

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
BENTON DIVISION

MARY E. SHEPARD and the ILLINOIS STATE RIFLE ASSOCIATION,	)	
	)	
	)	
Plaintiffs,	)	No. 3:11-cv-00405-MJR-PMF
	)	
	)	
v.	)	Honorable Judge Michael J. Reagan
LISA M. MADIGAN, solely in her official capacity as ATTORNEY GENERAL OF ILLINOIS, GOVERNOR PATRICK J. QUINN, solely in his official capacity as Governor of the State of Illinois, TYLER R. EDMONDS, solely in his official capacity as the State's Attorney of Union County, Illinois, and SHERIFF DAVID LIVESAY, solely in his official capacity as Sheriff of Union County,	)	Magistrate Judge Philip M. Frazier
	)	
	)	
	)	
Defendants.	)	
	)	

**REPLY BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES, AND TAXABLE COSTS**

**INTRODUCTION**

Until Plaintiffs prevailed in the Seventh Circuit, the State of Illinois blatantly disregarded the Constitution's guarantee that "the right of the people to keep and bear Arms, shall not be infringed." U.S. CONST. amend. II. Indeed, Illinois was "the *only* state [to] maintain[] a flat ban on carrying ready-to-use guns outside the home." *Moore v. Madigan*, 702 F.3d 933, 940 (7th Cir. 2012). Because of this action, Illinois's "uniquely sweeping ban" has been constitutionally "invalidated." *Id.* at 942; *Shepard v. Madigan*, 734 F.3d 748, 749 (7th Cir. 2013).

The State now seeks to escape its responsibility to reimburse Plaintiffs' reasonable attorneys' fees. The State not only takes issue with paying certain fees requested by Plaintiffs—the State lodges objections to approximately 85% of the hours claimed by Plaintiffs—but also

says that Plaintiffs *should not receive any compensation at all*. The State’s submission lacks merit. As this Court has recognized, “a fee award against [Defendants] is wholly appropriate . . . .” Order, Doc. 110, at 2. In light of Plaintiffs’ success, that award should be “fully compensatory.” *Hensley v. Eckerhart*, 461 U.S. 424, 435 (1983). What is more, that award should include fees for work done to secure a fee award. Thus, in addition to granting Plaintiffs’ motion, the Court should direct Plaintiffs to submit supplemental materials reflecting the additional hours their attorneys have spent seeking to secure a fee award.<sup>1</sup>

## I. PLAINTIFFS ARE “PREVAILING PARTIES.”

This Court’s determination that Plaintiffs “received from the Seventh Circuit . . . exactly [the relief] they sought,” *Shepard v. Madigan*, 958 F. Supp. 2d 996, 1000 (S.D. Ill. 2013), demonstrates that they are “prevailing parties.” *See Buckhannon Bd. & Care Home, Inc. v. West Virginia Dep’t of Health & Human Res.*, 532 U.S. 598, 603-04 (2001) (“prevailing party” is one “who has been awarded some relief by the court,” whether “in the trial court or on appeal” (emphasis omitted)). The State did not deprive the “change in the legal relationship of the parties” of the “judicial imprimatur” necessary for prevailing party status by repealing its unconstitutional law before the district court could enjoin it. *Id.* at 605. *See, e.g., National Rifle Ass’n of America, Inc. v. City of Chicago*, 646 F.3d 992, 994 (7th Cir. 2011); *Palmetto Props., Inc. v. County of DuPage*, 375 F.3d 542, 550 (7th Cir. 2004); *see also Young v. City of Chicago*, 202 F.3d 1000, 1000 (7th Cir. 2000) (“A defendant cannot defeat a plaintiff’s right to attorney’s fees by taking steps to moot the case after the plaintiff has obtained the relief he sought . . . .”)

---

<sup>1</sup> Exceptional circumstances support the filing of this reply brief, including that the State’s response brief was over twice the length of Plaintiffs’ opening brief, that the State’s response relies on discovery that was not conducted until after Plaintiffs had filed their motion, and the importance of ensuring that the State is held to account for the constitutional violations found in this case. Furthermore, this Court’s orders have consistently contemplated that Plaintiffs may file a reply. *See* Doc. 110 at 2; Doc. 118.

(Contrary to the State’s suggestion, *see* Defs.’ Objections to Pls.’ Mot. for Att’y Fees, Doc. 119, at 6, *Young* was not premised on the catalyst theory).

The State takes issue with Plaintiffs’ citation of *Hanrahan v. Hampton*, 446 U.S. 754, 757 (1980), for the proposition that final remedial orders are not required for prevailing party status. Doc. 119 at 4-5. But *Hanrahan* indicates that the key inquiry for “prevailing party” status is not whether “remedial orders ha[ve] . . . been entered” but rather whether the plaintiff has “established the liability of the opposing party” or, in other words, “established his entitlement to some relief on the merits of his claims.” 446 U.S. at 757. *Buckhannon* reinforces this conclusion. *See, e.g.*, 532 U.S. at 604 (citing *Hanrahan*, 446 U.S. at 757). And *Hewitt v. Helms*, 482 U.S. 755 (1987), is not inconsistent with it, for the plaintiff in that case had not established entitlement to relief on the merits. Rather, he secured an appellate decision that prison officials had violated his constitutional rights, but lost on his damages claim—the only claim he pursued on remand in district court—because the constitutional violation was not clearly established. *Id.* at 758-59. In other words, “[t]he most that he obtained was an interlocutory ruling that his complaint should not have been dismissed for failure to state a constitutional claim. That is not the stuff of which legal victories are made.” *Id.* at 760. Here, by contrast, Plaintiffs secured a ruling on the merits from the Seventh Circuit that they were entitled to the relief sought in their complaint.

The State also claims that Plaintiffs “misstate the holding” of *Southworth v. Board of Regents of University of Wisconsin System*, 376 F.3d 757 (7th Cir. 2004). Doc. 119 at 10. But that case indicates that one of the ways in which the plaintiffs prevailed was by securing a court ruling that the defendants violated the constitution and in response to which the defendants adopted new policies. *See Southworth*, 376 F.3d at 768.

In the end, the State acknowledges that prevailing party status does not require the entry of a final injunction, *see, e.g.*, Doc. 119 at 11, but it seeks to escape the application of that principle here on grounds that are either immaterial or illusory.

A. First, the State observes that it still had time to file a petition for certiorari when the case was mooted, suggesting that its option to appeal deprived the Seventh Circuit's mandate "declaring the old law unconstitutional and enjoining it," *Shepard*, 734 F.3d at 750, of its finality. But a final judgment on the merits that becomes moot before the time for appeal runs is a "judgment on the merits" for purposes of conferring prevailing party status. *See Young*, 202 F.3d at 1000-01. "Many a defendant gives up after a district court's final decision and does not appeal," but such "cessation of hostilities . . . does not deprive the victor of prevailing-party status." *NRA*, 646 F.3d at 994.

B. Second, the State insists that Plaintiffs were not prevailing parties because "the form of any relief to be granted by this court had never been decided." Doc. 119 at 12. But the Seventh Circuit remanded the case with instructions to the district court to enter a declaratory judgment that Illinois's carry ban was unconstitutional and an injunction against its enforcement. *Moore*, 702 F.3d at 942. The State's successful plea to extend the stay of the Seventh Circuit's mandate demonstrates that the State understood the import of this order: "This additional time will avoid a circumstance in which *there is no state law in place* governing the carrying of firearms in public places, a circumstance that this Court's original, 180-day stay *anticipated* and set out to avoid." Mot. to Stay Mandate for Additional 30 Days at 3, *Moore*, No. 12-1269 (7th Cir.), ECF No. 73 (emphases added); *see also id.* (failing to extend stay could lead to "a gap in state firearm regulation"). The State should be judicially estopped from now changing course to say that the consequences of the Seventh Circuit's remand order were unclear. See Br. in

Support of Pls.’ Mot. For Att’y Fees, Doc. 107, at 10 (discussing judicial estoppel).

The State’s argument also is at odds with the very federalism principles the State invokes. Tailoring an injunction after liability has been established may be necessary when the government neglects to carry out an affirmative duty and merely enjoining enforcement of the offending provision fails to remedy the constitutional violation. Such was the case in every case the State cites for the proposition that work remains to be done following a judgment that the government has violated the constitution. *See* Doc. 119 at 12 (collecting cases). In those cases, there was no less intrusive alternative to crafting a detailed injunction to correct the constitutional deficiency.<sup>2</sup> But here, the least intrusive course on “the operation of local and state governmental entities” would have been to enjoin the offending law, curing the constitutional violation complained of, and leaving the State completely free to do what it did here: to attempt to enact new legislation within the bounds of the Constitution. *See Shepard*, 734 F.3d at 752 (noting that *Moore v. Madigan* left the substance of replacement legislation “to the State of Illinois in the first instance”). For any federal court to have done what the State claims it would have requested of this Court on remand—that is, to “ask the parties for proposed remedial plans,” and to craft a detailed injunction regulating the carriage of firearms in Illinois, Doc. 119 at 13—would have been utterly inappropriate.

---

<sup>2</sup> In *Zessar v. Keith*, 536 F.3d 788 (7th Cir. 2008), the court held that Illinois’s absentee ballot law afforded voters whose ballots were denied inadequate notice and opportunity to be heard, thereby identifying a constitutional violation that could be remedied only by the creation of constitutionally adequate procedures. In *Lewis v. Casey*, 518 U.S. 343 (1996), and *Al-Alamin v. Gramley*, 926 F.2d 680 (7th Cir. 1991), state prison officials had violated prisoners’ rights to access the courts and to practice their religion, respectively, by failing to provide adequate facilities and accommodations—violations that could only be remedied by affirmative acts by the prison officials. Finally, by the time *Dayton Board of Education v. Brinkman*, 433 U.S. 406 (1977), had been decided, it was clear that merely enjoining states from segregating was not fulfilling the constitutional guarantee of equal protection.

At any rate, the government’s argument suffers from a fundamental misunderstanding of “prevailing party” status. Prevailing party status requires a “material alteration of the legal relationship of the parties.” *Buckhannon*, 532 U.S. at 604. That alteration may be accomplished in a number of ways, including a final judgment on the merits and a settlement agreement enforced through a consent decree. *Id.* But it may also occur when the defendant changes his conduct in a way that gives the plaintiff the relief he seeks and that change in conduct is marked with the necessary judicial imprimatur—that is, it is *involuntary*. *See id.* at 605; *Federation of Advert. Indus. Representatives, Inc. v. Chicago*, 189 F.3d 633, 639-40 (7th Cir. 1999).

In *Palmetto Properties* and *Zessar*, the plaintiffs had “a hurdle to overcome” to establish their entitlement to fees because two primary markers of “prevailing party status”—that is, a final judgment on the merits or a settlement agreement enforced through a consent decree—were lacking. *See Zessar*, 536 F.3d at 796. In the absence of these “normative judicial acts,” the Seventh Circuit had to decide whether the defendants’ conduct that mooted the case bore the necessary “judicial imprimatur”—that is, whether it could be considered involuntary. *Id.* That is why it mattered whether the summary judgment decisions in those cases contained “succinct and easily enforceable” holdings. *Id.* at 797.

The State’s conduct in this case was involuntary because, as explained above, the Seventh Circuit’s decision left it no choice but to eliminate the carry ban. *See Shepard*, 734 F.3d at 752 (describing *Moore v. Madigan* as invalidating the ban). True enough, the State had some choice about the restrictions on carriage it enacted in place of the ban, *id.* at 751, but the relief on which Plaintiffs premise their prevailing party status is *not* the creation of new restrictions, but instead the elimination of the ban, *id.* at 752 (noting that the Seventh Circuit’s mandate required the elimination of the ban and said nothing about the content of the replacement statute). The

State had no choice but to eliminate the ban, so its conduct in that regard was involuntary and marked with the necessary judicial imprimatur.

But while they can clear the *Zessar* hurdle, Plaintiffs have no such hurdle to overcome to establish their prevailing party status because, unlike the plaintiffs in *Palmetto Properties* and *Zessar*, they procured a final judgment on the merits. For that reason, *NRA* is the most relevant precedent. In that case, the cities, like the State in this case, relied heavily on *Zessar*. The Seventh Circuit rejected their argument, *not* because the case more closely resembled *Palmetto Properties*, which the *NRA* Court does not even cite, but because the plaintiffs had actually procured a final judgment on the merits. *See NRA*, 646 F.3d at 993 (“The district court was right to observe that plaintiffs did not receive a favorable judgment from it. But they did better: They won in the Supreme Court, which entered a judgment in their favor.”). Whereas the mooting of the case forestalled the entry of a final judgment in *Zessar* (and in *Palmetto Properties*), and therefore required the court to determine whether defendants’ action was voluntary, no such analysis is required when the judgment issues before the case becomes moot. *See id.* at 994. And there is no question that the Seventh Circuit’s decision was final before this case became moot, because the Seventh Circuit’s mandate issued before the State enacted its new carry law. As the Supreme Court’s judgment did in *NRA*, the Seventh Circuit’s judgment “changed the relationship between the parties” because it “established conclusively, and not just by a district court’s opinion that never led to a valid judgment (as in *Zessar*), that the second amendment” precludes a complete ban of carriage. *See id.*

**II. PLAINTIFFS’ FEE CALCULATION IS REASONABLE AND JUSTIFIED BY THE “EXCELLENT RESULTS” THEY ACHIEVED IN THIS LITIGATION.**

Having established that Plaintiffs are prevailing parties, the first step in determining the

amount of a “reasonable fee” is to calculate the lodestar—that is, “the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley*, 461 U.S. at 433. After it calculates the lodestar, the Court must decide whether to award the full lodestar or to adjust it upward or downward, considering, among other things, “the important factor of results obtained.” *Id.* at 434 (internal quotation marks omitted).

The “excellent results” Plaintiffs obtained in this case justify the award of a fully compensatory fee. *Hensley*, 461 U.S. at 435; Doc. 107 at 8-11. Plaintiffs note that the City of Chicago and the Village of Oak Park were ordered to pay over \$1.3 million in attorneys’ fees—over double of what Plaintiffs are requesting here—in the successful challenge to those jurisdictions’ handgun bans. *See Order, NRA v. City of Chicago*, No. 08-3697 (N.D. Ill. Aug. 14, 2012), ECF No. 139. While that litigation reached the United States Supreme Court, it further illustrates that the amount Plaintiffs seek here is reasonable.

At any rate, the State does not dispute that if Plaintiffs are prevailing they are entitled to the full lodestar. Instead, the State disputes Plaintiffs’ calculation of that lodestar. With very minor exceptions noted herein, the State’s objections are unavailing.<sup>3</sup>

#### **A. Plaintiffs’ Claimed Rates Are Reasonable.**

Plaintiffs have met their burden of “producing satisfactory evidence” that their requested rates reflect “the market rate for the services rendered.” *Pickett v. Sheridan Health Care Ctr.*, 664 F.3d 632, 640 (7th Cir. 2011) (internal quotation marks omitted). The burden therefore shifts to the State “to offer evidence that sets forth a good reason why a lower rate is essential.” *Id.* (internal quotation marks omitted). The State has made no such showing, so the Court should award Plaintiffs fees at their requested rates.

---

<sup>3</sup> Exhibit C-5 sets out fees Plaintiffs have agreed to deduct.

### *1. Reasonable Rates for Cooper & Kirk, PLLC*

The State asserts that the “reasonable rates” for this litigation are the market rates for East St. Louis, Illinois, which it argues are lower than the rates Cooper & Kirk attorneys charge. Doc. 119 at 21.<sup>4</sup> This argument lacks merit. The average rate charged by other attorneys in this geographic area fails to account for Cooper & Kirk’s opportunity cost, its extensive experience and expertise in Second Amendment litigation, and the complex nature of Plaintiffs’ claims. In recognition that a “reasonable rate” varies based on these factors, the Seventh Circuit has held that “[t]he market rate is the rate that lawyers of *similar ability and experience* in the community normally charge their paying clients *for the type of work in question.*” *Uphoff v. Elegant Bath, Ltd.*, 176 F.3d 399, 407 (7th Cir. 1999) (internal quotation marks omitted) (emphasis added). When “the litigation is one where the attorneys practicing it are highly specialized and the market for legal services in that area is a national market,” the “relevant community” may refer to a “community of practitioners,” rather than to any particular local market. *Jeffboat, LLC v. Director, Office of Workers’ Comp. Programs*, 553 F.3d 487, 490 (7th Cir. 2009).

Plaintiffs have provided ample evidence that the market rate, so defined, is equal to or higher than the rates Cooper & Kirk actually charged, and Plaintiffs claim, in the fee petition.<sup>5</sup>

---

<sup>4</sup> The State also argues, without explanation, that Cooper & Kirk partners and of counsel should be awarded rates that St. Louis firms pay their eighth-year associates. (Partner rates for the firms the State identifies are in the record. *See* Thompson Decl., Doc. 106-1, Ex. H.) The State does not even attempt to justify reimbursing the services of attorneys, including a former Assistant Attorney General for the Office of Legal Counsel, who boast anywhere from one to nearly four decades of legal experience, as associates. *See id.* ¶¶ 10a-d (describing attorneys’ experience).

<sup>5</sup> Plaintiffs are giving the State a discount by seeking to collect at the historical rate paid to Cooper & Kirk. In determining how to best compensate an attorney for the delay associated with collecting a fee award, courts may base the award on *current* rates or use historical rates *while adjusting the fee to reflect its present value.* *See Perdue v. Kenny A ex. rel. Winn*, 559 U.S.

As a starting point, Plaintiffs provided evidence of the rates actually charged in this litigation, which reflect “typical arm’s-length, market-rate transactions.” Thompson Decl., Doc. 106-1, ¶ 9 & Ex. A. Second, Plaintiffs provided evidence of Cooper & Kirk’s actual billing rate for similar litigation, *id.* ¶ 16 & Ex. D, which is presumptively the market rate, *see Pickett v. Sheridan Health Care Ctr.*, 664 F.3d 632, 640 (7th Cir. 2011). In that litigation, the City of Chicago and the Village of Oak Park did not even challenge Cooper & Kirk’s market rates. *See NRA v. Oak Park*, 871 F. Supp. 2d 781 (N.D. Ill. 2012). And in response to the State’s interrogatories, Plaintiffs identified more than a dozen additional cases involving the Second Amendment in which Cooper & Kirk charged rates equal to the rates it has charged in this case. See Exhibit A at 6. Finally, although the above evidence would suffice, Plaintiffs also provide “the next best evidence,” *Uphoff*, 176 F.3d at 407: the rate other attorneys charge for similar work, Thompson Decl., Doc. 106-1, ¶¶ 17a-c. These rates match or exceed the rates claimed by Plaintiffs. *Id.*

The State also insists that “if a party can attain competent counsel at a lower fee in a civil rights case, it [is] unreasonable for a lawyer who charged a higher rate to be awarded attorney’s fees by the Court at his hourly rate.” Doc. 119 at 24. But the case the State cites for this proposition offers no such rule, but instead reinforces the principle that the lodestar rate must reflect the attorney’s experience in the relevant practice area. *See Cooper v. Casey*, 97 F.3d 914, 920 (7th Cir. 1996) (suggesting that an experienced antitrust attorney may not be able to recover his full antitrust rate in a civil rights case to which his specialized skills are not transferable). As Cooper & Kirk has a specialty in civil rights litigation concerning the Second Amendment, its rates are easily justified.

---

542, 556 (2010). The Seventh Circuit has approved of both approaches. *See Smith v. Village of Maywood*, 17 F.3d 219, 221 (7th Cir. 1994).

The State argues in the alternative that Cooper & Kirk's services should be reimbursed at a "blended rate" of \$375, as that is the blended rate Cooper & Kirk charges the State of Tennessee in unrelated litigation that does not involve the Second Amendment. The State makes no effort to explain why that rate is a more reasonable measure of the market rate than the rates it actually charged in this case and many other Second Amendment cases. (In addition, the State neglects to mention that Tennessee's blended rate has since increased to \$425 per hour. *See Exhibit B.* It also omits any reference to the other blended rate agreement Plaintiffs provided during discovery, pursuant to which Cooper & Kirk charged the State of Louisiana a blended rate of \$495. *See Exhibit A* at 11.)

In short, Plaintiffs have demonstrated with "satisfactory evidence" that Cooper & Kirk's rates reflect "the market rate for the services rendered," and the State has fallen far short of meeting its own burden to show that a lower rate is "essential." *See Pickett*, 664 F.3d at 640 (internal quotation marks omitted).

## *2. Reasonable Rates for Stephen P. Halbrook*

While the State criticizes the \$540 rate requested for Mr. Halbrook, it is not clear that the State challenges it. At any rate, it is reasonable. As an initial matter, because the Seventh Circuit has approved using an attorney's current market rate as opposed to his historical rate when calculating a fee award, *see supra* note 5, it is of no moment that a sample invoice produced by Mr. Halbrook in discovery was dated December 2013. *See Doc. 119* at 29 n.13.

Furthermore, additional evidence demonstrates that the rate Plaintiffs seek for Mr. Halbrook's work is reasonable. The fees Mr. Halbrook charges to clients are below market rate because he "believe[s] that legal services required to support Second Amendment rights should be affordable." Halbrook Decl., Doc. 106-3, at 4. In addition, the Court can look to "evidence

of rates similarly experienced attorneys” receive in similar litigation. *Pickett*, 664 F.3d at 640 (internal quotation marks omitted); *see also Halderman v. Pennhurst State Sch. & Hosp.*, 899 F. Supp. 209, 215 (E.D. Pa. 1995). Plaintiffs have established that \$540 is an eminently reasonable rate in the relevant market for an attorney of Mr. Halbrook’s impressive experience and expertise. *See Doc. 107 at 14-15; Halbrook Decl., Doc. 106-3, at 4.*

### **B. Plaintiffs’ Claimed Hours Are Reasonable.**

In preparing their fee requests, Plaintiffs exercised billing judgment to eliminate “hours that [were] excessive, redundant, or otherwise unnecessary.” *Hensley*, 461 U.S. at 434. *See, e.g.*, Thompson Decl., Doc. 106-1, ¶ 7; Halbrook Decl., Doc. 106-3 at 2. Despite this good faith effort, in Exhibits 5, 7, 10, and 11, the State offers objections to all but 201.7 of Plaintiffs’ nearly 1,400 claimed hours. In Exhibit C, Plaintiffs respond individually to these line-by-line objections. But the vast majority of these objections are premised on legal theories that find no support in the case law. Plaintiffs address these general errors here.

#### *1. Work Performed in the Absence of a Written Contract*

The State complains that Plaintiffs’ responses to the State’s document requests did not include written contracts covering the entirety of this litigation. *See Doc. 119 at 17-20, 24, 29 n.13, 31.* It seeks to exclude *all work* performed in the absence of a written contract. *See id.*

As an initial matter, Plaintiffs note that the State’s request for documents exceeded the scope of this Court’s discovery order, which limited the State to interrogatories. Doc. 110 at 2. Indeed, the State did not even ask for leave to issue document requests. *See Doc. 108 at 2 (“Defendants request that they be allowed to conduct some discovery *limited to interrogatories*, and, if necessary, depositions of plaintiffs’ counsel . . .”)* (emphasis added). While Plaintiffs produced documents to avoid bringing the issue to the Court, any alleged shortcomings in the

documentary evidence cannot undermine Plaintiffs' fee requests in light of the fact that the Court contemplated that *there would be no such discovery at all*.

At any rate, the law does not require Plaintiffs to support their fee requests with copies of fee agreements. As explained above, the law expressly contemplates that Plaintiffs may meet their burden to show a "reasonable fee" with other forms of evidence of the prevailing market rate. Similarly, Plaintiffs may meet their burden to prove the reasonableness of the hours expended with other forms of evidence that the hours were expended in furtherance of the litigation and on behalf of Plaintiffs. *See, e.g., Shadis v. Beal*, 692 F.2d 924, 926-27 (3d Cir. 1982) (rejecting formalism in identifying attorney-client relationships); *Berkley Trace, LLC v. Food Lion, LLC*, No. 11-3207, 2013 WL 5718867, at \*8 n.11 (D. Md. Oct. 18, 2013). Plaintiffs amply meet that burden.

Attorney William N. Howard, who led teams at Freeborn & Peters LLP, and Locke Lord LLP, over the course of the litigation, entered an appearance on behalf of Plaintiffs, Doc. 4, and is listed in this Court's docket as Plaintiffs' "lead attorney." There can be no question that he was working on behalf of Plaintiffs throughout this litigation.

As explained in Plaintiffs' responses to the State's interrogatories, from the beginning "Plaintiffs understood that Mr. Howard would enlist the assistance of additional attorneys to work on their behalf . . .," and Cooper & Kirk was engaged pursuant to this arrangement. Exhibit A at 3. As Mr. Thompson explains in his declaration, "[a]lthough Cooper & Kirk did not appear for Plaintiffs until the initial appeal in this matter, attorneys from the Firm represented and performed work for Plaintiffs during all stages of this litigation, as demonstrated by the billing records . . ." Doc. 106-1, ¶ 8. *See Smith v. Atlanta Postal Credit Union*, 350 Fed. App'x 347, 350 (11th Cir. 2009) (rejecting argument that fees incurred before entry of

appearance were non-compensable); *see also Augustine v. Department of Veterans Affairs*, 503 F.3d 1362, 1366 (Fed. Cir. 2007). It is true that Cooper & Kirk *also* represented the NRA as an amicus in this Court, but as Mr. Thompson explains, he sought to exclude all hours expended pursuant to that representation from the records. Thompson Decl., Doc. 106-1, ¶ 7.

Mr. Howard also enlisted attorney Stephen P. Halbrook to assist in the litigation. Exhibit A at 3. Mr. Halbrook’s billing records reveal that his work was performed on behalf of Plaintiffs. Halbrook Decl., Doc. 106-3, at 2 & Ex. B. These hours were reasonably expended in the course of the litigation, even though Mr. Halbrook never entered an appearance on behalf of Plaintiffs. *See Priestley v. Astrue*, 651 F.3d 410, 416 (4th Cir. 2011).

## 2. *Vague Entries*

The State criticizes various entries as being overly vague. *See, e.g.*, Doc. 119 at 30. The Seventh Circuit has recognized that a court may look to surrounding entries to clarify the meaning of entries that may appear vague when viewed in isolation. *See Berberena v. Coler*, 753 F.2d 629, 634 (7th Cir. 1985). The State makes no serious effort to examine the entries in context. Indeed, in the exhibits attached to its opposition, the State removes many of the details from the attorneys’ detailed time entries and then misleadingly labels them as vague. In the attached Exhibit C, Plaintiffs show that almost all of the entries the State has singled out are adequately descriptive, either in isolation or “when viewed in the context of the surrounding documentation.” *Id.*

## 3. *Excessive Hours*

The State also identifies hours it considers to be excessive. The Seventh Circuit has cautioned that a finding of excessive hours must rest on more than “a gestalt reaction that there [i]s too much.” *Matter of Cont'l Ill. Sec. Litig.*, 962 F.2d 566, 570 (7th Cir. 1992). For this

reason, courts have been unsympathetic to bare assertions that the total amount of time dedicated to a given task is excessive when the objecting attorney fails to provide evidence of how much time attorneys would reasonably dedicate to the task. *See, e.g., Gibson v. City of Chicago*, 873 F. Supp. 2d 975, 992 (N.D. Ill. 2012); *Delgado v. Mak*, No. 06-3757, 2009 WL 211862, at \*7 (N.D. Ill. Jan. 29, 2009). Courts have also recognized that the amount of time to be dedicated to a given task will vary widely based on the complexity and importance of the issues involved. *See, e.g., Martin v. City of Indianapolis*, 28 F. Supp. 2d 1098, 1104 (S.D. Ind. 1998).

