to prioritize discovery and other prep for meet and confers with counties	1/5/20	1.06
Draft emails to team re county discovery to-dos and various f/up calls with team members	1/6/20	0.38
Review and draft emails to discovery subgroup re Knox Cty motion to quash	1/6/20	0.09
Case law research regarding Knox Cty motion to quash	1/6/20	0.04
Draft email to discovery subgroup re county subpoena priorities	1/6/20	0.08
Revise county subpoenas priority list based on discovery subgroup feedback	1/6/20	0.46
Draft search terms for county subpoenas and emails re same	1/6/20	2.00
Mtg with DR and TJL re county meet and confer logistics	1/8/20	0.10
Draft emails to discovery subgroup re various county subpoena issues	1/10/20	0.25
Draft emails to team re response to discovery extension	1/12/20	0.33
Draft emails to team and discovery subgroup re status of county meet and confers	1/12/20	0.17
Review state defs' discovery responses	1/13/20	0.23
Prep for Davidson Cty meet and confer	1/14/20	0.23
Lead meet and confer with Davidson Cty and draft f/up email	1/14/20	1.15
Draft emails to team and discoovery subgroup re motion to quash follow ups with Knox Cty and court	1/14/20	0.02
Review counter-proposal/response for Knox Cty and provide edits and emails re same	1/14/20	0.80
Revise Knox Cty-specific search terms	1/15/20	0.24
Meeting with D Rosborough re discovery to dos	1/16/20	0.53
Draft discovery status update for team and email re same	1/16/20	1.03
Prep for Shelby Cty meet and confer	1/21/20	0.57
Lead meet and confer with Shelby Cty	1/21/20	0.70
Meeting/call with D Rosborouogh and S Brannon re meet and confers/subpoenas and next steps	1/21/20	0.80
Meeting with D Rosborough re research for response to impending Shelby Cty motion to quash and email to J Zalisen re same	1/21/20	0.69
Call with NAACP counsel re response to letter re subpoena to Knox County Election Commission	1/22/20	0.62
Call with J Zalesin re response to Shelby Cty motion to quash	1/22/20	0.43
Draft response to Davidson Cty letter re subpoena	1/22/20	1.83
Draft letters to Davidson and Shelby Ctys re meet and confers and add'l proposals	1/23/20	2.30
Draft email f/up to Shelby Cty re add'l proposals	1/24/20	0.50
Draft email re motion to extend time to respond to motion to quash to Shelby Cty counsel and email to team re same	1/27/20	0.16
Review and file motion to extend time to respond to Shelby Cty motion to quash	1/28/20	0.32
Meeting with D Rosborough and L Carpenter re productions logistics and review	1/28/20	0.11
Draft email to team re response to Mr. Varela re Shelby Cty subpoena	1/29/20	0.53
Meetiing with D Rosborough re Shelby Cty subpoena and meet and confers	1/30/20	0.16
Draft email responding to Mr. Varela's letter re subpoena	1/30/20	0.30
Draft emails and participate in calls wiith team and NAACP counsel re proposed protective order	2/3/20	0.55

