

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

LUTHER SCOTT, JR., and LOUISIANA
STATE CONFERENCE OF THE
NAACP,

Plaintiffs,

v.

TOM SCHEDLER, in his official capacity as
the Louisiana Secretary of State, SUZY
SONNIER, in her official capacity as
Secretary of the Louisiana Department of
Children & Family Services, and BRUCE D.
GREENSTEIN, in his official capacity as
Secretary of the Louisiana Department of
Health & Hospitals,

Defendants.

Civil Action No. 2:11-cv-00926-JTM-
JCW
Section "H"

PLAINTIFFS' MOTION TO SET ATTORNEYS' FEES AND COSTS

Plaintiffs Luther Scott, Jr. and the Louisiana State Conference of the NAACP respectfully move the Court to fix attorneys' fees and costs pursuant to the Findings of Fact and Conclusions of Law (Doc. No. 436), concluding that the Defendants violated the National Voter Registration Act, 42 U.S.C. § 1973gg, et. seq.

Accordingly, as set forth in the accompanying memorandum of law, Plaintiffs seek attorneys' fees in the amount of \$2,894,514.80 and costs and expenses in the amount of \$141,907.35 from the Defendants. These amounts represent the lodestar amounts for hours spent on prosecuting this action (adjusted by taking a discount of 10% of the entire amount), a discounted payment for travel time (50 percent of the lodestar rate), and costs and expenses incurred related to this action.

The accompanying memorandum of law summarizes the totals for each category of fees claimed and describes in detail how the amount for each category was calculated. The requested out-of-district hourly rates are reflective of the specialized skills and experience of counsel in this case and the unavailability of local counsel willing and able to take on this matter. Further, the accompanying declarations from Plaintiffs' counsel detail all requested fees, costs and expenses incurred in litigating this action, reduced by removing duplicative or excessive entries or charges and otherwise by the exercise of billing discretion.

The results achieved by Plaintiffs constituted an unequivocal victory, and the requested fees are conservatively calculated, fully documented, and in all respects reasonable. As requested by your Honor in the Findings of Fact and Conclusions of Law (Doc. No. 436), Plaintiffs respectfully submit this motion to set attorneys' fees and costs and pray that the Court award Plaintiffs' the reasonable requested amounts in successfully litigating their claims.

Dated: February 26, 2013

Respectfully submitted,

/s/ Dale E. Ho

Dale E. Ho (dho@naacpldf.org)*

Natasha M. Korgaonkar

(nkorgaonkar@naacpldf.org)*

Debo P. Adegbile

Elise C. Boddie

Ryan P. Haygood (rhaygood@naacpldf.org)*

NAACP Legal Defense & Educational Fund, Inc.
(New York)

99 Hudson Street, Suite 1600

New York, NY 10013

212-965-2200

*MOTION FOR ADMISSION PRO HAC VICE
GRANTED

Ronald Lawrence Wilson

(cabral2@aol.com)

Ronald L. Wilson, Attorney at Law
701 Poydras Street, Suite 4100
New Orleans, LA 70139
504-525-4361

Michael B. de Leeuw
(michael.deleeuw@friedfrank.com)*
Israel David (israel.david@friedfrank.com)*
Erica Sollie*
Jesse Ryan Loffler*
David Yellin*
Fried, Frank, Harris, Shriver & Jacobson LLP
One New York Plaza
New York, NY 10004
212-859-8000
*MOTION FOR ADMISSION PRO HAC VICE
GRANTED

Sarah Brannon (sbrannon@projectvote.org)*
Niyati Shah (nshah@projectvote.org)*
Michelle Rupp (mrupp@projectvote.org)*
Project Vote
1350 Eye Street NW, Suite 1250
Washington, DC 20005
202-546-4173
*MOTION FOR ADMISSION PRO HAC VICE
GRANTED

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 26th of February, 2013, I electronically filed the foregoing Notice of Submission with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to persons electronically noticed. I further certify that I mailed the foregoing document and the notice of electronic filing by first class mail to any non-CM/ECF participant.

/s/ Dale E. Ho_____