The State appears to have tallied the amount of time it would take a person read or type the words in the relevant documents and objects to any amount of time Plaintiffs expended above and beyond that total. *See, e.g.*, Doc. 119 at 27 (objecting to seven hours spent writing a filing that is capped at 350 words; *id.* at 31 (objecting to twelve minutes spent reviewing a document and reading two motions); *id.* at 31-32 (objecting to two twelve minute increments spent on two emails); *id.* at 32 (objecting to twelve minutes spent writing two sentences). Such a mechanical approach does not account for the time required to analyze and carefully craft legal arguments—especially legal arguments pertaining to novel issues of constitutional law. *See Martin*, 28 F. Supp. 2d at 1104. For example, in objecting to the total number of hours dedicated to drafting the complaint (58.1 hours), the State emphasizes the fact that it contained only one count. Doc. 119 at 30. But the State makes no allowance for the fact that that one count sat at the frontier of Second Amendment litigation, seeking to secure judicial protection of a right whose contours at the time were judicially undefined in the wake of *District of Columbia v. Heller*, 554 U.S. 570 (2008). Neither does the State’s approach account for the relative importance of different tasks. Attorneys can reasonably spend more time drafting two sentences in a pleading than they spend drafting a two sentence intra-office email. *See, e.g., Sypniewski v. Warren Hills Reg’l Bd. of*

*Educ.*, No. 01-3061, 2006 WL 1675066, at \*11 (D.N.J. June 14, 2006) (emphasizing importance of complaint). Finally, the State’s analysis does not account for the allocation of hours. For example, accepting as true the State’s tallies, over two-thirds of the attorney hours spent reviewing, researching, and drafting the various appellate briefs were expended by associates.

*See Doc. 119 at 25-26 nn.7, 8, 10.*

The primary target of the State’s “excessive time” objections is the work attorneys at Cooper & Kirk performed on the Seventh Circuit appellate briefs and oral argument. *See Doc. 119 at 25-27.* But that time was reasonable, particularly in light of the excellent results Plaintiffs achieved in the Seventh Circuit. Indeed, according to the State’s calculations Plaintiffs’ are requesting reimbursement for approximately 140 hours spent by Cooper & Kirk attorneys drafting opening and reply briefs in the Seventh Circuit—about 1.5 hours per page, hardly an unreasonable amount. *See Doc. 119 at 25-26; See Brief of Plaintiffs-Appellants, Shepard, No. 12-1788 (7th Cir.), ECF No. 12 (64 pages); Reply Brief of Plaintiffs-Appellants, Shepard, No. 12-1788 (7th Cir.), ECF No. 36 (31 pages).* And Plaintiffs’ appellate briefs plainly were not mere reproductions of their briefs in this Court. Plaintiffs’ response to the State’s motion to dismiss, for example, was 20 pages. *See Doc. 40.* The time Mr. Cooper and his colleagues spent preparing for the argument also was reasonable, particularly in light of the excellent results accomplished on appeal and the magnitude and importance of this case. Furthermore, Plaintiffs should not be punished for the fact that the *Moore* plaintiffs’ attorneys took the “risky path” of spending less time preparing for oral argument. *NRA*, 871 F. Supp. 2d at 786.

The State also complains about conferencing and time spent on the fee petition. Although the State lists a number of conferences it finds excessive, it offers no explanation of why they were excessive. Doc. 119 at 22-23. Courts routinely recognize that reasonably staffed

conferences promote efficiency and quality in litigation. *See, e.g., Berberena*, 753 F.2d at 633.

With respect to the fee petition, Doc. 119 at 33-34, the attached Exhibit C shows that the time reported for the fee petition thus far was reasonable.

#### *4. Unnecessary or Uncompensable Activities*

The State identifies several categories of hours that it believes should be excluded. None of its arguments in favor of exclusion withstands scrutiny.

a. Lobbying: The State argues that the Court must exclude hours expended on legislative and public relations. *See* Doc. 119 at 20, 28. The cases on which it relies support no such categorical exclusion, but instead merely stand for the proposition that work performed by the same attorney for the same client, but unrelated to the litigation, cannot be claimed. *See Webb v. Board of Educ. of Dyer Cnty.*, 471 U.S. 234, 242 (1985). Indeed, courts permit the collection of fees for legislative or media efforts that meaningfully contribute to the litigation. *See Davis v. San Francisco*, 976 F.2d 1536, 1545 (9th Cir. 1992), *reh'g denied, vacated in part, and remanded*, 984 F.2d 345 (1993); *Jenkins by Agyei v. Missouri*, 862 F.2d 677, 678 (8th Cir. 1988); *Dupuy v. McEwen*, 648 F. Supp. 2d 1007, 1021 (N.D. Ill. 2009). An award of fees for legislative or public relations work is particularly appropriate for a controversy that “lend[s] itself to resolution in the political arena.” *Rum Creek Coal Sales, Inc. v. Caperton*, 31 F.3d 169, 176 (4th Cir. 1994). In their haste to exclude all public relations-related work, the State fails to consider the fact that, by seeking an extension of the stay of the Seventh Circuit’s mandate while it developed replacement carriage legislation, the State brought this litigation into the political arena and justified any legislative and public relations work claimed by Plaintiffs.

As it happens, though, Plaintiffs seek almost no fees for legislative or public relations work. Most of the work the State identifies as “legislative” in nature is work performed tracking

the development of the replacement carriage law in the Illinois legislature after the Seventh Circuit invalidated the flat ban. *See, e.g.*, Doc. 119-1, Ex.7, at 76 (objecting to “[r]esearch re consequences of amendatory veto of carry bill” on grounds that it is “[l]egislative, not litigation related”). A lawyer’s ethical duty requires him to track legal developments that affect the claim he is litigating. That work is not the sort of lobbying or media campaign work that is non-compensable when it does not further the litigation.

The State does identify a few entries that are genuinely media-related, as set forth in Exhibit C. Although Plaintiffs maintain that such work is compensable in this case, in the interest of compromise, Plaintiffs consent to the exclusion of those hours.

b. Researching Trial Judge: The State next objects to an alleged total of 10.1 hours spent researching judges in the Southern District of Illinois. As the more detailed billing records attached to Mr. Howard’s declaration reveal, that time was spent not only researching judges but also “analyz[ing] the relevant Illinois statutes for further limitations on the possession of firearms that could impact the complaint, including any restrictions on carrying firearms in churches[,] research[ing] and analyz[ing] equal protection issues and pleading standards and elements[, and] further editing . . . the draft complaint.” Howard Decl., Doc. 106-2, Ex. B, at 17.

At any rate, the State’s objection finds no support in the case law. Indeed, researching judges is part of the “careful pre-filing investigation of the facts and the law . . . required by the Federal Rules of Civil Procedure and [is] compensable pursuant to section 1988.” *Globe Glass & Mirror Co. v. Brown*, No. 94-4033, 1996 WL 325602, at \*3 (E.D. La. June 12, 1996); *see also Community House, Inc. v. City of Boise*, No. 05-0283, 2014 WL 1247758, at \*10 n.10 (D. Idaho Mar. 25, 2014); *Florez v. Delbovo*, No. 94-4475, 1996 WL 543314, at \*4 (N.D. Ill. Sept. 23, 1996). Plaintiffs are therefore entitled to compensation for the reasonable number of hours their

attorneys spent investigating the law of the forum before filing the complaint.

c. Clerical and Paralegal Work. The State objects to clerical or paralegal work “for which attorneys’ fees should not be charged.” *See, e.g.*, Doc. 119 at 25, 26 n.9, Ex. 7. Plaintiffs do not contend that these tasks can be compensated at an attorney’s billing rate, as they were performed by “staff, including legal assistants, law clerks, and summer associates.” Thompson Decl., Doc. 106-1, ¶ 11; *see also* Howard Decl., Doc. 106-2, ¶ 3. Instead, as Plaintiffs noted in their opening brief, they included these hours in their lodestar at “hourly rates charged for legal assistants, law clerks, and other non-attorney staff.” Doc. 107 at 12. The case law permits this approach. *See Missouri v. Jenkins by Agyei*, 491 U.S. 274, 284-85 (1989).

##### *5. Work After Seventh Circuit Decision on the Merits*

Finally, the State argues that Plaintiffs should not be able to claim hours expended after the Seventh Circuit issued its decision on the merits because “the case was over and all that was remaining was a final order.” Doc. 119 at 27. It is true that Plaintiffs won a final judgment on the merits and therefore became prevailing parties when the Seventh Circuit issued its decision, but surely the State cannot pretend that an attorney’s work on a case ends with the issuance of an opinion on appeal. *See, e.g., Bond v. Stanton*, 630 F.2d 1231, 1235 (7th Cir. 1980).

Plaintiffs have omitted from their fee request work relating to the dismissal of the case as moot and the subsequent appeal, but Plaintiffs are entitled to compensation for the work they did to defend the relief they secured from the Seventh Circuit on their first appeal. This included tracking and analyzing the State’s new legislation to determine whether it complied with the Seventh Circuit’s mandate, litigating the stay of the mandate, and preparing their fee petition.

### **III. PLAINTIFFS ARE ENTITLED TO FULL COMPENSATION FOR EXPENSES.**

The State objects to Plaintiffs’ itemized expenses on the ground that they are not

supported by adequate documentation. Yet Plaintiffs detailed the time and nature of every individual expense they incurred. As with attorney time entries, and as set forth in Exhibit D, the context of these billing entries provides further detail on the purpose of the expenses, so that the Court may assess their reasonableness. A \$12,441.65 bill of expenses for litigation that is going on its fourth year is hardly extravagant, and the records support Plaintiffs' request. Plaintiffs nevertheless agree to reduce their request by approximately \$900, as set forth in Exhibit D-4, resulting in a total request of \$11,517.30.

## **CONCLUSION**

For the foregoing reasons, Plaintiffs' motion should be granted, and this Court should award Plaintiffs \$606,298.00 in fees, \$11,517.30 in expenses, and \$791.00 in taxable costs.

Dated: May 27, 2014

William N. Howard  
LOCKE LORD LLP  
111 S. Wacker Dr.  
Chicago, Illinois 60606  
Tel: (312) 443-0333  
Fax: (312) 896-6433  
whoward@lockelord.com

Respectfully submitted,

s/ Charles J. Cooper  
Charles J. Cooper\*  
David H. Thompson\*  
COOPER & KIRK, PLLC  
1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036  
Tel: (202) 220-9600  
Fax: (202) 220-9601  
ccooper@cooperkirk.com  
\*Admitted *pro hac vice*.

*Attorneys for Plaintiffs*

## **CERTIFICATE OF SERVICE**

The undersigned attorney states that he caused a true and correct copy of **Reply Brief in Support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Taxable Costs** to be served upon the parties of record, as shown below, via the Court's CM/ECF system on the **27th day of May, 2014.**

By: s/ Charles J. Cooper

## **SERVICE LIST**

Terence J. Corrigan  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, IL 62706  
Tel: (217) 782-5819  
Fax: (217) 524-5091  
tcorrigan@atg.state.il.us

Joseph A. Bleyer  
K. Rockne Bleyer  
BLEYER & BLEYER  
601 West Jackson  
P.O. Box 487  
Marion, IL 62959  
Tel: (618) 997-1331  
jableyer@bleyerlaw.com

Jonathan Lee Diesenhaus  
HOGAN LOVELLS LLP  
555 13th Street, N.W.  
Washington, D.C. 20004  
Tel: (202) 637-5416  
Fax: (202) 637-5910  
jonathan.diesenhaus@hoganlovells.com

Karl Triebel  
Illinois Attorney General's Office -  
Chicago 2  
100 West Randolph Street  
12th Floor  
Chicago, IL 60601  
Tel (312) 814-2391  
Fax: (312) 814-2253  
ktriebel@atg.state.il.us

Karen L. McNaught  
Illinois Attorney General's Office -  
Springfield  
500 South Second Street  
Springfield, IL 62706  
Tel: (217) 782-1841  
Fax: (217) 524-5091  
kmcnaught@atg.state.il.us

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
BENTON DIVISION

MARY E. SHEPARD and the ILLINOIS STATE RIFLE ASSOCIATION,	)
	)
	)
Plaintiffs,	) No. 3:11-cv-00405-MJR-PMF
	)
	)
v.	) Honorable Judge Michael J. Reagan
	) Magistrate Judge Philip M. Frazier
LISA M. MADIGAN, solely in her official capacity as ATTORNEY GENERAL OF ILLINOIS, GOVERNOR PATRICK J. QUINN, solely in his official capacity as Governor of the State of Illinois, TYLER R. EDMONDS, solely in his official capacity as the State's Attorney of Union County, Illinois, and SHERIFF DAVID LIVESAY, solely in his official capacity as Sheriff of Union County,	)
	)
	)
	)
Defendants.	)

**OBJECTIONS AND ANSWERS TO INTERROGATORIES DIRECTED BY LISA MADIGAN TO PLAINTIFFS**

Plaintiffs Mary Shepard and the Illinois State Rifle Association, by and through their attorneys, hereby submit their objections and answers to the interrogatories directed by Lisa Madigan to Plaintiffs.

**GENERAL OBJECTIONS**

The following general objections are hereby incorporated by reference into Plaintiffs' answers:

1. Plaintiffs object that the interrogatories are not addressed to them but rather to Michael Moore, Charles Hooks, Peggy Fletcher, Jon Maier, Second Amendment Foundation, Inc., and Illinois Carry.

2. Plaintiffs object that to the extent the interrogatories are copied from interrogatories served in the *Moore* case, they are contrary to the purpose of SDIL-LR 33.1(b):

No photocopied or otherwise duplicated form containing interrogatories shall be served upon a party unless all interrogatories are consecutively numbered and applicable to the case in which the same are served. The intent and purpose of this rule is to prohibit the submission of photocopied or otherwise duplicated forms of “stock” interrogatories, except where the nature of the case or the number of the parties makes the use of such forms necessary and feasible.

### **SPECIFIC OBJECTIONS AND ANSWERS**

**INTERROGATORY NO. 1.** State the fee arrangement between each of the plaintiffs and each of their attorneys. In responding to this interrogatory, be specific in the terms of the fee agreement and contractual provisions and to which attorney each refers. If this is a contingency agreement, state the hourly rate that your attorney will charge the defendants, should you prevail and be awarded attorney’s fees pursuant to 42 U.S.C. § 1988. If this fee is more than the hourly rate the attorney customarily charges his clients, state the bases upon which the attorney will rely for this adjustment.

#### **ANSWER:**

Plaintiffs object that this request is outside the scope of the discovery permitted by the Court, as it is not “directed to specific issues in the motion for fees and costs.” Doc. 110 at 2. Plaintiffs further object that the discovery sought is unreasonably cumulative or duplicative, FED. R. CIV. P. 26(b)(2)(C)(i), as the materials submitted with the fee petition indicate that the National Rifle Association of America, Inc. (“NRA”) financed this litigation, that this case did not involve a contingency fee arrangement, and that the hourly rates requested by plaintiffs do not exceed the hourly rates customarily charged by their attorneys. *See, e.g.*, Howard Decl. ¶¶ 4-12; Thompson Decl. ¶¶ 6, 9; Halbrook Decl. at 4.

Subject to and without waiving their objections, Plaintiffs state that at the outset of this litigation they entered into agreements with Mr. Howard providing that the NRA would pay for the attorneys' fees and expenses incurred in connection with this litigation. Plaintiffs understood that Mr. Howard would enlist the assistance of additional attorneys to work on their behalf and that the NRA would pay for such attorneys' fees and expenses. Pursuant to this arrangement, the NRA has paid for the work performed on behalf of Plaintiffs by Mr. Howard and his colleagues at Freeborn & Peters and Locke Lord, attorneys at Cooper & Kirk, and Mr. Halbrook. Cooper & Kirk and Ms. Shepard entered a written agreement further reflecting this understanding by indicating that the NRA is responsible to pay for fees and expenses incurred on Ms. Shepard's behalf.

**INTERROGATORY NO. 2.** State the contractual hourly fee each attorney representing plaintiffs regularly and customarily charges his or her clients. For each such response, state to which attorney you are referring and the type of law for which this payment was made.

**ANSWER:**

Plaintiffs object that this request is outside the scope of the discovery permitted by the Court, as it is not "directed to specific issues in the motion for fees and costs." Doc. 110 at 2. Plaintiffs further object that the discovery sought is unreasonably cumulative or duplicative, FED. R. Civ. P. 26(b)(2)(C)(i), as the materials submitted with the fee petition establish that the rates regularly and customarily charged by Plaintiffs' attorneys meet or exceed the rates requested by the fee petition. *See, e.g.*, Thompson Decl. ¶9 ("The hourly rates sought by Cooper & Kirk reflect the rate[s] actually paid to the Firm in this case. . . . [T]he hourly rates we charged and that we seek here reflect a discount on rates the Firm has charged to other clients in litigation of similar complexity and magnitude."); Howard Decl. ¶5 ("During my representation of Plaintiffs,

I charged the clients between \$450.00 and \$475.00 per hour. These rates are less than my current customary rate of \$565.00 per hour and less than my customary rate during 2011-2013, which was \$545.00.”); Halbrook Decl. at 4 (“From the commencement of this litigation through the present, my hourly rates have been between \$475 and \$540 per hour, except that I performed services for one non-profit client at \$400 per hour.”). Plaintiffs further object that the request to “state . . . the type of law for which this payment was made” does not make sense and is thus unanswerable in the context of an interrogatory requesting information about regular and customary fees. At any rate, to the extent the interrogatory is asking for information about the types of cases on which Plaintiffs’ attorneys have worked, such information is provided in the materials submitted with the fee petition and the discovery sought is therefore unreasonably cumulative or duplicative. *See, e.g.*, Howard Decl. ¶¶ 2, 8, 9, 11; Thompson Decl. ¶¶ 10, 12-13; Halbrook Decl. at 2-3.

Subject to and without waiving their objections, Plaintiffs refer to the evidentiary materials submitted with their fee petition.

**INTERROGATORY NO. 3.** List all clients by name who have actually paid the hourly rate plaintiffs’ counsel claim they customarily charge their clients. For each such entry, identify the case in which the client was represented, including the name of the case, the docket number, and the court where any case was filed. If any appeal was taken, list the name of the case, the docket number on appeal, the citation to any published decision, and the court where the case was decided.

**ANSWER:**

Plaintiffs object that this request is outside the scope of the discovery permitted by the Court, as it is not “directed to specific issues in the motion for fees and costs.” Doc. 110 at 2.

Plaintiffs further object that this interrogatory calls for information that is not available to them in the form of information about what other parties have paid their attorneys in other cases. *See, e.g.*, 8B CHARLES ALAN WRIGHT, ARTHUR R. MILLER ET AL., FEDERAL PRACTICE & PROCEDURE § 2177 (3d ed. 2013) (“[I]nterrogatories should be answered . . . with information that the answering party possesses after due inquiry.”); FED. R. CIV. P. 33(b)(1)(B) (person answering for corporate entity must provide “information available to the party”). Information acquired or maintained by an attorney outside the scope of the attorney’s agency relationship with a party is not under the party’s control and thus not available to the party. Plaintiffs further object that this interrogatory requests information that may be subject to the attorney-client privilege as in certain circumstances disclosure of the fees paid by a particular client may amount to a disclosure of confidential attorney-client communications. *See, e.g., Matter of Grand Jury Proceeding, Cherney*, 898 F.2d 565 (7th Cir. 1990). Plaintiffs further object that answering this interrogatory would be unduly burdensome, FED. R. CIV. P. 26(b)(2)(C)(iii), as the evidence submitted with their fee petition establishes their attorneys’ market rates. *See, e.g., People Who Care v. Rockford Bd. of Educ.*, 90 F.3d 1307 (1996). Plaintiffs further object that this interrogatory requests irrelevant information to the extent it calls for information predating commencement of the litigation in this case. *See* FED. R. CIV. P. 26(b)(1).

Subject to and without waiving their objections, Plaintiffs state as follows:

Freeborn & Peters and Locke Lord:

Mr. Howard has authorized Plaintiffs to state that matters in which Freeborn & Peters and/or Locke Lord have been paid rates equal to those claimed for the comparable time period in this case include the following matters involving claims related to the Second Amendment (fees were paid by or on behalf of the represented parties):

- *NRA v. Village of Oak Park*, No. 8-cv-3696 (N.D. Ill.), among cases on appeal, *NRA v. City of Chicago*, Nos. 08-4241, 08-4243, 08-4244, 567 F.3d 856 (7th Cir.), on review on petition for certiorari, *McDonald v. City of Chicago*, 130 S. Ct. 3020 (2010) (counsel for plaintiffs in *NRA v. Village of Oak Park* matter).
- *People v. Aguilar*, No. 112116, 2013 IL 112116 (Ill. Sept. 12, 2013) (counsel for amicus curiae NRA).
- *Queen v. Alvarez*, No. 13-cv-3483 (N.D. Ill.) (counsel for plaintiffs).

Cooper & Kirk:

Cooper & Kirk has authorized Plaintiffs to state that matters in which Cooper & Kirk has been paid rates equal to those claimed for the comparable time period in this case include, but are not limited to, the following matters involving claims related to the Second Amendment (fees were paid by or on behalf of the represented parties):

- *Doe v. Wilmington Hous. Auth.*, No. 403, 2013 (Del.) (counsel for amicus curiae NRA).
- *Hall v. City of Chicago*, No. 13-cv-441 (N.D. Ill.) (counsel for plaintiffs).
- *Illinois Ass'n of Firearms Retailers v. City of Chicago*, No. 10-cv-4184 (N.D. Ill.) (counsel for plaintiffs).
- *New York State Rifle and Pistol Ass'n, Inc. v. Cuomo*, No. 13-cv-291 (W.D.N.Y.) (counsel for amicus curiae NRA), appeal pending, Nos. 14-16, 14-17 (2d Cir.).
- *NRA v. Bureau of Alcohol, Tobacco, Firearms, and Explosives (“BATF”)*, No. 10-cv-140 (N.D. Tex.), on appeal, No. 11-10959, 700 F.3d 185 (5th Cir. 2012) (counsel for plaintiffs).
- *NRA v. McCraw*, No. 5:10-cv-141 (N.D. Tex.), on appeal No. 12-10091, 719 F.3d 338 (5th Cir. 2013) (counsel for plaintiffs).
- *NRA v. Village of Oak Park/NRA v. City of Chicago*, Nos. 8-cv-3696, 8-cv-3697 (N.D. Ill.), among cases on appeal, *NRA v. City of Chicago*, Nos. 08-4241, 08-4243, 08-4244, 567 F.3d 856 (7th Cir.), on review on petition for certiorari, *McDonald v. City of Chicago*, 130 S. Ct. 3020 (2010) (counsel for plaintiffs in *NRA v. Village of Oak Park* and *NRA v. City of Chicago* matters).
- *People v. Aguilar*, No. 112116, 2013 IL 112116 (Ill. Sept. 12, 2013) (counsel for amicus curiae NRA).
- *Queen v. Alvarez*, No. 13-cv-3483 (N.D. Ill.) (counsel for plaintiffs).
- *Richards v. Prieto*, No. 11-cv-16255 (9th Cir.) (counsel for amicus curiae NRA).
- *Shew v. Malloy*, No. 3:13-cv-739 (D. Ct.) (counsel for amicus curiae NRA), appeal pending, No. 14-319 (2d Cir.).
- *Wilson v. County of Cook*, No. 112026, 968 N.E.2d 641 (Ill. 2012) (counsel for amicus curiae NRA).
- *Wollschlaeger v. Scott*, No. 11-cv-22026 (S.D. Fla.), appeal pending, *Wollschlaeger v. Governor, State of Florida*, No. 12-14009 (11th Cir.) (counsel for amicus curiae NRA).

- *Woppard v. Gallagher*, 712 F.3d 865, No. 12-1437 (4th Cir. 2013) (counsel for amicus curiae NRA).

**Mr. Halbrook:**

Other than Mr. Halbrook's discounted rate of \$400 per hour for the NRA, he charges all other clients at the rates of between \$475 and \$540 (more recently \$600). All of this work is as consulting counsel to other attorneys, to firearms industry clients, and to criminal defendants. All of this work concerns interpretation of and issues concerning federal, state, and local firearms laws nationwide. As these matters do not require Mr. Halbrook to enter an appearance in any related litigation, his consulting role is not a matter of public record. These clients have not authorized Mr. Halbrook to disclose their identities.

**INTERROGATORY NO. 4.** List any clients who have been given a discount from the hourly rate customarily charged by plaintiffs' counsel. For each entity, identify the case in which the client was represented, including the name of the case, the docket number, and the court where any case was filed. If any appeal was taken, list the name of the case, the docket number on appeal, the citation to any published decision, and the court where the case was decided.

**ANSWER:**

Plaintiffs object that this request is outside the scope of the discovery permitted by the Court, as it is not "directed to specific issues in the motion for fees and costs." Doc. 110 at 2. Plaintiffs further object that this interrogatory calls for information that is not available to them in the form of information about what other parties have paid their attorneys in other cases. *See, e.g.*, 8B WRIGHT, FEDERAL PRACTICE & PROCEDURE § 2177 ("[I]nterrogatories should be answered . . . with the information that the answering party possesses after due inquiry."); FED. R. CIV. P. 33(b)(1)(B) (person answering for corporate entity must provide "information

available to the party’’). Information acquired or maintained by an attorney outside the scope of the attorney’s agency relationship with a party is not under the party’s control and thus not available to the party. Plaintiffs further object that this interrogatory requests information that may be subject to the attorney-client privilege as in certain circumstances disclosure of the fees paid by a particular client may amount to a disclosure of confidential attorney-client communications. *See, e.g., Matter of Grand Jury Proceeding*, 898 F.2d 565. Plaintiffs further object that answering this interrogatory would be unduly burdensome, FED. R. CIV. P. 26(b)(2)(C)(iii), as the evidence submitted with their fee petition establishes their attorneys’ market rates. *See, e.g., People Who Care*, 90 F.3d 1307. Plaintiffs further object that this interrogatory requests irrelevant information to the extent it calls for information predating commencement of the litigation in this case. *See* FED. R. CIV. P. 26(b)(1).

Subject to and without waiving their objections, Plaintiffs state as follows:

Freeborn & Peters and Locke Lord:

Plaintiffs refer to paragraph 5 of Mr. Howard’s declaration, which indicates that the rates Mr. Howard charged in this case are lower than the rates he customarily charges. Plaintiffs also refer to their answer to interrogatory number 3, which identifies a number of other cases in which Freeborn & Peters and/or Locke Lord have charged rates equal to those charged here.

Cooper & Kirk:

Plaintiffs refer to paragraph 9 of Mr. Thompson’s declaration, which indicates that the rates charged in this case reflect a discount on rates Cooper & Kirk has charged to other clients in litigation of similar complexity and magnitude. Plaintiffs also refer to their answer to interrogatory number 3, which identifies a number of other cases in which Cooper & Kirk has charged rates equal to those charged here.