Sophia Lin Lakin Hours		
Description	Date	Hours
Draft response to Davidson Cty letter re subpoena and meet and confer	2/3/20	0.75
Draft response to Davidson Cty letter re subpoena and meet and confer	2/4/20	0.31
Draft emails regarding inspection of Davidson Cty voter reg forms	2/5/20	0.25
Draft f/up email to Mr. Varela's re Shelby Cty subpoena	2/7/20	0.28
Draft emails to team and discovery subgroup regarding inspection of Davidson Cty voter reg forms	2/9/20	0.14
Draft emails re Knox Cty motion to quash and other subpoenas	2/10/20	0.36
Draft email to NAACP counsel re Shelby Cty subpoena negotiations	2/10/20	0.36
Draft and respond to team emails re responding to Shelby Cty subpoena/motion to quash	2/10/20	0.42
Draft response to Shelby Cty re protective order	2/10/20	1.63
Draft emails to team re Shelby Cty subpoena status and protective order	2/11/20	0.59
Draft emails to team re potential legislation related to case	2/11/20	0.11
Call with Mr. Varela re Shelby Cty subpoena	2/11/20	0.17
Draft motion for extension of time to respond to Shelby Cty motion to quash	2/11/20	0.25
Draft emails to team and Mr. Varela re Shelby Cty subpoena and voter reg forms production issue	2/11/20	0.16
Call with D Rosborough and T Lee re Shelby Cty protective order/redaction issue	2/11/20	0.20
Draft emails to team and Mr. Varela re Shelby Cty subpoena and voter reg forms production issue	2/11/20	0.10
Draft response to Shelby Cty re protective order	2/11/20	1.12
Review and file motion to extend time to respond to Shelby Cty motion to quash	2/11/20	0.06
Draft f/up response to Shelby Cty re protective order	2/11/20	1.26
Draft f/up response to Shelby Cty re protective order	2/12/20	0.13
Meeting with discovery subgroup re outstanding discovery issues	2/12/20	0.93
Draft f/up response to Shelby Cty re protective order	2/12/20	0.95
Draft joint proposed order re Shelby Cty motion to quash/subpoena	2/17/20	1.85
Draft joint proposed order re Shelby Cty motion to quash/subpoena	2/18/20	0.09
Draft emails to NAACP counsel re joint motion and in response to Shelby Cty subpoena/motion to quash	2/18/20	0.32
Draft modified search terms for Shelby Cty and emails to NAACP counsel re same	2/18/20	0.47
Draft joint proposed order re Shelby Cty motion to quash/subpoena	2/18/20	0.29
Draft emails to team re new bill	2/19/20	0.50
Draft emails to NAACP counsel re joint motion and in response to Shelby Cty subpoena/motion to quash	2/19/20	0.28
Conversation with T Lee re new bill	2/19/20	0.33
Draft email to Shelby Cty regarding search terms and follow up on joint proposed order	2/19/20	0.13
Draft and file motion for extension of time to respond to Shelby Cty motion to quash	2/19/20	0.23
Rs ch re filing proposed joint order on motion to quash/subpoena	2/19/20	0.20
Draft email to Mr. Varela re filing logistics for proposed joint order on motion to quash/subpoena	2/19/20	0.26
Call/emails with clients re new bill	2/24/20	0.18
Advise and review LWV re press release	2/24/20	0.45
Coordinate and research Davidson Cty doc inspection logistics	3/10/20	0.13
Coordinate and research Davidson Cty doc inspection logistics	3/11/20	0.99
Coordinate and research Davidson Cty doc inspection logistics	3/12/20	0.14
Draft emails to county counsel re delaying discovery	3/30/20	0.67
Total		145.71

