

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BALTIMORE COUNTY BRANCH OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
*et al.*,

Plaintiffs,

v.

BALTIMORE COUNTY, MARYLAND,  
*et al.*,

Defendants.

Civil Action No. 1:21-cv-03232-LKG

**DEFENDANT BALTIMORE COUNTY'S OPPOSITION TO PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

Dated: February 26, 2024

Respectfully submitted,

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## INTRODUCTION

Plaintiffs ask this Court to award them close to \$1 million in fees and costs for bringing a misguided Voting Rights Act suit that could not yield the relief they sought—a second majority-Black district in the already Democratic-dominated Baltimore County. Adhering to traditional redistricting principles and Fourth Circuit precedent, this Court allowed the County to adopt an alternative map that strengthened Black voting power without creating another majority-Black district. Plaintiffs objected to, and vigorously opposed, this relief—the only relief the Court ultimately granted *on the County's motion* to modify the initial preliminary injunction. That ruling has governed the County's conduct since, including in conducting the 2022 election that once again saw Black-preferred candidates of choice elected to office in Baltimore County's majority-Black district and its strengthened crossover or coalition district. Plaintiffs thus *never* obtained the relief they sought, much less the kind of concrete, irreversible relief required to make them prevailing parties under the Fourth Circuit's recent decision in *Stinnie v. Holcomb*, 77 F.4th 200, 217 (4th Cir. 2023). This Court should deny the fee petition in its entirety.

Even if Plaintiffs could show they are prevailing parties, they still would not be entitled to the extraordinary award they seek. Their lack of success means that the only reasonable fee award is no fee at all. And Plaintiffs' billing records reflect that their fee petition fails to adhere to this Court's controlling Guidelines resulting in a vastly inflated fee petition that impermissibly seeks to recover fees for: (1) rates well in excess of those permitted by the Court's Guidelines, (2) attorneys doing work that should have been delegated to others, including legal research and clerical work, and (3) multiple attorneys performing tasks for which fees where only one attorney's fees can be recovered. Plaintiffs should receive nothing at all, but if they receive anything, it should be a vastly reduced amount that appropriately reflects their lack of success and incorporates rates, staffing, and billing practices recoverable under the Guidelines.

## **BACKGROUND**

This action arose from Baltimore County's adoption of a redistricting plan following the 2020 decennial census. In December 2021, the Baltimore County Council enacted Bill 103-21. That legislation adopted a redistricting map that maintained the County's District 4 as a majority-Black district, preserved other longstanding precinct and community lines, and improved overall compactness across districts.

What Bill 103-21 did not do was create a second majority-Black district. Plaintiffs were thus dissatisfied with the bill. Throughout the legislative process, Plaintiffs asserted that a second majority-Black district was not only feasible, but *required*. In their view, any redistricting plan that lacked a second majority-Black district would violate the Voting Rights Act. ECF 1 ¶¶ 32-34, 38, 41; *see also ACLU MD to County Council: Create a 2nd Majority Black District (Testimony & OpEd)*, available at <https://forwardbaltimore.com/2021/11/08/aclu-md-to-county-council-create-a-2nd-majority-black-district/> (Nov. 8, 2021) (“[T]wo majority Black districts can and should be created to comply with the Voting Rights Act.”). But both Council members and other community voices expressed concern that creating such a district would undermine Black voting power in the existing majority-Black district, District 4, and would not satisfy traditional redistricting principles. *See, e.g.*, ECF 1 ¶¶ 30, 35, 42.

When the County thus adopted Bill 103-21 instead of Plaintiffs' proposed alternative plans, Plaintiffs sued, alleging that Bill 103-21 violated Section 2 of the Voting Rights Act because the County's Black population “is sufficiently numerous and geographically compact such that two properly apportioned electoral districts can be drawn in which Blacks would constitute a majority of the voting-age population.” ECF 1 ¶ 81. Plaintiffs sought: (1) a declaratory judgment that the redistricting plan violated Plaintiffs' rights under the Voting Rights Act (“VRA”); (2) permanent injunctive relief preventing Defendants from conducting elections under the plan; and (3) a court

order adopting a redistricting plan that satisfies the VRA—*i.e.*, according to Plaintiffs, a court order requiring a map with two majority-Black districts. ECF 1 at 25.

Plaintiffs then moved for a preliminary injunction, asking this Court to “enjoin Baltimore County’s implementation of Bill 103-21 and require it to adopt a map *with two majority-Black districts.*” ECF 28-1 at 2 (emphasis added); *see also id.* at 34 (“Plaintiffs request that the Court issue a preliminary injunction enjoining implementation of Bill 103-21 *and ensuring the creation of two majority-Black districts.*”) (emphasis added). After expedited briefing over three weeks, this Court held a half-day hearing on the motion and then issued a memorandum opinion and order.

In its February 22, 2022 Order, the Court granted Plaintiffs’ motion for a preliminary injunction, but the precise relief it granted differed from Plaintiffs’ request. The Court reasoned that “[u]nder the Voting Rights Act and Supreme Court precedent, the proper remedy [for an alleged VRA violation] is to create a County redistricting plan that includes *either* an additional majority-Black County District, *or* an additional County District in which Black voters otherwise have an opportunity to elect a representative of their choice.” ECF 55 at 22-23 (emphasis added). The Court did *not require* the County to create a second majority-Black district.

This result was not what Plaintiffs expected or wanted. Indeed, on February 20, 2022, two days before the Court ruled on the preliminary injunction, the American Civil Liberties Union of Maryland (“ACLU”), one of the three entities representing Plaintiffs, prematurely issued a press release on its website proclaiming (incorrectly) that this Court had granted its motion and had held that “[t]he Council’s recommendation of a single Black super-majority district was a mistake they must rectify now.” **Exhibit 1**, ACLU Press Release.<sup>1</sup> Of course, this Court had not held any such

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<sup>1</sup> Plaintiffs remain so focused on the second-majority Black district, in fact, that the Brown Goldstein and Levy (“BGL”) website *still* incorrectly reports that this Court required the County to create such a district. *See* “Federal court strikes down Baltimore County’s discriminatory redistricting map, requires second

thing, as it had not yet decided the preliminary injunction motion. Nor did it reach that conclusion in its actual ruling issued two days later. *See* ECF 55.

But even when the Court declined to require a second majority-Black district in its February 22 decision, Plaintiffs continued to push for that result, and *only that result*. They publicly asserted: “We are determined to ensure that a fair map is created *with at least two majority-Black districts* that afford Black voters a fair and effective opportunity to elect representatives of their choice.” *Victory: Federal Judge Orders Baltimore County to Submit Redistricting Plan that Complies with Voting Rights Act*, available at <https://www.aclu-md.org/en/press-releases/victory-federal-judge-orders-baltimore-county-submit-redistricting-plan-complies> (Feb. 22, 2022) (emphasis added).

And when the County sought to modify the preliminary injunction to adopt a remedial map without a second majority-Black district, Plaintiffs vehemently opposed that course. Following the Court’s February 22 Order, the County moved to modify the preliminary injunction to allow it to adopt a remedial map. The proposed map the County submitted strengthened District 2, an existing coalition district, to further enhance the Black voting age population’s power to elect its candidates of choice. *See* ECF 57-1 at 2-3.