Mr. Halbrook:

Plaintiffs refer to page 4 of Mr. Halbrook's declaration, which indicates that from the commencement of this litigation through the time the declaration was signed, Mr. Halbrook's hourly rates have been between \$475 and \$540 per hour, except that he has performed services for one non-profit client at \$400 per hour. The only client would be the NRA, including cases in which it is a party or which it supports. While this interrogatory fails to specify a time period, recent such cases include:

- *McDonald v. City of Chicago*, 130 S. Ct. 3020 (2010) (on NRA brief). Case history: *National Rifle Ass'n v. Village of Oak Park*, 617 F. Supp.2d 752 (N.D. Ill. 2008), *aff'd sub nom.*, *National Rifle Ass'n v. City of Chicago*, 567 F.3d 856 (7th Cir. 2009), *cert. granted sub nom.*, *McDonald v. City of Chicago*, 130 S.Ct. 48 (2009), *rev'd*, *McDonald v. City of Chicago*, 130 S. Ct. 3020 (2010), *cert. granted & remanded*, *NRA v. Chicago*, 2010 WL 2571876 (U.S. 2010). On remand, *NRA v. Chicago*, 393 F. App'x 390 (7th Cir. Aug. 25, 2010), *on further remand*, *NRA v. Village of Oak Park*, 755 F. Supp.2d 982 (N.D. Ill. 2010) (denying attorney's fees), *rev'd*, *NRA v. Chicago*, 646 F.3d 992 (7th Cir. 2011) (remanding for award of attorney's fees), 2012 WL 2396366 (N.D. Ill. 2012) (fee award).

NRA-supported cases:

- *New York State Rifle & Pistol Ass'n, Inc. v. Cuomo*, 2013 WL 6909955 (W.D. N.Y. 2013).
- *Shew v. Malloy*, 2014 WL 346859 (D. Conn. 2014).

**INTERROGATORY NO. 5.** List each of the State agencies or other governmental units with which plaintiff's attorneys have had an oral or written contractual arrangement or have been paid attorneys fees for any reason. For each attorney, state the agency or governmental unit; whether the agreement is oral, written, or the result of a court-ordered award; the length of the arrangement, if applicable; the terms of the agreement, if applicable; and the compensation to be paid or that has been paid; whether this is paid on an hourly, lump sum, or other type of basis, giving the type of basis; and the date of the agreement or payment.

**ANSWER:**

Plaintiffs object that this request is outside the scope of the discovery permitted by the Court, as it is not “directed to specific issues in the motion for fees and costs.” Doc. 110 at 2. Plaintiffs further object that this interrogatory calls for information that is not available to them in the form of information about what other parties have paid their attorneys in other cases. *See, e.g.*, 8B WRIGHT, FEDERAL PRACTICE & PROCEDURE § 2177 (“[I]nterrogatories should be answered . . . with information that the answering party possesses after due inquiry.”); FED. R. CIV. P. 33(b)(1)(B) (person answering for corporate entity must provide “information available to the party”). Information acquired or maintained by an attorney outside the scope of the attorney’s agency relationship with a party is not under the party’s control and thus not available to the party. Plaintiffs further object that this interrogatory requests information that may be subject to the attorney-client privilege as in certain circumstances disclosure of the fees paid by a particular client may amount to a disclosure of confidential attorney-client communications. *See, e.g.*, *Matter of Grand Jury Proceeding*, 898 F.2d 565. Plaintiffs further object that answering this interrogatory would be unduly burdensome, FED. R. CIV. P. 26(b)(2)(C)(iii), as the evidence submitted with their fee petition establishes their attorneys’ market rates. *See, e.g.*, *People Who Care*, 90 F.3d 1307. Plaintiffs further object that this interrogatory requests irrelevant information to the extent it calls for information predating commencement of the litigation in this case and because there is no special significance to fees charged to a State. *See* FED. R. CIV. P. 26(b)(1).

Subject to and without waiving their objections, Plaintiffs state as follows:

Freeborn & Peters and Locke Lord:

During the pendency of this litigation, Mr. Howard has not entered into any such engagements.

Cooper & Kirk:

Cooper & Kirk has authorized Plaintiffs to state that since the filing of this lawsuit on May 13, 2011, Cooper & Kirk has had a written contractual arrangement with the State of Tennessee pursuant to which the State pays hourly fees for work done by all Cooper & Kirk attorneys at a single blended rate. That rate was \$375 per hour from the filing of this litigation until July 1, 2011, and it has been \$400 per hour since that date. In addition, since 2013 Cooper & Kirk has had a written contractual arrangement with the State of Louisiana Department of Education pursuant to which Cooper & Kirk is paid a blended rate of \$495 per hour for work done by Cooper & Kirk attorneys. Since the filing of this lawsuit, some of the Cooper & Kirk attorneys whose fees Plaintiffs are requesting, *see* Thompson Decl. ¶ 10, have performed work pursuant to these contractual arrangements. The blended rates charged pursuant to these contracts do not necessarily represent a discount because some of the lawyers who perform work under the contracts have billing rates that are lower than the blended rates.

Mr. Halbrook:

During the pendency of this litigation, Mr. Halbrook has not entered into any such engagements.

Finally, Plaintiffs refer to paragraph 5 of Mr. Howard's declaration, paragraph 16 of Mr. Thompson's declaration, and relevant docket entries in the matters of *NRA v. Village of Oak Park/NRA v. City of Chicago*, Nos. 08-cv-3696, 08-cv-3697 (N.D. Ill.), including docket entries 106, 107, 108, 133, 134, 139, and 150 in No. 08-cv-3697, for information about the fees Oak Park and Chicago were ordered to pay for work performed by Plaintiffs' attorneys.

**INTERROGATORY NO. 6.** List other persons who (and/or organizations which) have agreed to support or finance plaintiffs' litigation. If so, identify the terms of any fee agreement with those persons or entities.

**ANSWER:**

Plaintiffs object that this request is outside the scope of the discovery permitted by the Court, as it is not "directed to specific issues in the motion for fees and costs." Doc. 110 at 2. Plaintiffs further object that the discovery sought is unreasonably cumulative or duplicative, FED. R. CIV. P. 26(b)(2)(C)(i), as the materials submitted with the fee petition demonstrate that the NRA financed this litigation. *See, e.g.*, Thompson Decl. ¶ 9.

Subject to and without waiving their objections, Plaintiffs state that the NRA has financed the cost of this litigation. The rates the NRA has paid to Freeborn & Peters and Locke Lord are set forth in Mr. Howard's declaration and accompanying evidentiary materials and the rates the NRA has paid Cooper & Kirk are reflected in Mr. Thompson's declaration and accompanying evidentiary materials. The NRA has paid Mr. Halbrook at a rate of \$400 per hour for his work on this litigation.

Dated: March 3, 2014

Respectfully submitted,

William N. Howard  
LOCKE LORD LLP  
111 S. Wacker Dr.  
Chicago, Illinois 60606  
Tel: (312) 443-0333  
Fax: (312) 896-6433  
[whoward@lockelord.com](mailto:whoward@lockelord.com)

/s/ Charles J. Cooper  
Charles J. Cooper\*  
David H. Thompson\*  
COOPER & KIRK, PLLC  
1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036  
Tel: (202) 220-9600  
Fax: (202) 220-9601  
[ccooper@cooperkirk.com](mailto:ccooper@cooperkirk.com)  
\*Admitted *pro hac vice*.

*Attorneys for Plaintiffs*

## **CERTIFICATE OF SERVICE**

The undersigned attorney states that he caused a true and correct copy of **OBJECTIONS AND ANSWERS TO INTERROGATORIES DIRECTED BY LISA MADIGAN TO PLAINTIFFS** to be served upon the parties of record, as shown below, via electronic mail and United States mail on the **3rd day of March, 2014**.

By: /s/ Charles J. Cooper

## **SERVICE LIST**

Terence J. Corrigan  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, IL 62706  
Tel: (217) 782-5819  
Fax: (217) 524-5091  
[tcorrigan@atg.state.il.us](mailto:tcorrigan@atg.state.il.us)

Joseph A. Bleyer  
BLEYER & BLEYER  
601 West Jackson  
P.O. Box 487  
Marion, IL 62959  
Tel: (618) 997-1331  
[jableyer@bleyerlaw.com](mailto:jableyer@bleyerlaw.com)

Karen L. McNaught  
Illinois Attorney General's Office -  
Springfield  
500 South Second Street  
Springfield, IL 62706  
Tel: (217) 782-1841  
Fax: (217) 524-5091  
[kmcnaught@atg.state.il.us](mailto:kmcnaught@atg.state.il.us)

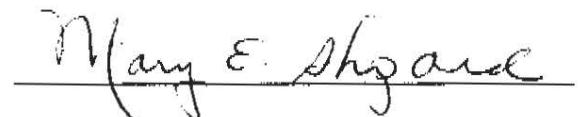
David A. Simpson  
Illinois Attorney General's Office -  
Chicago 2  
100 West Randolph Street  
12th Floor  
Chicago, IL 60601  
Tel: (312) 814-3419  
[dasimpson@atg.state.il.us](mailto:dasimpson@atg.state.il.us)

Karl Triebel  
Illinois Attorney General's Office -  
Chicago 2  
100 West Randolph Street  
12th Floor  
Chicago, IL 60601  
Tel: (312) 814-2391  
Fax: (312) 814-2253  
[ktriebel@atg.state.il.us](mailto:ktriebel@atg.state.il.us)

**VERIFICATION****STATE OF ILLINOIS****CITY OF COBDEN**

I, Mary Shepard, state that the information pertaining to her contained in the foregoing responses has been collected and the responses prepared with the advice and assistance of counsel. and that, subject to any inadvertent or undiscovered errors, and based on the records and information still in existence and thus discovered, the responses are true to the best of her knowledge, recollection, and belief based upon the information known or made available to her.

DATED: March 3, 2014

  
\_\_\_\_\_  
Mary Shepard

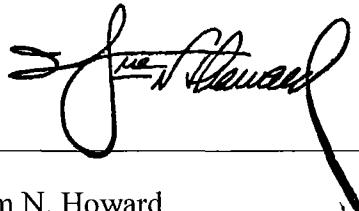
**VERIFICATION**

**STATE OF ILLINOIS**

**CITY OF CHICAGO**

I, William N. Howard, pursuant to Federal Rule of Civil Procedure 33 and with authority and on behalf of the Illinois State Rifle Association, states that the information pertaining to the Illinois State Rifle Association contained in the foregoing responses has been collected and the responses prepared with the advice and assistance of counsel, and that, subject to any inadvertent or undiscovered errors, and based on the records and information still in existence and thus discovered, the responses are true to the best of his knowledge, recollection, and belief based upon the information known or made available to him.

DATED: March 3, 2014



William N. Howard

On behalf of the Illinois State Rifle  
Association

# **EXHIBIT B**

# Cooper & Kirk

Lawyers

A Professional Limited Liability Company  
1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

Peter A. Patterson  
ppatterson@cooperkirk.com

(202) 220-9600  
Fax (202) 220-9601

March 25, 2014

## By Email and U.S. Mail

Karen L. McNaught  
Assistant Attorney General  
500 South Second Street  
Springfield, IL 62706  
kmcnauaght@atg.state.il.us

Re: *Shepard v. Madigan*, No. 11-405 (S.D. Ill.)

Dear Karen:

I am writing to supplement Plaintiffs' responses to the State's interrogatories. In particular, Plaintiffs' response to Interrogatory No. 5 states, in part, "Cooper & Kirk has authorized Plaintiffs to state that since the filing of this lawsuit on May 13, 2011, Cooper & Kirk has had a written contractual arrangement with the State of Tennessee pursuant to which the State pays hourly fees for work done by all Cooper & Kirk attorneys at a single blended rate. That rate was \$375 per hour from the filing of this litigation until July 1, 2011, and it has been \$400 per hour since that date." On March 21, 2014, Tennessee informed Cooper & Kirk that the State agreed to increase Cooper & Kirk's blended rate to \$425 per hour, effective March 1, 2014.

Sincerely,

s/ Peter A. Patterson  
Peter A. Patterson  
COOPER & KIRK, PLLC  
1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036  
Tel: (202) 220-9600  
Fax: (202) 220-9601  
ppatterson@cooperkirk.com  
*Attorney for Plaintiffs*