Davin Rosborough Hours		
Description	Date	Hours
Participate in team call to discuss case strategy for development of claims	5/2/19	1.00
Perform legal research and draft outline of potential claims under NVRA	5/3/19	3.00
Draft sections of complaint re: two plaintiffs	5/4/19	2.67
Draft portion of complaint regarding how certain provisions injure plaintiffs	5/5/19	2.37
Revise draft of complaint to reflect new plaintiff information and other information learned	5/6/19	2.87
Participate in call with plaintiff LWVTN to refine facts for complaint	5/6/19	0.78
Participate in full legal team call re strategy, division of responsibilities, plaintiff selection	5/6/19	1.12
Revise complaint to address inconsistencies and further develop certain arguments	5/7/19	3.87
Participate in call with plaintiff AMAC to refine facts for complaint	5/8/19	0.45
Perform research re organizational standing in Sixth Circuit for use in framing issues in complaint	5/8/19	0.78
Revise facts re plaintiff AMAC per call with client	5/8/19	0.58
Revise NVRA notice letter	5/8/19	1.58
Perform final review of and revisions to complaint	5/8/19	2.15
Perform final revisions to complaint and notice letter	5/9/19	1.83
Communicate with potential plaintiff organization	5/15/19	0.42
Perform legal research re extra-territorial application of challenged law	5/15/19	2.42
Call with potential plaintiff organization	5/28/19	0.50
Draft revisions to proposed amended complaint	6/14/19	2.17
Participate in team call re case strategy	6/18/19	0.50
Revise amended complaint re plaintiff facts	6/21/19	0.50
Participate in team call re amended complaint	7/1/19	0.50
Revise opposition to motion to dismiss	7/15/19	1.83
Participate in team call re preliminary injunction planning	7/26/19	1.00
Analyze and suggest revisions to preliminary injunction outline	8/1/19	0.70
Begin drafting facts section of preliminary injunction brief	8/6/19	4.67
Participate in call with Headcount re PI declaration	8/7/19	1.00
Continue drafting facts section of preliminary injunction brief	8/7/19	3.42
Finish drafting facts section of preliminary injunction brief	8/8/19	3.17
Revise first preliminary injunction brief draft	8/15/19	1.67
Draft standing section of preliminary injunction brief	8/19/19	1.93
Suggest changes to draft LWV declaration	8/21/19	1.08
Assemble collected facts for AMAC declaration to accompany PI	8/22/19	3.75
Perform review of , revisions to second draft of preliminary injunction brief	8/23/19	1.33
Revise AMAC declaration to accompany PI after client, cocounsel comments	8/26/19	2.08
Provide feedback on draft declarations from other plaintiffs	8/26/19	2.33
Perform final review, revisions to preliminary injunction brief	8/30/19	0.92
Review, analyze opposition to PI filed in companion case	9/3/19	0.75
Review court's decision on motion to dismiss for use in PI reply	9/9/19	1.00
Review and analyze defendants' opp to PI motion	9/9/19	0.90
Draft reply in support of PI motion	9/10/19	6.57
Revise reply brief in support of PI motion	9/11/19	1.57
Read and analyze court's decision granting PI	9/12/19	1.13

Davin Rosborough Hours		
Description	Date	Hours
Perform legal research re 6th circuit case law on stay of PI	9/13/19	0.80
Communicate with AMAC re initial disclosures	11/13/19	0.20
Revise initial disclosures re plaintiff AMAC	11/14/19	0.20
Perform research and communicate re potential expert witnesses	11/15/19	1.13
Draft initial version of proposed second amended complaint	11/18/19	3.67
Revise proposed second amended complaint after comments	11/19/19	0.67
Revise second amended complaint re comments of full team	12/2/19	0.78
Draft motions for leave to amend depending on consent status	12/3/19	1.78
Perform legal research re motion for leave to amend	12/3/19	0.78
Finalize motion for leave to amend and amended complaint before filing	12/4/19	0.95
Suggest revisions to interrogatories	12/11/19	1.28
Participate in team call re county election commission subpoenas and other discovery issues	1/3/20	0.667
Review and comment on proposed limitations to county election commission subpoenas	1/6/20	0.333
Participate in call with NAACP case team re county election commission subpoena responses	1/6/20	1.000
Prepare for and lead meet and confer call re Hamilton County Election Commission subpoena	1/8/20	1.500
Participate in meet and confer call re Franklin County Election Commission subpoena	1/8/20	0.500
Propose revisions to search terms for county election commission subpoenas responses	1/9/20	1.250
Revise search terms for county-specific information re election commission subpoenas responses	1/10/20	0.583
Correspond re issues concerning communications between parties	1/10/20	0.667
Draft letter to county election commissions that have not yet responded to subpoenas	1/13/20	0.617
Correspond with NAACP case counsel counterproposals to Defendants' discovery extension request	1/13/20	0.733
Participate in call with NAACP case counsel re discovery issues	1/13/20	0.500
Discuss issues re: motion to quash in E.D. Tenn and hearing set by court	1/13/20	0.500
Update team re: status of discovery and subpoena issues	1/13/20	0.367
Perform legal research re service of subpoena in response to motion to quash	1/15/20	1.350
Participate in meet and confer call re Sumner County Election Commission subpoena	1/15/20	0.667
Perform legal research re 100-mile rule re: motion to quash	1/15/20	1.267
Analyze motion to quash filed by Shelby County Election Commission	1/15/20	0.733
Correspond with counsel for Henry County Election commission re subpoena	1/16/20	0.567
Communicate with NAACP case counsel re outstanding discovery issues	1/16/20	0.700
Review joint motion to amend scheduling order and suggest revision	1/17/20	0.333
Correspond with co-counsel re strategy on motions to quash in W.D. Tenn.	1/17/20	0.500
Draft and revise motion to vacate hearing on motions to quash in W.D. Tenn. re Haywood and Madison subpoenas	1/17/20	1.750
Lead meet and confer call re Madison and Haywood Counties Election Commission subpoena and motions to quash	1/17/20	0.667
Draft search terms re Sumner County Election Commission subpoena	1/20/20	0.833
Lead meet and confer call re Rutherford County Election Commission subpoena and follow-up with search terms	1/21/20	0.750
Draft letter to defense counsel re communications between parties	1/21/20	1.833