Plaintiffs argued that this map failed to satisfy Section 2 of the VRA because it did not create a second majority-Black district. Indeed, they went so far as to assert that the County “violated that [February 22] order” by submitting the remedial map and moving for modification. **Exhibit 2**, Mar. 11, 2022 Hr’g Tr. at 19:8. Plaintiffs argued that a crossover district can *never* remedy a purported Section 2 violation. ECF 60 at 6-10 (“Section 2 cannot be invoked to require

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majority-Black council district”, available at <https://browngold.com/news/bc-redistricting-map-struck-down/> (last visited Feb. 22, 2024).

creation of a crossover district.”). And they again proposed an alternative map that would create a second majority-Black district. ECF 60-1.

On March 24, 2022, over Plaintiffs’ repeated and strenuous objections, this Court granted the County’s motion to modify the preliminary injunction and allowed the County to adopt a map that did not create a second majority-Black district. ECF 80 at 2, 4. In doing so, the Court expressly rejected Plaintiffs’ view that the County’s proposed map was “not a proper remedy.” ECF 80 at 10. Instead, the Court held, the remedial map complied with the Voting Rights Act and other relevant constitutional and statutory requirements. *Id.* The Court thus approved the proposed redistricting map. In doing so, the Court modified the initial February 22, 2022 preliminary injunction to allow the County Council to enact the map (Bill 22-22) and the County to conduct the 2022 election cycle and future elections under that redistricting plan. ECF 80 at 10-11.

Plaintiffs remained dissatisfied with this result. In fact, they asserted in a status report submitted after the March 24 ruling that they planned to evaluate the July 2022 election results to determine whether to bring a new or amended complaint alleging continued vote dilution. ECF 83 at 3. And they asked the Court to keep the case open in the meantime. Despite Plaintiffs’ assertion that the case remained in “an interim posture,” however, *id.*, this Court dismissed the action without prejudice prior to the July 2022 election. ECF 85.

Plaintiffs did not appeal the ultimate, controlling ruling on the County’s motion to modify that they opposed and lost, despite the ACLU’s proclamation that “the redrawn map hasn’t changed enough, and that it is considering its next steps.”<sup>2</sup> Nor did they amend the complaint.<sup>3</sup>

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<sup>2</sup> CBS News, *Federal Judge Rules In Baltimore County’s Favor In New Redistricting Plan*, (March 24, 2022), <https://www.cbsnews.com/baltimore/news/federal-judge-rules-in-baltimore-countys-favor-in-new-redistricting-plan/>.

<sup>3</sup> Plaintiffs’ failure to pursue further legal action after the 2022 election is unsurprising. The 2022 election simply confirmed what the historical voting data the County submitted to this Court already proved—that heavily Democratic-leaning Baltimore County voters can put Black-preferred candidates in office. The

Instead, seeking to salvage something from their unsuccessful efforts, Plaintiffs pivoted to recast the Court’s rulings—despite their opposition to them—as wins that entitle them to fee-shifting. Of course, when Plaintiffs first asserted their eligibility for fees, Fourth Circuit precedent foreclosed that assertion. It still does. Though the Fourth Circuit has now held that securing a preliminary injunction can *sometimes* make a party eligible for a fee award, the preliminary injunction here cannot.

### **ARGUMENT**

Plaintiffs do not qualify as prevailing plaintiffs eligible for any fee award. And even if they were technically eligible for an award, they would not be entitled to any fees, much less the staggering amount of close to \$1 million they seek in fees and costs on an unsuccessful litigation. Most of the fees claimed are for services, rates, and tasks that are not recoverable under the Court’s Guidelines. Hence, the fees sought are unreasonable, and this Court should exercise its discretion to deny or drastically reduce it.<sup>4</sup>

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2022 election saw Black-preferred Democratic candidates win statewide (*i.e.*, Governor and Attorney General, both of whom are the first Black candidates to win these offices) and county-wide (*i.e.*, then Council Chair Julian Jones and current Council Chair Izzy Patoka, whom the County repeatedly demonstrated is Black voters’ candidate of choice in his District).

For example, in Council Chair Izzy Patoka’s win in District 2, he received the majority of the vote in 9 of the 12 majority Black precincts, including his opponent, (Plaintiff) Anthony Fugett’s home precinct. Mr. Fugett, a Black candidate, only received the majority of votes in the remaining 3 majority-Black precincts, and won no non-majority-Black precincts at all—reflecting that (consistent with this Court’s conclusion in modifying the initial preliminary injunction) Council Chair Patoka was and remains the candidate of choice for Black voters, who have been able to consistently elect him to office in District 2. *See Exhibit 3*, Mar. 24, 2022 Hr’g Tr. at 13:15-18 (“[T]he evidence before the Court shows that Councilmember Patoka was the candidate of choice by an overwhelming margin in the five precincts within District 2 that have the highest percentage of Black voters.”).

<sup>4</sup> To best assist the Court’s evaluation of the fee petition, and because Plaintiffs submitted their billing records separately for the three legal departments involved in the action, the County attaches as **Exhibit 4** a consolidated spreadsheet reflecting all of Plaintiffs’ billing records and requested fees together, alongside the controlling rates set forth in the Guidelines. *See infra*.

**I. PLAINTIFFS ARE NOT ELIGIBLE FOR A FEE AWARD.**

Under civil rights fee-shifting statutes, including 52 U.S.C. § 10310, a movant must first cross “the statutory threshold” of showing they are a “prevailing party” eligible for fees. *Stinnie*, 77 F.4th at 217. Until recently, a movant that secured a preliminary injunction never qualified as a prevailing party in the Fourth Circuit. In August 2023, the Fourth Circuit made a “narrow” change to that rule. *Id.* Now, a movant who obtains a preliminary injunction *may* qualify as a prevailing party, but *only* if that preliminary injunction “(a) provides her with concrete, irreversible relief on the merits of her claim by materially altering the parties’ legal relationship, and (b) becomes moot before final judgment such that the injunction cannot be reversed, dissolved, or otherwise undone by a later decision.”<sup>5</sup> *Id.* at 216 (citations omitted). Plaintiffs satisfy neither requirement.<sup>6</sup>

**A. Plaintiffs did not obtain concrete, irreversible relief on the merits.**

Plaintiffs contend they became prevailing parties when the Court issued its initial February 22, 2022 preliminary injunction because that order gave them “almost all the relief they sought.” ECF 105 at 12. This assertion is a creative re-telling of what Plaintiffs wanted and what they got.

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<sup>5</sup> The Commonwealth of Virginia petitioned the U.S. Supreme Court for a writ of certiorari from the Fourth Circuit’s *en banc* decision in *Stinnie*. See *Holcomb v. Stinnie*, No. 23-621 (filed Nov. 20, 2023). Nineteen states filed an *amicus curiae* brief supporting the Commonwealth’s petition. The Supreme Court called for a response to that petition, which is due February 28, and will likely decide whether to grant the petition soon thereafter. Thus, there is a possibility that the Supreme Court will review Fourth Circuit’s decision—and decide whether a preliminary injunction conveys prevailing party status—in the October 2024 Term.