Cc: Terrence J. Corrigan  
Joseph A. Bleyer  
Karl Triebel

# EXHIBIT C

## PLAINTIFFS' RESPONSES TO STATE'S LINE-BY-LINE OBJECTIONS

### I. Freeborn and Peters LLP

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/2/2011	WNH	Work with lobbyist, telephone conference; outline	Work with Todd Vandermyde regarding new matter; telephone conference with client regarding preparation for and background of complain; work on outline of potential complaint.	1.3	Work not done for client – work done with lobbyist	Agree to omit.
5/6/2011	GLW	Research venue issues	Review venue issues.	0.7	None.	n/a
5/8/2011	WNH	Review of emails and materials	Review of emails and materials therein with regard to potential plaintiffs for potential lawsuit with regard to concealed·carry cause of action.	1.3	Insufficient documentation to whether the hours claims are reasonable and related or necessary for the case	Full entry reveals that materials concerned prospective plaintiffs for a challenge to the state's carriage statute.
5/9/2011	GLW	Research, analysis, editing	Continue researching potential causes of action for the complaint challenging Illinois' concealed carry law; research and analyze standing issues; analyze and edit the draft of the complaint.	4.2	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/9/2011	WNH	Preparation, communications	Work on issues pertaining to preparation of complaint; communications with team regarding same.	1.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; could be clerical work	Full entry reveals that the work concerned the complaint in this case.
5/10/2011	GLW	Research, analysis, editing	Further research on standing issues; research and analyze recent Illinois case law reexamining precedent on the concealed carry laws in light of the McDonald and Heller cases; analyze and edit the complaint.	3.4	None.	n/a
5/10/2011	WNH	Communications, work on complaint, drafting claim, incorporating changes and laws	Several communications with team regarding status, developments, legal issues and refinements to complaint; continued work on Complaint; work on drafting of 1983 claim; work on incorporating changes suggested by team into complaint; work on incorporating various IL laws into complaint.	5.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/11/2011	GLW	Research, analysis, editing	Further research and analysis of Illinois case law interpreting the Kalodimos decision in light of the recent Supreme Court decisions; further editing of the draft of the complaint.	1.9	Kalodimos v. Village of Morton Groce, 103 Ill. 2d 483; state law case, not relevant to this case	Status of statute under state law relevant to identifying appropriate forum and targets of litigation.
5/11/2011	WNH	Drafting, email follow-up	Continued work on drafting Complaint; follow-up on numerous email exchanges with regard to new developments pertaining to the SAF and how to keep the case in state court and avoid consolidation with federal claim brought by SAF.	2.8	None.	n/a
5/12/2011	GLW	Research, analysis, editing	Analyze potential federal district courts in which to file the complaint, including biographical information on the judges, the speed of the docket, etc. analyze the relevant Illinois statutes for further limitations on the possession of firearms that could impact the complaint, including any restrictions on carrying firearms in churches; research and analyze equal protection issues and pleading standards and elements; further editing of the draft complaint.	7.2	Object to time spent on bios of judges - forum shopping	As explained in brief, research concerning judges is compensable.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/12/2011	WNH	Preparation, communications, securing feedback, discussions	Continued work on preparation for complaint; communications with team regarding same; efforts to secure feedback regarding various judges in central and southern district; discussions with Vince Quilici regarding status and potential status for suit and reported to clients regarding same; tended to attempting to figure out proper venue for the case.	4.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details work on complaint, research concerning judges and venue issues, exploration of strategies for suit.
5/13/2011	GLW	Analysis, editing, finalizing	Work with Bill Howard analyzing, editing and finalizing the complaint for filing.	1.6	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/13/2011	WNH	Review, communications, telephone conference, email, discussions	Review of complaint filed by Gura in Moore v. Madigan; review of comments from team regarding complaint filed by Gura in Central District; tended to communications with team regarding issues as to why we sued the States attorney and sheriff and tended to issues as to explaining situation to client; telephone conference with State's Attorney as to confirmation of approval to speak with client to have him explain he understands the mechanics of the situation and to appease client that all is well; tended to preparation of email and forwarding of complaint to Victor Quilici; examined emails and other materials from Victor Quilici; tended to preparation and issuance of summonses; numerous discussion with team regarding venues and filing of complaint in different venues.	5.8	Redacted the work on press release, but didn't reduce hours claimed	Redaction of lengthy entry may justify reduction of hours claimed, but not complete exclusion.
5/14/2011	WNH	Communications	Communications with team regarding status and issues pertaining to client's concerns about suing local governmental agencies.	0.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/16/2011	WNH	Email review, discussion, telephone conference, reporting, preparation, review, communications	Review of email from D. Thompson regarding FFL right to carry in Illinois; discussion with T. Vandermyde regarding contact w/ State's Attorney and attempts to discuss with Mary need for inclusion in suit; telephone conference with Tyler Edmonds regarding case and contact with Mary; report to clients regarding same; prepared for discussion with Ginny Simone; review of Richards v. Prieto decision from E.D. California; review of post-Kalodimos decisions and considered effect on same of case; communications with client regarding scheduling meeting to meet her in her home town; discussions with team regarding communications with Mary Shepard.	2	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; Kalodimos not relevant to federal issues	Full entry details review of relevant case law, communications with plaintiff Mary Shepard, and general case strategy.
5/17/2011	WNH	Email, review, communications	Prepared email to team regarding status and next steps; review of Rule 16 bases for purposes of expediting; communications with client and report to team regarding same and anticipated meeting next week.	1.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/18/2011	WNH	Review, response	Review of and response to email friend of Mary Shepard regarding meeting with Mary and related matters.	0.3	None.	n/a
5/19/2011	WNH	Summons follow-up	Follow-up on service of summons	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; clerical duty	Eighteen minutes to supervise service of summons is reasonable.
5/20/2011	WNH	Preparation	Prepare for trip to visit with Mary Shepard.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Entry, which refers to plaintiff by name, is clearly related to the case. One half hour to prepare for travel to a meeting is reasonable.
5/22/2011	WNH	Travel, meeting	Travel to Springfield for meeting with Todd Vandermyde regarding upcoming meeting with client and to discuss various alternatives and arguments for purposes of defeating statute and succeeding in court; conducted meeting with Todd Vandermyde.	3.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/23/2011	WNH	Work on meeting issues, discussions, travel, meeting	Work on issues pertaining to upcoming meeting with client; discussions with Todd Vandermyde regarding same; travel from Springfield, IL to Cobden, IL for meeting with client; conducted meeting with client; return from meeting with client.	10	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Again, read in context, hours relate to meeting with Plaintiff in this case. Entry includes details of starting and ending point of travel.
5/31/2011	WNH	Communications	Communication with Todd Vandermyde regarding judge being assigned to case and related issues.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
6/7/2011	WNH	Work on motion, review, report preparation, report and review	Work on motion to withdraw on behalf of partner, Jeff Cross; review of materials from opposing counsel regarding extension of time; prepared report to NRA regarding update and request for extension; prepared report to Mary Shepard regarding same; report to client regarding status, update and next steps; review of materials from court granting extension of time and report to client regarding same; review of ISRA comments with regard to flash mobs events in Chicago and forwarded same to client.	1.5	Prepare report for NRA not part of case	As full entry makes clear, preparing a report for the NRA was only one of many tasks that are reflected in this entry.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/8/2011	WNH	Telephone conference, request	Telephone conference with Todd Vandermyde regarding status and next steps, request for additional time and court order granting same.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
6/9/2011	WNH	Examined materials, forwarded	Examined materials with regards to concealed carry in Colorado and forwarded same to client for consideration.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
6/15/2011	WNH	Review, communications	Review of notice from court regarding appearance for defendants; communication with Todd Vandennyde regarding Aguilar appeal and timing of same; review of Aguilar decision and consideration of impact and usefulness on our case.	1.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry refers to notices of appearance by State's counsel, which appeared on the docket on this date, and to relevant legal developments.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/20/2011	WNH	Telephone conference, communications, response, review	Telephone conference with Vince Quilici regarding status and attempted conf call w/ several participants re-carve-out of Cook County for concealed carry weapon statutes; communications with team regarding same; response to Vince Quilici regarding status and next steps; review of motion for extension of time filed by certain defendants.	1.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry refers to motion filed by defendants on this date, and to various Second Amendment-related legal developments in Illinois.
6/21/2011	WNH	Review, communications, review and examination of communications	Review of info from court regarding response date for Defendants; communications with client regarding same; review of communication from Vince Quilici; examined communication from opposing counsel regarding draft Order for granting of motion for extension of time.	1.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry refers to motions and filings on or around this date.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/22/2011	WNH	Examined communications, communications, examined notice, conference call, report preparation, examined response	Examined communication from Livesay's counsel regarding status and developments; communications with clients regarding same; examined notice from court with regard to timing of answer and response; participated in conference call with various people involved on ISRA's part regarding potential action in removing Cook county from law that is being sought to be passed to attempt to intro and succeed on concealed carry statute; prepared summary report to client team; examined response from client team regarding same.	2.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; part of discussion clearly about another case	Full entry details meeting with Plaintiff ISRA, and other developments related to the case.
6/27/2011	WNH	Examination of communication, review decision, communication	Examined most recent communication from Chicago Alderman and Police regarding heightened security issues; review of Mimes decision; communication from client with regard to next steps.	1	Information about heightened security in Chicago?	Agree to omit.
7/5/2011	WNH	Email review	Review of email and attachment from Todd Vandermyde regarding amendment to Chicago ordinance allowing gun ranges in Chicago.	0.3	Another case; nothing to do with this one	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
7/8/2011	GLW	Telephone calls, analysis, editing, review, finalization	Call with the judge's clerk regarding filing requirements for a supporting declaration and confer with Bill Howard regarding same; multiple calls with co-counsel regarding finalizing the motion for injunctive relief and filing issues relating to same; analyze and edit the motion for oral argument; review and edit the motion for injunctive relief and supporting memorandum; finalize all of the pleadings and coordinate the filing of same; analyze the defendant's second motion for an extension of time to file their responsive pleadings.	5.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details work on preliminary injunction motion filed this date.
7/8/2011	WNH	Telephone conferences, review of motion and local rules, discussion, work on motion	Telephone conferences with T. Vandermyde regarding preparation of motion for injunction; telephone conference with C. Conte regarding same; review of drafts of motion; review of local rules regarding same; strategy discussion with Garry Wills regarding filing same; continued work on assuring filing of motion.	2.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details work on preliminary injunction motion filed this date.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
7/11/2011	WNH	Issues on hearing, follow-up communications, examination	Tended to issues pertaining to timing of hearing on Motion for Preliminary Injunction and Temporary Restraining Order; follow-up with clients regarding same and exchange of communications regarding same; examined notices from court regarding same.	0.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; clerical or legal	Reasonable for lead attorney to track scheduling of important hearing.
7/12/2011	WNH	Communication and follow- up	Communication with client regarding status and follow-up communication with team regarding request for hearing date and feedback from court; follow-up on attempts to determine time frame for events going on in Central District case filed by SAP.	1.00	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Reasonable to track legal developments related to the case.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
7/13/2011	WNH	Discussion, telephone conference, communication preparation, follow-up, analysis	Discussion with Todd Vandermyde regarding status and next strategy steps in case; telephone conference with Court Clerk in case to discuss timing of hearing; prepared communication to clients regarding same; work on next steps in case; follow-up communications with client regarding status and go forward plan; continued analysis of Ezell case to determine use in Shepard and possibility of supplementing pleadings based on decision.	2.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; conference with clerk about timing of hearing that was never granted?	State's second objection, based on developments in this case, belies claim that full entry lacks sufficient detail to assess reasonableness of hours. Hearing not denied until several months later, and work toward scheduling hearing is a reasonable part of litigation.
7/14/2011	WNH	Communication	Communication with team regarding status and next steps in litigation given developments.	0.3	None.	n/a
7/18/2011	WNH	Review	Review of Article 22 interpretation by voters; re-review of Kalomidos for purposes of attacking same.	0.7	Not relevant to federal issue	Work developing full scope of legal challenge, including exploring related claims never filed, is compensable.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
7/21/2011	WNH	Argument issues, review of communications	Work on issues pertaining to possible arguments in support of position; review of communications with team regarding reports on oral argument and recent filing of petition for certification.	0.5	None.	n/a
7/22/2011	WNH	Review of motions and pleadings, email	Review of Motion to Dismiss filed by State; review of Opposition to Motion for Preliminary Injunction; review of motion to dismiss filed by sheriff; review of pleadings filed by defendants; exchange of emails with possible amicus issues.	1.80	None.	n/a
7/25/2011	WNH	Review of pleadings, response to communications	Continued review of recently Defendants' pleadings and considered arguments to be made in response thereto; review of and response to communications from possible amicus counsel.	1.8	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
7/27/2011	WNH	Examined communications, review, examined pleadings, discussion	Examined communications from co-counsel regarding responding to amicus request from Brady Center; review of notes from court hearing attended by Todd Vandermyde; examined pleadings filed in Moore case; participated in discussion amongst team members regarding next strategic steps to advance resolution with Motion for Summary Judgment and related issues.	1.3	TV is NRA lobbyist; relevance? Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details tracking legal developments and developing case strategy.
8/1/2011	WNH	Review of communication, telephone call	Review of communication from co-counsel regarding logistics for filing motion to dismiss and motion for summary judgment; place call to court clerk regarding intent to file two briefs and to secure suggestion as to how to proceed.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; clerical or legal	Eighteen minutes spent exploring disposition strategy is reasonable. Delegation to clerical staff not required when process of delegating would take as long as the task itself.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
8/2/2011	GLW	Analysis of federal rules and case law, conference	Analyze the federal rules and applicable case law on the appealability of an order granting or denying injunctive relief and confer with Bill Howard regarding same; analyze the timing for responding to a motion for leave to file an amicus brief and the standards for opposing same.	1.1	None.	n/a
8/2/2011	WNH	Discussion and communications, procedural issues, memo review	Strategy discussions and communications with team; looked into procedural issues and aspects of various permutations of rulings and strategic steps depending on court's ruling; commenced review of memo in support filed by Brady Center.	1.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details tracking legal developments and developing case strategy.
8/4/2011	GLW	Analysis	Analyze the amicus brief in support of the defendants.	0.6	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
8/4/2011	WNH	Review of hearing outcome and initial draft	Review of outcome of hearing in Central District case and notes provided by Todd Vandermyde; review of initial draft of summary judgment motion prepared by co-counsel.	1.3	Outcome was that case taken under advisement; no explanation for what took 1.3 hours; insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	State's first objection, based on contemporary developments in this case, belies claim that full entry lacks sufficient detail to assess reasonableness of hours. Full entry reveals that part of this time was spent reviewing a draft summary judgment brief.
8/5/2011	GLW	Analysis	Analyze the local and procedural rules for the motion.	0.8	Legal or clerical; insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals that GLW performed legal analysis of procedural rules, which is not a clerical duty.
8/5/2011	WNH	Review, commentary provided, communication, discussions, forwarding draft, securing copies	Review of draft of Motion for Summary Judgment and provided commentary regarding same; communications and discussions amongst team members regarding brief and declaration; tended to forwarding draft declaration to Mary Shepard; secured copies of materials from Mary Shepard to be used in brief.	2.8	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
8/6/2011	WNH	Review, work on motion	Continued review of and work on motion for summary judgment and declarations; continued work on declaration in support.	1.3	None.	n/a
8/7/2011	GLW	Analysis, cite checking, proofing, drafting	Continue analyzing, cite checking, and proofing motion for summary judgment; draft declarations in support of brief.	1.9	None.	n/a
8/8/2011	WNH	Finalizing motion	Tended to attempting to finalize Motion and Declarations in support of same.	2.8	None.	n/a
8/8/2011	GLW	Conference, revising, analyzing, final review, filing motion	Confer with Bill Howard regarding go-forward strategy for finalizing the motion and otherwise; revise the declarations; analyze the local rules regarding summary judgment motions; final review of the motion and coordinate filing of same.	1.1	None.	n/a
8/10/2011	WNH	Review of transcript	Review of transcript from in front of Judge Dow.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; no transcript in this case	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
8/12/2011	WNH	Examined communications and pleading, communications	Examined communication and draft pleading from D.C. counsel regarding response to Motion to Dismiss and communication with team regarding same.	1.3	None.	n/a
8/15/2011	WNH	Review, communications	Review of next iteration of response to motion to dismiss and communication with team regarding same; communications with other counsel regarding latest version of brief and filing of same.	2.8	Includes clerical time for filing	Full entry and context reveals time spent, in part, on communication related to filing of the brief. Actual filing did not occur until the next day.
8/15/2011	GLW	Analysis	Analyze draft of the response to the state's motion to dismiss for substance and to cite check.	0.6	None.	n/a
8/19/2011	WNH	Examined communications, review of response	Examined communications amongst team members with regard to response to Sheriffs arguments raised in briefs and responded to same; continued review of response to motion to dismiss.	1.3	None.	n/a
8/19/2011	GLW	Analysis of response	Analyze the draft of the response to the Sheriffs motion to dismiss.	0.2	None.	n/a
8/24/2011	WNH	Review of motion	Review of motion to clarify filed in Moore matter filed by Attorney General.	0.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
8/29/2011	WNH	Examined materials from court	Examined materials from court.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Docket reveals that State filed a reply brief on this date.
8/29/2011	GLW	Analysis	Analyze the defendants' reply in support of their motions to dismiss.	0.3	None.	n/a
9/1/2011	WNH	Review of materials	Review of recent materials filed by Attorney General's office; review of materials from second motion to dismiss.	0.3	None.	n/a
9/2/2011	WNH	Review and communications	Review of Motion to Defer Ruling on Summary Judgment filed by Defendants and corresponding exhibits thereto and communication with clients regarding same.	0.5	None.	n/a
9/16/2011	WNH	Preparation, coordination, and filing of response, communications, review of motion	Tended to preparation, coordination, communication and filing of response to Motion to Defer ruling; communications with team members regarding same; review of motion to defer to confirm bases for challenging same.	1.8	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
9/16/2011	GLW	Conference, analysis, editing response	Confer with Bill Howard regarding the response to the motion to defer and our go forward strategy; analyze the local rules and the case docket to confirm the date for the response to the motion to defer; analyze and edit the response to the motion to defer.	0.8	None.	n/a
9/21/2011	WNH	Review of motion and response, communications	Review of Motion to Cite Supplemental Authority; review of response filed in Moore case forwarded by Todd Vandermyde; communication with team regarding status and developments.	0.5	None.	n/a
9/22/2011	WNH	Communication, review of response	Communication with team regarding filing of Response to Motion for Leave to Cite Supplemental Authority; review of draft response to same and prepared comments back to Dave Thompson regarding same.	1.3	None.	n/a
9/23/2011	WNH	Review of materials and communications	Continued review of materials relative to response to motion to cite supplemental authority and communications with team regarding same and tended to filing of same with court.	1.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
9/26/2011	WNH	Completion and filing of response	Tended to completion of filing of response to motion to cite supplemental authority.	0.3	None.	n/a
9/29/2011	WNH	Review of decision	Review of recent Ezell decision finding case not moot given City's change to its ordinance and review of communications amongst team members regarding same.	0.5	None.	n/a
11/16/2011	GLW	Analysis of court order and case file, conference	Analyze the court's order making several rulings on pending matters (0.1); analyze the case file and confer with Bill Howard regarding the impact of the court's ruling on other pending issues and our go-forward strategy in light of the court's rulings (0.4).	0.5	None.	n/a
11/16/2011	WNH	Review of order, preparation of email, review of docket	Review of Order entered by court relative to "docket control"; prepared email to clients regarding order and discussion of next steps; review of docket for purposes of conference call with clients.	0.8	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
11/17/2011	GLW	Conference call, researching legal issue	Conference call with co-counsel regarding the court's rulings and coordinating our strategy going forward (0.3); begin researching the legal issue of de facto denial of a motion for a preliminary injunction (0.5).	0.8	Duplicative; the time claimed (3.4 hours) is excessive to read a 4 paragraph order for which no litigant was to do anything additional; see Doc #53	Unclear what this objection refers to. Time claimed is only 0.8 hours. Entry details research of a legal issue prompted by court's denial of a request for a PI hearing; length of order irrelevant.
11/17/2011	WNH	Follow-up on status, report preparation	Follow-up on status of what needs to be filed and when pursuant to recent court order; prepared report to clients.	1.3	None.	n/a
11/21/2011	WNH	Review of case	Review of recent UUW case.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details review of legal developments relevant to case.
1/17/2012	WNH	Conference call	Conference call with team regarding status and developments.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; nothing has happened since November 1	Eighteen minute conference on case status and strategy two months after most recent movement in case eminently reasonable.
1/23/2012	WNH	Communication	Communication amongst team members regarding status, timing and possible hearing or ruling dates.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details development of case strategy.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
1/26/2012	WNH	Conference call	Conference call with Chris Conte regarding status and next steps in Southern District litigation.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
2/3/2012	WNH	Telephone conference, review of decision, forwarding document, correspondence	Telephone conference with Todd Vandermyde regarding status and decision in Moore; review of Moore decision and forwarded same to clients; correspondence with team regarding status and next steps.	1.5	In part; Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; No objection to review of decision, but do not know number of hours claimed	Entire 1.5 hour entry relates to review of decision and communication to client regarding decision.
2/5/2012	WNH	Email communications	E-mail communication with team regarding status and nest steps.	0.3	None.	n/a
2/6/2012	WNH	Follow-up with court clerk, review of motion, communications with client	Follow-up with Court Clerk regarding status and next steps; review of motion to supplement filed by the IL Attorney General; communication with client regarding same and next steps	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details tracking developments in case, including motion filed that day by State, and communications with Court regarding same. Eighteen minutes reasonable for these tasks.
2/6/2012	GLW	Analysis of motion and decision	Analyze the motion to cite additional authority; analyze the decision in the Moore case and its impact on our case.	0.5	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
2/7/2012	WNH	Telephone conferences	Telephone conference with clerk regarding status, next steps and go forward plan for briefing of Motion to Supplement; telephone conference with Chris Conte regarding status, next steps, preparation of response to Motion to Supplement to provide court with responsive arguments to same, and related issues.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details development of strategy for supplementing in light of <i>Moore</i> decision.
2/8/2012	WNH	Work on response; call to court clerk, communications to team	Work on response to motion to cite supplemental authority; call to court clerk to advise of heads up that we are filing same; communication with team regarding same.	1.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; call to clerk	Full entry details preparation of response to motion to supplement. Delegation to clerical staff not required when process of delegating would take as long as the task itself.
2/16/2012	WNH	Work on issues, communications	Work on issues pertaining to press release and communications with client and Steve Halbrook regarding same.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; press release not recoverable	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
2/22/2012	WNH	Tended to issues pertaining to interview, communications	Tended to issues pertaining to press request for interview of Mary Shepard; communications amongst team members relative to same.	0.5	Press release not recoverable	Agree to omit.
		Call with clerk	Call with clerk.	0.2	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Communications with clerk regarding case status reasonable task for attorney. Delegation to clerical staff not required when process of delegating would take as long as the task itself.
2/29/2012	WNH	Telephone conference, reporting, checking docket entries	Telephone conference with client regarding status; placed call to Clerk regarding status; report to client regarding status; checked Pacer system for docket entries.	0.5	None.	n/a
3/2/2012	WNH	Telephone conferences	Telephone conference with Court Clerk regarding status and scheduling issues; telephone conference with Chris Conte regarding same.	0.5	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
3/5/2012	WNH	Review of decision, discussions, review of rules and notice, call to court clerk, communication with client, summary	Review of Woppard decision with regard to intermediate scrutiny test; numerous discussions between and amongst team members relative to filing of notice to court of decision; review of Rule 28(f) to see if it is applicable to a district court proceeding; review of draft of notice letter to court; call to Court Clerk relative to supplementing with additional information from Woppard case; communication with client regarding submission of decision to court and other issues; commenced putting together bullet-point summary of case for submission of relevant items to court.	1.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry minutely details review of relevant legal development (regarding standard of review) and creation and implementation of decision to file a motion to supplement.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
3/7/2012	WNH	Review and consideration, telephone conference, call to court clerk, review of rules	Review of Wppard decision and consideration of mechanism to advise court of same; telephone conference with client regarding same; placed call to court clerk to see advice as to how to proceed; review of Fed. R. Civ. P. regarding proper procedure for supplementing brief in trial court; review of samples of Rule 28j motions to consider application to this situation.	1.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry minutely details review of relevant legal development (regarding standard of review) and creation and implementation of decision to file a motion to supplement.
3/8/2012	WNH	Review of materials	Review of materials provided by client relative to new decision and consideration of impact on Shepard proceedings.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals further work tracking legal development relevant to case.
3/9/2012	WNH	Review, examination of communications	Review of brief filed in Moore; examined communication from Todd Vandermyde regarding same.	1	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; TV	Full entry details tracking legal developments related to case.
3/20/2012	WNH	Follow-up communications	Follow-up with client and Mary Shepard regarding participation in related case as amicus and communication with clients and counsel regarding same.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals communications with Plaintiff regarding amicus strategy.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
3/21/2012	WNH	Review of communications	Review of communication from court to parties regarding open questions as a result of court order.	0.3	None.	n/a
3/29/2012	WNH	Call to clerk	Call to Clerk.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Context reveals that parties had recently received communication from court.
3/30/2012	WNH	Follow-up on status, review, communications	Follow-up with client regarding status; follow-up with Clerk regarding same; commenced review of Wollard pleading; review of notice from court relative to decision; review of decision; numerous communications with team regarding same; call with clients to discuss outcome/result; communication amongst team members regarding status and next steps.	1.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry and context from docket reveals that this work related to the dismissal order issued on this date.
4/2/2012	WNH	Communication, work on notice, forwarding notice, telephone conference	Communication with team regarding status and next steps; work on notice of appeal of decision from southern district; forwarded notice of appeal to clients and NRA; telephone conference with David Thompson regarding appellate brief logistics.	1.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
4/4/2012	WNH	Review	Went through appeal check list for compliance and follow-through.	0.3	None.	n/a
4/5/2012	WNH	Review of material	Review of materials from Victor Quilici regarding empirical study information.	0.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; too late for evidence	Full entry reveals review of relevant factual developments pertaining to government interest in the statute, which is relevant to appeal.
4/6/2012	GLW	Analysis of documents	Analyze the appellate rules and requirements regarding the docketing statement, the designation of the record, the certificate regarding the transcripts, etc; analyze the court's opinion and draft the docketing statement.	1.5	None.	n/a
4/6/2012	WNH	Work on appeal, communications, review, reporting, revising and review	Continued work in furtherance of appeal and work on related documentation regarding same; communication with Washington team regarding same and review of feedback and comments thereto; review of motion to suspend briefing filed by defendants; reported on same to clients; revised court documents given clients' input; review of communications from D.C. team regarding appearances.	1.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry minutely details work on appeal.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
4/9/2012	GLW	Conference, analysis, drafting and revising, coordinating, analysis	Confer with Bill Howard regarding the initial filings in the Seventh Circuit, and analyze the federal appellate rules and local rules regarding the procedures and requirements for the designation of the record, the jurisdictional statement, the disclosure statement, the transcript information sheet, etc.; draft and revise the initial filings in the Seventh Circuit, and coordinate the filing of same; analyze the defendants' motion to stay and the relevant rules regarding same).	1.7	None.	n/a
4/9/2012	WNH	Work on forms, completing documents, communications	Work on completing proper forms for filing; completed docketing entry listing; completed Docketing statement; communication with team regarding inclusion of Section 1343 in the Docketing Statement; communication with team regarding motion by State to suspend briefing and review of research regarding possible bases for a response and to press current schedule regardless of other firearms laws cases.	1.5	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
4/10/2012	WNH	Review of draft, conference call, reporting, responding, preparation of comments, review of motion and draft	Review of draft of 7th Circuit brief; participated in conference call; call to Mary regarding status of defendant/assailant; report to clients regarding same; respond to team regarding comments on brief; prepared comments on 7th Circuit draft brief; follow-up on locating whereabouts of assailant of Mary's and confirmation of his time behind bars; communication with clients regarding same; review of motion to hold in abeyance filed by defendants; review of draft of response to motion to hold in abeyance.	4.8	Investigation about assailant does not advance the litigation; Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Investigation about assailant necessary part of representation of client whose assault received public attention as a result of this litigation. Full entry details extensive work on appeal.
4/11/2012	WNH	Communications, finalized filing	Communication with team regarding filing of brief; finalized filing of brief.	2	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; is part clerical?	Full entry details final work on brief. Brief filed by C&K staff, per Thompson Declaration, so no part of the entry is clerical.
4/13/2012	WNH	Review of notice, advising client	Review of notice from court and advised client and team relative to same.	0.3	None.	n/a
4/20/2012	WNH	Review	Review of amici brief filed by NRA and others in Shepard case.	1.5	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
4/23/2012	WNH	Examination of notice, reporting to client	Examined notice from court regarding State's request for more time; report to client regarding same.	0.3	None.	n/a
4/24/2012	WNH	Review of motion, work on response, review of rules and law, review of communications	Review of motion to consolidate appeals in Shepard and Moore and report to client regarding same seeking direction as to preparation of opposition or not; work on issues pertaining to preparation of a response to Motion to Consolidate; work on response to same; review of rules and case law relative to same; review of communications with team regarding arguments to be raised in response.	4	None.	n/a
4/24/2012	GLW	Conference, analysis, outlining	Confer with Bill Howard regarding responding to the defendants' motion to consolidate; analyze the motion to consolidate and research case law relating to this issue, and devise and outline arguments for the opposition brief.	4.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
4/25/2012	WNH	Response to motion, communications	Response to motion for consolidation work continued; communications with team relative to same, proper arguments to raise and revisions to brief.	1.3	None.	n/a
4/25/2012	GLW	Analysis and editing	Analyze and edit the revised draft of the opposition to the motion to consolidate.	0.1	None.	n/a
4/26/2012	WNH	Review of court order, reporting	Review of court order denying relief requested by state and others re extension of time and consolidation; report to clients regarding same.	0.5	None.	n/a
4/26/2012	GLW	Analysis of court order	Analyze the court's order denying the motion to consolidate.	0.1	None.	n/a
5/9/2012	GLW	Analysis	Analyze defendant's motion to join.	0.1	None.	n/a
5/9/2012	WNH	Review, communications, review of brief	Review of materials regarding oral argument; communications with team regarding same; commenced review of brief filed by State.	1.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals discussion of oral argument strategy and review of State's brief, filed this date.
5/10/2012	WNH	Logistical issues, review of communications	Tended to amicus and appeal logistical issues and rules and review of communications regarding same.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; clerical?	Full entry reveals coordination with amici.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/11/2012	WNH	Work on request, communications	Tended to request for amicus and communications amongst team members regarding same.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals coordination with amici.
5/14/2012	WNH	Consent issues, communications	Tended to issues relating to consents of amici and communications amongst team members regarding same.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals coordination with amici.
5/15/2012	GLW	Research and analysis	Research and analyze prior briefing, case law, the relevant statutes, and the defendants' argument that the governor is not a proper party; research the relevant legislative histories.	3.6	None.	n/a
5/16/2012	WNH	Examination of notice, materials compiled, questions reviewed	Examined notices relative to amici briefs; compiled the materials to be in a position to ask questions of presenters in 7th Circuit arguments; review of potential questions that could be raised by court in 7th Cir discussions.	1.5	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/16/2012	GLW	Research and analysis	Further research into the relevant legislative history of the relevant statutes and the amendments over time, including information from secondary sources, newspapers, law journals, etc; continue researching and analyzing the defendants' argument that the governor is not a proper party (4.5).	4.6	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry minutely details relevant legal research.
5/17/2012	WNH	Securing information, communications, review	Tended to securing information relative to the Coram case and communications with client regarding same; review of infringe/abridge materials from co-counsel.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
5/17/2012	GLW	Research	Continue researching the legislative history for the relevant statutes.	1	None.	n/a
5/18/2012	GLW	Research and analysis	Further research and analysis of source materials relating to the legislative history for the relevant statutes.	0.6	None.	n/a
5/19/2012	GLW	Research and analysis	Additional research into and analysis of legislative history and materials.	0.7	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/22/2012	WNH	Review	Commenced review of draft of brief from co-counsel; review of comments suggested by Steve Halbrook; review of materials in response to questions posted by David Thompson regarding various issues.	0.8	None.	n/a
5/22/2012	GLW	Conference, drafting, analysis	Confer with Bill Howard and draft memorandum detailing the results of the research into the proper parties and the legislative history (1.1); analyze the draft of the appellate response brief (1.0).	2.1	None.	n/a
5/23/2012	WNH	Review, correspondence	Continued review of draft of brief from co-counsel and corresponded with team regarding waiver and governor as party issues and general work on logistics for filing of same.	1.3	None.	n/a
5/24/2012	WNH	Review, provision of documents	Review of Gura's brief in Moore case; provided brief to clients (Mary & Vic).	0.8	None.	n/a
6/2/2012	WNH	Review	Continued review of materials for moot court session.	2.7	None.	n/a
6/3/2012	WNH	Review of materials	Continued review of materials to prepare for moot court session.	7	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/4/2012	WNH	Preparation for and participation in moot court session, review of case law, communications	Prepared for moot court session; participated in moot court session; review of case law to assist in discussions and prep for argument; communication with clients regarding update and status for oral argument.	2.3	None.	n/a
6/4/2012	GLW	Research case law	Research case law for the appellate oral argument.	0.2	None.	n/a
6/7/2012	WNH	Work on arrangements, preparation of materials	Work on arrangements for argument & attempt to determine panel and time for argument; work on preparation of materials for Pete Patterson..	0.5	None.	n/a
6/8/2012	WNH	Appearance in court, post- argument conference, telephone conference	Appeared in court to monitor argument on appeal; post-argument conference with Todd Vandermyde and Christopher Conte regarding impressions of same; telephone conference with Mary Shepard regarding outcome of hearing; telephone conference with Victor Quilici regarding outcome of hearing.	2	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case; telephone conference - watching argument - duplicative and unnecessary	Full entry details attendance at argument and post-argument meeting with co-counsel; reasonable for lead attorney below to appear. Note that no time claimed for other members of F&P legal team.
6/12/2012	WNH	Review, document preparation	Review of notes from 7th Circuit argument and prepared version for client review/consideration.	0.3	No objection noted.	State does not record this entry among the hours to which it does not object, but presumably this was a clerical error.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/27/2012	WNH	Examination, review	Examined notice of new appearance being filed on behalf of Lisa Madigan; review of gun crime statistics information in anticipation of possible remand from 7th Circuit to be used to show empirical data as identified by 7th Circuit in oral argument.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details review of entry of appearance on behalf of State on this date, and preparation for possible remand.
6/25/2012	WNH	Securing copies, communication	Work on securing copy of digital oral argument before 7th Circuit; communication with clients regarding same.	0.8	Not legal	Agree to omit.
8/6/2012	WNH	Telephone conference, follow-up	Telephone conference with Todd Vandermyde regarding status; follow-up with Docket contacts regarding same; follow-up with Court Clerk; prepared report to client regarding same.	0.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
8/31/2012	GLW	Call, status update	Call with the Illinois Rifle Association updating on the status of the case.	0.1	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details communications with Plaintiff re case status. Surely six minutes for this purpose is reasonable.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
9/6/2012	GLW	Analysis, email, follow-up correspondence	Analyze correspondence regarding the fee issue and e-mail opposing counsel with proposal for paying the fees and for handling the supplemental fees issue; follow up correspondence with co-counsel payment.	0.3	No fee issue before decision of 7 <sup>th</sup> Circuit	Agree to omit.
10/26/2012	WNH	Follow-up with court clerk	Follow-up with court clerk regarding status of ruling.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Communications with clerk regarding case status after period of inactivity reasonable.
11/26/2012	WNH	Review of decision	Review of most recent decision out of the 2d Circuit.	0.2	None.	n/a
11/28/112	GLW	Analysis	Analyze the defendants' submission of supplemental authority along with the relevant recent decision.	0.5	None.	n/a
11/28/2012	WNH	Review and analysis	Review and analysis of Kachalsky case; communications with Chris Conte regarding same.	1	None.	n/a
11/30/2012	WNH	Review of letter and communication	Review of 28j letter to court and communication team regarding same.	0.3	None.	n/a
12/11/2012	GLW	Analysis	Analyze the appellate decision reversing the trial court and remanding the case.	1.8	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
12/11/2012	WNH	Review, telephone conference, consideration of next steps	Review of court order/decision on case; telephone conference with clients regarding same; consideration of next steps given 180 day stay of enforcement.	2	None.	n/a
12/14/2012	GLW	Analysis	Further analyze the Seventh Circuit's decision, and analyze the briefs to determine whose briefs cited the empirical evidence relied on by the court.	0.8	None.	n/a
12/17/2012	GLW	Conference, analysis	Confer with Bill Howard, and further analyze the briefs to determine which ones cited to the empirical studies included in the court's decision; analyze the defendants' motion for an extension of time to petition for a rehearing.	0.3	None.	n/a
12/17/2012	WNH	Follow-up on citations	Follow-up on citations to studies.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry reveals research concerning relevant facts.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
12/18/2012	GLW	Research, outline	Research the relevant procedural rules to determine the effect that the request for an extension of time and that a potential petition for a rehearing will have on the issuance of the mandate; draft an outline of the research results.	0.8	Did not prevail on this issue	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .
12/18/2012	WNH	Examination of documents, communications	Examined notice from court allowing extension of time; examined communication from client regarding impact on extension on the 180 day timeframe for new legislation.	0.3	Did not prevail on this issue	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .
12/19/2012	GLW	Analysis	Analyze the draft bill of costs and the relevant procedural rules.	0.2	None.	n/a
12/19/2012	WHN	Communication, follow-up on media and articles	Communication with clients regarding status and strategy and potential impact of additional maneuvers by IL and others; follow-up on media and articles with regard to possible steps that will be taken by the State in response to ruling and related matters.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details development of case strategy in light of stay of mandate.
12/26/2013	GLW	Analysis	[This entry does not appear in Plaintiffs' exhibit.]	0.1	None.	Plaintiffs do not claim this time.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
1/7/2013	WNH	Issues regarding filing and communications	Tended to issues regarding possible filing of amici and communications amongst all counsel relative to same.	0.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details coordination with possible amici.
1/8/2013	GLW	Analysis, conference, analysis	Analyze the motion for a rehearing en banc, as well as the amici briefs in support of the motion for a rehearing; confer with Bill Howard regarding the strategy for responding; analyze the applicable federal and seventh circuit procedural rules relating to the.	1.8	None.	n/a
1/8/2013	WNH	Review of notice, telephone conference, review of communications and motion	Review of notice of motion for rehearing en banc; telephone conference with Todd Vandermyde regarding same; review of communications from client relative to same; commenced review of motion for rehearing; commenced review of City amicus.	1.3	Conference with lobbyist is not compensable; Insufficient documentation to determine the time spent on other matters	Full entry reveals matters, including conference, pertaining to petition for rehearing filed on this date.
1/9/2013	GLW	Analysis	Analyze Livesay's motion to join and the order regarding filing a response brief.	0.1	None.	n/a
1/9/2013	WNH	Review of materials, communications	Review of materials issued today with regard to en banc; communication with team regarding same and next steps.	0.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
1/10/2013	WNH	Review, communications	Review of notices from court; review of brief and communication with client regarding same.	0.5	None.	n/a
1/22/2013	GLW	Analysis	Analyze the draft response in opposition to the petition for a rehearing en banc.	0.4	None.	n/a
1/23/2013	WNH	Review and communications	Review of draft of brief and communication with team regarding same.	0.8	None.	n/a
1/24/2013	GLW	Analysis	Analyze Moore's brief in opposition to the petition for rehearing en banc.	0.4	None.	n/a
1/24/2013	WNH	Communication, issues regarding disclosure statement, review	Communication with D.C. counsel regarding disclosure statement; tended to issues regarding disclosure statement; begin review of Moore en banc opposition.	1.3	None.	n/a
1/29/2013	WNH	Conferences	Conferences with Mary Shepard, Chris Conte and Todd Vandermyde regarding avoidance of interviews, taping and public comment during pendency of en banc proceedings.	0.5	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
2/1/2013	WNH	Telephone conferences and follow-up	Telephone conference with Mary Shepard and follow-up with Chris Conte regarding Congressional Hearings.	0.3	Congressional hearing; insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
2/4/2013	WNH	Follow-up, communications	Follow-up with Steven Aaron of NRA federal regarding next steps with respect to Mary Shepard testimony before Congressional Sub-committee; communication via email and call with Mary Shepard to advise of status.	0.5	No congressional hearing advanced this litigation	Agree to omit.
2/8/2013	GLW	Research and analysis	Research and analyze the right to privacy under the Illinois constitution and the scope of the constitutional protects.	1.9	No Illinois Constitution issues in this case	Agree to omit.
2/11/2013	WNH	Follow-up	Follow-up on status of en banc.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case because motion en banc was pending	The fact that en banc motion was pending is what makes this time entry relevant.
2/13/2013	GLW	Research and analysis	Continue researching and analyzing case law delineating the boundaries of the Illinois constitutional right against invasions of privacy.	0.8	Not relevant	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
2/14/2013	GLW	Research, drafting	Complete research in to privacy issues and draft memorandum detailing same.	1.1	Not relevant	Agree to omit.
2/14/2013	WNH	Preparation of materials	Preparation of materials to be sent to Todd Vandermyde with regard to privacy issues.	0.3	Not relevant	Agree to omit.
2/18/2013	WNH	Telephone conference	Telephone conference with Mary Shepard regarding status and next steps.	0.3	None.	n/a
2/20/2013	GLW	Analysis, research, conference	Analyze statements by the state's attorney challenging the enforceability of the Seventh Circuit's ruling; research and analyze case law supporting the enforceability of the appellate decision; research the distinction between the precedential value versus the enforceability of a federal court's decision; research collateral estoppel issues; confer with Bill Howard regarding the results of the research and analysis.	3.9	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry minutely details research concerning the enforceability of the Seventh Circuit's mandate.
2/20/2013	WNH	Conversations, communications	Multiple conversations with Victor Quilici regarding status of informational hearings in Springfield and related matters; communication with NRA and lobbyist relative to same.	0.3	Not relevant; about lobbying	Agree to omit.