Davin Rosborough Hours		
Description	Date	Hours
Revise and send search terms re subpoenas to Haywood and Madison county election commissions	1/21/20	0.500
Revise and send search terms re subpoena to Rutherford county election commission	1/21/20	0.333
Participate in call with NAACP counsel re response to letter re subpoena to Knox County Election Commission	1/22/20	0.500
Revise letter to Knox County Election Commission counsel re subpoena	1/22/20	0.333
Revise letters to Davidson and Shelby County Election Commissions counsel re subpoenas	1/23/20	0.917
Communicate with counsel for Henry County Election Commission re subpoena	1/23/20	0.417
Follow up call with counsel for Hamilton County Election Commission re subpoena response	1/23/20	0.350
Communicate with Shelby County Election Commission counsel re motion to quash	1/24/20	0.317
Draft motion for extension of time re Shelby County Election Commission motion to quash	1/27/20	0.600
Participate in call with defense counsel re communications between clients	2/3/20	0.500
Draft revisions to motion for protective order and protective order re Knox County Election Commission document production	2/4/20	0.917
Call and emails with NAACP case counsel re protective order governing county election commission documents	2/4/20	0.667
Communicate with NAACP case counsel re protective order governing county election commission documents	2/5/20	0.383
Review and provide comments re protective order draft by Knox County re document subpoena	2/6/20	0.433
Communicate with NAACP case counsel re Knox county subpoena issues	2/10/20	0.500
Outreach to potential plaintiffs' experts	2/10/20	0.567
Edit letter re Shelby County Election Commission subpoena	2/11/20	0.533
Participate in call with NAACP case counsel re: discovery issues	2/12/20	0.833
Correspond with Shelby County Election Commission counsel re :subpoena	2/13/20	0.250
Watch Tennessee House subcommittee hearing re: bill that would repeal challenged portions of the law	2/19/20	0.617
Read and analyze bill that would repeal/replace challenged portions of the law for lawsuit implications	2/19/20	0.783
Revise proposed order on motion to quash filed by Shelby County Election Commission	2/19/20	0.450
Participate in call with defense counsel re: protective order	2/19/20	0.500
Participate in call with Knox County attorney re: protective order	2/20/20	0.500
Participate in call with case team re: implications of new bill	2/20/20	0.583
Participate in call with NAACP case counsel re: implications of new bill	2/21/20	0.250
Analyze and communicate with clients re new Bills	3/25/20	0.500
Communicate with county commission attorneys re subpoena status	3/27/20	0.417
Total		122.72

