

# EXHIBIT 7

**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

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

*Plaintiffs,*

v.

TRE HARGETT, *et al.*,

*Defendants.*

**DECLARATION OF WILLIAM L. HARBISON**

I, William L. Harbison, being of sound mind aware of 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Tennessee and am counsel of record for the plaintiffs. I am a member of the law firm of Sherrard Roe Voigt & Harbison, PLC (“SRVH”), where I have been since 1983. I am providing this declaration in support of the Plaintiffs’ Motion for Attorneys’ Fees, Costs, and Expenses.

2. SRVH—together with the national American Civil Liberties Union (“ACLU”), ACLU of Tennessee (“ACLU-TN”), Fair Elections Center (“FEC”), and Campaign Legal Center (“CLC”)—was retained to represent the League of Women Voters of Tennessee, League of Women Voters of Tennessee Education Fund, American Muslim Advisory Council, Mid-South Peace & Justice Center, Rock the Vote, Memphis Central Labor Council, and HeadCount.

3. SRVH began working on this case in May 2019. I was the lead attorney for SRVH on this matter, and I am familiar with all aspects of this matter and SRVH’s work on it.

4. I received my law degree *cum laude* from Harvard Law School in 1980. I received my bachelor’s degree with highest honors from the University of North Carolina at Chapel Hill. I am a member of Phi Beta Kappa. In my legal career of more than forty years in Nashville, I have received numerous professional recognitions. The following list provides a sample: past president of the Tennessee Bar Association; Tennessee Board of Law Examiners; American Bar Foundation Fellow; past president of the Nashville Bar Association; American College of Trust and Estate Counsel Fellow; Tennessee Bar Foundation Fellow; Nashville Bar Foundation Fellow; past president of the Nashville Bar Foundation; past general counsel to the Tennessee Bar Association; lecturer for the Tennessee and Nashville Bar Associations; member and past president of the Nashville Estate Planning Council; selected by the Tennessee Supreme Court to serve on the Board of Professional Responsibility Advisory Committee; hearing panel member of the Tennessee Board of Professional Responsibility; publisher of several articles in the Tennessee Bar Journal; recipient of the Nashville Scene’s 2015 Nashvillian of the Year award; and recipient of the Tennessee Bar Association Joseph W. Henry Award in 1985.

5. I have also been recognized in several recent “best lawyers” lists, including “Woodward/White: The Best Lawyers In America,” (Bet-the-Company Litigation; Commercial

Litigation; Elder Law; Litigation-Trusts and Estates; Trusts and Estates), including being named “Lawyer of the Year” for Litigation-Trusts and Estates in 2009, 2011, and 2013, for Bet-the-Company Litigation in 2014 and 2017, for Trusts and Estates in 2018, and for Elder Law in 2019; “The Best of the U.S.” (Trusts and Estates, Tax Law and Commercial Litigation); “Nashville Business Journal Best of The Bar”; “The Chambers USA Guide” (Litigation: General Commercial); “Mid-South Super Lawyers” (Estate Planning and Probate); “The Best Attorneys Network” (Commercial/Business Litigation and Wills); “Tennessee Bar Journal Pro Bono Honor Roll”; and “Business TN Magazine” 150 Best Lawyers, 2010.

6. I collaborated with and oversaw the work of my colleagues, C. Dewey Branstetter Jr. (“Dewey”) and Hunter C. Branstetter (“Hunter”), who also served as counsel in this lawsuit. I am very familiar with their qualifications.

7. Dewey Branstetter is also a member of SRVH. Dewey is a 1978 graduate of Vanderbilt University, where he was a member of Phi Beta Kappa; he graduated Vanderbilt University School of Law in 1981 in the top ten percent of his class. From 1981 until he joined SRVH as a member in June 2014, Dewey was an associate or member of Branstetter, Stranch & Jennings, PLLC, or its predecessor firms. I know Dewey has received numerous professional recognitions including serving as a previous Director and First Vice President of the Nashville Bar Association; previously being a Hearing Officer for Tennessee Board of Professional Responsibility; being a Fellow of both the Nashville Bar Foundation and Napier-Looby Bar Foundation; and currently serving as Chair of the Metropolitan Nashville Charter Revision Commission. Dewey has previously served on many other boards including chairing the Metropolitan Nashville Board of Public Education. Dewey has also received recognition in several recent “best lawyers” listings, such as “Woodward/White: The Best Lawyers In America,”

(Litigation-Labor and Employment; Utilities Law), including being named “Lawyer of the Year” for Litigation-Labor and Employment in 2011, 2012, and 2019; Benchmark Litigation (“Litigation Star”); “Nashville Business Journal Best of The Bar”; “Mid-South Super Lawyers”; and Business Tennessee Magazine’s “150 Best Lawyers in Tennessee.”

8. Hunter Branstetter is an associate attorney at SRVH. Hunter graduated *magna cum laude* from Washington and Lee University in 2009 and graduated from Vanderbilt University Law School in 2013. Before joining SRVH in September 2014, Hunter was a law clerk for the Honorable Bernice B. Donald of the U.S. Court of Appeals for the Sixth Circuit, and while in law school, he also served as a summer clerk for Senior Judge Thomas A. Wiseman, Jr. of the U.S. District Court for the Middle District of Tennessee. Hunter is active in numerous local and regional bar associations, including previously serving a multi-year terms as the President of the Nashville Chapter of the American Constitution Society. Hunter has received the Tennessee Supreme Court’s “Attorney for Justice” Pro Bono Service Award for several consecutive years and was recently recognized in Woodward/White: The Best Lawyers In America “Ones to Watch” in the practice areas of Alternative Dispute Resolution; Antitrust Law; Civil Rights Law; Commercial Litigation; and Litigation-Real Estate.