<b>Date</b>	<b>Attorney</b>	<b>State's Summary of Description</b>	<b>Full Description</b>	<b>Hours</b>	<b>State's Objection</b>	<b>Plaintiffs' Response</b>
2/21/2013	GLW	Research, draft outline	Further research to support the enforceability of the federal appellate court's order; draft an outline of the results of same.	0.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details research concerning the enforceability of the Seventh Circuit's mandate.
2/22/2013	GLW	Analysis	Analyze the denial of the petition for a rehearing; analyze the relevant federal and local rules regarding the issuance of the mandate, and effect of a petition for certiorari, etc.	0.5	None.	n/a

**II. Locke Lord LLP**

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
3/13/2013	WNH	Review of communication from client	Review of communication and attachment from client relative to Governor's desire to have Moore decision appealed.	0.3	None.	n/a
3/19/2013	JC	Research	Research home rule powers under Illinois Constitution.	1.5	Not related to litigation	Full entry details research related to legal status and impact of contemplated carriage legislation.
3/20/2013	WNH	Status call, correspondence, follow-up on issues	Call with Mary Shepard regarding status and request for permission to participate in conference; correspondence with Chris Conte regarding conversation with Mary Shepard and approval for discussions with Brownell; follow-up on issues related to home rule and how we can use limitations on home rule/state law dichotomy to our advantage to challenge likely new statute.	1.3	Lacks detail and home rule issues not related to litigation	Agree to omit.
3/21/2013	JC	Research	Research home rule powers under Illinois Constitution.	2.1	Not related to this litigation	Full entry details research related to legal status and impact of contemplated carriage legislation.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
3/22/2013	WNH	Review of materials, review of decision	Review of materials from decision in Woppard to determine if any applicability to our decision and in anticipation of IL legislature's revision of the law; review of new criminal court decision regarding declaration of IL statute as unconstitutional.	0.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details research related to legal developments and status of the legislation that was part of the outcome of the litigation.
3/26/2013	WNH	Review of decisions, communications	Review of recent criminal court decisions misinterpreting the 7th circuit precedent in Shepard and Moore; communication with Todd Vandermyde regarding same.	0.5	Not related to this litigation	Agree to omit.
3/28/2013	WNH	Telephone conference, report preparation	Telephone conference with Michael Bennett of Appellate Defender's Office regarding offer to assist in matter; he confirmed they are seeking a Petition for Rehearing; prepared report to client regarding same.	0.5	Related to work on other litigation	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
5/6/2013	WNH	Discussions, review of decision	Discussions with David Thompson and Todd Vandermyde regarding possible challenges to County ordinances given Shepard/Moore decision; discussion with Todd Vandermyde and Chris Conte regarding same; review of Sup. Ct. decision granting IL-AG request for more time.	0.8	Not related to this litigation	Agree to omit.
5/23/2014	WNH	[Entry not included in State's tables.]	Review of proposed bill from IL legislature; discussions with David Thompson and Pete Patterson regarding same.	0.5	None.	n/a
5/24/2013	WNH	Telephone conference	Telephone conference with Mary Shepard regarding request of Mike Rowe for comment with regard to proposed concealed carry bill.	0.3	Not litigation related	Agree to omit.
5/28/2013	WNH	Follow-up with 7 <sup>th</sup> Circuit and District Court	Follow-up with 7th Circuit and District Court regarding any filing by the State with regard to legislative action, delay or other tactics.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details work related to issuance of mandate and securing final judgment from district court.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/3/2013	WNH	Review, telephone conference	Review of motion for additional time from IL AG; telephone conference with Todd Vandermyde regarding same and work toward securing more background re timing issues of legislature and our review of draft bill.	0.3	Conference with lobbyist not compensable	Agree to omit.
6/4/2013	WNH	Communication, review, discussions, telephone conference, review of order, follow-up conversation	Communication with DC counsel regarding response to Motion for Extension of Time; review of timeline supplied by Todd Vandermyde; review of opposition filed by Gura; discussions amongst team regarding status and next steps including contact with Judge Posner's clerk; telephone conference with Mary Shepard regarding same; review of order from Posner granting extension; follow-up conversation with Todd Vandermyde regarding same.	2.8	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details work related to securing issuance of mandate by Seventh Circuit.
6/4/2013	WNH	Review of communication from opposing counsel	Review of communication from opposing counsel regarding status conference, change in same and need for joint status report to court.	0.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/4/2013	KLG	Research and review	Research and review of Illinois news articles and publications regarding Gov. Quinn comments on IL concealed carry law for response to request for extension of stay of mandate.	1.2	Not related to this litigation	Full entry details tracking developments in case.
6/5/2013	WNH	Follow-up regarding status, developments and next steps	Follow-up with group regarding status, developments and next steps.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Context confirms that this entry concerns general litigation strategy.
6/6/2013	WNH	Telephone conference, continued work on legal research	Telephone conference with David Thompson regarding legal research into delay built into legislation and propriety of same; continued work on same.	1.3	Work toward challenge to future litigation	Full entry details work related to securing issuance of mandate by Seventh Circuit.
6/6/2013	WNH	Examination of documents, communication	Examined electronic notice from court regarding filings, status and court dates being stricken and reset; communication with Pete Patterson and David Thompson regarding same.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full text of entry details tracking activity related to case.
6/6/2013	KLG	Legal research and review	Legal research and review of 50 state law related to invalidating IL legislative extension of court stay of mandate.	1.2	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Reasonable for plaintiffs to examine statute to determine whether it was consistent with Seventh Circuit's mandate.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/7/2013	WNH	Strategy discussions, review of case law	Strategy discussions with Keith Gibson regarding ways to attack statute passed by legislature; review of caselaw regarding same.	2	Plan to attack later statute is unclear and does not further this litigation	Reasonable for plaintiffs to examine statute to determine whether it was consistent with Seventh Circuit's mandate.
6/7/2013	WNH	Examination of communications	Examined communications relating to timing of responses and related matters.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Agree to omit.
6/7/2013	KLG	Legal research	Continued detailed and extensive legal research and review of 50 state case law on issue related to IL legislature extension of court stay of mandate.	6.5	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Reasonable for plaintiffs to examine statute to determine whether it was consistent with Seventh Circuit's mandate.
6/12/2013	WNH	Review of ordinances, statutes, and case law	Review of Randolph County local ordinance allowing concealed carry; review of Blair Holt statute; review of case law relative to legislature's ability to circumvent timing established by court.	1.3	Not related to this litigation	Agree to omit.
6/14/2013	WNH	Discussion	Discussion with Victor Quilici regarding status of law and related matters.	0.3	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Full entry details communication concerning developing carriage legislation.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/14/2013	KLG	Legal research	Continued legal research of 50 state case law regarding legislature extension of court stay of mandate.	2.2	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case	Reasonable for plaintiffs to examine statute to determine whether it was consistent with Seventh Circuit's mandate.
6/17/2013	WNH	Review of application, communications, review of case law, report	Review of Application for Second Extension of time to file petition for writ of certiorari; communications with team regarding same; review of case law with regard to ability of legislature to circumvent mandated time frame from court; report to David Thompson regarding same.	1.8	None.	n/a
6/17/2013	KLG	Preparation of detailed email analyzing research	Prepare detailed email analyzing research regarding legislative attempt to extend stay of mandate.	1.3	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
6/18/2013	WNH	Review of communications, communications	Review of communications from co-counsel and client regarding Madigan's request for additional time to file petition for writ of certiorari; communication with Mary Shepard regarding same; communication with group regarding any relationship between continued requests for extensions on writ and legislation and Governor's delay in processing, etc.	0.8	None.	n/a
6/19/2013	WNH	[Entry not included in State's tables.]	Follow-up on various counties' decisions with regard to prosecution of UUW and AUUW statutes.	0.3	None.	n/a
6/26/2013	WNH	Review of articles	Review of various articles with regard to actions of various municipalities regarding assault weapons and state conceal carry law.	0.3	Not related to this litigation	Agree to omit.
6/27/2013	WNH	Review of draft response, communication	Review of draft of response to motion to dismiss and communication with David Thompson regarding same.	1	Insufficient documentation to determine whether the hours claimed are reasonable and related or necessary for the case;	Agree to omit.

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
7/8/2013	WNH	Follow-up regarding legislature developments, conference call	Follow-up with Todd Vandermyde regarding developments in legislature; participated in conference call with all to discuss status and next steps.	1	Conference with lobbyist not compensable	Agree to omit.
7/8/2013	KLG	Conference	Conference with B. Howard regarding strategy for response to Illinois legislative action and Firearm Concealed Carry Act.	0.4	Not related to the litigation future challenge	Reasonable for plaintiffs to examine statute to determine whether it was consistent with Seventh Circuit's mandate.
7/12/2013	KLG	Review of file materials per court order	Review of fife materials regarding status of collection of costs per court order.	0.4	Appears clerical	It is reasonable for an attorney to be tasked with matter to court order.
7/18/2013	KLG	Review of federal rules and case law	Review of Federal Rules and case law regarding analysis of timing for filing attorneys fees petition.	0.4	None.	n/a
7/31/2013	KLG	Preparation of draft motion	Preparation of draft motion to extend time to file claim for attorneys fees.	0.6	None.	n/a
7/31/2013	KLG	Telephone calls with defendants' counsel	Telephone calls with defendants' counsel regarding extension of time to file briefs for attorneys' fees.	0.4	None.	n/a
8/2/2013	KLG	Preparation of draft motion, email regarding review of same	Continued preparation of draft motion to extend time to file briefs regarding attorneys fees; prepare email to attorney P. Patterson regarding review of same.	1.2	None.	n/a

Date	Attorney	State's Summary of Description	Full Description	Hours	State's Objection	Plaintiffs' Response
8/5/2013	KLG	Emails regarding status of payment	Exchange emails with IL Attorney General (Corrigan) regarding status of payment of costs as ordered by mandate.	0.2	Excessive; object in part (deduct .1)	Twelve minutes for email exchange is reasonable.
8/5/2013	KLG	Emails regarding status of bill of costs	Exchange emails with counsel Patterson regarding status of bill of costs and motion to extend time.	0.2	Excessive; object in part (deduct .1)	Twelve minutes for email exchange is reasonable.
8/7/2013	KLG	Review court order	Review court order regarding motion for extension of time to file fees and costs briefs.	0.2	None.	n/a
8/12/2013	KLG	Preparation of motion	Continued preparation of motion for extension of time regarding filing attorneys fees request.	0.6	None.	n/a
8/12/2013	KLG	Emails regarding draft motion	Exchange emails with opposing counsel regarding draft motion for extension regarding attorneys fees.	0.3	None.	n/a