Sarah Brannon Hours		
Description	Date	Hours
emails about next steps with plaintiff	5/2/19	0.50
email about NVRA analysis	5/3/19	0.33
reviewed NVRA analysis	5/3/19	0.25
emails about facts from plaintiffs for complaint	5/3/19	0.50
review draft complaint	5/3/19	1.00
emails about potential plaintiffs and edits to complaint	5/4/19	0.67
emails about facts from clients for complaint	5/5/19	0.75
email about count in the complaint	5/5/19	0.83
emails about facts from clients for complaint	5/6/19	0.75
draft language for pls parts of complaint	5/6/19	1.25
emails about finalize facts in complaint	5/6/19	0.75
changes to the complaint	5/6/19	0.75
review edits from plaintiffs about complaint	5/7/19	0.50
call with clients about the case	5/7/19	0.75
emails with plaintiffs about complaint language	5/7/19	0.17
emails with co-counsel about plaintiffs and edits	5/7/19	1.00
review draft notice letter	5/7/19	0.83
finalizing complaint	5/8/19	0.75
emails about finalize complaint	5/8/19	0.50
email with clients about finalizing complaint	5/8/19	0.25
review and edit notice letter	5/8/19	1.75
emails about notice letter	5/8/19	0.75
call with clients about the complaint	5/8/19	0.50
more edits to the complaint	5/8/19	0.83
more emails with client about facts in complaint	5/8/19	0.33
more emails with co-counsel about finalized the compliant	5/8/19	0.42
review final complaint	5/9/19	0.67
sent final complaint to clients	5/10/19	0.17
emails with co-counsel about additional cleints	5/13/19	0.33
emails with co-counsel about next steps	5/16/19	0.33
email with co-counsel about response	6/3/19	0.33
reviewed edits about content of amended complaint	6/3/19	0.50
reviewed motion to dismiss	6/4/19	0.83
emails with co-counsel about research for response to motion to dismiss	6/4/19	0.50
emails about edits to amended complaint	6/5/19	0.67
emails with co-counsel about next steps	6/5/19	0.83
emails about adding additional plaintiffs	6/11/19	0.42
emails about and review about additional language for amended complaint	6/19/19	0.75
edits to amended complaint	6/19/19	0.50
final edits to amended complaint	6/20/19	0.75
sent email to the League about amended complaint	6/20/19	0.25
drafted language for amended complaint	6/20/19	0.83
email to clients about amended complaint and edits	6/20/19	0.25

Sarah Brannon Hours		
Description	Date	Hours
call with League of Women Voters	6/21/19	0.75
reviewed LCCR response to motion to dismiss	6/21/19	0.83
final edits to the amended complaint	6/21/19	1.17
emails about edits to the amended complaint	6/21/19	0.33
emails for co-counsel about scheduling conference and proposed schedule	6/26/19	0.25
emails about communications with clients	6/27/19	0.17
email about Defendants request for an extension	6/28/19	0.17
emails with co-counsel about edits to oppn to motion to dismiss	7/12/19	0.17
review draft of oppn to motion to dismiss	7/14/19	1.00
email about oppn to motion to dismiss	7/14/19	0.17
reviewed edits from co-counsel to oppn to motion to dismiss	7/17/19	0.33
emails about clients members	7/18/19	0.33
emails about co-counsel about finalizing oppn to motion to dismiss	7/18/19	0.33
review final draft of oppn of motion to dismiss	7/18/19	0.67
emails with co-counsel about discovery and research	7/31/19	0.17
review of PI outline	8/5/19	0.33
email about content of the PI	8/5/19	0.75
emails with co-counsel about content of the PI	8/6/19	0.75
talk to clients about declaration	8/7/19	0.67
emails about declarations for PI	8/7/19	0.33
worked on draft declaration for the League of women voters	8/8/19	1.00
work on declaration for PI	8/12/19	2.00
draft declaration for League	8/13/19	1.00
email with client - Marion about declaration	8/14/19	0.17
review county voter registration training	8/14/19	0.75
emails with co-counsel about county voter registration drive training	8/14/19	0.17
call with client about PI declaration	8/15/19	0.75
edits to draft declaration	8/15/19	0.67
edits to draft PI	8/15/19	1.50
emails with client about county voter registration drives	8/16/19	0.33
edits to PI	8/17/19	1.25
emails with the clients	8/20/19	0.17
emails about voting registration drives	8/20/19	0.17
finalize declaration	8/20/19	0.50
reviewed and responded to emails about marian's declaration (LWV)	8/21/19	0.75
edits to Marian's declaration	8/21/19	1.00
talk with Marian about declaration	8/21/19	0.33
email with co-counsel about declarations	8/23/19	0.33
emails with co-counsel	8/26/19	0.17
reviewed draft declarations	8/26/19	1.50
reviewed draft of PI	8/26/19	1.25
finalize declaration - proofread	8/27/19	0.15
made edits to draft PI	8/27/19	3.00