<sup>6</sup> *Reyazuddin v. Montgomery Cnty., Md.*, 988 F.3d 794 (4th Cir. 2021), and *Project Vote/Voting for America, Inc. v. Dickerson*, 444 F. App’x 660 (4th Cir. 2011), are procedurally distinguishable. In *Reyazuddin*, a jury found the defendant liable, while the court awarded summary judgment to the plaintiff in *Project Vote*. That is, both actions involved final judgments (and relief) on the merits. Neither involved a grant of a preliminary injunction that was later modified, nor did they involve the analysis that the Fourth Circuit just articulated in *Stinnie* a few months ago. In any event, in both cases, BGL and the ACLU’s fee petitions were significantly reduced on remand pursuant to the Guidelines (*i.e.*, 47% of requested amount in *Reyazuddin* and 59% of the requested amount in *Project Vote*). See *infra*.



In bringing this action, Plaintiffs wanted to remedy what they viewed as vote dilution in Baltimore County. To achieve that end, Plaintiffs did not (contrary to their story now) simply want the County to throw out Bill 103-21 and conduct the 2022 election under any new map the Court approved. Instead, Plaintiffs wanted the County to conduct the 2022 election *only if it did so* with a map that created a second majority-Black district—because, in Plaintiffs’ view, *only* such a map would avoid vote dilution violating the VRA. *See supra* at 2.

By allowing—indeed, ordering—the County to adopt a map that did not create a second majority-Black district, the Court’s initial preliminary injunction ruling did the opposite of what Plaintiffs wanted. As Plaintiffs argued after that Order, in their view, a map with anything short of a second majority-Black district—including one with a strengthened crossover or coalition district—would not remedy the VRA violation they alleged. ECF 60 at 8 (“The Supreme Court has *never* held that a Section 2 violation can be cured by using racially-based district line drawing to create a crossover district.”) (emphasis in original); *id.* at 9 (“Read correctly, Supreme Court precedent establishes that a second majority-Black district is *the* appropriate cure to the Section 2 violation here[.]”) (emphasis added). Yet, the February 22 Order authorized the County to adopt just such a map when it gave the County the option of *either* creating a second majority-Black district *or* otherwise giving Black voters an opportunity to elect a representative of their choice.

Because the Court’s initial preliminary injunction Order did not require the County to create a second majority-Black district, and instead authorized the County to create a map the Plaintiffs argued did not remedy vote dilution, the Court’s initial preliminary injunction Order gave Plaintiffs none of the relief they sought. This scenario is nothing like the cases in which “a preliminary injunction has provided the plaintiff with precisely the merits-based relief she needs for precisely as long as she needs it,” *Stinnie*, 77 F.4th at 215—for example, when the injunction

in *Stinnie* “allowed the plaintiffs to again drive to their jobs and personal engagements, providing concrete, irreversible economic and non-economic benefits that the plaintiffs sought in bringing suit.” *id.* at 211.

The preliminary injunction here did not give Plaintiffs “precisely” what they wanted for any period of time—not even close. In fact, it gave them no concrete benefit. It disallowed using Bill 103-21 in an election scheduled months out but did not require replacing that legislation with the kind of redistricting plan Plaintiffs wanted. So, according to Plaintiffs, it failed to address the purported vote dilution harm on which their suit was focused. Plaintiffs thus fail to satisfy this first prong of *Stinnie*’s standard.

**B. Any limited relief Plaintiffs obtained from the initial preliminary injunction order was reversed, dissolved, and otherwise undone by the modified preliminary injunction Plaintiffs opposed.**

Even if the Court’s initial February 22, 2022 Order—the only ruling Plaintiffs contend makes them prevailing parties<sup>7</sup>—could be viewed as granting some limited relief to Plaintiffs, any such relief was neither irreversible nor enduring. It is just the opposite. Just weeks after issuing the February 22, 2022 Order, this Court *modified the preliminary injunction* on the County’s motion and over Plaintiffs’ opposition, while also rejecting Plaintiffs’ request that this Court keep the initial preliminary injunction in place. *See* ECF 80 at 4.

Predictably, Plaintiffs omit this fact from their brief. Indeed, they now incorrectly assert that the initial preliminary injunction was somehow mooted by the remedial map that they previously argued *violated* the February 22, 2022 Order. *See* ECF 68 at 4; *id.* at 1 (“Baltimore County has failed to comply with this Court’s February 22, 2022 Order. Once again, it has

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<sup>7</sup> Plaintiffs concede that they could not be viewed as “prevailing” in any sense after the February 22 Order, as they acknowledge they “are not seeking to recover any fees or expenses from” the litigation over the County’s motion to modify the initial preliminary injunction. ECF 105 at 24.

proposed a redistricting plan that would dilute the vote of its Black citizens in violation of Section 2 of the Voting Rights Act.”). But contrary to how Plaintiffs mischaracterize the record, the County did not simply comply with the initial preliminary injunction and leave it intact. Nor was that initial injunction mooted. Instead, it was *modified* several weeks later by this Court’s March 24, 2022 Order authorizing the County to adopt the remedial map that Plaintiffs *opposed*. And Plaintiffs, the party that fought against that modification, failed to appeal that ruling.

The injunction, as modified by the Court’s March 24, 2022, Order, no longer barred the County from conducting elections under Bill 103-21 or allowed even the option of adopting a map with a second majority-Black district. Instead, it authorized: (1) the Council to pass a redistricting bill to enact the proposed redistricting map that Plaintiffs opposed and that lacked a second majority-Black district; and (2) the County to conduct the 2022 election cycle and future cycles using that map that Plaintiffs claimed continued to cause vote dilution. ECF 80 at 10-11.

Thus, even if Plaintiffs are right that simply barring the use of Bill 103-21 and requiring a new map was sufficient relief at *Stinnie*’s first prong (it was not), that relief was undone entirely when the modified injunction authorized the County to adopt the new redistricting map that Plaintiffs opposed. And it is that March 24 modified injunction—*not* the initial February 22 injunction Plaintiffs laud—that remained in effect, because Plaintiffs did not appeal the March 24, 2022 Order and the Court then dismissed the action without prejudice. This modified injunction simultaneously undid the initial injunction while denying Plaintiffs the relief they sought, and it is the version of the injunction that stands. Plaintiffs thus achieved no enduring relief (if the few weeks between the preliminary injunction’s issuance and its modification could even be characterized as enduring) mooted before final judgment.

Plaintiffs ended up exactly where they started: with a redistricting plan they oppose that does not create a second majority-Black district and thus, according to Plaintiffs' incorrect view, continues to dilute Black voting power. Plaintiffs did not "prevail" in any sense of the word or under the *Stinnie* standard, and their fee request should be denied.

**II. PLAINTIFFS SEEK UNREASONABLE FEES FOR TASKS LEADING TO MINIMAL SUCCESS AND FOR WORK LEADING TO NO SUCCESS AT ALL.**

Even if Plaintiffs prevailed by the mere issuance of the preliminary injunction, they are still not entitled to fees. A party that shows it has "prevailed" has done "no more than" cross the initial threshold to mere "eligibility for a fee award." *Stinnie*, 77 F. 4th at 206. That party is simply "eligible for, rather than entitled to, an award of attorney's fees." *Id.* (quoting *Mercer v. Duke Univ.*, 401 F.3d 199, 203 (4th Cir. 2005)) (emphasis added). The district court must still exercise its "broad discretion" to determine what, if any, fee award is "reasonable." *Id.* Here, no fee award is "reasonable," much less one approaching \$1 million for a couple of months of unsuccessful work by three different legal departments. Specifically, Plaintiffs seek \$896,556.00<sup>8</sup> plus another \$72,669.24 in total costs including \$71,075 in expert fees and costs, for a total of \$969,225.24. Either none or very little of this amount should be awarded.