### III. Cooper & Kirk PLLC

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/10/2012	HAB	Format short appendix for Shepard brief filing for J. Brown.	0.20	Secretarial duty; insufficient documentation as to what position HAB holds	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
5/22/2012	HAB	Cite check Shepard reply brief.	5.30	Insufficient documentation as to whether this is secretarial duty or analyzing cases	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
5/23/2012	HAB	Cite check Shepard reply brief.	6.30	Insufficient documentation as to whether this is secretarial duty or analyzing cases	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
11/29/2012	HAB	Cite check 28j letter for P. Patterson.	0.40	Insufficient documentation as to whether this is secretarial duty or analyzing cases	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
1/22/2013	HAB	Cite check opposition to Illinois rehearing petition for P. Patterson.	1.20	Insufficient documentation as to whether this is secretarial duty or analyzing cases	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
1/23/2013	HAB	Cite check and compile opposition to Illinois rehearing petition for P. Patterson.	4.30	Insufficient documentation as to whether this is secretarial duty or analyzing cases	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
6/4/2013	HAB	Cite check opposition to Illinois' Motion to Stay Mandate for P. Patterson.	1.50	Insufficient documentation as to whether this is secretarial duty or analyzing cases	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Bair was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/9/2013	ACC	Cite check brief, review CA7 local rules for filing motion to recall or clarify mandate, perform case law research on criteria for granting motions to clarify or revise mandate per D. Thompson, draft email and memo re same; monitor status of Illinois carriage law.	12.00	Excessive hours; not an issue upon which plaintiffs prevailed	Hours not excessive for the work performed; reasonable to research issues relating to issuing of mandate.
5/10/2011	CJC	Conference with D. Thompson re strategy.	0.50	Duplicative with work of Freeborn & Peters; firm had appeared as amicus not plaintiffs	Cooper & Kirk called in to consult in part in order to make contributions to strategy, so strategy meetings are not duplicative of strategy meetings elsewhere. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/7/2011	CJC	Review SAF's preliminary injunction motion	0.70	Duplicative with work of Freeborn & Peters; firm had appeared as amicus not plaintiffs	Cooper & Kirk participated in case, so hours spent reviewing relevant legal developments are compensable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/7/2011	CJC	Prepare preliminary injunction motion in Shepard.	0.90	Duplicative with work of Freeborn & Peters; firm had appeared as amicus not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/8/2011	CJC	Conferences with D. Thompson re PI motion; prepare preliminary injunction motion in Shepard.	1.80	Duplicative with work of Freeborn & Peters; firm had appeared as amicus not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/18/2011	CJC	Conference with P. Patterson re 2d Amendment incorporation.	0.20	Duplicative with work of Freeborn & Peters; firm had appeared as amicus not plaintiffs	Cooper & Kirk participated in case, so hours spent researching the law are compensable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
3/30/2012	CJC	Review district court decision; messages to co-counsel re same.	1.50	Duplicative of P. Patterson	It is not only reasonable but necessary for all attorneys participating in a case to review the order disposing of that case.
3/31/2012	CJC	Further review of case; conferences with D. Thompson, B. Koukoutchos re appeal strategy and content of opening brief; review rules re expediting appeal.	2.00	Duplicative of David H. Thompson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to develop strategy for an important appeal is eminently reasonable.
4/6/2012	CJC	Conference with appeal team re appeal strategy.	1.50	Duplicative of David H. Thompson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between two attorneys to develop strategy for an important appeal is eminently reasonable.
4/6/2012	CJC	Review decision in Moore.	0.40	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/8/2012	CJC	Review and revise draft brief to CA7; conferences with D. Thompson, P. Patterson re same.	6.50	Duplicative of David H. Thompson; not specific to reduce duplicative time	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing appellate brief in complex appeal is reasonable. Context of entry reveals that conference portion was .5 hours. Time for P. Patterson's participation already omitted.
4/9/2012	CJC	Review and revise draft brief to CA7; conferences with D. Thompson, P. Patterson re same.	8.50	Duplicative of David H. Thompson; not specific to reduce duplicative time	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing appellate brief in complex appeal is reasonable.
5/14/2012	CJC	Analyze IL brief in opposition.	1.20	None.	n/a
5/14/2012	CJC	Conference call re reply brief with P. Patterson, D. Thompson, and H. Nielson.	1.20	Duplicative with P. Patterson and David H. Thompson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between four attorneys to outline reply brief not only reasonable but promoted efficiency because over three-quarters of the hours spent drafting reply brief were billed by associate who charged lower fees than partners who participated in strategy call.
5/18/2012	CJC	Prepare for oral argument further work on reply brief.	2.80	Excessive and duplicative	Note that some of the hours the State attributes to oral argument prep are instead spent editing the reply brief. Moreover, time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/19/2012	CJC	Prepare for oral argument and further work on reply brief.	5.40	Excessive and duplicative	Note that some of the hours the State attributes to oral argument prep are instead spent editing the reply brief. Moreover, time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
5/20/2012	CJC	Prepare for oral argument and further work on reply brief.	2.20	Excessive and duplicative	Note that some of the hours the State attributes to oral argument prep are instead spent editing the reply brief. Moreover, time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
5/22/2012	CJC	Prepare for oral argument and further work on reply brief.	8.30	Excessive and duplicative	Note that some of the hours the State attributes to oral argument prep are instead spent editing the reply brief. Moreover, time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
5/28/2012	CJC	Prepare for oral argument.	3.50	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
5/29/2012	CJC	Prepare for oral argument.	8.50	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
5/30/2012	CJC	Prepare for oral argument.	6.20	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/31/2012	CJC	Prepare for oral argument.	7.00	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/1/2012	CJC	Prepare for CA7 oral argument.	5.80	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/2/2012	CJC	Prepare for CA7 oral argument.	3.50	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/3/2012	CJC	Prepare for oral argument moot court.	12.50	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/4/2012	CJC	Conference with P. Patterson & D. Thompson re Shepard moot.	0.60	Duplicative with P. Patterson and D. Thompson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to prepare for oral argument reasonable in light of excellent results achieved on appeal.
6/4/2012	CJC	Prepare for and participate in moot court.	5.00	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/5/2012	CJC	Prepare for CA7 oral argument.	3.90	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/5/2012	CJC	Conference with D. Thompson, P. Patterson re CA7 oral argument.	1.10	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/6/2012	CJC	Conference with P. Patterson & D. Thompson re argument preparation.	0.50	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/6/2012	CJC	Prepare for CA7 oral argument.	9.00	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/7/2012	CJC	Conference with D. Thompson re oral argument.	0.70	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/7/2012	CJC	Prepare for oral argument.	9.80	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/8/2012	CJC	Prepare for and participate in CA7 oral argument.	6.10	Excessive	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
11/30/2012	CJC	Conference with P. Patterson re 28j response.	0.10	Duplicative of P. Paterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting that enables partner to delegate to associate promotes efficiency and economy.
12/11/2012	CJC	Review CA7 opinion.	1.80	Excessive time for review	Hours billed reasonable to read and analyze twenty-page constitutional law opinion.
12/15/2012	CJC	Conferences with D. Thompson re possible motion to vacate 180-day stay.	1.30	Did not prevail	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
12/20/2012	CJC	Review Dames & Moore case.	0.60	Not necessary for this litigation	Agree to omit.
12/26/2012	CJC	Draft rehearing petition.	1.40	None.	n/a
12/26/2012	CJC	Review CA7 rules.	0.20	Insufficient detail to determine whether necessary	Reasonable to briefly review the rules of the Court in which the case is pending.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/26/2012	CJC	Conferences with D. Thompson, P. Patterson re rehearing petition/motion to vacate order staying case.	0.50	Duplicative with David H. Thompson and P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to discuss strategy after Seventh Circuit issued its decision reasonable.
1/8/2013	CJC	Conference with D. Thompson re motion to vacate status, and strategy.	0.40	Duplicative with David H. Thompson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to discuss strategy after Seventh Circuit issued its decision reasonable.
1/10/2013	CJC	Review rehearing petition and amicus briefs in support; conference with D. Thompson re same; conference with P. Patterson re same; telephone call from Pat Yagle (IL Times) re same.	1.50	Duplicative of David H. Thompson and P. Paterson; excessive	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to discuss strategy after State filed a petition for rehearing en banc reasonable.
1/11/2013	CJC	Review and revise draft motion to vacate 180-day stay.	2.70	Did not prevail on issue	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
1/14/2013	CJC	Review and revise draft reply to State's rehearing petition.	1.40	Duplicative with David H. Thompson and P. Patterson	Multiple attorneys may make independent contributions to drafting of brief. The overall time spent on the opposition was reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
1/22/2013	CJC	Review and revise opposition to rehearing petition	2.40	Duplicative with David H. Thompson	Multiple attorneys may make independent contributions to drafting of brief. The overall time spent on the opposition was reasonable.
1/23/2013	CJC	Review and revise opposition to rehearing petition.	2.00	Duplicative with David H. Thompson	Multiple attorneys may make independent contributions to drafting of brief. The overall time spent on the opposition was reasonable.
5/30/2013	CJC	Conference with D. Thompson, N. Moss, P. Patterson re status of cases and strategy re challenge to IL concealed carry law.	1.30	Duplicative; not necessary for litigation; this is legislative work	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between four attorneys to discuss strategy in response to legislation that was part of outcome and relief in this case was reasonable.
6/3/2013	CJC	Conference with D. Thompson re impact of/strategy for new IL carry law.	0.30	Duplicative; not necessary for litigation; this is legislative work	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between two attorneys to discuss strategy in response to legislation that was part of outcome and relief in this case was reasonable.
6/4/2013	CJC	Review and revise opposition to motion to extend stay.	1.20	Duplicative with David H. Thompson	Multiple attorneys may make independent contributions to drafting of motion.
6/4/2013	CJC	Review IL motion to extend stay of CA7 mandate.	0.30	Duplicative with David H. Thompson	It is not only reasonable but necessary for all attorneys participating in a case to review major filing by opposing party.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/4/2013	CJC	Conference with D. Thompson, P. Patterson re opposition to motion to extend stay.	0.20	Duplicative with David H. Thompson and did not prevail on issue	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
6/6/2013	CJC	Conference with D. Thompson, P. Patterson re status and S. Ct. strategy.	0.60	Duplicative with David H. Thompson and did not prevail on issue	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
7/8/2013	CJC	Conference with D. Thompson, P. Patterson re mandate strategy.	0.80	Duplicative with David H. Thompson and did not prevail on issue	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
7/8/2013	CJC	Review memo re district court implementation of appellate mandate.	0.30	Duplicative with David H. Thompson and did not prevail on issue	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/28/2011	JCB	Proof, edit and cite check brief.	0.90	Insufficient documentation to determine what position JCB holds in firm; insufficient documentation to determine if work performed was legal analysis or secretarial	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
8/11/2011	JCB	Proof, edit and cite check court filing.	0.80	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
4/9/2012	JCB	Proof, edit and cite check CA7 opening brief.	6.20	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
4/10/2012	JCB	Proof, edit and cite check opening brief, opposition to motion and related court filings.	8.80	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/11/2012	JCB	Proof, edit and cite check opening brief, opposition to motion and related court filings; filing of same.	4.10	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
1/3/2013	JCB	Proof, edit & cite check supplemental brief.	0.90	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
1/23/2013	JCB	Proof, edit and cite check court papers.	0.80	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
6/26/2013	JCB	Proof, edit and cite check court filing.	0.90	Insufficient documentation to determine what position JCB holds in firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Brown is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/6/2013	CSD	Researched S. Ct. precedent for enforcing a time limit on injunctive stays where legislature fails to act within allotted time.	5.50	Did not prevail on issue	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
6/7/2013	CSD	Research re injunctive stays.	5.20	Did not prevail on issue	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
6/12/2013	CSD	Researched S. Ct. precedent for enforcing a time limit on injunctive stays where legislature fails to act within allotted time.	5.50	Did not prevail on issue	Mandate ultimately issued; party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
7/12/2013	CSD	Research on FRAP 39 and commencement of 14-day filing deadline for motion for attorneys' fees in Seventh Circuit.	2.90	Excessive; object in part	Policy of § 1988 supports diligence in preserving Plaintiffs' entitlement to fees.
7/15/2013	CSD	Prepared memo for P. Patterson re attorneys' fees filing in the Seventh Circuit.	2.10	Excessive; duplicative	Policy of § 1988 supports diligence in preserving Plaintiffs' entitlement to fees.
5/14/2012	AG	Research statute of Northampton and English case reports.	3.10	Excessive hours, since firm claims to be expert in this area and has researched on other cases; hours claimed by attorney in fee petition	Firm has expertise in litigating Second Amendment, but this case presented novel questions of law, which required research.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/15/2012	AG	Research historical sources cited by Illinois.	13.30	Excessive hours, since firm claims to be expert in this area and has researched on other cases; hours claimed by attorney in fee petition	Firm has expertise in litigating Second Amendment, but this case presented novel questions of law, which required research. Furthermore, time spent researching sources cited by opposing counsel is reasonable.
5/17/2012	AG	Research historical sources cited by Illinois.	10.60	Excessive hours, since firm claims to be expert in this area and has researched on other cases; hours claimed by attorney in fee petition	Firm has expertise in litigating Second Amendment, but this case presented novel questions of law, which required research. Furthermore, time spent researching sources cited by opposing counsel is reasonable.
5/18/2012	AG	Research historical sources cited by Illinois.	3.90	Excessive hours, since firm claims to be expert in this area and has researched on other cases; hours claimed by attorney in fee petition	Firm has expertise in litigating Second Amendment, but this case presented novel questions of law, which required research. Furthermore, time spent researching sources cited by opposing counsel is reasonable.
5/21/2012	AG	Research historical sources cited by Illinois.	7.10	Excessive hours, since firm claims to be expert in this area and has researched on other cases; hours claimed by attorney in fee petition	Firm has expertise in litigating Second Amendment, but this case presented novel questions of law, which required research. Furthermore, time spent researching sources cited by opposing counsel is reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/16/2012	LAL	Research for memo on affray, carriage, carry, gun, firelock, pistol, weapon in treatises for D. Thompson.	2.00	Insufficient documentation as to what position LAL held with firm; legislative, not litigation related	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Lipovsky is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Description shows that the work was not legislative.
5/17/2012	LAL	Further research on affray, carriage, carry, gun, firelock, pistol, weapon in treatises for D. Thompson.	1.30	Insufficient documentation as to what position LAL held with firm;	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Lipovsky is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
5/23/2012	LAL	Cite check reply brief.	7.40	Insufficient documentation as to what position LAL held with firm; insufficient documentation as to whether this involves legal analysis	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Lipovsky is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/12/2012	LAL	Rule 28j Supp. Auth. cite check for P. Patterson.	2.00	Insufficient documentation as to what position LAL held with firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Lipovsky is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
1/23/2013	LAL	Cite check <i>Shepard</i> doc, add edits, edit TOC, and file for P. Patterson.	3.30	Insufficient documentation as to what position LAL held with firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Lipovsky is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
6/4/2013	LAL	Cite check <i>Shepard</i> filing for P. Patterson.	1.00	Insufficient documentation as to what position LAL held with firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Lipovsky is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/14/2011	MM	Research re originalism and date of inquiry for incorporation cases; draft memo on same for P. Patterson.	6.20	Insufficient documentation to determine what position MM holds in firm; firm appeared as amicus, not on behalf of plaintiff	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Also as noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
6/6/2013	MM	Research cases on Munsingwear doctrine.	4.90	Insufficient documentation to determine what position MM holds in firm; did not prevail on issue; appears to be legislative, not litigation related	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research regarding the potential effect of the case being mooted reasonably related to the litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/7/2013	MM	Conduct follow-up research on Munsingwear doctrine.	2.80	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research regarding the potential effect of the case being mooted reasonably related to the litigation.
6/10/2013	MM	Conduct follow-up research on Munsingwear doctrine.	1.00	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research regarding the potential effect of the case being mooted reasonably related to the litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/19/2013	MM	Conduct research on definition of prevailing party under § 1988	4.80	Insufficient documentation to determine what position MM holds in firm; excessive, duplicative of attorney work	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Allocation of research to staff minimized attorney work and promoted economy.
6/20/2013	MM	Review Supreme Court and Seventh Circuit cases on definition of prevailing party under § 1988.	6.90	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
6/21/2013	MM	Draft motion for attorney fees.	6.20	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Note: Despite objection, State includes these 6.2 hours in the category of hours to which it does not object.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/24/2013	MM	Draft motion for attorney fees.	7.10	Insufficient documentation to determine what position MM holds in firm; excessive	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Allocation of research to staff minimized attorney work and promoted economy.
6/25/2013	MM	Draft motion for attorney fees.	6.30	Insufficient documentation to determine what position MM holds in firm; excessive	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Allocation of research to staff minimized attorney work and promoted economy.
6/26/2013	MM	Draft motion for attorney fees.	8.90	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. F335Allocation of research to staff minimized attorney work and promoted economy.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/27/2013	MM	Draft motion for attorney fees.	9.60	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Allocation of research to staff minimized attorney work and promoted economy.
6/28/2013	MM	Draft motion for attorney fees.	6.80	Insufficient documentation to determine what position MM holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Miller was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Allocation of research to staff minimized attorney work and promoted economy.
12/18/2012	NJM	Review appellate rules on responding to motion for extension of time.	0.30	None.	n/a
12/27/2012	NJM	Call with David Thompson to discuss possible appeal.	0.30	Did not prevail	Reasonable to discuss litigation options even if ultimately not pursued or successful.
12/28/2012	NJM	Research on staying mandates, FRAP 41, and rules for requesting en banc review.	7.80	Excessive; object in part	Research concerned complex and novel procedural issue.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/31/2012	NJM	Continue legal research of staying mandates.	5.00	Excessive	Research concerned complex and novel procedural issue.
1/3/2013	NJM	Draft motion to lift stay and issue mandate.	6.00	Excessive; object in part	Research concerned complex and novel procedural issue.
1/7/2013	NJM	Emails regarding motion to lift stay and issue mandate	0.70	Insufficient documentation to determine whether this was necessary	Context suggests that emails pertained to research on the same subjects (lift stay and issue mandate) attorney researched in the preceding week.
1/8/2013	NJM	Review edits to motion to lift stay and issue mandate.	0.50	None.	n/a
3/21/2013	NJM	Draft memo regarding research on filing motion for attorney's fees.	1.00	Duplicative	State does not identify how this work is duplicative. Only other entry pertaining to filing fees at this time is an 18 minute entry by D. Thompson analyzing the issue. A total of 1.3 hours on this issue is reasonable.
5/30/2013	NJM	Conference with C. Cooper, D. Thompson, P. Patterson re status of cases and strategy re challenge to IL concealed carry law.	1.30	Legislative, not litigation related	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between four attorneys to discuss strategy in response to legislation that was part of outcome and relief in this case was reasonable.
5/9/2011	HN	IL State. Analyze issues relating to potential state court challenge to IL carriage statute.	0.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may participate in case. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/11/2011	HN	IL State. Analyze issues relating to potential state court challenge and discuss with co-counsel.	0.30	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may participate in case. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/7/2011	HN	Research and analyze historical materials for PI motion.	2.40	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/8/2011	HN	Review draft PI motion and supporting declarations.	0.80	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
2/10/2012	HN	Review City's motion for extension	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs; city did not appear in this case; insufficient detail about what this is	Agree to omit.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
3/23/2012	HN	Analyze issues for summary judgment briefing; discuss with co-counsel.	1.30	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment briefing is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry specifically refers to Shepard brief.
5/2/2012	HN	Read and analyze Shepard briefing and provide comments to co-counsel re same.	1.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment briefing is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry specifically refers to Shepard briefing.
5/14/2012	HN	Conference call re reply brief with P. Patterson, D. Thompson, and C. Cooper.	1.20	Duplicative w/ CJC, DHT, and PP	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between four attorneys to outline reply brief not only reasonable but promoted efficiency because over three-quarters of the hours spent drafting reply brief were billed by associate who charged lower fees than partners on strategy call.
5/14/2012	HN	Read and analyze Illinois response brief.	2.30	Duplicative of DHT and PP	It is not only reasonable but necessary for all attorneys participating in a case to review major filing by opposing party.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/15/2012	HN	Research and analyze historical arguments for reply brief.	5.90	Duplicative of DHT and PP	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing reply brief in complex appeal is reasonable.
5/16/2012	HN	Research and analyze historical arguments for reply brief.	5.70	Duplicative of DHT and PP	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing reply brief in complex appeal is reasonable.
5/17/2012	HN	Research and analyze historical arguments for reply brief.	6.20	Duplicative of DHT and PP	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing reply brief in complex appeal is reasonable.
5/18/2012	HN	Read draft reply brief and provide comments on same.	4.80	Duplicative of DHT and PP	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing reply brief in complex appeal is reasonable.
5/22/2012	HN	Review co-counsel and client's revisions to draft reply brief and provide comments on same.	2.00	Duplicative of DHT and PP	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing reply brief in complex appeal is reasonable.
5/23/2012	HN	Review co-counsel's proposed revisions to draft reply brief.	0.80	Duplicative of DHT and PP	Multiple attorneys may make independent contributions to drafting of brief. As explained in reply brief, overall time spent composing reply brief in complex appeal is reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/24/2012	HN	Review SAF reply brief.	0.50	Insufficient detail to determine what this is	As other entries referring to SAF reveal, this is a brief in a related case, and reviewing it is a necessary part of keeping abreast of legal developments.
6/1/2012	HN	Conference with P. Patterson and D. Thompson re Shepard argument preparation.	1.00	Duplicative of DHT and PP	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to prepare for oral argument is reasonable in light of excellent results achieved on appeal.
6/1/2012	HN	Analyze potential oral argument issues.	1.20	Excessive; insufficient detail as to why this is necessary	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
6/3/2012	HN	Analyze potential oral argument issues.	0.40	Excessive; insufficient detail as to why this is necessary	Time spent preparing for important oral argument reasonable in light of excellent results achieved on appeal.
11/28/2012	HN	Read supplemental authority letter filed by Illinois and client's analysis of same.	0.20	Duplicative of DHT and PP; insufficient detail to know which "client" to which this refers	Entry clearly identifies Illinois as opposing party, and Illinois filed a supplemental authority letter on this date. Furthermore, regardless of who "client" was, it is reasonable to review information from any source regarding an opposing party's court filing.
11/29/2012	HN	Review draft supplemental authority letter.	0.20	Duplicative of PP	It is reasonable for multiple attorneys to review filing by opposing party.
12/12/2012	HN	Read and analyze CA7 decision; discuss next steps with co-counsel.	1.80	Excessive; duplicative of other counsel; object in part	It is not only reasonable but necessary for all attorneys participating in a case to review the order disposing of that case.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/14/2012	HN	Review and analyze outside counsels recommendation re lifting stay; discuss with co-counsel.	0.30	Insufficient detail to determine to whom is being referred and in what capacity because no contract was provided in discovery	Contract unnecessary to conclude that, at the time, Halbrook and Freeborne & Peters LLP were also on the case. Both have time entries revealing that entire team was analyzing next steps in response to Seventh Circuit decision.
2/20/2013	HN	Review reports of potential defiance of CA7 decision by IL state officials and discuss possible responses with co-counsel.	0.20	Not related to litigation; it is monitoring of media	Reviewing media reports discussing opponent's planned legal strategy in litigation relates to litigation.
2/22/2013	HN	Read and analyze order denying rehearing and dissent from same.	0.30	Did not prevail on issue	This entry pertains to the denial of the State's petition for rehearing en banc, on which Plaintiffs did prevail.
4/29/2013	HN	Look at State's request for cert extension and discuss potential response to same with co-counsel.	0.30	Did not prevail on issue; duplicative	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .
6/3/2013	HN	Look at Illinois' request for extension of stay and co-counsel's analysis of same.	0.20	Duplicative; did not prevail	Mandate issued. Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .
6/17/2013	HN	Analyze Illinois's request for an additional extension and discuss with co-counsel.	0.60	Excessive; did not prevail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/26/2013	HN	Review and analyze draft response to motion to dismiss and provide comments on same.	0.50	Did not prevail	Agree to omit.
6/3/2013	KN	Research procedure for the issuance of mandates: next steps after stay terminates.	4.80	Legislative, not litigation related	Research concerned procedural steps in litigation.
6/4/2013	KN	Research procedure for the issuance of mandates: next steps after stay terminates.	3.50	Legislative, not litigation related	Research concerned procedural steps in litigation.
6/5/2013	KN	Research procedure for the issuance of mandates: next steps after stay terminates.	2.50	Legislative, not litigation related	Research concerned procedural steps in litigation.
6/6/2013	KN	Research procedure for issuance of mandates: next steps after stay terminates.	4.20	Legislative, not litigation related	Research concerned procedural steps in litigation.
6/7/2013	KN	Research state laws regarding the right to carry long guns in public.	9.10	Legislative, not litigation related	Research of other states' carry laws is reasonably related to the litigation.
6/10/2013	KN	Research issuance of mandates.	0.30	Legislative, not litigation related	Research concerned procedural steps in litigation.
6/11/2013	KN	Research attorney's fees.	1.70	Duplicative of work performed by attorney	Time spent researching attorneys' fees issues reasonable.
6/12/2013	KN	Research attorney's fees.	7.30	Legislative, not litigation related	Attorneys' fees relate to litigation.
6/13/2013	KN	Write memo re: next steps after issuance of mandate.	1.80	Did not prevail on issue	Time spent analyzing response to the issuance of the mandate is reasonable.
5/25/2011	PP	Review Shepard memo.	0.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may participate in a case. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/7/2011	PP	Draft PI motion.	0.60	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/8/2011	PP	Draft PI motion; conference with D. Thompson re same.	10.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/18/2011	PP	Research re 2d Amendment incorporation; conference with C. Cooper re same.	0.40	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may participate in case. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/21/2011	PP	Research re preliminary injunction.	1.00	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/22/2011	PP	Review State Defendants' motion to dismiss, pi opposition.	0.90	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion and motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/22/2011	PP	Review Sheriff Livesay motion to dismiss.	0.60	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/25/2011	PP	Research re summary judgment brief.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
7/25/2011	PP	Draft response to motion to dismiss.	4.90	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/26/2011	PP	Review Brady amicus brief.	0.60	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may participate in the litigation. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This does not include reviewing amicus briefs filed in support of opposing party, which attorneys were required to review pursuant to their representation of Plaintiffs.
7/27/2011	PP	Review State PI opposition.	0.40	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/27/2011	PP	Draft message re summary judgment brief/opposition to motion to dismiss.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/29/2011	PP	Review State preliminary injunction response.	0.60	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
8/1/2011	PP	Draft motion for summary judgment; opposition to motion to dismiss; research re same	3.70	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/2/2011	PP	Draft summary judgment brief.	5.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/2/2011	PP	Review Brady Center brief.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may participate in litigation. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This does not include reviewing amicus briefs filed in support of opposing party, which attorneys were required to review pursuant to their representation of Plaintiffs.
8/3/2011	PP	Draft summary judgment brief.	9.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/5/2011	PP	Draft opposition to motion to dismiss.	6.90	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/8/2011	PP	Draft summary judgment brief.	3.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/8/2011	PP	Draft opposition to State motion to dismiss	5.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/9/2011	PP	Review summary judgment filings.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/9/2011	PP	Research re opposition to State motion to dismiss; draft same.	11.00	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/10/2011	PP	Draft opposition to State motion to dismiss.	9.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/11/2011	PP	Draft opposition to Livesay motion to dismiss.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/11/2011	PP	Draft opposition to State motion to dismiss.	10.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/11/2011	PP	Conference with D. Thompson re opposition to State motion to dismiss.	0.40	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/12/2011	PP	Draft opposition to Livesay motion to dismiss.	5.50	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/12/2011	PP	Draft opposition to State motion to dismiss.	0.70	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/15/2011	PP	Draft opposition to Livesay motion to dismiss.	0.30	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/15/2011	PP	Draft opposition to State motion to dismiss.	2.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/18/2011	PP	Draft opposition to Livesay motion to dismiss.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/19/2011	PP	Draft Livesay motion to dismiss.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
8/22/2011	PP	Draft opposition to Livesay motion to dismiss	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/29/2011	PP	Review State reply to motion to dismiss.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent responding to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
9/3/2011	PP	Respond to State motion to defer judgment.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	Reasonable for attorneys from each firm to review motion filed by opposing party.
9/12/2011	PP	Review State motion to file supplemental authority.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	Reasonable for attorneys from each firm to review motion filed by opposing party.
9/12/2011	PP	Draft message re response to 56(d) motion.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
9/13/2011	PP	Respond to State 56(d) motion	0.30	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
9/26/2011	PP	Review opposition to motion to defer sj ruling; review response to supplemental filing.	0.20	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on summary judgment is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
2/4/2012	PP	Read Moore decision.	0.30	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	Reasonable for an attorney drafting the bulk of the papers for Plaintiffs to review pertinent legal developments.
2/6/2012	PP	Review Illinois' motion to cite supplemental authority.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	Reasonable for attorneys from each firm to review motion filed by opposing party.
2/7/2012	PP	Review correspondence from Shepard counsel regarding procedural posture.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	Reasonable for separate lawfirms representing same Plaintiff to confer.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
2/9/2012	PP	Review response to supplemental citation.	0.10	Duplicative of work of Freeborn & Peters; firm had appeared as amicus, not plaintiffs	More than one firm may cooperate on the drafting of papers. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief filed by Plaintiffs, is clearly unrelated to amicus work.
3/30/2012	PP	Review order dismissing Shepard case; research re potential appeal.	0.40	None.	n/a
3/31/2012	PP	Research re 7th circuit appeal.	1.00	None.	n/a
4/1/2012	PP	Research re 7th Circuit appeal.	0.10	None.	n/a
4/2/2012	PP	Review notice of appeal.	0.40	Duplicative of Freeborn & Peters; excessive time for review	Twenty-four minutes to review co-counsel's notice of appeal, which has jurisdictional significance, is reasonable.
4/2/2012	PP	Prepare 7th Circuit admission forms.	0.50	Defendant should not be required to pay for counsel to be admitted to the bar	Agree to omit.
4/3/2012	PP	Research and discuss issues related to Shepard appeal.	0.80	None.	n/a
4/3/2012	PP	Submit application for admission to 7th Circuit.	0.20	Defendant should not be required to pay for counsel to be admitted to the bar	Agree to omit.
4/6/2012	PP	Draft Seventh Circuit brief.	6.20	None.	n/a
4/7/2012	PP	Draft 7th Circuit brief.	2.40	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/9/2012	PP	Draft 7th Circuit brief.	9.70	Excessive and duplicative of DHT	Multiple attorneys may make independent contributions to drafting of brief. Note that if all of State's objections to hours spent drafting the brief were sustained, only 20.8 hours drafting a 64-page appellate brief on a novel constitutional issue would remain, which is plainly an unreasonably low number.
4/9/2012	PP	Conference with C. Cooper & D. Thompson re 7th Circuit brief.	0.80	None.	n/a
4/9/2012	PP	Review draft procedural filings.	1.50	Lacks specification on how this was necessary	Docket reveals that work on procedural filings necessitated by the State's motion to hold the appeal in abeyance, filed on this date.
4/10/2012	PP	Review draft response to motion to hold in abeyance.	0.30	Excessive time for this review; object to portion	Eighteen minutes for close review of important procedural motion eminently reasonable.
4/10/2012	PP	Conference with litigation team re motion to hold in abeyance.	0.20	None.	n/a
4/10/2012	PP	Draft 7th Circuit brief.	12.20	Excessive and duplication with other counsel; objection to portion	Multiple attorneys may make independent contributions to drafting of brief. Note that if all of State's objections to hours spent drafting the brief were sustained, only 20.8 hours drafting a 64-page appellate brief on a novel constitutional issue would remain, which is plainly an unreasonably low number.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/11/2012	PP	Research re paper copies of brief.	0.10	Excessive; insufficient detail to determine as to why this is necessary	Docket reveals that this work was necessary because Plaintiffs filed a brief on this date and needed to know whether and how to file paper copies.
4/16/2012	PP	Research re 7th Circuit argument.	0.10	Insufficient detail to determine as to why this is necessary	Research on Seventh Circuit argument necessitated by upcoming oral argument before the Seventh Circuit in this case.
4/23/2012	PP	Research re consolidation.	0.50	Did not prevail on this argument	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
5/1/2012	PP	Review filing re argument availability.	0.20	Insufficient detail to determine as to why this is necessary	Docket reveals that court had issued a scheduling order just the week before.
5/9/2012	PP	Prepare 7th Circuit argument form.	0.40	None.	n/a
5/9/2012	PP	Prepare for oral argument.	0.20	Counsel did not argue; therefore excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
5/10/2012	PP	Read state's 7th Circuit brief.	1.10	None.	n/a
5/10/2012	PP	Research re Seventh Circuit reply.	0.10	None.	n/a
5/10/2012	PP	Prepare Seventh Circuit argument form.	0.40	Duplicative of 05-09-12	Nothing unreasonable about briefly working on this on two consecutive days.
5/10/2012	PP	Conference with D. Thompson re 7th Circuit reply.	0.60	None.	n/a
5/14/2012	PP	Conference with C. Cooper, D. Thompson, and H. Nielson re 7th Circuit reply.	1.20	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/14/2012	PP	Draft 7th Circuit reply.	8.60	None.	n/a
5/15/2012	PP	Draft 7th Circuit reply.	10.30	None.	n/a
5/16/2012	PP	Draft 7th Circuit reply.	12.30	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/17/2012	PP	Draft 7th Circuit reply.	11.60	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/18/2012	PP	Draft Seventh Circuit reply.	7.50	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/19/2012	PP	Draft 7th Circuit reply.	0.10	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/21/2012	PP	Draft 7th Circuit reply.	9.20	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/22/2012	PP	Draft 7th Circuit reply.	5.20	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/23/2012	PP	Draft 7th Circuit reply.	7.30	Excessive; duplication with other counsel	Total time spent drafting reply brief on complex constitutional question reasonable.
5/24/2012	PP	Review plaintiff's reply brief in Moore.	0.50	None.	n/a
5/24/2012	PP	Prepare for Shepard argument.	0.30	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
5/29/2012	PP	Prepare for 7th Circuit argument.	4.20	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/30/2012	PP	Prepare for Shepard argument.	2.50	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/1/2012	PP	Conference with D. Thompson and H. Nielson re Shepard argument preparation.	1.00	None.	n/a
6/1/2012	PP	Respond to 7th Circuit argument confirmation email.	0.10	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/1/2012	PP	Draft Q&A's for Shepard argument.	5.80	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/2/2012	PP	Prepare for Shepard argument.	3.80	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/3/2012	PP	Prepare for Shepard argument.	6.90	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/4/2012	PP	Prepare for 7th Circuit argument.	8.50	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/4/2012	PP	Participate in 7th Circuit moot.	1.50	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/4/2012	PP	Conference with C. Cooper & D. Thompson re Shepard moot.	0.60	None.	n/a
6/5/2012	PP	Prepare for 7th Circuit argument.	3.70	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/5/2012	PP	Conference with D. Thompson & C. Cooper re Shepard argument.	1.10	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/6/2012	PP	Prepare for oral argument.	2.20	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/6/2012	PP	Conference with C. Cooper & D. Thompson re argument preparation.	0.50	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/7/2012	PP	Prepare for 7th Circuit argument.	3.90	Did not argue; duplicative; excessive	Associate performing oral argument-related preparation for arguing partner promotes economy.
6/8/2012	PP	Prepare for and attend Shepard	3.00	Did not argue; therefore unnecessary and duplicative	It is reasonable for the primary associate on the case to attend oral argument. Note that this entry also includes preparation for oral argument, so there is not mismatch between it and the other entries recording 1.8 hours for attendance at oral argument.
6/29/2012	PP	Review Michigan Court of Appeals carriage decision.	0.20	Not necessary to this litigation	Reasonable to track relevant legal developments during litigation, as the State did with its 28(j) letter.
	PP	Review letter re motion to supplement record.	0.30	None.	n/a
11/29/2012	PP	Draft response to 28j letter.	1.90	None.	n/a
11/30/2012	PP	Edit 28j response.	0.70	Excessive for a short letter	Less than an hour responding to legal argument eminently reasonable, especially in light of difficulty of fitting complex response into short word limit.
11/30/2012	PP	Conference with C. Cooper re 28j response.	0.10	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/11/2012	PP	Conference with D. Thompson re Shepard decision.	0.30	None.	n/a
12/11/2012	PP	Review Shepard decision.	1.10	Excessive for reading decision; object in part. (deduct 0.10)	Six additional minutes reviewing and analyzing twenty-page decision can hardly be deemed unreasonable.
12/12/2012	PP	Research re costs.	0.60	Excessive; object in part (deduct 0.10)	State is objecting to six minutes. Six additional minutes reviewing a legal issue is reasonable.
12/21/2012	PP	Review draft bill of costs.	0.20	None.	n/a
12/26/2012	PP	Conference with C. Cooper & D. Thompson re Shepard stay or mandate.	0.50	None.	n/a
12/26/2012	PP	Draft motion to extend time to seek rehearing.	1.80	Excessive time to draft a MET; object to part	Amount of time reasonable for drafting legal motion, including any necessary research.
12/26/2012	PP	Research re case status.	0.20	Insufficient detail for why this is necessary	Research necessary because many developments in the case were occurring on and around this date
1/8/2013	PP	Research re motion to vacate stay.	0.60	None.	n/a
1/8/2013	PP	Review en banc filings.	0.60	None.	n/a
1/9/2013	PP	Research re motion to vacate Shepard stay.	1.60	Excessive; object in part (deduct 0.10)	State is objecting to six minutes. Six additional minutes reviewing a legal issue is reasonable.
1/10/2013	PP	Conference with C. Cooper re Shepard rehearing petition.	0.20	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
1/16/2013	PP	Review draft motion to vacate stay.	0.20	Did not prevail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
1/21/2013	PP	Review draft opposition to rehearing.	3.60	None.	n/a
1/22/2013	PP	Draft response to en banc petition.	0.80	Duplication of DHT	Attorney Thompson spent only 2.6 hours on opposition to petition, most of it reviewing and revising the draft.
1/23/2013	PP	Edit en banc response.	3.70	Duplication of DHT	Attorney Thompson spent only 2.6 hours on opposition to petition, most of it reviewing and revising the draft.
1/24/2013	PP	Review Moore plaintiffs' en banc opposition.	0.10	Unnecessary to this litigation	<i>Moore</i> en banc petition is part of this litigation, due to consolidation on appeal.
2/20/2013	PP	Research re Illinois's legislature's response to <i>Moore</i> .	1.10	Legislative, but litigation related; did not prevail	Objection unclear. State recognizes that this research tracking the legislation meant to cure the constitutional violation is "litigation related," and yet it objects on grounds that Plaintiffs "did not prevail." It is unclear how they "did not prevail."
2/22/2013	PP	Review en banc denial order.	0.20	None.	n/a
2/25/2013	PP	Review Moore/Shepard orders.	0.30	None.	n/a
3/15/2013	PP	Review and respond to message re potential consequences of <i>Shepard</i> ruling.	0.20	Insufficient detail to determine if this was necessary	Entry indicates that these twelve minutes were spent corresponding about case strategy.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
3/25/2013	PP	Review Woppard decision.	0.50	Not related to litigation	Reviewing related decisions it is a necessary part of keeping abreast of legal developments.
3/25/2013	PP	Research re stay of mandate.	0.10	Not necessary to an issue on which plaintiff prevailed; insufficient detail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
3/27/2013	PP	Research re Illinois state court decisions on carry ban.	0.20	Legislative, not litigation related	It is unclear what this entry has to do with legislative work. Reviewing related decisions is a necessary part of keeping abreast of legal developments.
3/28/2013	PP	Research re scope of 7th Circuit decision.	0.80	Legislative, but litigation related	It is unclear what this entry has to do with legislative work. Conducting legal research is, as the objection notes, "litigation related."
4/29/2013	PP	Review Illinois's motion for extension of time to file cert.	0.20	Excessive; object in part	Twelve minutes reviewing motion filed by opposing party is reasonable.
5/3/2013	PP	Research re history of right to carry.	3.00	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/22/2013	PP	Review proposed Illinois carry bill.	1.30	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/23/2013	PP	Research re Illinois carry bill.	1.30	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/24/2013	PP	Research re Illinois carry bill.	0.20	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/28/2013	PP	Research re fee motion.	0.40	Legislative, not litigation related	Objection must be in error. Fee motion is litigation-related.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/28/2013	PP	Research re proposed Illinois carry bill.	1.40	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/29/2013	PP	Research re proposed Illinois carry bill.	0.30	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/30/2013	PP	Conference with C. Cooper, D. Thompson, N. Moss re status of cases and strategy re challenge to IL concealed carry law.	1.30	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
5/31/2013	PP	Research re status and effects of proposed Illinois carry bill.	2.80	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/3/2013	PP	Research re Illinois legislation and options upon issuance of mandate.	1.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/3/2013	PP	Review State motion to extend stay.	0.20	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .
6/4/2013	PP	Conference with C. Cooper, D. Thompson re opposition to motion to extend stay.	0.20	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .
6/4/2013	PP	Work on response to Madigan motion to extend stay of mandate.	3.70	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/4/2013	PP	Research re procedures for enforcing ruling upon issuance of mandate.	0.10	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
6/4/2013	PP	Conference with C. Cooper & D. Thompson re response to motion extend stay of mandate.	0.20	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
6/4/2013	PP	Research re motion to extend stay of mandate.	0.60	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
6/5/2013	PP	Research re 7th Circuit extension of stay of mandate.	1.00	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
6/6/2013	PP	Conference with C. Cooper, D. Thompson re status and S. Ct. strategy.	0.60	Did not prevail on issue	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart.</i>
6/6/2013	PP	Monitor status of Illinois carry bill.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/6/2013	PP	Research re Illinois carry prohibitions.	0.30	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/6/2013	PP	Research re implementation requirements of Illinois carry bill.	1.00	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/7/2013	PP	Research re <i>Munsingwear</i> doctrine.	4.10	Legislative, not litigation related	Research on the potential consequences of new legislation is reasonable..
6/7/2013	PP	Research re effects of Illinois carry bill.	0.20	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/10/2013	PP	Research re <i>Munsingwear</i> doctrine.	0.90	Legislative, not litigation related	Research on the potential consequences of new legislation is reasonable..
6/11/2013	PP	Monitor status of proposed carry bill.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/11/2013	PP	Research re potential consequences of <i>Shepard</i> decision.	0.20	Legislative, not litigation related	It is unclear how this entry relates to legislation. Researching implications of decision in this litigation is "litigation related."
6/11/2013	PP	Research re grace periods for recognizing constitutional rights.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/12/2013	PP	Research re grace periods for implementing constitutional rights.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/16/2013	PP	Research re attorney fees.	0.30	None.	n/a
6/16/2013	PP	Research re consequences of amendatory veto of carry bill.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/17/2013	PP	Work on motion for attorneys fees in <i>Shepard</i> .	0.60	None.	n/a
6/17/2013	PP	Research re Illinois motion for extension to file cert petition.	0.10	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/19/2013	PP	Monitor status of Illinois carry bill.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/20/2013	PP	Work on Shepard fee motion.	0.20	Legislative, not litigation related	Objection must be in error. Fee motion is litigation-related.
6/20/2013	PP	Monitor status of Illinois carry bill.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/21/2013	PP	Monitor status of Illinois carry bill.	0.10	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
6/21/2013	PP	Review draft outline for fee motion.	0.10	None.	n/a
7/2/2013	PP	Monitor Illinois carry bill status.	0.20	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
7/3/2013	PP	Monitor status of Illinois carry bill.	0.20	Legislative, not litigation related	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
7/8/2013	PP	Conference with C. Cooper, D. Thompson re mandate strategy.	0.80	None.	n/a
7/12/2013	PP	Research re attorneys fees.	0.50	None.	n/a
7/15/2013	PP	Research re attorneys fees.	1.10	None.	n/a
7/19/2013	PP	Review draft letter re costs.	0.10	None.	n/a
7/19/2013	PP	Research re attorneys' fees.	0.80	Insufficient documentation to determine if this is excessive	Less than an hour to research attorneys fees issues is reasonable.
7/29/2013	PP	Draft message re motion for attorneys fees.	0.30	None.	n/a
8/2/2013	PP	Review motion for extension on fee motion.	0.10	Excessive; object in part	Six minutes spent reviewing a motion is not excessive.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/3/2013	PP	Edit motion for extension on attorneys' fees.	0.90	None.	n/a
8/5/2013	PP	Review and edit motion for extension to file for attorneys' fees.	0.20	None.	n/a
8/7/2013	PP	Review order granting fee extension.	0.10	None.	n/a
8/28/2013	PP	Research re attorneys' fees.	1.00	None.	n/a
11/8/2013	PP	Communicate with local counsel re fee petition.	0.50	None.	n/a
11/18/2013	PP	Research re fee petition.	3.30	None.	n/a
11/19/2013	PP	Research re fee petition.	0.60	None.	n/a
11/20/2013	PP	Research re attorney fees.	1.20	None.	n/a
11/21/2013	PP	Research re fee petition.	0.40	None.	n/a
11/22/2013	PP	Research re fee petition.	3.00	None.	n/a
11/22/2013	PP	Draft fee petition.	1.20	None.	n/a
11/25/2013	PP	Draft fee petition.	2.60	None.	n/a
11/26/2013	PP	Research re fee petition.	3.70	Excessive	Time spent researching attorneys fees issues is reasonable.
11/27/2013	PP	Conference with D. Thompson re fee petition.	0.10	None.	n/a
11/27/2013	PP	Draft fee petition.	0.40	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/28/2011	HS	Compare motions and briefs filed by Illinois in Moore and Shepard.	3.00	Insufficient documentation to determine what position HS hold in firm; firm approved as amicus, not for plaintiffs	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Also as noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
7/29/2011	HS	Research re English historical sources.	7.00	Insufficient documentation to determine what position HS hold in firm; firm approved as amicus, not for plaintiffs	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Also as noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/9/2012	HS	Research re violent crime stats, shall issue laws.	2.00	Insufficient documentation to determine what position HS hold in firm; insufficient documentation to determine if "shall issue laws" is relevant to case; object in part	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. "Shall issue laws" are laws that require the issuance of a permit to carry a firearm if applicant meets certain objective characteristics. They are relevant to the law suit because they are one way in which states regulate carriage.
4/10/2012	HS	Research re motion to expedite.	1.70	Insufficient documentation to determine what position HS hold in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/18/2012	HS	Research re OLC opinion regarding Second Amendment.	2.60	Insufficient documentation to determine what position HS hold in firm; insufficient documentation as to what OLC opinion is and how it is relevant to case	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Entry indicates that OLC opinion related to Second Amendment and is therefore clearly relevant.
6/4/2012	HS	Research re the binding nature of preliminary injunction findings.	1.00	Insufficient documentation to determine what position HS holds in firm; No p.i. was entered; did not prevail on issue	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research related to relevant legal question is compensable.
6/5/2012	HS	Research re the binding nature of preliminary injunction findings; Heller and Mcdonald oral arguments.	5.90	Insufficient documentation to determine what position HS holds in firm; dup	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research related to a legal question. It is unclear how this entry is duplicative.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/6/2012	HS	Research re statute of Northampton; the binding nature of preliminary injunction findings.	7.20	Insufficient documentation to determine what position HS holds in firm; dup	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research related to a legal question. It is unclear how this entry is duplicative.
12/18/2012	HS	Appropriate time to appeal.	4.80	Insufficient documentation to determine what position HS holds in firm; insufficient documentation as to what this was for; if for record appeal, plaintiff is not a prevailing party	Agree to omit.
12/19/2012	HS	Research re City's comments re carriage	0.50	Insufficient documentation to determine what position HS holds in firm; insufficient documentation to determine whether this is related to case and why it is necessary	Agree to omit.
12/20/2012	HS	Research re statement from	2.20	Insufficient documentation to determine what position HS holds in firm; insufficient documentation to determine whether this is related to case and why it is necessary	Agree to omit.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/27/2012	HS	Research re FRAP rule 41.	9.10	Insufficient documentation to determine what position HS holds in firm; excessive; duplication of attorney work performed	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Research related to a legal question. It is unclear how this entry is duplicative.
12/28/2012	HS	Research re withholding mandates.	5.90	Insufficient documentation to determine what position HS holds in firm; excessive; object in part	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Amount of time devoted to complex procedural issue is reasonable.
12/31/2012	HS	Research re circuit court rules relating to their mandates.	4.60	Insufficient documentation to determine what position HS holds in firm; excessive; object in part	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. Amount of time devoted to complex procedural issue is reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
1/1/2013	HS	Research re waiving preliminary injunctions.	4.70	Insufficient documentation to determine what position HS holds in firm; no p.i. was entered; plaintiff did not prevail on issue	Agree to omit.
1/2/2013	HS	Research re withholding mandates.	0.60	Insufficient documentation to determine what position HS holds in firm	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
7/8/2013	HS	Research re new gun law.	0.20	Insufficient documentation to determine what position HS holds in firm; legislation, not litigation related	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Mr. Slugh is a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work. As discussed in reply brief, tracking legislation that was part of outcome and relief in this case is reasonable.
8/11/2011	MLS	Cite check response to motion to dismiss.	4.00	Insufficient documentation to determine what position MLS holds in firm; insufficient documentation to determine if this involves legal analysis	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Smith was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/12/2011	MLS	Edit tables for Motion to Dismiss.	0.50	Insufficient documentation to determine what position MLS holds in firm; insufficient documentation to determine if this involves legal analysis	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Smith was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
8/15/2011	MLS	Cite check response to motion to dismiss.	0.80	Insufficient documentation to determine what position MLS holds in firm; insufficient documentation to determine if this involves legal analysis	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Smith was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
9/19/2011	MLS	Cite check and format response supp. authority.	0.30	Insufficient documentation to determine what position MLS holds in firm; insufficient documentation to determine if this involves legal analysis	Thompson Declaration states that staff in addition to attorneys listed in the Declaration worked on the case, indicating that Ms. Smith was a staff member at Cooper & Kirk. Thompson declaration also indicates that hourly rates requested for staff work are the rates the firm charged for the work.
5/6/2011	DHT	Draft and review correspondence re complaint.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/9/2011	DHT	Analyze draft complaint.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on complaint is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to complaint filed by Plaintiffs, is clearly unrelated to amicus work.
5/9/2011	DHT	Review emails re draft complaint.	0.90	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on complaint is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to complaint filed by Plaintiffs, is clearly unrelated to amicus work.
5/9/2011	DHT	Review pertinent case law.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
5/10/2011	DHT	Review and revise draft complaint.	1.20	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on complaint is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to complaint filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/10/2011	DHT	Conference with C. Cooper re strategy.	0.50	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
5/11/2011	DHT	Analyze draft complaint.	0.70	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on complaint is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to complaint filed by Plaintiffs, is clearly unrelated to amicus work.
5/11/2011	DHT	Analyze venue and jurisdiction in each of the federal district courts of Illinois.	0.90	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
5/11/2011	DHT	Telephone conferences re filing in federal as opposed to state court.	1.20	No one else billed for such a telephone conference.	Although it is reasonable, it is not required that all attorneys who participate in conferences bill for them.
5/12/2011	DHT	Analyze decisions of judges in southern district of Illinois.	2.90	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/12/2011	DHT	Analyze appropriate defendants for complaint.	1.10	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on complaint is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to complaint filed by Plaintiffs, is clearly unrelated to amicus work.
5/13/2011	DHT	Research relevant precedents in Southern District of Illinois.	2.20	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
5/13/2011	DHT	Revise draft complaint.	0.90	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on complaint is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to complaint filed by Plaintiffs, is clearly unrelated to amicus work.
7/7/2011	DHT	Prepare preliminary injunction papers.	5.90	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/8/2011	DHT	Conference with P. Patterson re PI motion.	0.60	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/8/2011	DHT	Conferences with C. Cooper re PI motion; prepare preliminary injunction motion in Shepard.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.
7/8/2011	DHT	Prepare preliminary injunction papers.	8.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on PI motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion filed by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
7/22/2011	DHT	Analyze feasibility of moving for summary judgment.	0.70	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to motion contemplated by Plaintiffs, is clearly unrelated to amicus work.
7/27/2011	DHT	Analyze strategic options for expediting final resolution of case.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
8/1/2011	DHT	Draft motion for summary judgment.	0.60	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/2/2011	DHT	Conference call re briefing strategy.	0.20	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/2/2011	DHT	Draft summary judgment brief.	0.60	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/3/2011	DHT	Prepare summary judgment brief.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/4/2011	DHT	Draft motion for summary judgment.	2.30	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/5/2011	DHT	Analyze Shepard declaration.	0.30	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may participate in litigation. As noted in the Thompson Declaration, hours dedicated to amicus have been omitted.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/5/2011	DHT	Further work on summary judgment brief.	0.70	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/8/2011	DHT	Finalize summary judgment brief.	0.90	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/9/2011	DHT	Prepare summary judgment brief.	0.60	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/10/2011	DHT	Draft summary judgment brief.	2.20	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/11/2011	DHT	Draft opposition to the motion to dismiss.	1.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on opposition to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/11/2011	DHT	Conference with P. Patterson re opposition to State motion to dismiss.	0.40	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on opposition to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/12/2011	DHT	Edit summary judgment brief.	1.20	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
8/19/2011	DHT	Review opposition to Livesay's motion to dismiss.	0.30	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on opposition to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
8/23/2011	DHT	Review motion to dismiss Livesay.	0.10	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on opposition to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
9/2/2011	DHT	Analyze motion to suspend briefing.	0.30	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on opposition to motion to dismiss is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
9/16/2011	DHT	Prepare brief in opposition to Rule 56d motion.	0.80	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. Overall time spent on SJ motion is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
9/22/2011	DHT	Revise motion re supplemental authority.	0.50	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to filing by Plaintiffs, is clearly unrelated to amicus work.
2/5/2012	DHT	Analyze decision in Moore.	0.60	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the case strategy. Overall time spent on developing case is reasonable. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation.
2/7/2012	DHT	Prepare response to motion to supplement.	0.50	Duplicative of work done by Freeborn & Peters; firm had appeared as amicus, not for plaintiffs	More than one firm may cooperate on the drafting of papers. As noted in Thompson declaration, Cooper & Kirk represented Plaintiffs at all times in this litigation. This entry, which pertains to brief by Plaintiffs, is clearly unrelated to amicus work.
3/5/2012	DHT	Analyze recent Maryland decision relating to right to carry under the Second Amendment.	0.30	Not relevant to this litigation and plaintiff did not prevail on this claim	Reviewing related decisions is a necessary part of keeping abreast of legal developments.
3/29/2012	DHT	Analyze district court decision; conferences and correspondence re same.	1.20	Not specific as to which district court decision	Order dismissing this case was issued 3/30; context suggests a one-day error in recording this time, a conclusion supported by the lack of additional entries reflecting Mr. Thompson reviewing this court's decision.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
3/31/2012	DHT	Conferences with C. Cooper, B. Koukoutchos re appeal strategy and content of opening brief.	0.20	None.	n/a
4/2/2012	DHT	Draft Seventh Circuit brief.	1.10	None.	n/a
4/3/2012	DHT	Review documents needed to perfect appeal.	0.60	Duplicative of Freeborn & Peters	Given importance of properly perfecting appeal, review reasonable.
4/6/2012	DHT	Conference with appeal team re appeal strategy.	1.50	None.	n/a
4/6/2012	DHT	Draft Seventh Circuit brief.	3.60	None.	n/a
4/8/2012	DHT	Conferences with C. Cooper, P. Patterson re revised CA7 brief.	0.50	Duplicative with C. Cooper and P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys regarding appellate brief is reasonable. Note that P. Patterson's time already omitted.
4/9/2012	DHT	Draft Seventh Circuit brief.	4.00	None.	n/a
4/9/2012	DHT	Conferences with C. Cooper, P. Patterson re draft brief to CA7.	0.80	Duplicative with C. Cooper and P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys regarding appellate brief is eminently reasonable.
4/10/2012	DHT	Review and revise Seventh Circuit brief.	6.10	Some hours are excessive; object to portion	As explained in reply brief, overall time spent on appellate brief concerning important and complex constitutional issue is reasonable.
4/24/2012	DHT	Draft correspondence re opposition to motion for consolidation.	0.20	Did not prevail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> .