Sarah Brannon Hours		
Description	Date	Hours
emails with research for PI	8/27/19	0.75
fnal proof read of client declaration for PI	8/28/19	0.33
review motion for additional pages	8/28/19	0.17
review of cites for League Declaration for PI	8/28/19	0.33
review decaration from Head Court for PI	8/28/19	1.00
proof read and finalized Marian's declaration (LWV)	8/28/19	0.83
email about to affilate about the declarations for PI	8/28/19	0.17
reviewed and respond to emails about Headcount declaration (and reviewed draft)	8/28/19	1.00
talked to Davin about Headcount declaration	8/28/19	0.25
co-counsel call about Headcourt declaration	8/29/19	0.58
review declarations for PI	8/29/19	0.92
edits to the PI memo	8/29/19	0.50
review final Headcount declaration	8/29/19	0.33
sent email about Headcount declaration	8/29/19	0.25
emails about finalize declarations for PI	8/29/19	0.58
final review of PI draft	8/30/19	0.67
emails about voter registration training	9/3/19	0.75
review oppn to motion to dismiss	9/6/19	0.58
emails with clients about case	9/6/19	0.50
reviewed court decisions	9/9/19	1.25
review opinion denying motion to dismiss	9/9/19	0.75
emails about the PI reply	9/10/19	0.42
exchanged emails about edits to draft PI reply	9/10/19	0.33
reviewed opinion denying motion to dismiss and the oppn to PI filed by Defendants	9/10/19	1.25
edits to the PI reply	9/10/19	1.42
reviewed S.L. edits to draft reply of PI and finalized edits to draft PI reply	9/10/19	2.08
research for the PI	9/11/19	2.00
reviewed updated draft of PI reply	9/11/19	0.33
reviewed and exchanged emails about draft of PI reply	9/11/19	0.50
talk to Davin about content of draft PI reply	9/11/19	0.10
email exchange with M. Cohen and discussion with Davin about Sheen case	9/11/19	0.17
emails with co-counsel about the PI reply content	9/11/19	1.00
work on finalize PI reply	9/11/19	1.00
review court decision	9/12/19	0.75
follow-up with clients about PI decision	9/12/19	0.42
review related case decision	9/13/19	0.25
email with clients about appeal	9/16/19	0.25
emails with co counsel regarding potential next steps	9/30/19	0.50
emails with co-counsel about scheduling	10/17/19	0.25
emails with co-counsel about lack of appeal	10/18/19	0.25
reivew proposed scheduling order	10/25/19	0.25
email about scheduling coference	11/4/19	0.50
call with clients about scheduling order	11/7/19	0.50