9. I am familiar with the legal fees and expenses charged in civil litigation in Tennessee because I have participated in numerous cases in both state and federal courts. I am also generally familiar with the hourly rates charged by several of the larger law firms in Nashville. My six years’ experience as a hearing panel member for the Board of Professional Responsibility is of particular relevance, as is my long service as a member, and former chair, of the Fee Disputes Committee of the Nashville Bar Association. Both of these volunteer activities have provided me with many opportunities to review legal fees and charges.

10. I have reviewed all of SRVH's records relating to the attorneys' fees incurred in this case. These records include the number of hours expended by each attorney, paralegal, or law clerk; the hourly rate charged by each; and the descriptions of the tasks performed for each discrete unit of time on the time entries in the billing statements associated with this case. I have been personally involved in this case from the beginning of SRVH's engagement.

11. All of the SRVH attorneys have exercised reasonable billing judgment in this case. SRVH has excluded from its fee request *de minimis* time spent by attorneys in this matter as well as all time spent by our paralegals and support staff time. Moreover, SRVH has excluded other items from its request hours, including time spent on legal team calls and meet and confers which included another SRVH attorney who has documented that time and the hours spent preparing the fee petition in this matter. Further, SRVH has opted to forego any costs and expenses that may be recoverable.

12. Based on my experience as an attorney and my knowledge of typical fees and hourly rates in Nashville, I believe that the total attorneys' fees incurred during SRVH's representation of plaintiffs are reasonable. All of the hours expended were reasonable and necessary to achieve an outcome that changed Tennessee law. Moreover, the hourly rates charged are reasonable. The hourly rates are the current rates at which SRVH currently bills and collects from its paying clients for the work performed by each attorney. They are well within the range of hourly rates for comparable attorneys of like skill and experience within the Nashville legal community.

13. In total, SRVH seeks an award of reasonable fees in the amount of \$94,982.50 as outlined in the table below and as provided in the detailed, itemized billing records attached hereto as **Exhibit A**:

<i>Attorney Name</i>	<i>Time Billed</i>	<i>Hourly Rate</i>	<i>Billed Amount</i>
William L. Harbison (“WLH”)	34.4	\$700	\$24,080.00
C. Dewey Branstetter Jr. (“CDB”)	39.3	\$500	\$19,650.00
Hunter C. Branstetter (“HCB”)	157.7	\$325	\$51,252.50
<b>Total</b>	231.4		\$94,982.50

14. I have also reviewed the hourly rates sought by our co-counsel in this case and believe they too are reasonable. For example, the hourly rates sought by the attorneys practicing at the ACLU, FEC, and CLC, are not only well below the rates at which these attorneys customarily bill for their work (albeit in other places such as New York or Washington, DC), but also at or below the market rates charged by attorneys in Nashville who have the comparable experience and expertise to work on a case of this nature.

I declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing is true and correct.

Executed on this 21<sup>st</sup> day of December, 2020.

/s/ William L. Harbison

William L. Harbison

**William L. Harbison Hours**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Billed Hours</b>	<b>Rate</b>	<b>Amount</b>
5/3/2019	WLH	Meet with counsel; telephone conferences	0.50	\$700.00	\$350.00
5/6/2019	WLH	Telephone conferences; review draft complaint	2.00	\$700.00	\$1,400.00
5/8/2019	WLH	Emails; telephone conference; review complaint; WLH/HCB conference.	4.50	\$700.00	\$3,150.00
5/9/2019	WLH	Emails; telephone conferences.	1.00	\$700.00	\$700.00
5/10/2019	WLH	Emails; WLH/HCB conference.	0.50	\$700.00	\$350.00
5/14/2019	WLH	Telephone conference with J. Kleinfelter; email	0.50	\$700.00	\$350.00
5/15/2019	WLH	Telephone conference with counsel; emails	1.50	\$700.00	\$1,050.00
5/28/2019	WLH	Emails	0.50	\$700.00	\$350.00
6/3/2019	WLH	Emails	0.30	\$700.00	\$210.00
6/18/2019	WLH	Emails	0.50	\$700.00	\$350.00
6/19/2019	WLH	Emails	0.50	\$700.00	\$350.00
7/1/2019	WLH	Emails; telephone conference with counsel	1.30	\$700.00	\$910.00
7/17/2019	WLH	Emails; review drafts.	1.00	\$700.00	\$700.00
7/23/2019	WLH	Emails.	0.50	\$700.00	\$350.00
7/26/2019	WLH	Telephone conference with counsel.	1.00	\$700.00	\$700.00
8/29/2019	WLH	Emails.	0.50	\$700.00	\$350.00
9/3/2019	WLH	Emails; review pleadings.	1.00	\$700.00	\$700.00
9/9/2019	WLH	Review court order and memorandum; emails.	3.00	\$700.00	\$2,100.00
9/10/2019	WLH	Review orders; emails.	2.00	\$700.00	\$1,400.00
9/11/2019	WLH	Review drafts; emails.	1.80	\$700.00	\$1,260.00
9/12/2019	WLH	Review court orders; emails.	2.00	\$700.00	\$1,400.00
9/13/2019	WLH	Review opinions.	1.40	\$700.00	\$980.00
10/1/2019	WLH	Emails; research.	0.50	\$700.00	\$350.00
10/17/2019	WLH	Emails re: CMC.	0.30	\$700.00	\$210.00