**A. Plaintiffs have no right to any fee award because of their lack of meaningful success.**

Fees should not be awarded to a plaintiff whose "success is purely technical or de minimis." *Farrar v. Hobby*, 506 U.S. 103, 117 (1992) (O'Connor, J., concurring). When a civil rights plaintiff only technically prevails, "no fees can be awarded" because the "plaintiff either has failed to achieve victory at all, or has obtained only a Pyrrhic victory for which the reasonable fee is

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<sup>8</sup> Highlighting the many errors and issues that pervade Plaintiffs' billing records, Plaintiffs' itemized entries do not even add up to this amount they claim to be seeking in their motion. *See* ECF 105 at 17. Instead, the itemized fee records add up to a total amount of \$895,468.50. The County has worked off of this amount in this Opposition brief.

zero.” *Id.* (emphasis added). To determine whether such a plaintiff’s purported success justifies any fees at all, courts in this Circuit assess “(1) the extent of relief sought compared to the relief obtained; (2) the significance of the legal issues on which the plaintiff prevailed; and (3) whether the litigation served a public purpose.” *Pitrolo v. Cnty. of Buncombe, N.C.*, 589 F. App’x 619, 630 (4th Cir. 2014).

“[T]he most critical factor in determining the reasonableness of a fee award is the degree of success obtained.” *Farrar*, 506 U.S. at 114; *see also Mercer v. Duke Univ.*, 401 F.3d 199, 204 (4th Cir. 2005) (“[T]he extent of the relief obtained by the plaintiff” is “of primary importance in all cases where a court is asked to award fees.”); *Hensley v. Eckerhart*, 461 U.S. 424, 440 (1983) (“A reduced fee award is appropriate if the relief . . . is limited in comparison to the scope of the litigation as a whole.”). In cases like this where the plaintiff seeks injunctive relief, courts must compare “the scope of the injunctive relief sought to the relief actually granted.” *Mercer*, 401 F.3d at 205. Even by Plaintiffs’ own telling, the most they achieved here was an initial preliminary injunction precluding the County from using the first map it enacted, rather than their real goal: an order requiring the County to enact a map with a second majority-Black district. And that first order was quickly modified by one that authorized the County to enact a map that lacked a second majority-Black district and that Plaintiffs opposed both for that omission and because they claimed the map otherwise failed to increase Black voting power. Plaintiffs also never received the permanent injunction or the declaratory judgment they sought.

Because Plaintiffs’ entire purpose was to obtain a second majority-Black district and they opposed the ultimate relief the Court granted *to the County*, any limited (and fleeting) success Plaintiffs achieved with the first preliminary injunction order cannot support a fee award in any amount. Such a purely technical success certainly cannot support a fee award of the magnitude

Plaintiffs request, as their counsel is well aware, having had fee awards reduced before on this basis. *See Knussman v. Maryland*, No. CIV. AMD 95-1255, 2005 WL 701065, at \*2 (D. Md. Mar. 11, 2005) (reducing the ACLU and BGL’s original fee request of \$688,227.30 to \$220,000 due to plaintiff’s “limited success”).

The other relevant factors also weigh against granting Plaintiffs any fee award. By securing only a preliminary injunction that did not give them the relief they sought and was then undone, Plaintiffs also failed to establish any legally significant precedent on any question of public importance. Indeed, *no* binding precedent was established in this action, much less any “novel legal principle” that “alter[ed] the legal landscape” for VRA cases. *Kane v. Lewis*, 675 F. App’x 254, 258 (4th Cir. 2017); *Pitrolo*, 589 F. App’x at 630 (“[T]he case should be significant to the body of civil rights law because it is novel, establishes important precedent, or otherwise advances the law”). And because the case “broke no new ground” and did not give Plaintiffs the second majority-Black district they wanted, it also had no “far-reaching effects” that broadly benefitted the public. *Kane*, 675 F. App’x at 260. Instead, Plaintiffs’ efforts landed them back where they started—with a councilmanic map with one majority-Black district.

This Court should thus deny the fee request entirely. At the very least, the Court should significantly reduce the fees requested to reflect Plaintiffs’ lack of meaningful success.

**B. Plaintiffs cannot otherwise recover for unsuccessful work.**

Even if Plaintiffs could validly recover for some portion of their work, they improperly seek a total of \$158,262.60 in fees for 255.9 hours of time spent on work wholly separate from the initial preliminary injunction’s issuance—the only successful result they can claim to have achieved. *See McAfee v. Boczar*, 738 F.3d 81, 91 (4th Cir. 2013), *as amended* (Jan. 23, 2014) (courts must “subtract fees for hours spent on unsuccessful claims unrelated to the successful ones”) (citation omitted); *see also Hensley*, 461 U.S. at 440 (“[W]here the plaintiff achieved only

limited success, the district court should award only that amount of fees that is reasonable in relation to the results obtained.”).

While disclaiming their intent to do so, Plaintiffs seek to recover substantial fees totaling \$41,407.90<sup>9</sup> for work spent litigating over the County’s proposed remedial map, including planning, drafting, reviewing, and filing their opposition to the motion to modify the preliminary injunction. That is, Plaintiffs ask to recover for unsuccessful work on a motion they opposed and lost. Despite Plaintiffs apparently recognizing their lack of entitlement to fees for this stage of the litigation, ECF 105-1 ¶ 13, ECF 105-2 ¶ 18, ECF 105-3 ¶ 15, their billing records still contain dozens of entries from the period between the first preliminary injunction order and the hearing on the motion to modify it. For example, on March 9, 2022, Mr. Mazzullo billed 3.6 hours for “research and draft[ing] report to Court on whether Baltimore County’s newly-proposed map is compliant with the Voting Rights Act/Court’s prior order,” while Mr. Colley billed 6 hours to “develop and draft response to County motion/new map” and for “related research and communications.” **Exhibit 4A**, Row 772; *id.* at Row 769; *see also id.* at Row 750 (3/7/2022 entry for Andy Freeman, 1.8 hours, \$1,305.00; “E-mails from/to co-counsel re edits to A. Lias-Booker and M. Martinez requesting precinct data and shapefiles for Council’s new proposed map; edit same.”). Because Plaintiffs unsuccessfully opposed the County’s motion to modify the initial preliminary injunction, fees for work on that stage of the litigation should be denied.

Similarly, fees for work entirely unrelated to the initial preliminary injunction are not recoverable. *See McAfee*, 738 F.3d at 91. Yet, Plaintiffs seek to recover \$32,663.00<sup>10</sup> for time

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<sup>9</sup> A subset of Plaintiffs’ time entries involving work opposing the County’s second map is attached as **Exhibit 4A**.