Sarah Brannon Hours		
Description	Date	Hours
emails about discovery	11/13/19	0.83
review initial disclosures	11/13/19	0.50
collecting information from League for initial disclosures	11/13/19	0.83
emails about initial disclosures	11/18/19	0.17
draft of language for initial disclosures	11/18/19	0.83
review amend complaint	11/18/19	0.50
emails about amended complaint	11/18/19	0.33
edits to second amended complaint	11/19/19	0.83
emails about second amended complaint	11/19/19	0.17
emails about second amended complaint	11/20/19	0.17
emails about discovery	11/20/19	0.17
work on discovery requests	11/25/19	1.33
emails about discovery	11/25/19	0.50
emails about filing second amended complaint	11/26/19	0.25
emails about discovery next steps	1/10/20	0.50
email exchange with counsel team with questions about reviewing rejected voter registration applications within the counties	1/21/20	0.67
debrief call with county, discussed next steps and sent email to M.K.Cohen about potential solution	1/21/20	0.33
emails about discovery and subpoenas to counties	1/21/20	0.83
emails about League's communications with counties about VR	1/23/20	0.68
emails about discovery issues	1/23/20	0.83
Total		93.43

Lila Carpenter Hours

Description	Date	Hours
Prepping PHV motions	5/15/19	3.71
Prepping PHV motions	5/28/19	2.42
Formatting and citechecking resp. in opp'n to MTD	7/18/19	3.14
Formatting and citechecking resp. in opp'n to MTD	7/19/19	5.33
Proofing resp. in opp'n to MTD	7/19/19	1.01
Formatting and citechecking resp. in opp'n to MTD	7/19/19	0.53
Cite-checking PI Br.	8/28/19	1.34
Cite-checking PI Br.	8/29/19	6.76
PI Br. mark and format tables of contents and authorities	8/30/19	2.36
PI Br. Proofread	8/30/19	1.09
Cite-checking/proofreading 2d Amended Compl.	12/2/19	2.95
Proofreading 1st set of ROGS	12/4/19	1.43
Reviewing Mot(s) for leave to file 2d Amended Compl.	12/4/19	1.59
Total		33.67

ATTACHMENT 2

From: notification@pay.gov
To: [Tom Castelli](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 9, 2019 9:46:01 AM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HBN4TF
Agency Tracking ID: 0650-2909761
Transaction Type: Sale
Transaction Date: May 9, 2019 10:45:56 AM

Account Holder Name: Hedy M Weinberg
Transaction Amount: \$400.00
Card Type: MasterCard
Card Number: *****2944

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 2:31:12 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQB4UC
Agency Tracking ID: 0650-2923113
Transaction Type: Sale
Transaction Date: May 30, 2019 3:31:06 PM

Account Holder Name: Erin O'Rourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 2:36:31 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQB6QV
Agency Tracking ID: 0650-2923121
Transaction Type: Sale
Transaction Date: May 30, 2019 3:36:26 PM

Account Holder Name: Erin O'Rourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 3:25:31 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQKK22
Agency Tracking ID: 0650-2923223
Transaction Type: Sale
Transaction Date: May 30, 2019 4:25:25 PM

Account Holder Name: Erin Orourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 2:42:21 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQB98V
Agency Tracking ID: 0650-2923132
Transaction Type: Sale
Transaction Date: May 30, 2019 3:42:16 PM

Account Holder Name: Erin O'Rourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 3:15:57 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQKHGM
Agency Tracking ID: 0650-2923206
Transaction Type: Sale
Transaction Date: May 30, 2019 4:15:52 PM

Account Holder Name: Erin Orourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 3:02:09 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQKCUP
Agency Tracking ID: 0650-2923175
Transaction Type: Sale
Transaction Date: May 30, 2019 4:02:04 PM

Account Holder Name: Erin Orourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 3:20:13 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQKIO5
Agency Tracking ID: 0650-2923212
Transaction Type: Sale
Transaction Date: May 30, 2019 4:20:06 PM