10/22/2019	WLH	Telephone conference with counsel; emails.	1.00	\$700.00	\$700.00
10/29/2019	WLH	Emails; telephone conference with counsel re: CMO.	1.50	\$700.00	\$1,050.00
10/30/2019	WLH	Emails.	0.50	\$700.00	\$350.00
11/4/2019	WLH	Court appearance; meet with counsel.	1.50	\$700.00	\$1,050.00
3/27/2020	WLH	Telephone conference with counsel; emails.	1.00	\$700.00	\$700.00
4/17/2020	WLH	Telephone conference with counsel.	0.30	\$700.00	\$210.00
<b>Totals:</b>	WLH		34.4		\$24,080.00

**C. Dewey Branstetter Jr. Hours**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Billed Hours</b>	<b>Rate</b>	<b>Amount</b>
5/6/2019	CDB	CDB/WLH conference re: case; review draft of complaint; conference call with HCB/WLH/ACLU counsel, etc. re: lawsuit over new Tennessee law on voter registration	1.00	\$500.00	\$500.00
5/9/2019	CDB	Review complaint as filed; CDB/WLH/HCB conference re: service	0.80	\$500.00	\$400.00
5/13/2019	CDB	Emails re: next steps; CDB/WLH conference re: service on state	0.20	\$500.00	\$100.00
5/15/2019	CDB	Prepare for call with co-counsel; conference call with co-counsel	0.00	\$500.00	\$0.00
6/6/2019	CDB	Emails re: court filings; additional plaintiffs, etc.	1.00	\$500.00	\$500.00
6/18/2019	CDB	Review emails and latest version of amended complaint; CDB/HCB conference call with national counsel.	2.50	\$500.00	\$1,250.00
6/20/2019	CDB	Review latest drafts of amended complaint; CDB/HCB conference; emails from co-counsel.	2.00	\$500.00	\$1,000.00
6/21/2019	CDB	Emails re: complaint; review complaint as filed by Castelli	1.00	\$500.00	\$500.00
6/27/2019	CDB	Review emails re: initial case management conference, attendance of counsel, etc., denial of MTD as moot, etc.	1.00	\$500.00	\$500.00
7/1/2019	CDB	Review emails re: CMC, meet and confer with A.G., etc.; CDB/WLH conference re: our duties	0.40	\$500.00	\$200.00
7/19/2019	CDB	Review final versions of opposition to motion to dismiss complaint.	1.00	\$500.00	\$500.00
8/8/2019	CDB	CDB/HCB conference; emails re: NVRA response letter, etc.	1.50	\$500.00	\$750.00
8/30/2019	CDB	Review drafts and final versions of declarations and motion for preliminary injunction; review State's response in Memphis case.	1.30	\$500.00	\$650.00
9/10/2019	CDB	Review Judge Trauger's decision denying motion to dismiss from state; emails re: decision and reply for preliminary injunction motion.	0.80	\$500.00	\$400.00
9/12/2019	CDB	Emails re: injunction decision; review Judge Trauger's decision granting preliminary injunction; CDB/WLH conference.	1.00	\$500.00	\$500.00

10/21/2019	CDB	Review State's answer, material on case management conference, call for 10/22, etc.	0.80	\$500.00	\$400.00
10/29/2019	CDB	Review and draft case management conference orders; prepare for meeting and conference with Attorney General's office; telephone conference with co-counsel and attorneys from Attorney General's office.	0.90	\$500.00	\$450.00
10/30/2019	CDB	Email correspondence re: November 4 case management orders, etc.	0.80	\$500.00	\$400.00
10/31/2019	CDB	Review final decisions of League of Women Voters and NAACP case management orders as filed.	0.80	\$500.00	\$400.00
11/1/2019	CDB	CDB/WLH/HCB conference; review material for case management conference.	0.80	\$500.00	\$400.00
11/4/2019	CDB	Prepare for case management conference; review Judge Traugher's order on injunction and motion to dismiss; go to court for case management conference.	2.00	\$500.00	\$1,000.00
11/18/2019	CDB	Review initial disclosures from NAACP and draft LWU disclosures.	1.00	\$500.00	\$500.00
11/19/2019	CDB	Review final versions of disclosures; email re: C. Wheeler; CDB/HCB conference.	0.80	\$500.00	\$400.00
11/21/2019	CDB	Review Proposed Amended Complaint re: additional NURA claims, etc.	1.00	\$500.00	\$500.00
12/4/2019	CDB	Review discovery requests, amended complaint, emails among co-counsel; CDB/HCB conference re: discovery.	1.50	\$500.00	\$750.00
12/5/2019	CDB	Review amended complaint as filed.	0.80	\$500.00	\$400.00
12/10/2019	CDB	Review draft discovery requests; CDB/HCB conference.	0.80	\$500.00	\$400.00
12/13/2019	CDB	Review discovery, etc.; emails from co-counsel.	1.00	\$500.00	\$500.00
12/19/2019	CDB	Review emails re: discovery update, J. Delanis, Answer to Amended Complaint, etc.	1.00	\$500.00	\$500.00
12/27/2019	CDB	Review Answer to Amended Complaint, emails re: discovery, etc.	1.00	\$500.00	\$500.00
1/6/2020	CDB	Emails re: discovery issues; CDB/HCB conference, etc.	1.00	\$500.00	\$500.00
1/14/2020	CDB	Emails re: pro hac motion for Davin; review emails re: subpoena issues for Knox service counties; review secretary of state discovery responses.	1.50	\$500.00	\$750.00