<sup>10</sup> A subset of Plaintiffs’ time entries involving tasks unrelated to the preliminary injunction is attached as **Exhibit 4B**.

spent on various unrelated filings, submissions, conferences, and other tasks that were performed long after the initial preliminary injunction was entered (and after it was then modified). For example, Plaintiffs submit billing entries for work on the status report to the Court stating the parties' position on whether the Court should close the case after modifying the preliminary injunction (in which Plaintiffs opposed closing the case). **Exhibit 4B**, Row 844 (4/29/2022 entry by Andy Freeman, 2.3 hours, \$1,667.50; "Review and edit multiple drafts of Plaintiffs' section of status report; multiple e-mails from and to M. Martinez re shell of Joint Status Report and process for filing; finalize Joint Status Report with Plaintiffs' section included and send to M. Martine[z]").

Likewise, Plaintiffs should not recover \$15,018.60<sup>11</sup> in fees relating to a mediation that never happened. *See Alfonso v. Aufiero*, 66 F. Supp. 2d 183, 193 (D. Mass. 1999) ("The Court [] deducted the 6.7 hours that plaintiffs' counsel unsuccessfully spent on mediation."). That mediation contributed nothing to Plaintiffs' efforts to obtain a preliminary injunction (much less to obtain fees for that initial injunction). It is thus wholly inappropriate for Plaintiffs to recover any such fees. *Cf. Sedillo v. Long View Sys. Co. (USA)*, No. 17-CV-03070-KLM, 2020 WL 869855, at \*6 (D. Colo. Feb. 20, 2020) ("Plaintiff cannot recover for any mediation-related hours even though he succeeded on his Title VII claim.").

Plaintiffs also seek to recover \$14,415.40<sup>12</sup> in fees for drafting improper subpoenas and discovery requests to Baltimore County seeking its outside counsel's billing records.<sup>13</sup> Not only

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<sup>11</sup> A subset of Plaintiffs' time entries involving the mediation that never took place is attached as **Exhibit 4C**.

<sup>12</sup> A subset of Plaintiffs' time entries for their efforts to obtain and utilize the County's outside counsel's billing records is attached as **Exhibit 4D**.

<sup>13</sup> On May 27, 2022, after the case was closed, Plaintiffs served the County with subpoenas, interrogatories, and requests for the production of documents seeking the County's attorneys' billing records. The County objected, citing controlling Fourth Circuit case law that those billing records have no relevance to this case and Plaintiffs are not entitled to them. Plaintiffs abandoned these requests. Instead, they skirted the County's objections and obtained the County's outside counsel billing records using Maryland Public



was such work untethered to any asserted success Plaintiffs obtained, as well as lacking any legal justification, but it is not even relevant to the fee award sought here. *See McClintick v. Leavitt*, No. CV BPG-05-2880, 2008 WL 11363283, at \*3 (D. Md. July 31, 2008) (“The amount of hours expended by defense counsel is not one of the factors [for reasonableness of fees] defined by the Fourth Circuit.”) (citing *Brodziak v. Runyon*, 145 F.3d 194, 196 (4th Cir. 1998)). *See supra* Section II.A; *see infra* Section II.C.

Further, although a party may recover reasonable fees for work on a successful fee petition, Plaintiffs here seek to recover \$54,757.70<sup>14</sup> in fees for work expended on a fee petition months before any such petition *could* have been successful. When this Court initially granted Plaintiffs’ motion for preliminary injunction in February 2022 (and for more than a year after, until *Stinnie* was decided in August 2023), it was clear-cut and beyond dispute in the Fourth Circuit that obtaining a preliminary injunction *never* conferred prevailing party status. Yet, Plaintiffs somehow spent over 95 hours first researching whether they could qualify as prevailing parties and then drafting a fee petition seeking fees that then-controlling law plainly foreclosed. *See, e.g., Exhibit 4E*, Row 816 (4/14/2022 entry by Youlia S. Racheva, 5.9 hours, \$2,961.80; “Legal research on fourth circuit precedent re whether a plaintiff prevailing on a PI can be considered a ‘prevailing party’ for the purpose of fees. Email to team re same.”); *see also id.* at Rows 797-1027 (entries under category “fee petition” from 3/31/2022 to 8/3/2023). This work was entirely futile. And it apparently served no purpose in assisting Plaintiffs’ drafting of the fee petition now before this Court. After *Stinnie* was issued, Plaintiffs’ counsel then spent over *200 hundred hours* and an

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Information Act (“MPIA”) requests issued by the Baltimore County Coalition of Fair Maps, a presumed affiliate of Plaintiffs or the ACLU. The redacted invoices that the County produced in response to these MPIA requests are attached to Plaintiffs’ Motion for Attorneys’ Fees at Exhibit D, ECF 105-4.

<sup>14</sup> A subset of Plaintiffs’ time entries involving work performed on their premature fee petition is attached as **Exhibit 4E**.

astonishing \$100,000 in claimed fees redrafting the petition to conform with the new Fourth Circuit law. *See, e.g., id.* at Row 1036 (8/17/2023 entry by Youlia S. Racheva, 2 hours, \$1,004.00; “Review en banc opinion in *Stinnie v. Holcomb* and prepare to re-draft fee petition to comport with same.”). Plaintiffs should not recover any fees for work on the fee petition before the *Stinnie* en banc decision was issued in August 2023.

### **III. PLAINTIFFS’ FEES SHOULD BE FURTHER REDUCED UNDER THIS COURT’S GUIDELINES AND FOURTH CIRCUIT LAW.**

Plaintiffs’ requested fee award should be additionally reduced to conform to this Court’s Rules and Guidelines for Determining Attorneys’ Fees. *See* U.S. District Court of Maryland Local Rules (July 1, 2023) at Appendix B.

#### **A. Plaintiffs’ billing rates are unreasonable and excessive.**

If the Court even needs to look beyond Plaintiffs’ lack of prevailing party status and lack of success to further assess the fee request, it will find that the rest of Plaintiffs’ petition is also rife with unreasonable requests—starting with Plaintiffs’ requested billing rates. Twelve factors (beyond lack of success) guide this Court’s discretion in deciding “what constitutes a ‘reasonable’ number of hours and rate: (1) the time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney’s opportunity costs in pressing the instant litigation; (5) the customary fee for like work; (6) the attorney’s expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount in controversy and the results obtained; (9) the experience, reputation and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between attorney and client; and (12) attorneys’ fees awards in similar cases.” *Robinson v. Equifax*

*Info. Servs., LLC*, 560 F.3d 235, 243-44 (4th Cir. 2009). The County focuses here on the most relevant (and least reasonable) aspects of Plaintiffs' fee request, beginning with their billing rates.

*This Court's Guidelines control.* This Court has adopted Guidelines that establish "presumptively reasonable fee ranges" for litigation in this District, based on attorneys' years of practice. *Bank of Am., N.A. v. Jericho Baptist Church Ministries Inc.*, No. CV PX 15-02953, 2018 WL 5809665, at \*3 (D. Md. Nov. 6, 2018); *see* L.R. 109.2, Appendix B. In awarding fees, the Court "may rely on its own knowledge of the market," and "[i]n the District of Maryland, this market knowledge is embedded in the [local rules'] Guidelines." *Beyond Sys., Inc. v. World Ave. USA, LLC*, No. PJM-08-921, 2011 WL 3419565, at \*4 (D. Md. Aug. 1, 2011).

