

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NATIONAL RIFLE ASSOCIATION OF)	
AMERICA, INC. and DR. GENE A. REISINGER,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 08 C 3696
)	
)	Judge Milton I. Shadur
VILLAGE OF OAK PARK)	
)	
Defendant.)	

**AGREED MOTION FOR ENTRY OF
SCHEDULE FOR MOTION FOR ATTORNEYS' FEES**

Pursuant to Local Rule 54.3 and Federal Rule of Civil Procedure 54, plaintiffs the National Rifle Association of America, Inc. and Dr. Gene A. Reisinger, by and through their attorneys, Stephen P. Halbrook and William N. Howard, hereby file this Motion for Entry of Schedule for Motion for Attorneys' Fees, and in support hereof state as follows:

1. The mandate of the Court of Appeals pertaining to the issue of attorney's fees was filed in this Court on June 24, 2011 [Doc. # 87]. Pursuant to Northern District of Illinois Local Rule 54.3 ("LR 54.3"), the parties to this litigation are required to meet and confer regarding any potential motion by a party for the award of fees and/or costs. Local Rule 54.3 sets forth certain deadlines for the parties to exchange information, confer regarding objections to certain fee requests, and to create a joint statement regarding the fee request. Under LR 54.3(b), the Court may modify the deadlines set forth in LR 54.3.

2. Plaintiffs and Defendant in this case, and Plaintiffs and Defendant in *National Rifle Association of America, Inc., et al. v. City of Chicago*, No. 08-cv-3697, have jointly conferred and agreed regarding an appropriate schedule for meeting LR 54.3's requirements. Counsel invited

Plaintiffs' counsel in the related case of *McDonald, et al. v. City of Chicago*, No. 08-cv-3945, to participate in this conference and join in this agreed motion to set a LR 54.3 schedule, but *McDonald* plaintiffs' counsel refused this invitation.

3. Based on the parties' agreement on an appropriate schedule for compliance with LR 54.3, Plaintiffs request that the Court enter the following schedule with regard to LR 54.3's requirements:

August 5, 2011 – Plaintiffs shall comply with Local Rules 54.3(d)(1)-(4) by providing Defendant all information required under such Rules.

September 12, 2011 – If necessary, Defendant shall comply with the first paragraph of Local Rule 54.3(d)(5) and subsections (A)-(D) thereunder, by providing Plaintiffs all information required under such rules.

October 3, 2011 – If necessary, the parties shall comply with Local Rule 54.3(d)(5) by: (1) identifying all hours, billing rates, or related nontaxable expenses (if any) that will and will not be objected to, the basis of any objections and the specific hours, billing rates, and related nontaxable expenses that in the parties' respective views are reasonable and should be compensated; and (2) attempting to resolve any remaining disputes.

October 31, 2011 – The parties shall comply with Local Rule 54.3(e) by filing a joint statement setting forth the information specified in such Rule.

November 21, 2011 – If necessary, Plaintiffs shall file their motion for attorneys' fees.

WHEREFORE, Plaintiffs, National Rifle Association of America, Inc. and Dr. Gene Reisinger, respectfully request that the Court enter an order setting the above schedule for the parties to comply with LR 54.3 and Federal Rule of Civil Procedure 54.

Dated: July 13, 2011.

**NATIONAL RIFLE ASSOCIATION
OF AMERICA, INC. and Dr. GENE A.
REISINGER**
Plaintiffs

BY: s/ William N. Howard
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, William N. Howard, an attorney, certify that I served a copy of Plaintiffs' **Agreed Motion for Entry of Schedule for Motion for Attorneys' Fees** to be served upon the parties of record, as shown below, via the Court's CM/ECF filing system, on the **13th** day of **July, 2011**.

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