1/15/2020	CDB	Emails re: Pro Hac; review various motions for protective order; CDB/HCB conference re: responses to motions to quash, etc.	2.00	\$500.00	\$1,000.00
1/23/2020	CDB	Review emails re: discovery, April 2021 trial date, etc.	1.00	\$500.00	\$500.00
2/24/2020	CDB	Emails re: new Tennessee legislation; review legislation; CDB/HCB conference, etc.	1.50	\$500.00	\$750.00
3/11/2020	CDB	Emails re: legislation, document review, etc.; CDB/HCB conference re: status of case.	1.00	\$500.00	\$500.00
4/2/2020	CDB	Review releases re: new TN legislation; emails among co-counsel; emails re: CNS request for comment.	0.80	\$500.00	\$400.00
<b>Totals:</b>			39.30		\$19,650.00

### Hunter C. Branstetter Hours

Date	Timekeeper	Description	Billed Hours	Rate	Amount
5/6/2019	HCB	Obtain copy of enrolled version of HB1079; HCB/M. Delchamps and HCB/WLH email correspondence re: same; HCB/CDB/WLH participate in conference call re: case; review initial draft of complaint from same; email correspondence re: same.	2.50	\$325.00	\$812.50
5/7/2019	HCB	Review drafts of Complaint and NVRA notice letter; email correspondence with litigation team re: same	4.90	\$325.00	\$1,592.50
5/8/2019	HCB	Review and make edits to various Complaint drafts; input WLH's edits to same; review updated drafts of NVRA letter; email correspondence re: all of same.	4.30	\$325.00	\$1,397.50
5/10/2019	HCB	Email correspondence re: retainers for clients and re: service.	0.40	\$325.00	\$130.00
5/14/2019	HCB	Update litigation team re: service; email correspondence re: same; review co-counsel agreement.	0.70	\$325.00	\$227.50
5/15/2019	HCB	Prepare for and participate in litigation team conference call re: next steps, amending complaint to assert new claims and add new parties, and internal housekeeping like PHV motions and retainers; email correspondence re: same.	0.30	\$325.00	\$97.50

5/16/2019	HC B	Review NVRA letter from parallel proceeding; review new list of potential plaintiff; email correspondence with litigation team re: all of same, re: service being complete, re: pro hac motions, and re: corporate disclosure statements	1.20	\$325.00	\$390.00
5/17/2019	HC B	Email correspondence with litigation team re: engagements and retainers and re: potential additional plaintiffs	0.60	\$325.00	\$195.00
5/24/2019	HC B	Review email from D. Rosborough re: refused service; email S. Lakin re: availability for conference call; review information re: Headcount issues from M. Kanter Cohen	0.40	\$325.00	\$130.00
5/28/2019	HC B	Email correspondence re: upcoming call and re: issues with notice letter delivery; review NVRA and rejected mailings; email J. Klienfelter re: same.	0.90	\$325.00	\$292.50
5/29/2019	HC B	Email correspondence re: litigation team conference call; participate in same; email notes re: same to CDB/WLH	1.80	\$325.00	\$585.00
5/30/2019	HC B	Review PHV form filings	0.20	\$325.00	\$65.00
6/3/2019	HC B	Email correspondence re: additional plaintiffs and follow-up questions for amending	0.50	\$325.00	\$162.50
6/4/2019	HC B	Review motion to dismiss filed in parallel case; litigation team email correspondence re: same, counterarguments, and potential research points for our case.	1.90	\$325.00	\$617.50
6/6/2019	HC B	Email correspondence with litigation team re: potential additional plaintiffs	0.30	\$325.00	\$97.50

6/7/2019	HCB	Review initial, erroneous motion to dismiss filing; email correspondence re: same and re: contacting state to correct; analyze subsequent correct motion to dismiss filing; email correspondence re: follow-up call.	2.60	\$325.00	\$845.00
6/10/2019	HCB	Telephone conference with litigation team re: strategy moving forward and in light of motion to dismiss; email correspondence re: all of same, particularly retainers and additional potential plaintiffs	0.90	\$325.00	\$292.50
6/11/2019	HCB	Review Rock the Vote video; litigation team email correspondence re: same and re: retainers and additional potential plaintiffs and claims	0.50	\$325.00	\$162.50
6/12/2019	HCB	Review draft of HeadCount, Rock the Vote, and Spread the Vote allegations; email correspondence re: same and re: retainers	1.10	\$325.00	\$357.50
6/14/2019	HCB	Email correspondence re: additional allegations for amended complaint	0.30	\$325.00	\$97.50
6/16/2019	HCB	Review most recent draft of amended complaint; email correspondence re: Headcount's press release re: lawsuit and Bonnaroo results	1.40	\$325.00	\$455.00
6/17/2019	HCB	Review email correspondence re: revisions to draft of Amended Complaint	0.30	\$325.00	\$97.50
6/18/2019	HCB	Review most recent drafts of amended complaint; email correspondence re: same and re: Spread the Vote's status as a Plaintiff; telephone conference re: same.	1.60	\$325.00	\$520.00