*Plaintiffs fail to support their request for higher rates with specific evidence.* Plaintiffs fail to overcome the presumption that the Guidelines' fee ranges are reasonable and thus controlling. They assert that they are seeking their customary fees they charge clients, but such fees are "not dispositive;" instead, "the guideline rates are more representative of a broader range of fees charged by practitioners appearing in federal court in Maryland." *Reyazuddin v. Montgomery Cnty., Md.*, No. CV DKC 11-951, 2022 WL 4608331, at \*12 (D. Md. Sept. 30, 2022) (citations omitted). In *Reyazuddin*, BGL and its co-counsel litigated against Montgomery County, Maryland, and, after obtaining a liability determination at trial, sought attorneys' fees for the plaintiff as the prevailing party. *Id.* at \*1. Applying the Guidelines and other considerations, including degree (or lack) of success, Judge Chasanow reduced BGL and its co-counsel's requested fees from \$1,672,575 to \$782,390. *Id.* at \*19. Judge Chasanow explained:

[Plaintiff] must provide "specific evidence" that those rates match the market for the type of work for which [s]he seeks an award. [Plaintiff's] evidence is not sufficiently specific. While she provides affidavits from local attorneys, those affidavits merely state that Plaintiff's requested rates as a whole are "generally comparable" to "market rates," and "in line with" rates charged at another firm. Beyond those generalized statements, [Plaintiff] does not provide specific evidence

that local attorneys with experience comparable to [the attorneys in the case] charge the requested rates for comparable work.

*Id.* at \*14; *see also Carrera*, 2021 WL 3856287, at \*6; *Burley v. Balt. Police Dep't*, No. CV SAG-18-1743, 2020 WL 1984906, at \*4 (D. Md. Apr. 27, 2020) (applying Guidelines and reducing BGL's fee request for motion to compel from \$11,137 to \$3,382.50).

Similarly, here, Plaintiffs do not provide “sufficiently specific” evidence that their requested rates “match the market for the type of work for which [they] seek[] an award.” *Reyazuddin*, 2022 WL 4608331 at \*14 (citations omitted). The two declarations from other area attorneys submitted by Plaintiffs make the general and conclusory assertion that the rates sought “are at or below the market rate for comparable attorneys and paralegals in the Baltimore region.” ECF 105-5 at ¶ 9, ECF 105-6 ¶ 8. But they do not explain why a departure from the Guidelines should be permitted. Mr. Smith explains that he worked on the Fee Petition Subcommittee of the Court's Bench-Bar Liaison Committee, which in 2013 surveyed the rates charged by Maryland firms. ECF 105-5 ¶ 5. The Guidelines' rates were amended effective 2014 and remain in place. Mr. Smith does not explain why they should not be considered presumptively reasonable or why the Court should depart from those rates in *this* case. *See* ECF 105-5 at ¶ 5. Neither declaration provides any specific evidence of what attorneys at their respective firms charge clients in any specific cases, much less any cases that parallel the litigation here. These kind of “generalized statements” fall far short of the “specific evidence” required to go beyond the presumptively reasonable rates set forth in the Guidelines. *Reyazuddin*, 2022 WL 4608331, at \*14.

Moreover, these declarations contradict far more specific evidence submitted in comparable civil rights actions—including those litigated by BGL. An affidavit submitted by a local practitioner in *Reyazuddin* reflects that local attorneys involved in discrimination cases in this Court against BGL charge rates consistent with the Guidelines. **Exhibit 5** ¶¶13, 16. The

affidavit also sets out the specific rates charged by a local firm for representing defendants in such cases. *Id.* ¶ 13. This affidavit shows both (1) the specificity required to establish market rates (which Plaintiffs’ declarants fail to provide), and (2) that market rates in this District for civil rights cases like this one are in line with the Guidelines rates. Plaintiffs’ declarations, in contrast, do neither. They are thus irrelevant and unhelpful to this Court’s fee analysis, and the Court should not consider them.<sup>15</sup> Instead, the Guidelines should control.

*Defense counsel’s rates are irrelevant.* For the ACLU’s attorneys, Plaintiffs do not tether the rates they seek to anything other than the rate purportedly charged by the County’s outside counsel. ECF 105 at 22. But defense counsel’s rates are irrelevant in assessing the reasonableness of Plaintiffs’ counsel’s rates. Plaintiffs argue that courts have *sometimes* viewed the *hours* spent by opposing counsel as relevant to the lodestar calculation, but nothing showing that opposing counsel’s *rates* somehow establish the prevailing market rates for their own individual levels of experience and expertise. *Compare* ECF 105 at 22 n.7 (“Some courts have found it useful to compare the hours spent and fees incurred by opposing counsel in the same case to determine the reasonableness of a party’s attorneys’ fees.”) (citing Eleventh Circuit authority), *with McClintick*, 2008 WL 11363283, at \*3 (“The amount of hours expended by defense counsel is not one of the factors [for reasonableness of fees] defined by the Fourth Circuit.”); *Cf. Saman v. LBDP, Inc.*, No. CIV.A. DKC 12-1083, 2013 WL 6410846, at \*8 n.14 (D. Md. Dec. 6, 2013) (defense counsel’s fees “will not be considered as it is not relevant to an examination of an opposing party’s fee

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<sup>15</sup> In addition, statements in Mr. Smith’s declaration purporting to opine on the reasonableness of Plaintiffs’ counsel’s staffing and billing practices should be stricken or excluded. Mr. Smith has not been qualified as an expert on these matters, nor could he so qualify based on these vague and unsupported generalizations. As with Mr. Smith’s un-specific statements about billing rates, his assertions on these points lack any specifics that would assist the Court in determining the reasonableness of Plaintiffs’ fee request. This Court should not consider his declaration. *See* Fed. R. Evid. 702 (expert opinion admissible only if it “will help the trier of fact”); Fed. R. Civ. P. 56(c)(4) (declarations must “set out facts that would be admissible in evidence, and show that the affiant or declarant is competent to testify on the matters stated”).

request”) (citations omitted). Nor is there any meaningful comparison to be drawn between what Plaintiffs assert was a blended rate (*i.e.*, an alternative rate structure) charged for the County’s four-attorney team and the individual hourly rates Plaintiffs seek to recover for seven attorneys employed at different firms and organizations.

*Local District of Maryland, not D.C., prevailing rates apply.* Plaintiffs are also wrong to seek hourly rates for the Arnold & Porter (“A&P”) attorneys based on what they assert are prevailing market rates in the District of Columbia. “The community in which the court sits is the first place to look to in evaluating the prevailing market rate.” *Montcalm Pub. Corp. v. Commonwealth of Virginia*, 199 F.3d 168, 173 (4th Cir. 1999) (quoting *Rum Creek*, 31 F.3d at 179)); *see Chaten v. Marketsmart LLC*, No. PX-19-1165, 2020 WL 4726631, at \*6 (D. Md. Aug. 14, 2020) (“The District of Columbia is not the relevant market” in determining fees.). A different locality’s rates are only potentially relevant if the movant establishes that the matter was “so complex or specialized that no attorney, with the required skills, is available locally.” *Montcalm Pub. Corp.*, 199 F.3d at 173 (internal quotations omitted). For example, in one case, the ACLU submitted multiple affidavits showing that they had tried, and failed, to find local Maryland counsel that could litigate the case. *Thompson v. U.S. Dep’t of Hous. & Urb. Dev.*, No. CIV.A. MGJ95309, 2001 WL 1636517, at \*12 (D. Md. Dec. 12, 2001). Plaintiffs fall far short of meeting this standard.

