

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOHN W. JACKSON and SECOND)	
AMENDMENT FOUNDATION, INC.,)	
)	
Plaintiffs,)	
)	
-against-)	
)	
GORDON E. EDEN, in his Official Capacity)	Case No. 1:12-CV-421-MCA-RHS
as Director of the Special Investigations)	
Division of the New Mexico Department of)	
Public Safety,)	
)	
Defendant.)	

MOTION FOR ATTORNEY FEES AND EXPENSES

Come now Plaintiffs, JOHN W. JACKSON and SECOND AMENDMENT FOUNDATION, INC., by and through counsel, and respectfully move this Honorable Court to award Plaintiffs' counsel their attorney fees and costs pursuant to 42 U.S.C. § 1988.

This motion is made upon the attached memorandum in support of said motion, declarations, exhibits, the Court's file, and any other matter deemed relevant to the determination of the motion. The attorney fees and costs requested by this motion are as follows:

Attorney Fees:

David G. Sigale:	63.8 hours x \$500.00/hr	\$ 31,900.00
(through 4/22/14)	13.4 travel hours x \$250.00/hr	\$ 3,350.00
Paul M. Kienzle, III	16.2 hours x \$275.00/hr	\$ 4,455.00
(through 3/31/14)		
Costs:		\$ 1,331.08

As noted in the attached declarations, attorney fees are requested at present rates.

Plaintiffs reserve the right to supplement this request as additional time is incurred litigating the

CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On April 30, 2014, the foregoing document was electronically filed with the District Court Clerk via CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
David G. Sigale