6/19/2019	HCB	Review nearing-final draft of amended complaint; email correspondence re: same and re: severing ties with Spread the Vote and letter to effect of same	1.30	\$325.00	\$422.50
6/20/2019	HCB	Review most recent drafts of Amended Complaint; litigation team telephone conference and email correspondence re: reconciling edits and obtaining client approvals for same before filing	2.40	\$325.00	\$780.00
6/21/2019	HCB	Review final, ready-to-file Amended Complaint; email correspondence re: last-minute nits to same and re: successful filing of same; email correspondence re: draft talking points as requested by Head Count	1.60	\$325.00	\$520.00
6/24/2019	HCB	Review order denying as moot initial motion to dismiss; email correspondence re: sharing complaint with Plaintiffs	0.20	\$325.00	\$65.00
6/26/2019	HCB	Litigation team email correspondence re: case management conference prep, state's request for extension, and discovery pending motion to dismiss	0.40	\$325.00	\$130.00
6/28/2019	HCB	Email correspondence re: proposed ESI order and expedited trial schedule for CMC	0.70	\$325.00	\$227.50
7/1/2019	HCB	Email correspondence re: scheduling meet & confer and re: call in preparation for same	0.00	\$325.00	\$0.00
7/2/2019	HCB	Email correspondence re: and post-meet-and-confer with State re: case management conference	0.40	\$325.00	\$130.00



7/9/2019	HCB	Review and analyze second of motion to dismiss for general content; email correspondence re: same and re: press issues with clients	1.40	\$325.00	\$455.00
7/12/2019	HCB	Review current draft of motion to dismiss response; email correspondence with litigation team re: same.	2.20	\$325.00	\$715.00
7/17/2019	HCB	Email correspondence re: seeking page limit extension.	0.30	\$325.00	\$97.50
7/18/2019	HCB	Review most recent, nearing-final drafts of motion to dismiss response; email correspondence re: same.	1.30	\$325.00	\$422.50
7/19/2019	HCB	Review as-filed Response to motion to dismiss.	0.80	\$325.00	\$260.00
7/22/2019	HCB	Review TN Voters' Guide documents re: new law; email correspondence re: same.	0.40	\$325.00	\$130.00
7/31/2019	HCB	Analyze outline for preliminary injunction; perform supplemental research re: potential additions to same; email correspondence re: same.	1.90	\$325.00	\$617.50
8/5/2019	HCB	Review email correspondence and edits to outline for PI.	0.40	\$325.00	\$130.00
8/6/2019	HCB	Email correspondence re: thoughts on preliminary injunction outline.	0.30	\$325.00	\$97.50
8/8/2019	HCB	Review state's response to NVRA letter; HCB/CDB conference re: same	0.20	\$325.00	\$65.00
8/16/2019	HCB	Review PI motion papers from parallel case; email correspondence re: same.	1.40	\$325.00	\$455.00
8/19/2019	HCB	Review most recent draft of PI motion and comments thereto; email correspondence re: status of affidavits.	0.90	\$325.00	\$292.50
8/25/2019	HCB	Review most recently circulated declaration drafts and email correspondence re: same.	0.80	\$325.00	\$260.00

8/27/2019	HCB	Review most current drafts of declarations and proposed edits to same; email correspondence re: same and re: additional issues and arguments for motion for PI.	0.90	\$325.00	\$292.50
8/28/2019	HCB	Email correspondence re: current draft of PI filing and status of declarations for same; review drafts attached to all of same.	1.40	\$325.00	\$455.00
8/29/2019	HCB	Review revised PI draft and proposed edits and updated declarations; email correspondence re: same and re: HeadCount issues.	1.20	\$325.00	\$390.00
9/3/2019	HCB	Review State's response to PI motion in companion case; email correspondence re: first voter training and re: rules for replies.	1.10	\$325.00	\$357.50
9/4/2019	HCB	Email correspondence re: press coverage.	0.00	\$325.00	\$0.00
9/9/2019	HCB	Analyze Judge Trauger's order denying the state's motion to dismiss; email correspondence re: same and re: plan for reply in support of motion for preliminary injunction.	1.60	\$325.00	\$520.00
9/10/2019	HCB	Analyze Response in Opposition to Motion for PI filed by the state; email correspondence re: same.	1.30	\$325.00	\$422.50
9/11/2019	HCB	Review as-circulated drafts of responses to Motions for Preliminary Injunctions; email correspondence re: same.	0.90	\$325.00	\$292.50
9/12/2019	HCB	Analyze Judge Trauger's order granting preliminary injunction; email correspondence re: same and re: next steps in light of same.	1.50	\$325.00	\$487.50

9/13/2019	HC B	Additional email correspondence re: looking forward toward possible appeal; analyze Judge Trauger's PI order from parallel case.	0.70	\$325.00	\$227.50
9/18/2019	HC B	Email correspondence re: media request and client communications for same.	0.30	\$325.00	\$97.50
10/1/2019	HC B	Email correspondence re: pretrial conference scheduling, status of the State's answer and strategy re: same.	0.20	\$325.00	\$65.00
10/9/2019	HC B	Analyze the State's answer to operative Complaint.	0.90	\$325.00	\$292.50
10/17/2019	HC B	Review order setting case management conference; email correspondence re: same.	0.40	\$325.00	\$130.00
10/21/2019	HC B	Email correspondence re: preparing for case management conference.	0.30	\$325.00	\$97.50
10/22/2019	HC B	Analyze T. Lee's draft of ESI protocol and first stab at a case- management order.	0.50	\$325.00	\$162.50
10/24/2019	HC B	Review various proposed case management orders to be circulated to defendants; email correspondence re: same.	0.30	\$325.00	\$97.50
10/29/2019	HC B	Attend meet & confer telephone conference with parties; subsequent telephone conference among plaintiffs re: same; email correspondence re: same and re: proposed case management order.	2.50	\$325.00	\$812.50
10/30/2019	HC B	Follow-up email correspondence re: finalizing case management order proposal and re: potentially requesting to waive the ICMC.	1.80	\$325.00	\$585.00
11/4/2019	HC B	Prepare for and attend Initial Case Management Conference.	1.50	\$325.00	\$487.50

