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11 Attorneys for Plaintiffs

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 NATIONAL RIFLE ASSOCIATION OF
15 AMERICA; JOHN DOE,

16 Plaintiffs,

17 vs.

18 CITY OF LOS ANGELES; ERIC
19 GARCETTI, in his official capacity as
20 Mayor of City of Los Angeles; HOLLY
21 L. WOLCOTT, in her official capacity as
22 City Clerk of City of Los Angeles; and
23 DOES 1-10,

24 Defendants.

Case No.: 2:19-cv-03212 SVW (GJSx)

**DECLARATION OF
KONSTADINOS T. MOROS IN
SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEYS’
FEES**

Hearing Date: June 15, 2020
Hearing Time: 1:30 p.m.
Judge: Stephen V. Wilson
Courtroom: 10A

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DECLARATION OF KONSTADINOS T. MOROS

I, Konstadinos T. Moros, declare as follows:

1. I am an attorney licensed to practice law in the state of California and before the United States District Court for the Central District of California. I am an Associate Attorney at the law firm Michel & Associates, P.C. (“MAPC”), attorneys of record for Plaintiffs in this action. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto.

Plaintiffs’ Counsel’s Experience

2. In 2014, I graduated from California Western School of Law, earning my Juris Doctor.

3. I have been admitted to practice law before the courts of California since December 2015. I have also been admitted in the United States District Court for the Southern District of California since December 2015, and the Central District of California since April 2019.

4. I began my full-time legal career in 2015 working in immigration law at the Law Offices of Chris M. Ingram. Following my tenure there, I began working in employment law, which has been the continued focus of my practice.

5. In 2019, I began working at MAPC, as an Associate Attorney, where my primary focus is employment law and firearms litigation.

6. During my law firm’s litigation of this matter, for which plaintiffs seek fees, I was categorized by MAPC as “Associate 4.” *See* Ex. B (attached to the declaration of Anna M. Barvir, filed simultaneously herewith). My \$375 hourly rate is well within the hourly rates charged by highly specialized attorneys of similar skill, experience, and expertise in Southern California.

Authentication of Billing

7. Plaintiffs’ billing records, attached to the Declaration of Haydee Villegas filed simultaneously herewith, include true and accurate copies of my

1 billing records for which fee recovery is sought in this matter. *See* Ex. A (attached to
2 the Declaration of Haydee Villegas filed simultaneously herewith). The records
3 include detailed descriptions of the work I performed on this matter and the time
4 spent on each task between October 2018 and February 2020, as well as work I
5 performed on this fee motion through April 30, 2020. *Id.*

6 8. In the regular course and scope of my daily business activities, I
7 prepared the descriptions contained in each billing record that shows my name as the
8 “Timekeeper,” and I did so at or near the time of the occurrence of the work that I
9 performed on this matter.

10 9. The descriptions contained within my billing records are a fair and
11 accurate description of the work I performed on this matter and time spent on each
12 task. In my professional judgment, the amount of time indicated for each task
13 described in my billing records is a reasonable amount of time for me to have spent
14 on the type of work described therein.

15 **Role in the Litigation**

16 10. I spent approximately **12.3** hours during the settlement phase of
17 litigation. The entirety of that time was devoted to legal research and analysis of
18 procedural and legal questions relevant to settlement at the partners’ direction. Exs.
19 A, C.

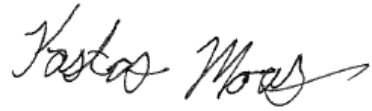
20 11. I spent approximately **1.7** hours during the pre-trial and trial preparation
21 phase of litigation. The entirety of that time was devoted to researching the
22 admissibility of certain evidence and reporting my findings to my supervising
23 attorneys for use in preparing evidence for trial. Exs. A, C.

24 12. I spent approximately **.50** hours during the fee motion phase of
25 litigation. The entirety of that time was spent reviewing, revising, and approving my
26 declaration in support of Plaintiffs’ fee motion. Exs. A, C.

27
28 I declare under penalty of perjury under the laws of the United States that the

1 foregoing is true and correct. Executed within the United States on April 30, 2020.

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Konstadinos T. Moros
Declarant

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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *National Rifle Association, et al., v. City of Los Angeles, et al.*
Case No.: 2:19-cv-03212 SVW (GJSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**DECLARATION OF KONSTADINOS T. MOROS IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Benjamin F. Chapman
Los Angeles City Attorney
200 N. Main St., Suite 675
Los Angeles, CA 90012
benjamin.chapman@lacity.org
Attorneys for Defendants

I declare under penalty of perjury that the foregoing is true and correct.

Executed April 30, 2020.

s/ Laura Palmerin

Laura Palmerin