Account Holder Name: Erin Orourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 3:06:32 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQKERA
Agency Tracking ID: 0650-2923180
Transaction Type: Sale
Transaction Date: May 30, 2019 4:06:27 PM

Account Holder Name: Erin Orourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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From: notification@pay.gov
To: [Tom Castelli](#); [Lauren Davis](#); [Erin O'Rourke](#)
Subject: Pay.gov Payment Confirmation: TNMD CM ECF
Date: Thursday, May 30, 2019 3:29:11 PM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26HQKL88
Agency Tracking ID: 0650-2923235
Transaction Type: Sale
Transaction Date: May 30, 2019 4:29:07 PM

Account Holder Name: Erin Orourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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Pay.gov Payment Confirmation: TNMD CM ECF

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notification@pay.gov

Fri 8/2/2019 12:44 PM

To: Lauren Davis; Tom Castelli; Erin O'Rourke

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or y

Application Name: TNMD CM ECF

Pay.gov Tracking ID: 26J81JDK

Agency Tracking ID: 0650-2964352

Transaction Type: Sale

Transaction Date: Aug 2, 2019 1:44:16 PM

Account Holder Name: Erin ORourke

Transaction Amount: \$100.00

Card Type: MasterCard

Card Number: *****4960

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Pay.gov Payment Confirmation: TNMD CM ECF

N notification@pay.gov
Thu 10/31/2019 1:31 PM
To: Lauren Davis; Tom Castelli; Erin O'Rourke

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to contact the TNMD CM ECF Helpdesk at (615) 695-2888.

Application Name: TNMD CM ECF
Pay.gov Tracking ID: 26L7C384
Agency Tracking ID: 0650-3022864
Transaction Type: Sale
Transaction Date: Oct 31, 2019 2:31:13 PM

Account Holder Name: Erin ORourke
Transaction Amount: \$100.00
Card Type: MasterCard
Card Number: *****4960

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ATTACHMENT 3

American Civil Liberties Union, Inc.
ACLU (Consolidated)
Case Code Transaction Detail Search
April 01, 2019 - December 10, 2020
SL020 (LWV V. HARGETT)

Date	Vendor Name	Memo	Account	Amount
5/31/19	ACLUF-TN	Payment to ACLU-TN; reimbursing affiliate for paying PHV fees in USDC-TN MD court.	Other Expenses : Case Fees & Transcripts	\$500.00
10/23/19	Delta Airlines	Theresa Lee - Travel to TN for Case Management conference.	Travel : Travel	\$424.78
10/23/19	American Express - GBT	Amex fee for travel to TN.	Travel : Travel Fees & Amex Fees	\$9.00
10/31/19	Delta Airlines	Sophia Lakin - Travel to TN for case management conference.	Travel : Travel	\$671.21
10/31/19	American Express - GBT	Amex fee for travel to TN.	Travel : Travel Fees & Amex Fees	\$9.00
11/4/19	Lyft	Sophia Lakin - Taxi home after travel from TN for Hargett case hearing	Travel : Travel	\$50.23
11/4/19	Lyft	Sophia Lakin - Taxi to travel to LGA for Hargett case hearing	Travel : Travel	\$45.24
11/4/19	Lyft	Sophia Lakin - Taxi in TN for Hargett case hearing	Travel : Travel	\$23.68
11/4/19	Lyft	Sophia Lakin - Taxi in TN for Hargett case hearing	Travel : Travel	\$13.81
11/4/19	Lyft	Theresa Lee - Taxi home after travel from TN for case management hearing.	Travel : Travel	\$39.71
11/4/19	Lyft	Theresa Lee - Taxi to JFK to travel to TN for case management hearing.	Travel : Travel	\$56.83
1/4/20	Proof Technology, Inc.	Service fees in TN NVRA case	Other Expenses : Case Fees & Transcripts	\$1,085.00
Total				\$2,928.49