11/5/2019	HCB	Email correspondence re: follow-up from Initial Case Management Conference and re: removing jury trial reference in filing.	0.70	\$325.00	\$227.50
11/8/2019	HCB	Email correspondence re: LWV-TN press release language.	0.00	\$325.00	\$0.00
11/13/2019	HCB	Internal LWV-TN plaintiffs' counsel call re: discovery and Rule 26 disclosures; HCB/T. Lee follow up email correspondence re: same.	0.60	\$325.00	\$195.00
11/14/2019	HCB	Review most current draft of Rule 26 disclosures.	0.90	\$325.00	\$292.50
11/15/2019	HCB	Prepare for and participate in all-Plaintiffs call re: discovery plan; email SRVH team re: same; review current drafts of Rule 26(a)(1) initial disclosures.	1.00	\$325.00	\$325.00
11/18/2019	HCB	Review nearing-final and final drafts of LWV group's Rule 26 initial disclosures; analyze same from NAACP-plaintiffs and from state defendants; email CDB/WLH initial impressions of defendants' disclosures.	1.90	\$325.00	\$617.50
11/19/2019	HCB	HCBS/S. Lakin/T. Castelli email correspondence re: sample interrogatories and requests for production in the Middle District of Tennessee.	0.30	\$325.00	\$97.50
11/20/2019	HCB	Review draft of First Amended Complaint.	0.50	\$325.00	\$162.50
11/25/2019	HCB	Review CLC's draft subpoena to Shelby County; email correspondence re: motion to amend.	0.50	\$325.00	\$162.50
11/26/2019	HCB	Review drafts of interrogatories and RFPs to Tre Hargett; email correspondence re: agreement to amend complaint.	1.20	\$325.00	\$390.00

11/27/2019	HCB	Review most recent rounds of edits to proposed Amended Complaint and to discovery request to T. Hargett; email correspondence re: circulating proposed amended complaint to state defendants; email correspondence re: MidSouth Peace and Justice Center issues.	0.70	\$325.00	\$227.50
12/2/2019	HCB	Review most recent drafts of Second Amended Complaint and of county RFPs with edits.	1.20	\$325.00	\$390.00
12/3/2019	HCB	Review most recent set of draft RFPs/ROGs and edited versions thereof; email correspondence re: SRVH's discovery housing capabilities, local rules, and local preferences.	1.20	\$325.00	\$390.00
12/4/2019	HCB	Review drafts of opposed/unopposed motions for leave to amend, revised RFPs and ROGs for T. Hargett; additional email correspondence re: discovery logistics.	0.40	\$325.00	\$130.00
12/6/2019	HCB	Review initial drafts of LCCR's ROGs and RFPs to Goins, Election Commission, and Slatery.	0.90	\$325.00	\$292.50
12/10/2019	HCB	Participate in conference call re: discovery timeline; email WLH/CDB re: same; review most recent drafts of NAACP-Plaintiffs' discovery to state officials.	1.80	\$325.00	\$585.00
12/12/2019	HCB	Research re: TN procedural questions; email correspondence with T. Lee re: same; review most recent drafts and edits to discovery requests and comments to/re: same.	2.20	\$325.00	\$715.00

12/13/2019	HCB	Review final edits to and final versions of discovery requests; email correspondence re: service of same.	0.80	\$325.00	\$260.00
12/16/2019	HCB	HCB/T. Lee email correspondence re: subpoena service and TN procedure questions.	0.20	\$325.00	\$65.00
12/19/2019	HCB	Email correspondence re: serving remaining outstanding parties with subpoenas.	0.30	\$325.00	\$97.50
12/19/2019	HCB	Review answers to LVWTN and NAACP amended complaints; review letter and voicemail from L. Fox in Metro legal re: subpoena.	1.90	\$325.00	\$617.50
12/20/2019	HCB	Email correspondence with litigation team re: Hamilton County and Davidson County objections to subpoena; email L. Fox re: Davidson County objections.	0.60	\$325.00	\$195.00
12/23/2019	HCB	Exchange emails/voicemails with S. Derrick re: Sumner County election commission subpoena; email litigation team re: same; email correspondence with and review letter from A. Bussell re: Metro's objections to subpoenas; HCB/T. Lee/litigation team email correspondence re: all of same.	2.30	\$325.00	\$747.50
12/27/2019	HCB	Review Davidson County's proposed timeline re: upcoming elections; exchange messages with S. Derrick re: Sumner county.	0.30	\$325.00	\$97.50

12/30/2019	HCB	Review subpoena objection letter from L. Carson on behalf of Williamson County; T. Lee/S. Derrick email correspondence re: Sumner County Subpoena; A. Bussell/T. Lee email correspondence re: objections to subpoena on behalf of additional Metro defendants.	0.70	\$325.00	\$227.50
1/3/2020	HCB	Telephone conference and voicemail exchange with K. Cantrell (counsel for Jackson county); email correspondence with litigation team re: same and re: other objections to subpoenas; conference call re: responding to third party discovery issues; email CDB/WLH updates re: same; follow up email correspondence with LWV team re: same and re: next action items, including potential search terms.	2.30	\$325.00	\$747.50
1/6/2020	HCB	Email correspondence in preparation for and telephone conference re: handling and division of labor/resources on third party discovery negotiations and re: Knox county motion to quash, issues re: service and parties to same, and how to deal with all of same; email correspondence Knox county and state defendants' counsel re: E.D. Tenn. re: setting hearing for same; review discovery priority list drafts and follow up email correspondence re: thoughts on same; HCB/T. Lee email correspondence re: county outreach.	2.60	\$325.00	\$845.00