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
4/24/2012	DHT	Review motion filed by Illinois.	0.20	None.	n/a
5/9/2012	DHT	Review Illinois brief.	1.10	None.	n/a
5/10/2012	DHT	Analyze Illinois brief.	0.70	None.	n/a
5/10/2012	DHT	Conference with P. Patterson re 7th Circuit reply.	0.60	Duplicative with P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys regarding appellate brief is eminently reasonable.
5/14/2012	DHT	Analyze Illinois brief and sources cited therein.	3.40	None.	n/a
5/14/2012	DHT	Conference call re reply brief with P. Patterson, C. Cooper, and H. Nielson.	1.20	Duplicative with C. Cooper and H. Nielson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys regarding reply brief is eminently reasonable.
5/15/2012	DHT	Analyze historical sources and contrary sources relating to history of public carriage in England and the United States.	2.70	Duplicative of research done by other staff	Amount of time spent on historical research for this novel constitutional litigation is reasonable.
5/16/2012	DHT	Review amicus briefs.	0.60	None.	n/a
5/16/2012	DHT	Draft reply brief.	0.40	None.	n/a
5/17/2012	DHT	Draft reply brief.	0.90	None.	n/a
5/18/2012	DHT	Review historical materials to be included in reply brief.	0.90	None.	n/a
5/21/2012	DHT	Draft reply brief.	2.20	Duplicative of P. Patterson; excessive	The State seeks to exclude over half of the hours P. Patterson devoted to the reply, also as duplicative. Total of 79.2 hours spent drafting reply brief on complex constitutional question reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
5/22/2012	DHT	Draft reply brief.	2.30	Duplicative of P. Patterson; excessive	The State seeks to exclude over half of the hours P. Patterson devoted to the reply, also as duplicative. Total of 79.2 hours spent drafting reply brief on complex constitutional question reasonable.
5/23/2012	DHT	Review reply brief.	1.30	None.	n/a
5/30/2012	DHT	Review Gura reply brief.	0.80	None.	n/a
6/1/2012	DHT	Conference with P. Patterson and H. Nielson re Shepard argument preparation.	1.00	Duplicative of P. Patterson; H. Nielson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to prepare for oral argument reasonable in light of excellent results achieved on appeal.
6/1/2012	DHT	Review questions and answers for oral argument.	1.00	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/3/2012	DHT	Analyze potential oral argument issues.	0.40	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/4/2012	DHT	Prepare for and participate in moot court; analysis of consolidation.	2.20	Duplicative with C. Cooper and P. Patterson	More than one attorney required to put on a moot court. Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/4/2012	DHT	Prepare materials for oral argument.	1.10	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/4/2012	DHT	Conference with P. Patterson & C. Cooper re Shepard moot.	0.60	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/5/2012	DHT	Conference with P. Patterson, C. Cooper re CA7 oral argument.	1.10	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/5/2012	DHT	Prepare memo with questions and answers of anticipated questions at oral argument.	1.30	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/6/2012	DHT	Draft questions and answers for oral argument.	1.30	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/6/2012	DHT	Conference with P. Patterson & C. Cooper re argument preparation.	0.50	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/7/2012	DHT	Conference with C. Cooper re oral argument.	0.70	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal.
6/8/2012	DHT	Oral argument in the Seventh Circuit.	1.80	Did not argue at oral argument; excessive, duplicative	Amount of time legal team spent preparing for oral argument reasonable in light of excellent results achieved on appeal. It is also reasonable for multiple attorneys to attend argument.
11/21/2012	DHT	Analyze en banc strategy.	0.40	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
11/29/2012	DHT	Review and revise 28j letter.	0.40	Duplicative; excessive	Total of 48 minutes spent reviewing appellate paper to be filed in firm's name is reasonable.
11/30/2012	DHT	Review and revise response to 28j letter.	0.40	Duplicative with P. Patterson; excessive for a short letter;	Total of 48 minutes spent reviewing appellate paper to be filed in firm's name is reasonable.
11/30/2012	DHT	Correspondence re Kachalsky.	0.40	Not necessary for litigation, did not prevail	Correspondence regarding <i>Kachalsky</i> necessitated by State's 28(j) letter regarding that case. Unclear what State means by "did not prevail," as Plaintiffs did prevail on the merits that the State's 28(j) letter addressed.
12/11/2012	DHT	Analyze appellate decision.	2.10	Excessive	Two hours to analyze important appellate court decision is reasonable.
12/11/2012	DHT	Conference with P. Patterson re Shepard decision.	0.30	Duplicative with P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between two attorneys to discuss disposition of appeal is reasonable.
12/13/2012	DHT	Analysis of state's appellate options.	0.30	Unnecessary; did not prevail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally <i>Hensley v. Eckerhart</i> . Regardless, it is unclear in what way Plaintiffs "did not prevail" with respect to this entry.
12/18/2012	DHT	Review Seventh Circuit rules on en banc procedures.	0.20	None.	n/a

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
12/26/2012	DHT	Conferences with C. Cooper, P. Patterson re rehearing petition.	0.50	Duplicative with C. Cooper and P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between two attorneys to discuss the State's rehearing petition is reasonable.
12/26/2012	DHT	Analyze possible challenge to 180 day de facto stay.	1.50	Did not prevail; unnecessary	It was reasonable to analyze potential options in light of the stay of the mandate.
12/27/2012	DHT	Call with N. Moss to discuss possible appeal.	0.30	Did not prevail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
12/27/2012	DHT	Analyze possibility of attacking 180 de facto stay of mandate.	0.90	Did not prevail; unnecessary	It was reasonable to analyze potential options in light of the stay of the mandate.
12/28/2012	DHT	Further analysis of motion to vacate 180 day stay.	0.30	Did not prevail; unnecessary	It was reasonable to analyze potential options in light of the stay of the mandate.
12/31/2012	DHT	Analyze motion to vacate.	0.30	None.	n/a
1/6/2013	DHT	Review draft opposition to the stay.	0.20	Did not prevail	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> .
1/8/2013	DHT	Analyze filings; conference with C. Cooper re same.	1.20	Excessive; object to part (deduct 0.2)	One motion, two amicus briefs, and State's petition for rehearing en banc were filed that day. Twelve additional minutes spent reviewing these numerous pleadings is reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
1/10/2013	DHT	Further work on opposition to petition for rehearing; conference with C. Cooper re same.	0.50	None.	n/a
1/22/2013	DHT	Review and revise opposition to petition for rehearing.	1.70	None.	n/a
1/23/2013	DHT	Revise opposition to en banc petition.	0.40	None.	n/a
2/20/2013	DHT	Analyze ability of state to disregard injunction from a federal court.	0.40	Did not prevail	It was reasonable to analyze potential options in light of the stay of the mandate.
2/22/2013	DHT	Review dissent from denial of hearing.	0.20	None.	n/a
2/22/2013	DHT	Analyze availability of attorneys' fees.	0.30	None.	n/a
3/21/2013	DHT	Review Wppard decision.	0.30	Not necessary for this litigation	Reviewing related decisions is a necessary part of keeping abreast of legal developments.
3/28/2013	DHT	Analyze scope of injunction and ability to bind other officials.	1.80	Excessive and unnecessary; did not prevail on this issue	It was reasonable to conduct research about the scope of potential relief.
4/11/2013	DHT	Analyze timing of issuance of injunction.	0.20	This is a legislative function not litigation related	It is unclear how the analysis of an injunction is a "legislative function."
4/29/2013	DHT	Analyze motion for extension of time.	0.50	Excessive	Thirty minutes to review a motion is reasonable.
5/30/2013	DHT	Conference with C. Cooper, N. Moss, P. Patterson re status of cases and strategy re challenge to IL concealed carry law.	1.30	Duplicative; legislative, not litigation related	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between four attorneys to discuss case strategy and status is reasonable.

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/3/2013	DHT	Analyze strategy relating to stay.	0.60	Legislative, not litigation related	Objection must be in error. It is unclear how the analysis of the stay of the relief Plaintiffs received in this litigation is a "legislative function" and "not litigation related."
6/3/2013	DHT	Conference with C. Cooper re impact of/strategy for new IL carry law.	0.20	Legislative, not litigation related	Conference to discuss strategy in response to legislation that was part of outcome and relief in this case was reasonable.
6/4/2013	DHT	Conference with C. Cooper, P. Patterson re opposition to motion to extend stay.	0.20	Duplicative with C. Cooper and P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Meeting between three attorneys to discuss strategy to secure relief in this case is reasonable.
6/4/2013	DHT	Review, revise, and confer re opposition to motion to stay.	2.10	None.	n/a
6/6/2013	DHT	Conference with C. Cooper, P. Patterson re status and S. Ct. strategy.	0.60	Did not prevail; duplicative	Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. <i>See generally Hensley v. Eckerhart</i> . Regardless, it is unclear in what way Plaintiffs "did not prevail" with respect to this entry.
6/6/2013	DHT	Analyze appellate issues, including mootness and Munsingwear, in wake of legislative developments.	2.40	Legislative, not litigation related; did not prevail	Research on the potential consequences of new legislation is reasonable..
6/7/2013	DHT	Analyze Munsingwear issues.	0.40	Legislative, not litigation related; did not prevail	Research on the potential consequences of new legislation is reasonable..

Date	Attorney/ Staff Member	Description	Hours	State's Objection	Plaintiffs' Response
6/10/2013	DHT	Analyze Munsingwear issue.	0.20	Legislative, not litigation related; did not prevail	Research on the potential consequences of new legislation is reasonable..
6/17/2013	DHT	Analyze ability to oppose motion to extend time.	0.20	Legislative, not litigation related; did not prevail	Objection must be in error. It is unclear how the analysis of the State's motion to extend time, filed in this litigation, is a "legislative function" and "not litigation related." Party may claim time reasonably expended in pursuit of successful claim, even if it does not prevail on every procedural point. See generally Hensley v. Eckerhart.
7/2/2013	DHT	Analyze legislative developments.	0.20	Legislative, not litigation related; did not prevail	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
7/3/2013	DHT	Analyze recent legislative developments.	0.20	Legislative, not litigation related; did not prevail	As discussed in reply brief, tracking legislation that was part of outcome and relief in this case was reasonable.
7/8/2013	DHT	Call with C. Cooper re strategy.	0.80	Insufficient detail	Context reveals that the Seventh Circuit's mandate deadline was the next day.
7/8/2013	DHT	Draft Seventh Circuit motion.	0.80	Insufficient detail; did not prevail	Context reveals that the Seventh Circuit's mandate deadline was the next day; reasonable to prepare for contingencies related to expiration of stay of mandate.
11/27/2013	DHT	Conference with P. Patterson re fee petition.	0.10	Duplicative with P. Patterson	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting. Six-minute meeting between two attorneys to discuss strategy to compensate Plaintiff for money spent vindicating civil rights is reasonable.

#### IV. Stephen P. Halbrook

Date	Description	Hours	State's Objection	Plaintiffs' Response
5/6/2011	Ill. CCW - Email, Review of Files	1.2	Lack of specificity	Entry specific enough to judge reasonableness of hours spent reviewing background materials for challenge to Ill. concealed carry law.
5/9/2011	Email, Legal Research, Review of Complaint	1.5	Lack of specificity	Entry specific enough to judge the reasonableness of the hours spent drafting and reviewing the complaint.
5/10/2011	Legal Research, Email	1.6	Lack of specificity	Context suggests that research related to the development of the complaint.
5/11/2011	Email, Preparation of Comments - Complaint	3.6	Lack of specificity	Entry specific enough to judge the reasonableness of the hours spent drafting and reviewing the complaint.
5/12/2011	Draft Complaint, Email - Parties, Forum	4.8	Duplicative of other counsel	Multiple attorneys may make independent contributions to drafting of pleadings. As explained in reply brief, overall time spent composing complaint stating a novel constitutional claim was reasonable.
5/13/2011	Review of Complaint drafts, Email	3.6	Lack of specificity	Entry specific enough to judge the reasonableness of the hours spent drafting and reviewing the complaint.
5/15/2011	Email - Plaintiff Issue	0.3	Lack of specificity	Entry specific enough to judge reasonableness of hours spent developing case.
5/16/2011	Email, Preparation of Memo - Carry Issue	5.8	Lack of specificity	Entry specific enough to judge reasonableness of hours spent doing background legal research.
5/17/2011	Email, Preparation of Memo - Public Understanding	4.8	Lack of specificity	Entry specific enough to judge reasonableness of hours spent doing historical research about the original public understanding of the Second Amendment.

Date	Description	Hours	State's Objection	Plaintiffs' Response
05-18-11	Preparation of Memo	3.4	Lack of specificity	Context suggests that research related to topics mentioned in two previous entries.
5/19/2011	Preparation of Memo	4	Lack of specificity	Context suggests that research related to topics mentioned in previous entries.
5/24/2011	Preparation of Memo, Legal Research	1.2	Lack of specificity	Context suggests that research related to topics mentioned in previous entries.
5/26/2011	Phone Conference with Counsel, Review of Aguilar File	2.8	Lack of specificity; doesn't correspond with any other counsel	Agree to omit.
5/27/2011	Email Aguilar, Review of Petition, Decision Preparation of Memo	1.6	Lack of specificity	Agree to omit.
6/13/2011	Legal Research, Preparation of Memo - Bear Arms	2.8	Lack of specificity	Entry specific enough to judge reasonableness of hours spent doing background legal research.
6/22/2011	Review of Docket, Motion	0.2	Excessive time to review MET	Twelve minutes to review motion filed by the State is reasonable.
6/27/2011	Review of Alderman Letter, Email, Legal Research	1	Lack of specificity	Agree to omit.
7/8/2011	Review of Declaration, P.I. Motion, Legal Research, Preparation of Comments	2.8	Excessive time to review a document drafted by someone else	Entry suggests that work was not limited to reading the motion; it included legal research and comments.
7/11/2011	Review of P.I. Memo	0.5	Duplicative of work done by other counsel	Multiple attorneys may make independent contributions to drafting of papers Overall time spent on PI motion was reasonable.
7/14/2011	Email P.I.	0.2	Excessive time to send an email; lack of specificity	Entry details subject matter of the email; time spent is reasonable.
7/18/2011	Legal Research, Preparation of Memo	0.6	Lack of specificity	Entry specific enough to judge reasonableness of hours spent doing background legal research.

Date	Description	Hours	State's Objection	Plaintiffs' Response
7/21/2011	Review of Masciandaro Petition	1	Lack of specificity as to how this relates to this case	Entry refers to <i>Masciandaro v. United States</i> , a then-pending Second Amendment case and therefore a relavent legal development.
7/22/2011	Email - Brady Amicus	0.2	Excessive time to send an email; lack of specificity	Entry details subject matter of the email; time spent is reasonable.
7/25/2011	Review of Opp. to Injunction, Review of Motion to Dismiss	2.5	Duplicative of work done by other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent seeking PI and defending against motion to dismiss is reasonable.
7/26/2011	Review of Briefs	0.5	Lack of specificity; which briefs were reviewed?	Context suggests that entry refers to motion to dismiss/PI/MSJ.
7/27/2011	Email - Dismiss, MSJ	0.4	Excessive time to read an email; lack of specificity	Entry does not state that time was spent reading, as opposed to composing, email. Entry details subject matter of email.
7/28/2011	Review of Brady Motions, Email	0.4	Duplicative of work done by other counsel	Multiple attorneys may make independent contributions to litigation.
8/5/2011	Review Summary Judgment Draft, Comments	1.2	Duplicative of work done by other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on MSJ is reasonable.
8/6/2011	Review of Opposition, Brady Amicus	2.5	Duplicative of other counsel; excessive time	Multiple attorneys may make independent contributions to litigation. Overall time spent on various dispositive motions is reasonable.
8/7/2011	Preparation of Reply Brief	5.4	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent seeking PI is reasonable.
8/8/2011	Preparation of Reply Brief	3.2	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent seeking PI is reasonable.