The ACLU *did* find Maryland counsel—Andrew Freeman—who took the lead in the case, including arguing the entirety of the first preliminary injunction hearing (the only one at which Plaintiffs arguably had some success). Since Mr. Freeman had been retained at the outset, Plaintiffs fail to explain why they also needed to hire A&P just to get John Freedman on board—especially when Mr. Freedman then handled very little of the case and appeared only at one hearing

(where Mr. Freeman took the lead role).<sup>16</sup> Indeed, the initial conferences with A&P were handled by associate Michael Mazzullo—not Mr. Freedman. **Exhibit 4**, Row 81, 105. And Plaintiffs’ billing records show that A&P’s *associate* team and a different partner at the firm—not the purported election law expert, Mr. Freedman—did the bulk of the work on the matter.<sup>17</sup>

*The reasonable hourly ranges under the Guidelines.* Under the Guidelines, the appropriate hourly rate ranges for the timekeepers involved in this action are as follows:

<b>Attorney</b>	<b>Years of Experience</b>	<b>MD Guidelines Range</b>
Debbie Jeon (ACLU)	20 or more	\$300-475
Andy Freeman (BGL)		
John A. Freedman (A&P)		
Mark D. Colley (A&P)		
Tierney Peprah (ACLU)	5-8	\$165-300
Nick Steiner (ACLU)		
Michael L. Mazzullo (A&P)	less than 5	\$150-225
Youlia S. Racheva (A&P)		
<b>Non-Attorney</b>	<b>Role</b>	<b>MD Guidelines Range</b>
Amy Cruice (ACLU)	Paralegals & Staff	\$95-150
Elsha Aemero (ACLU)		
Marie Bauer (BGL)		

<sup>16</sup> Relatedly, Plaintiffs fail to show that they could not have secured a similar team (comprised primarily of associates with no voting rights expertise) locally. Dr. Deborah Jeon, the ACLU’s Legal Director, does not aver that she looked for, but failed to, secure local representation that could have done the work A&P did (again, work mostly done by associates without any special election law expertise). Instead, she simply asserts that no one in Baltimore other than a retired BGL attorney had the requisite expertise in voting rights litigation and would be able to “jump in on short notice.” ECF 105-2 ¶ 14. She does not explain whether she believes there are currently no Baltimore attorneys with the relevant expertise or whether there are such attorneys, but she feared they would be unable to take on the case. Nor does she assert that she asked or evaluated any local firm before going to A&P. Because the ACLU did not even *try* to find local representation, and because they ultimately used the D.C. firm primarily for associate work that did not require or employ any special election law expertise, Plaintiffs fail to show that they had no choice but to secure D.C.-located counsel or that D.C. market rates should apply.

<sup>17</sup> John Freedman logged a total of 81.5 billable hours on the case total (less than 50 of which was relevant to the preliminary injunction), while his partner Mark Colley billed 87.9 hours and associates Michael Mazzullo and Youlia Racheva billed 247.7 hours and 233.1 hours, respectively, on the litigation. *See Exhibit 4.*

This Court should reduce the hourly rates for Plaintiffs' timekeepers to amounts within these ranges. *See, e.g., Thompson v. U.S. Dept. of Hous. & Urban Dev.*, No. CIV.A. MGJ-95-309, 2002 WL 31777631, at \*12 (D. Md. Nov. 21, 2002) ("Accordingly, as to the attorney's fees of the ACLU chargeable against the Local Defendants, the rates allowed will be the current version of the Guidelines."); *see also Dause v. Broadway Servs., Inc.*, No. JKD-11-3136, 2012 WL 1131524, at \*6 (D. Md. April 3, 2021) (reducing BGL's fee request of \$36,237 to \$11,540). Applying the Guidelines ranges for each timekeeper results in another drastic reduction to Plaintiffs' fee request, from \$737,205.90 to a range of \$291,886.00 on the low end of the Guidelines, to a *maximum* of \$459,105.00. *See Exhibit 4* at Row 1244, Columns M-N.

**B. This Court's Rules explicitly prohibit certain of Plaintiffs' staffing and billing practices.**

Plaintiffs' fee records reflect numerous instances of double billing for the same tasks, which the Guidelines prohibit.<sup>18</sup> On January 19, 2022, a total of six attorneys for Plaintiffs billed for attending a scheduling conference with this Court, even though only one attorney (the local attorney, Mr. Freeman) spoke on that call. *See Exhibit 4F* at 2 (entries for 1/19/2022). Then, on February 15, 2022, those same six attorneys plus an additional A&P partner separately billed for attending the initial preliminary injunction hearing, at which again only Mr. Freeman argued and examined witnesses. *See id.* at 4 (entries for 2/15/2022). Plaintiffs also seek attorneys' fees for *each* attorney that attended the over 50 internal, client, and expert meetings and conference calls reflected on their billing records from October 7, 2021 to January 23, 2024. *See id.*

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<sup>18</sup> A subset of Plaintiffs' time entries involving instances where more than one attorney billed for the same call, meeting, court conference, or hearing is attached as **Exhibit 4F**, with lines striking through all entries related to the same event except the highest-billing attorney for that event.



Guideline 2(c) in Appendix B states that “[o]nly one lawyer for each party shall be compensated for attending hearings.” Likewise, Guideline 2(d) states that “only one lawyer is to be compensated for client, third party, and intra-office conferences.” The proper remedy for such duplication is for this Court to “disregard[] the duplicative entries, and consider[] only the billing entry from the most senior attorney.” *Ramirez v. 316 Charles, LLC*, No. CV SAG-19-03252, 2021 WL 662185, at \*3 (D. Md. Feb. 19, 2021) (citing Guideline 2(d)). Accordingly, after eliminating the time entries of all but one attorney for attending hearings, meetings, and calls,<sup>19</sup> the Court should reduce Plaintiffs’ fee request from the Guidelines range of \$291,886.00-\$459,105.00 down to \$260,358.50-\$409,532.50.

**C. Plaintiffs’ remaining staffing and billing practices are unreasonable and excessive.**

This Court should also reduce the fees sought by Plaintiffs because they seek to recover for unreasonable billing practices, including over-billing for junior associate-level work, billing for time spent on clerical tasks, and seeking fees for time entries that are incomplete or are inadvertently reflected multiple times. These failings require applying a blanket percentage reduction to Plaintiffs’ fee request.

*Plaintiffs overcharge for billable tasks that should have been allocated to more junior attorneys.* “[W]here there is a more junior attorney assigned to a case it is reasonable to expect that research will be completed by that attorney,” not the one with significantly more experience who is seeking a far higher billing rate. *Kreuze v. VCA Animal Hosps., Inc.*, No. CV PJM-17-1169, 2019 WL 2107263, at \*5 (D. Md. May 14, 2019); *see also McManama v. Lukhard*, 464 F.

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<sup>19</sup> The billing records also reflect instances where multiple attorneys billed for reading a Court order. *See, e.g., Exhibit 4*, Row 712-16, 718. *Jahn v. Tiffin Holdings, Inc.*, No. SAG-18-1782, 2020 WL 4436375, at \*4 (D. Md. Aug. 3, 2020) (“In accordance with Guideline 2(d) above, the Court does not find it necessary for multiple attorneys to bill for reviewing a Court order.”).