1/7/2020	HCB	HCB/L. Carson telephone conference re: Williamson County's subpoena objections and re: meet and confer process moving forward; email correspondence with representatives for Hamilton, Jackson, and Davidson Counties re: setting up meet and confers on subpoena issues; email correspondence internally and with E.D. Tenn. re: setting Knox County hearing date; review letters from A. Bussell on behalf of Davidson County; review email/filings from D. Wigler re: correcting certificates of service in E.D. Tenn.	1.90	\$325.00	\$617.50
1/8/2020	HCB	Email correspondence internally re: subpoena meet and confers; email correspondence with counsel for Sumner, Williamson, and Davidson Counties re: scheduling meet and confers and issues to be discussed in same; telephone conferences with Hamilton and Jackson counties to meet and confer re: subpoenas; review internal spreadsheet re: subpoena status and follow ups; email NAACP team analysis in advance of call with Williamson county.	5.80	\$325.00	\$1,885.00
1/9/2020	HCB	Outline thoughts on potential search terms; review various drafts of potential search terms and research re: TN computer systems from previous cases to consider alterations re: same; email correspondence with litigation team re: same; analyze Sevier county's motion to quash; review E.D.Tenn. order re: hearing on motions to quash from Knox County.	5.30	\$325.00	\$1,722.50



1/10/2020	HCB	Email correspondence re: Knox County's motion to quash and service of same, re: Sevier county's motion to quash and similar service issues, re: coordinating with Judge Poplin's clerk to set these two east TN motions at the same time; re: scheduling meet and confer with Davidson County's counsel re: their subpoena objections, and re: coordinating response to same. Additional email correspondence re: SumnerCDB's appearance in the Eastern District of Tennessee; email correspondence with A. Reiger re: outstanding discovery and anticipated delays in the state's response to same. Additional email correspondence re: Sumner County issues with the LWV-TN and potential interference from Defendants	3.60	\$325.00	\$1,170.00
1/13/2020	HCB	Email correspondence and telephone conference re: responding to E.D. Tenn. subpoenas, re: updating court, and re: more global strategy for coordinating timing of subpoena responses; email correspondence re: Williamson County subpoena responses and timing re: same.	1.80	\$325.00	\$585.00

1/14/2020	HCB	Perform initial review of AG's and State Election Commissioner's discovery responses and document productions; email correspondence re: Knox County, Wilson County, and Henry County and re: letters following up with unresponsive counties; telephone conference with Metro Legal re: their objections to the subpoena and potential accommodations re: same.	4.40	\$325.00	\$1,430.00
1/15/2020	HCB	Email correspondence re: Knox county subpoena, Sevier County subpoena, and ED Tenn. motions to quash, re: Rutherford County objections, and re: Madison county objections and motion to quash; research and email correspondence re: Sumner county subpoena and potential service issue; review State Election Commission discovery responses.	2.90	\$325.00	\$942.50
1/16/2020	HCB	Email correspondence re: outstanding subpoenas, objections, and motions to quash and re: potentially seeking extension of time to accommodate the presidential preference primaries.	0.60	\$325.00	\$195.00
1/17/2020	HCB	Email correspondence re: upcoming W.D. Tenn. hearing on motions to quash; email correspondence and telephone conference with counsel for Haywood and Madison Counties re: same; enter appearance and draft joint motion and agreed order to continue hearing on motions to quash from same.	5.10	\$325.00	\$1,657.50

1/21/2020	HCB	Email correspondence re: joint motion to amend scheduling order; review additional communications re: status of subpoenas and objections from county election commissions.	1.10	\$325.00	\$357.50
1/24/2020	HCB	Review last several days of email correspondence re: trial date, re: joint motion to amend scheduling order; re: outstanding subpoena communications with counties, and re: copy/document repository services.	2.20	\$325.00	\$715.00
1/27/2020	HCB	Email correspondence re: joint motion to amend filing and re: resolution of W.D. Tenn. subpoena and motion to quash issues.	0.70	\$325.00	\$227.50
1/28/2020	HCB	Review orders resetting trial date and granting extension of time to file reply to motion to quash; email correspondence re: same.	0.50	\$325.00	\$162.50
1/29/2020	HCB	Email correspondence re: approaching state about potential retaliation issues in Sumner County; email correspondence with P. Varela re: subpoena items not being currently requested as part of the parties agreement.	0.90	\$325.00	\$292.50
1/31/2020	HCB	Review Agreement and Joint Motion to Withdraw Motion to Quash from Haywood County; email correspondence re: filing of same.	0.40	\$325.00	\$130.00

2/5/2020	HCB	Review email correspondence re: proposed protective order for M.D. Tenn. and/or Knox and Sevier county issues; review email correspondence re: conference call with AG's office on potential retaliation issues; email correspondence re: scheduling call with M. Jennings re: Wilson County subpoena; review order dismissing W.D. Tenn. objections; review documents produced by Sumner County in response to subpoena.	2.80	\$325.00	\$910.00
2/6/2020	HCB	Email correspondence re: proposal for in-person inspection of Davidson County documents and timing for performance of same; review most recent drafts of and email correspondence re: Knox county protective order; email correspondence re: cybersecurity emails from election commission that hit on subpoena search terms.	1.20	\$325.00	\$390.00
2/7/2020	HCB	Email correspondence with AG's office re: Knox County agreed order and their consent to same; internal email correspondence re: document inspection coordination and scheduling call re: same.	0.80	\$325.00	\$260.00
2/11/2020	HCB	Internal correspondence re: scheduling document inspections; email correspondence with P. Varela re: finalizing agreement for Shelby County subpoena terms and agreeing to extension and filing of consent motion re: same.	0.80	\$325.00	\$260.00