Date	Description	Hours	State's Objection	Plaintiffs' Response
8/14/2011	Review of Draft Opposition Dismiss, Email	1.2	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent defending against motion to dismiss is reasonable.
8/19/2011	Review of Response Motion Dismiss	0.6	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent defending against motion to dismiss is reasonable.
8/29/2011	Review of Madigan Reply	0.4	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on various dispositive motions is reasonable.
9/5/2011	Review of Motion to Defer	0.4	Excessive time spent on a 2-page motion	Time spent reviewing and analyzing State's motion reasonable.
9/6/2011	Legal Research - Kachalsky	0.8	Lack of specificity on why this was necessary to this litigation	State acknowledged relevance of <i>Kachalsky</i> case by filing a 28(j) letter about it during appeal.
9/19/2011	Review of Opposition to Summary Judgment	0.3	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on MSJ is reasonable.
9/21/2011	Legal Research - New Cases	0.4	Lack of specificity	Entry specific enough to judge the reasonableness of tracking rapidly evolving area of the law.
9/22/2011	Review of Response to Supp. Authority	1	None.	n/a
9/27/2011	Phone Conference with Counsel	0.3	Lack of specificity; not with other lawyers in this case	Agree to omit.
9/29/2011	Review of Ezell Order Mootness	0.4	Lack of specificity of why this was necessary to this litigation	Reviewing related legal developments both reasonable and necessary.
9/30/2011	Legal Research - Hightower, New Cases	0.8	Lack of specificity	Entry specific enough to judge the reasonableness of tracking rapidly evolving area of the law.

Date	Description	Hours	State's Objection	Plaintiffs' Response
10/19/2011	Legal Research - P. Charles L. Rev.	0.6	Lack of specificity	Entry specific enough to judge the reasonableness of tracking rapidly evolving area of the law.
11/16/2011	Review of Order, Email	0.2	Lack of specificity	Docket suggests that this entry refers to this Court's order dismissing the motion for a hearing on the PI motion as moot, which issued on this date.
11/17/2011	Conf. Call Counsel, Email	0.4	Lack of specificity; duplicative	It is unclear how the State can allege that the entry is both ambiguous and duplicative. Context suggests that this entry concerns communication about the Court's order of the previous day.
11/27/2011	Legal Research - Montyce H.	0.8	Lack of specificity	Entry specific enough to judge the reasonableness of tracking rapidly evolving area of the law.
12/19/2011	Legal Research - New Cases	1.6	Lack of specificity	Entry specific enough to judge the reasonableness of tracking rapidly evolving area of the law.
12/19/2011	Email Extension	0.1	Lack of specificity	Agree to omit.
1/3/2012	Prepare Memo - Preemption	3.8	Nothing on this was ever filed	Agree to omit.
1/4/2012	Review Petition Rehear and Brady Amicus Review Kachalsky Petition	2.4	Nothing to rehear; MTD granted on 03-30-12; this was filed 07-25-11	Reasonable to review filings in other cases relating to Second Amendment.
1/9/2012	Review Filings, Email	0.4	Lack of specificity; duplicative	Agree to omit.
1/26/2012	Conference Call with Counsel- Status	0.5	Duplicative; excessive	Attorneys participating in reasonably staffed meetings may each bill hours for participating in meeting.
2/5/2012	Review of Moore, Gonzales Decisions	1.5	Lack of specificity as to how Gonzalez is relevant	Entry specific enough to judge overall reasonableness of tracking rapidly evolving area of the law.
2/7/2012	Conference Call with Counsel Review of Hightower Brief	0.6	Not with anyone who entered appearance; Howard spoke with Chris Conte, \but <.5 hour	Agree to omit.

Date	Description	Hours	State's Objection	Plaintiffs' Response
2/8/2012	Response to Motion to Supplement	0.3	Duplicative of other counsels' work	Multiple attorneys may make independent contributions to litigation. Overall time spent on motion to supplement is reasonable.
3/5/2012	Review of Md. Decision, Comments, Prepare Letter to Court	3.4	No letter to the SD Ill was docketed; lack of specificity on Maryland decision relevance	Agree to omit.
3/12/2012	Review of Woppard Filings - Stay	0.6	No stay in our case as of that date	Stay in <i>Woopard</i> case. Entry specific enough to judge the reasonableness of tracking rapidly evolving area of the law.
3/16/2012	Review of Moore Appeal Brief	0.6	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on tracking legal developments is reasonable.
3/20/2012	Review of Nordyke Oral Argument, Legal Research - Standard of Review	1.4	Lack of specificity	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
3/21/2012	Review of Woppard Opp. to Stay, Court Questions, Email	0.6	Lack of specificity	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
5/11/2012	Email - Amici	0.2	Lack of specificity	Entry specific enough to judge the reasonableness of time spent relating to amici.
5/16/2012	Review Amici Briefs, Legal Research, Prepare Response	2.2	Lack of specificity	Entry specific enough to judge the reasonableness of time spent relating to amici.
5/22/2012	Review Drafts, Prepare Comments - Reply	1.2	Lack of specificity	Entry specific enough to judge the reasonableness of time spent developing appellate reply brief.
5/24/2012	Review Moore Reply	0.6	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on tracking legal developments is reasonable.

Date	Description	Hours	State's Objection	Plaintiffs' Response
5/30/2012	Legal Research	0.6	Lack of specificity	Context suggests that entry refers to research for oral argument prep.
6/1/2012	Legal Research, Review Briefs	2.4	Lack of specificity	Context suggests that entry refers to research for oral argument prep.
6/4/2012	Review Briefs, Moot Court	2.4	Lack of specificity	Context suggests that entry refers to oral argument prep.
6/7/2012	Review Oral Argument - Mass.	1	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
6/12/2012	Review Oral Argument - 7th Cir.	1.3	Lack of specificity; doesn't further this litigation	Context suggests that entry refers to review of oral argument in this case, which occurred four days before this date.
6/18/2012	Review Woppard Appeal Brief	0.4	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
6/29/2012	Legal Research- New Cases- Standard of Review	0.5	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
7/6/2012	Review of Historians Brief- Aguilar, Email	1.6	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
7/12/2012	Review of Woppard Amicus	0.4	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
7/30/2012	Review Woppard Briefs	0.8	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
8/6/2012	Review Historians Brief - Woppard	0.8	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
11/28/2012	Review Supplemental Authority, Email	0.7	Lack of specificity; doesn't further this litigation	Context reveals that State filed 28(j) letter on this date.

Date	Description	Hours	State's Objection	Plaintiffs' Response
11/30/2012	Review Response Kachalsky, Prepare Comments	0.8	Lack of specificity; doesn't further this litigation	Context suggests that this entry refers to responding State's 28(j) letter concerning <i>Kachalsky</i> .
12/11/2012	Review Opinion (7th Circuit), Prepare Memo	1.6	Excessive; duplicative	It is not only reasonable but necessary for all attorneys participating in a case to review the order disposing of the appeal.
12/13/2012	Review Supp. Letters, Email	0.4	Lack of specificity	Agree to omit.
12/14/2012	Review Opinion, Prepare Memo	0.8	Excessive	Time reasonably spent analyzing opinion disposing of appeal.
12/18/2012	Review Motion Rehear Extension, Email	0.2	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on motion to extend time (here, twelve minutes) is reasonable.
1/22/2013	Review Opposition to Rehear draft, Prepare Comments	1.2	Duplicative of other counsel	Multiple attorneys may make independent contributions to litigation. Overall time spent on tracking legal developments is reasonable.
2/22/2013	Email - Denial Rehearing, Review Dissent	1.4	Excessive; duplicative	It is not only reasonable but necessary for all attorneys participating in a case to review and communicate about the order disposing of the appeal.
3/14/2013	Review Kachalsky Opposition	0.4	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
3/22/2013	Review Woppard Opinion	1	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
3/24/2013	Legal Research - New Cases	1.5	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
3/26/2013	Legal Research - New Cases	0.6	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.

Date	Description	Hours	State's Objection	Plaintiffs' Response
3/27/2013	Review Kalchasky Reply, New Decisions	1.8	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
4/29/2013	Review of App. Extend Time-Cert.	0.2	Lack of specificity	Context suggests that entry refers to State's application to the Supreme Court to extend time to file a petition for certiorari.
6/7/2013	Legal Research- New Cases	0.6	Lack of specificity; doesn't further this litigation	Entry specific enough to judge the reasonableness of time spent tracking rapidly evolving area of the law.
12/5/2013	Preparation of motion for attorney's fee - Phone Conference w/Counsel, Compile Fee Info	0.4	Lack of specificity	Entry specific enough to judge the reasonableness of the hours spent preparing motion for attorneys fees.
12/12/2013	Preparation of motion for attorney's fee - Review of Draft Brief, Case Records	1.4	Duplicative, excessive	Multiple attorneys may make independent contributions to litigation. Overall time spent on motion for attorneys fees is reasonable.
12/12/2013	Preparation of motion for attorney's fee - Preparation of Declaration	1.5	7.5 hours on a 4-page fee petition; only 3 paragraphs explain what he did in this case; the rest is a recitation of his resume; excessive	Overall amount of time reviewing bills filed over the course of two and a half year litigation reasonable.
12/13/2013	Preparation of motion for attorney's fee - Preparation of Declaration Fees	3.2	See above	See above.
12/16/2013	Preparation of motion for attorney's fee - Review of Time Sheet- Reasonableness, Preparation of Declaration	2.8	See above	See above.

**FEES PLAINTFFS AGREE TO OMIT FROM REQUEST**

**I. Freeborne & Peters LLP**

Date	Attorney	Description	Hours Omitted	Rate	Fees Omitted
5/2/2011	WNH	Work with Todd Vandermyde regarding new matter; telephone conference with client regarding preparation for and background of complaint; work on outline of potential complaint.	1.30	\$ 475.00	\$ 617.50
5/22/2011	WNH	Travel to Springfield for meeting with Todd Vandermyde regarding upcoming meeting with client and to discuss various alternatives and arguments for purposes of defeating statute and succeeding in court; conducted meeting with Todd Vandermyde.	3.80	\$ 475.00	\$ 1,805.00
5/31/2011	WNH	Communication with Todd Vandermyde regarding judge being assigned to case and related issues.	0.30	\$ 475.00	\$ 142.50
6/8/2011	WNH	Telephone conference with Todd Vandermyde regarding status and next steps, request for additional time and court order granting same.	0.30	\$ 475.00	\$ 142.50
6/9/2011	WNH	Examined materials with regards to concealed carry in Colorado and forwarded same to client for consideration.	0.30	\$ 475.00	\$ 142.50
6/27/2011	WNH	Examined most recent communication from Chicago Alderman and Police regarding heightened security issues; review of Mimes decision; communication from client with regard to next steps.	1.00	\$ 475.00	\$ 475.00
7/5/2011	WNH	Review of email and attachment from Todd Vandermyde regarding amendment to Chicago ordinance allowing gun ranges in Chicago.	0.30	\$ 475.00	\$ 142.50
8/10/2011	WNH	Review of transcript from in front of Judge Dow.	0.50	\$ 475.00	\$ 237.50
1/26/2012	WNH	Conference call with Chris Conte regarding status and next steps in Southern District litigation.	0.30	\$ 475.00	\$ 142.50
2/16/2012	WNH	Work on issues pertaining to press release and communications with client and Steve Halbrook regarding same.	0.50	\$ 475.00	\$ 237.50
2/22/2012	WNH	Tended to issues pertaining to press request for interview of Mary Shepard; communications amongst team members relative to same.	0.50	\$ 475.00	\$ 237.50
5/17/2012	WNH	Tended to securing information relative to the Coram case and communications with client regarding same; review of infringe/abridge materials from co-counsel.	0.50	\$ 475.00	\$ 237.50

6/25/2012	WNH	Work on securing copy of digital oral argument before 7th Circuit; communication with clients regarding same.	0.80	\$ 475.00	\$ 380.00
8/6/2012	WNH	Telephone conference with Todd Vandermyde regarding status; follow-up with Docket contacts regarding same; follow-up with Court Clerk; prepared report to client regarding same.	0.80	\$ 475.00	\$ 380.00
9/6/2012	GLW	Analyze correspondence regarding the fee issue and e-mail opposing counsel with proposal for paying the fees and for handling the supplemental fees issue; follow up correspondence with co-counsel payment.	0.30	\$ 375.00	\$ 112.50
2/1/2013	WNH	Telephone conference with Mary Shepard and follow-up with Chris Conte regarding Congressional Hearings.	0.30	\$ 475.00	\$ 142.50
2/4/2013	WNH	Follow-up with Steven Aaron of NRA federal regarding next steps with respect to Mary Shepard testimony before Congressional Sub-committee; communication via email and call with Mary Shepard to advise of status.	0.50	\$ 475.00	\$ 237.50
2/8/2013	GLW	Research and analyze the right to privacy under the Illinois constitution and the scope of the constitutional protects.	1.9	\$ 395.00	\$ 750.50
2/13/2013	GLW	Continue researching and analyzing case law delineating the boundaries of the Illinois constitutional right against invasions of privacy.	0.8	\$ 395.00	\$ 316.00
2/14/2013	GLW	Complete research in to privacy issues and draft memorandum detailing same.	1.1	\$ 395.00	\$ 434.50
2/14/2013	WNH	Preparation of materials to be sent to Todd Vandermyde with regard to privacy issues.	0.3	\$ 475.00	\$ 142.50
2/20/2013	WNH	Multiple conversations with Victor Quilici regarding status of informational hearings in Springfield and related matters; communication with NRA and lobbyist relative to same.	0.30	\$ 475.00	\$ 142.50
<b>TOTAL</b>					<b>\$ 7,598.50</b>

**II. Locke Lord LLP**

Date	Attorney	Description	Hours Omitted	Rate	Fees Omitted
3/20/2013	WNH	Call with Mary Shepard regarding status and request for permission to participate in conference; correspondence with Chris Conte regarding conversation with Mary Shepard and approval for discussions with Brownell; follow-up on issues related to home rule and how we can use limitations on home rule/state law dichotomy to our advantage to challenge likely new statute.	1.30	\$ 450.00	\$ 585.00
3/26/2013	WNH	Review of recent criminal court decisions misinterpreting the 7th circuit precedent in Shepard and Moore; communication with Todd Vandermyde regarding same.	0.50	\$ 450.00	\$ 225.00
3/28/2013	WNH	Telephone conference with Michael Bennett of Appellate Defender's Office regarding offer to assist in matter; he confirmed they are seeking a Petition for Rehearing; prepared report to client regarding same.	0.50	\$ 450.00	\$ 225.00
5/6/2013	WNH	Discussions with David Thompson and Todd Vandermyde regarding possible challenges to County ordinances given Shepard I Moore decision; discussion with Todd Vandermyde and Chris Conte regarding same; review of Sup. Ct. decision granting IL-AG request for more time.	0.80	\$ 450.00	\$ 360.00
5/24/2013	WNH	Telephone conference with Mary Shepard regarding request of Mike Rowe for comment with regard to proposed concealed carry bill.	0.30	\$ 450.00	\$ 135.00
6/3/2013	WNH	Review of motion for additional time from IL AG; telephone conference with Todd Vandermyde regarding same and work toward securing more background re timing issues of legislature and our review of draft bill.	0.30	\$ 450.00	\$ 135.00
6/7/2013	WNH	Examined communications relating to timing of responses and related matters.	0.30	\$ 450.00	\$ 135.00
6/12/2013	WNH	Review of Randolph County local ordinance allowing concealed carry; review of Blair Holt statute; review of case law relative to legislature's ability to circumvent timing established by court.	1.30	\$ 450.00	\$ 585.00
6/26/2013	WNH	Review of various articles with regard to actions of various municipalities regarding assault weapons and state conceal carry law.	0.30	\$ 450.00	\$ 135.00

6/27/2013	WNH	Review of draft of response to motion to dismiss and communication with David Thompson regarding same.	1.00	\$ 450.00	\$ 450.00
7/8/2013	WNH	Follow-up with Todd Vandermyde regarding developments in legislature; participated in conference call with all to discuss status and next steps.	1.00	\$ 451.00	\$ 451.00
<b>TOTAL</b>					<b>\$ 3,421.00</b>

**III. Cooper & Kirk PLLC**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours Omitted</b>	<b>Rate</b>	<b>Fees Omitted</b>
12/20/2012	CJC	Review Dames & Moore case.	0.60	\$ 895.00	\$ 537.00
2/10/2012	HN	Review City's motion for extension.	0.10	\$ 545.00	\$ 54.50
6/26/2013	HN	Review and analyze draft response to motion to dismiss and provide comments on same.	0.50	\$ 585.00	\$ 292.50
4/2/2012	PP	Prepare 7th Circuit admission forms.	0.50	\$ 395.00	\$ 197.50
4/3/2012	PP	Submit application for admission to 7th Circuit.	0.20	\$ 395.00	\$ 79.00
12/18/2012	HS	Appropriate time to appeal.	4.80	\$ 120.00	\$ 576.00
12/19/2012	HS	Research re City's comments re carriage.	0.50	\$ 120.00	\$ 60.00
12/20/2012	HS	Research re statement from	2.20	\$ 120.00	\$ 264.00
1/1/2013	HS	Research re waiving preliminary injunctions.	4.70	\$ 150.00	\$ 705.00
<b>TOTAL</b>					<b>\$ 2,765.50</b>

**IV. Stephen P. Halbrook**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours Omitted</b>	<b>Rate</b>	<b>Fees Omitted</b>
5/26/2011	SPH	Phone Conference with Counsel, Review of Aguilar File	2.80	\$ 540.00	\$ 1,512.00
5/27/2011	SPH	Email Aguilar, Review of Petition, Decision, Preparation of Memo	1.60	\$ 540.00	\$ 864.00
6/27/2011	SPH	Review of Alderman Letter, Email, Legal Research	1.00	\$ 540.00	\$ 540.00
9/27/2011	SPH	Phone Conference with Counsel	0.30	\$ 540.00	\$ 162.00
12/19/2011	SPH	Email Extension	0.10	\$ 540.00	\$ 54.00
1/3/2012	SPH	Prepare Memo - Preemption	3.80	\$ 540.00	\$ 2,052.00
1/9/2012	SPH	Review Filings, Email	0.40	\$ 540.00	\$ 216.00
2/7/2012	SPH	Conference Call with Counsel; Review of Hightower Brief	0.60	\$ 540.00	\$ 324.00
3/5/2012	SPH	Review of Md. Decision, Comments, Prepare Letter to Court	3.40	\$ 540.00	\$ 1,836.00
12/13/2012	SPH	Review Supp. Letters, Email	0.40	\$ 540.00	\$ 216.00
<b>TOTAL</b>					<b>\$ 7,776.00</b>

<b>GRAND TOTAL</b>	<b>\$ 21,561.00</b>
--------------------	---------------------

# **EXHIBIT D**

## PLAINTIFFS' RESPONSES TO STATE'S LINE-BY-LINE OBJECTIONS TO COSTS

### I. Freeborn and Peters LLP

Date	Description	Amount	State's Objection	Plaintiffs' Response
5/10/2011	Photocopying	\$ 0.80	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/12/2011	Certificate of Admission	\$ 30.00	Defendant should not bear cost of plaintiffs' counsel being admitted to bar.	Agree to omit.
5/12/2011	Westlaw Research	\$ 145.24	Lack of specificity on topic researched.	Context suggests that research pertained to complaint.
5/17/2011	Messenger Delivery	\$ 6.05	No invoice to establish necessary or done in this case	Vendor and invoice number provided. Relates to institution of case.
5/23/2011	Process Service	\$ 441.00	No invoice to establish necessary or done in this case	Agree to omit as duplicative of taxable costs.

Date	Description	Amount	State's Objection	Plaintiffs' Response
5/24/2011	Photocopying	\$ 21.20	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/10/2011	Westlaw Research	\$ 899.84	Lack of specificity on topic researched.	Context suggests that research pertained to complaint.
5/10/2011	Westlaw Research	\$ 94.23	Lack of specificity on topic researched.	Context suggests that research pertained to complaint.
5/11/2011	Westlaw Research	\$ 318.49	Lack of specificity on topic researched.	Context suggests that research pertained to complaint.
5/25/2011	Photocopying	\$ 74.00	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
6/10/2011	Filing Fee for <i>Pro Hac Vice</i> motion	\$ 100.00	Defendant should not bear cost of filing fee	Filing fee is a recoverable expense. <i>See, e.g., Lewis v. Sullivan</i> , 279 F.3d 526, 530 (7th Cir. 2002).

Date	Description	Amount	State's Objection	Plaintiffs' Response
6/10/2011	Filing Fee for complaint	\$ 350.00	Defendant should not bear cost of filing fee	Already omitted from fee request as duplicative of taxable costs.
6/15/2011	Photocopying	\$ 11.40	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
7/13/2011	Photocopying	\$ 10.60	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
7/28/2011	Photocopying	\$ 27.20	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
8/2/2011	07/27 Transcript of Proceedings	\$ 53.35	No transcripts for this case; therefor lacks specificity	Agree to omit.

<b>Date</b>	<b>Description</b>	<b>Amount</b>	<b>State's Objection</b>	<b>Plaintiffs' Response</b>
8/2/2011	Westlaw Research	\$ 73.04	Lack of specificity on topic researched	Context suggests that research pertained to preliminary injunction and/or motion to dismiss.
8/2/2011	Westlaw Research	\$ 47.11	Lack of specificity on topic researched	Context suggests that research pertained to preliminary injunction and/or motion to dismiss.
8/12/2011	Photocopying	\$ 9.40	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
8/29/2011	Photocopying	\$ 2.80	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
8/24/2011	Air Express Delivery	\$ 39.81	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
9/12/2011	Photocopying	\$ 25.20	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
9/16/2011	Photocopying	\$ 0.80	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
9/22/2011	Air Express Delivery	\$ 37.05	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
11/17/2011	Telephone Roll Call	\$ 2.30	None.	n/a
1/9/2012	Photocopying	\$ 28.20	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
2/7/2012	Telephone conference calls	\$ 7.20	None.	n/a
3/8/2012	Air Express Delivery	\$ 18.18	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
3/9/2012	Photocopying	\$ 30.60	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
3/13/2012	Copies of pleadings	\$ 38.75	Lack of specificity as to the rate per page and necessity of copies	Invoice number given. Full explanation suggests that Plaintiffs were obtaining copies of pleadings and briefs from the Court.
3/30/2012	Photocopying	\$ 66.40	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
4/11/2012	Air Express Delivery	\$ 35.24	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
4/12/2012	Photocopying	\$ 549.00	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
4/23/2012	Photocopying	\$ 2.40	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
4/24/2012	Westlaw Charges	\$ 17.82	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to motion to consolidate.
4/24/2012	Westlaw Charges	\$ 42.82	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to motion to consolidate.

Date	Description	Amount	State's Objection	Plaintiffs' Response
5/10/2012	Air Express Delivery	\$ 35.39	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/10/2012	Air Express Delivery	\$ 38.03	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/11/2012	Photocopying	\$ 141.80	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/15/2012	Westlaw Charges	\$ 157.72	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to case law and relevant statutes from appellate briefs.

Date	Description	Amount	State's Objection	Plaintiffs' Response
5/15/2012	Westlaw Charges	\$ 369.89	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to case law and relevant statutes from appellate briefs.
5/16/2012	Filing Fee for Notice of Appeal	\$ 455.00	Previously awarded in the appellate bill of costs	Already omitted from fee request as duplicative of taxable costs.
5/16/2012	Westlaw Charges	\$ 614.32	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to legislative history.
5/17/2012	Westlaw Charges	\$ 12.47	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to legislative history.
5/17/2012	Westlaw Charges	\$ 62.58	Lack of specificity on topic researched	GLW's time record for this date suggests that research related to legislative history.
5/17/2012	Air Express Delivery	\$ 75.44	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. See, e.g., <i>Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
5/17/2012	Air Express Delivery	\$ 75.44	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/24/2012	Photocopying	\$ 138.10	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
5/24/2012	Air Express Delivery	\$ 35.39	No invoice, no explanation of why express mail was required	Evidence submitted with motion supports this as an expense of the litigation, and postage expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
6/7/2012	Messenger Delivery	\$ 6.05	No invoice to establish necessary or done in this case	Evidence submitted with motion supports this as an expense of the litigation, and such expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
6/7/2012	Photocopying	\$ 79.20	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
12/11/2012	Photocopying	\$ 23.20	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
12/26/2012	Photocopying	\$ 3.60	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
12/7/2012	Telephone Conference Call	\$ 7.90	None	n/a
1/8/2013	Photocopying	\$ 14.40	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
2/8/2013	Westlaw Research	\$ 563.17	Lack of specificity on topic researched	Evidence submitted with motion supports this as an expense of the litigation, and such expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
2/22/2013	Photocopying	\$ 1.80	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

**II. Locke Lord LLP**

<b>Date</b>	<b>Description</b>	<b>Amount</b>	<b>State's Objection</b>	<b>Plaintiffs' Response</b>
Jun-13	Long Distance Calls	\$ 4.23	None	n/a
Jun-13	Photocopies	\$ 42.60	Lack of specificity as to the rate per page and necessity of copies	Evidence submitted with motion supports this as an expense of the litigation, and photocopying expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).
Jun-13	PACER Online Research	\$ 1.60	Lack of specificity as to why this is necessary	Corresponding entries suggest that research related to stay of mandate.
Jun-13	Binding Supplies	\$ 1.75	District Court proceedings did not require pleadings be bound	Relevant pleadings were in appellate court.
Jun-13	Westlaw Research	\$ 3,883.63	Lack of specificity on topic researched	Corresponding entries suggest that research related to stay of mandate.
6/19/2013	Complaint Filing Fee	\$ 400.00	Defendant should not bear cost of filing fee	Agree to omit.

### III. Cooper & Kirk PLLC

<b>Date</b>	<b>Description</b>	<b>Amount</b>	<b>State's Objection</b>	<b>Plaintiffs' Response</b>
Mar-12	Delivery Services/Messengers	\$ 40.03	No invoice to establish necessary or done in this case	Context suggests that expenses related to notice of appeal.
May-12	Long Distance Telephone	\$ 9.40	None.	n/a
Jun-12	Delivery Services/Messengers	\$ 74.44	No invoice to establish necessary or done in this case	Context suggests that expenses related to oral argument preparation.
Jun-12	Hotel & Accommodations	\$ 417.88	No invoice to establish necessary or done in this case	Context suggests that expenses related to oral argument preparation.
Jun-12	Meals	\$ 118.44	No invoice to establish necessary or done in this case	Context suggests that expenses related to oral argument preparation.
Jun-12	Out-of-town travel	\$ 2,373.60	No invoice to establish necessary or done in this case	Context suggests that expenses related to oral argument preparation.
Jan-13	Delivery Services/Messengers	\$ 69.21	No invoice to establish necessary or done in this case	Evidence submitted with motion supports this as an expense of the litigation, and such expenses are compensable under § 1988. See, e.g., <i>Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

Date	Description	Amount	State's Objection	Plaintiffs' Response
Feb-13	Delivery Services/Messengers	\$ 82.43	No invoice to establish necessary or done in this case	Evidence submitted with motion supports this as an expense of the litigation, and such expenses are compensable under § 1988. <i>See, e.g., Heiar v. Crawford County, Wisconsin</i> , 746 F.2d 1190, 1203 (7th Cir. 1984).

**EXPENSES PLAINTIFFS AGREE TO OMIT FROM  
REQUEST**

**I. Freeborn and Peters LLP**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
5/12/2011	Certificate of Admission	\$ 30.00
5/23/2011	Process Service	\$ 441.00
8/2/2011	07/27 Transcript of Proceedings	\$ 53.35

**II. Locke Lord LLP**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
6/19/2013	Complaint Filing Fee	\$ 400.00

**TOTAL \$ 924.35**