IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

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, <i>et al.</i> ,)) Civil Nos. 3:19-cv-365, 3:19-cv-385
Defendants.) Hon. Aleta A. Trauger)
LEAGUE OF WOMEN VOTERS OF TENNESSEE, et al.,	- '))
Plaintiffs,)
v.)
TRE HARGETT, et al.,)
Defendants.))

JOINT MOTION TO ENTER AGREED ORDER ON PLAINTIFFS' APPELLATE FEES AND COSTS

Plaintiffs and Defendants hereby jointly move the Court for the entry of an Agreed Order on the remaining issue in this case, Plaintiffs' entitlement to attorneys' fees and costs for their work responding to Defendants' appeal of this Court's fee award to the Sixth Circuit, and Defendants' petition for certiorari in the Supreme Court.

In accordance with this Court's Order dated January 10, 2023, Plaintiffs' supplemental fee applications pursuant to M.D. Tenn. Local Rule 54.01 for their attorneys' fees and costs on appeal were due on or before July 12, 2023. This Court granted the parties' joint motions to extend this time to allow the parties additional time to seek a negotiated resolution of the appellate attorneys' fee issues. In their discussions, Plaintiffs' counsel shared their hours and costs with Defendants' counsel, counsel conferred, and the parties were able to reach an agreement. Defendants agreed to pay Plaintiffs' appellate fees and costs in the total amount of \$197,000, broken down as follows:

- 1. To Plaintiffs in the Tennessee NAACP case, in the amount of \$145,000;
- 2. To Plaintiffs in the League of Women Voters case, in the amount of \$52,000.

Plaintiffs and Defendants respectfully submit a proposed Agreed Order contemporaneously herewith.

Dated: October 16, 2023

Respectfully submitted,

/s/ Taylor A. Cates

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