2/12/2020	HCB	Call with Plaintiffs' counsel group re: subpoena responses, coordinating inspections, and hosting documents re: same; research re: hosting possibilities internally; HCB/T. Lee follow-up telephone conference re: same; telephone conference and follow-up email correspondence with M. Jennings on behalf of Wilson County re: subpoena.	2.60	\$325.00	\$845.00
2/13/2020	HCB	Email correspondence internally and with P. Varela re: reaching agreement on Shelby County subpoena; internal email correspondence re: Knox/Sevier county draft agreement and edits to same.	0.90	\$325.00	\$292.50
2/18/2020	HCB	Email correspondence re: finalizing search terms for agreement re: Shelby County subpoena; email correspondence re: confirming dates for in-person document inspection for Davidson County; review email correspondence with AG's office re: Knox/Sevier county subpoenas; email correspondence re: new bill in TN Legislature that could revise law at issue in this lawsuit; research re: same.	1.70	\$325.00	\$552.50

2/19/2020	HCB	Email correspondence re: finalizing and filing joint motion and proposed agreed order re: Shelby County subpoena; email correspondence re: coordinating with AG's office for Knox County subpoena and re: new bill in legislature; additional email correspondence re: new bill, implications of same, and potential communications re: same; research re: same; follow-up email correspondence with Metro legal re: additional search term; review documents produced by Sumner County in response to subpoena.	3.40	\$325.00	\$1,105.00
2/20/2020	HCB	Email correspondence re: Sumner county discovery; create and send shared document link for same to team.	0.50	\$325.00	\$162.50
2/24/2020	HCB	Email correspondence re: corraling client statements in response to new bill; HCB/CDB conference re: all of same.	0.30	\$325.00	\$97.50
2/28/2020	HCB	Review email correspondence re: filing of Knox and Sevier county motions and extension for same from Judge Poplin; internal email correspondence re: A. Reiger's noting that the new bill in the legislature "has legs."	0.30	\$325.00	\$97.50
3/10/2020	HCB	Email correspondence re: whether to reschedule Davidson County document inspection and, if so, to when in light of current deadlines.,	0.50	\$325.00	\$162.50

3/12/2020	HCB	Follow-up email correspondence re: rescheduling Davidson County document inspection; perform initial review of and make outlined notes re: documents produced my Rutherford County in response to subpoena.	2.70	\$325.00	\$877.50
3/20/2020	HCB	Review text of revised voter registration bill as passed by the TN House; LWV-TN team email correspondence re: same and setting up a call to discuss.	0.60	\$325.00	\$195.00
3/24/2020	HCB	Email correspondence from counsel for Knox and Sevier counties re: difficulty in complying with subpoena agreement in light of CoVid-19; M. Kanter-Cohen email re: client reactions to the new bill.	0.40	\$325.00	\$130.00
3/27/2020	HCB	Send edits re: draft press release; HCB/CDB/T. Lee email correspondence re: same; participate in full-group conference call re: potential next steps in light of expected new law; research re: time deadlines from engrossment to enrollment to governor's signature; email plaintiffs' counsel groups re: same; review email correspondence for LWV-TN team to county attorneys re: pausing subpoena response deadlines in light of expected new law.	0.80	\$325.00	\$260.00
3/30/2020	HCB	Additional email correspondence with LWV-TN team and county attorneys re: release subpoena production/inspection dates; internal LWV-TN communications re: finalized press release draft.	0.60	\$325.00	\$195.00

3/31/2020	HC B	Additional internal LWV-TN email correspondence re: finalizing release in anticipation of Gov. Lee signing new law.	0.40	\$325.00	\$130.00
4/2/2020	HC B	LWV-TN team email correspondence re: new law being passed and re: release in response to same; HCB/CDB/WLH telephone conferences and email correspondence re: responding to CNS inquiry about future of the lawsuit; email LWV-TN group re: same.	1.00	\$325.00	\$325.00
4/13/2020	HC B	LWV-TN email correspondence re: next steps and scheduling a call to discuss same.	0.20	\$325.00	\$65.00
4/17/2020	HC B	LWV-TN team conference call re: thoughts on how to proceed in light of new law and time horizons for same.	0.00	\$325.00	\$0.00
4/21/2020	HC B	Participate in call with counsel for both plaintiffs groups re: next steps.	0.30	\$325.00	\$97.50
5/1/2020	HC B	Perform overview analysis of State's discovery responses and requests and email re: potential of litigation being mooted.	0.70	\$325.00	\$227.50
5/5/2020	HC B	Review past several days of email correspondence between LWV- TN team and among all plaintiffs' counsel; analyze fee petition research contained in same.	0.80	\$325.00	\$260.00
6/29/2020	HC B	Email correspondence re: nudging case forward and time records.	0.00	\$325.00	\$0.00
9/1/2020	HC B	Review proposed stipulation of dismissal circulated by litigation team in companion case.	0.00	\$325.00	\$0.00
9/10/2020	HC B	I. Feinberg/A Reiger email correspondence re: proposed stipulation of dismissal.	0.00	\$325.00	\$0.00



<b>Totals</b>			157.7 0		\$51,252.5 0