Supp. 38, 43 (W.D. Va. 1978), *aff'd and remanded*, 616 F.2d 727 (4th Cir. 1980) (“The court is of the opinion that a lower rate must be applied to the hours spent on research, drafting and other preparation.”). Plaintiffs, however, seek to recover for work done by partners and senior attorneys on tasks that are typically more appropriately assigned to junior attorneys. This effort is not appropriate and such entries should be struck or reduced. In particular, Dr. Jeon, who had over 20 years of legal experience, performed *most* of the ACLU’s “legal research” despite staff attorney Tierney Peprah’s assignment to the case and despite the fact that Dr. Jeon had no speaking role in the myriad hearings. Indeed, Dr. Jeon was the only attorney on Plaintiffs’ entire team who billed for legal research before the complaint’s filing on December 21, 2021. *See Exhibit 4*. Dr. Jeon also appears to have been the complaint’s primary drafter, rather than the one providing revisions and reviewing, as would be expected from a senior attorney—and such efforts researching for and preparing the complaint totaled almost *70 hours* compared to the 20 hours spent by all other attorneys *combined* who worked on the complaint. *See id.* In addition, Dr. Jeon then spent over 80 hours researching for and drafting Plaintiffs’ motion for a preliminary injunction. Further, when a more experienced attorney *does* work on a task, she should be able to perform it more efficiently—the opposite of spending 150 hours<sup>20</sup> researching and drafting a complaint and a motion. *See Project Vote*, 2012 WL 12996855, at \*6 (D. Md. Sept. 28, 2012) (cutting Dr. Jeon’s hours working on one phase of fee petition briefing from 87.2 hours to 30 hours); *see also Antonio v. Sec. Serv. of Am., LLC*, No. CIV.A. AW-05-2982, 2011 WL 1230892, at \*2 (D. Md. Mar. 30, 2011) (“Ostensibly the more experienced an attorney, the more efficient he or she is expected to perform.”).

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<sup>20</sup> A subset of Dr. Jeon’s time entries involving work on the complaint and motion for a preliminary injunction is attached as **Exhibit 4G**.

*Plaintiffs seek fees for clerical tasks.* Plaintiffs’ counsel also billed for administrative tasks that are not recoverable. “Clerical work is not properly billable as legal fees to one’s adversary.” *Jahn*, 2020 WL 4436375, at \*3 (clerical tasks, such as filing documents, preparing documents for mailing, and mailing documents are not billable). For example, on January 17, 2022, Dr. Jeon spent 5.8 hours—which Plaintiffs billed for in the amount of \$3,770.00—“prep[ping] motions papers, exhibits, memorandum for filing.” **Exhibit 4**, Row 380. The next day, she spent 10.5 hours “finaliz[ing] motions papers for filing; phone, email, to/from clients and co-counsel re same.” *Id.* at Row 397. And on February 19, 2022, both Dr. Jeon and Andrew Freeman billed for time spent ordering the transcript of the first preliminary injunction hearing. *Id.* at Row 707-08. Fees for such tasks are not recoverable.

*Plaintiffs’ billing records are error-ridden and imprecise.* Plaintiffs’ billing records contain apparent errors and inadvertent double billing.<sup>21</sup> A&P’s billing sheets are particularly problematic, as several entries are listed with identical narratives for the same date, time and amount billed, and billing attorney. *See generally* ECF 105-1, Ex. 2. For example, the records contain two entries by Mr. Mazzullo for 0.50 hours on February 4, 2022, both stating, “Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.” **Exhibit 4H**, Rows 564-65. Mr. Mazzullo’s entries also reflect several duplicative “block-billed” entries. *See id.* at Row 1043-44 (two entries on 9/5/2023 with identical narratives, both for 2.8 hours); *id.* at Rows 1069-70 (two entries on 9/7/2023 with identical narratives, both for 1.4 hours). In addition, dozens of time entries set forth just a one-word description. *Id.* at Rows 257 (“Conference.”); Row 319 (“reports.”); Row 636 (“Milligan.”); Rows 818, 863, and 1035

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<sup>21</sup> A subset of Plaintiffs’ time entries which appear to be incomplete, double billed, or otherwise erroneous is attached as **Exhibit 4H**.

(“same.”). Not only should any such double and incomplete entries be struck entirely, but they call into question the accuracy and reasonableness of Plaintiffs’ billing records as a whole.

*This Court should reduce Plaintiffs’ fee request by 30 percent.* Courts frequently make “wholesale percentage reductions” or other “downward adjustments” to fee petitions when those petitions reflect deficiencies including “redundant time entries, failure to exercise billing judgment, or excessive number of hours sought.” *Thompson v. U.S. Dep’t of Hous. & Urb. Dev.*, No. CIV.A. MGJ-95-309, 2002 WL 31777631, at \*10, 13 (D. Md. Nov. 21, 2002); *see also id.* at \*13) (citing *Uzzell v. Friday*, 618 F.Supp. 1222, 1226–30 (M.D.N.C.1985)) (twenty-five percent reduction of one portion of fees claimed to eliminate the possibility of duplicative or unreasonable time; thirty-five percent reduction of one portion of fees claimed because of insufficiency of information provided to court for review); *see also Wortley v. Colvin*, No. CIV. JFM-13-2272, 2014 WL 2094019, at \*3 (D. Md. May 19, 2014) (reducing fee award by twenty-five percent where attorney submitted inadequate descriptions and breakdown of tasks and did not provide justification to support his requested billing rate); *Miller v. U.S. Foodservice, Inc.*, No. CIV CCB-04-1129, 2006 WL 2547212, at \*3 (D. Md. Aug. 30, 2006) (adopting an across-the-board attorneys’ fee reduction of 20% “to account for problems such as work that is unrelated . . . , block-billing practices and vague descriptions, and duplication”). Given the deficiencies that plague Plaintiffs’ fee petition and the overall excess and lack of billing judgment the petition reflects, this Court should apply a blanket reduction of 30 percent across Plaintiffs’ fee request, *after* eliminating fees spent on unsuccessful work and fees reflecting billing practices contrary to the Guidelines, as well as adjusting for reasonable billing rates.

Applying that downward adjustment to Plaintiffs’ fee request, as already reduced as described above, leaves a recoverable amount ranging from \$182,250.95 to no more than

\$286,672.75 in attorneys' fees. *See Wortley v. Colvin*, No. CIV. JFM-13-2272, 2014 WL 2094019, at \*3 n.6 (D. Md. May 19, 2014) ("The percentage reduction should apply after accounting for the specific hourly reductions discussed above."); *Hernandez v. Woodstock Bar & Grill LLC*, No. CV CCB-18-1582, 2022 WL 4554843, at \*4 (D. Md. Sept. 29, 2022) ("[T]he court will reduce the award by 10% after making the deductions above.").

#### **IV. PLAINTIFFS ARE NOT ENTITLED TO EXPERT COSTS.**

Plaintiffs seek excessive expert fees in the amount of \$71,075 (on top of the attorneys' fees discussed above that should be reduced or denied). Plaintiffs fail to show that the fees requested are reasonable, and none should be awarded.

First, Plaintiffs provide vague and completely inadequate support for their request. "Courts have 'denied requested expert fees in their entirety where the documentation proffered in support of the award was "plainly deficient," in that it failed to itemize the expert's hourly rate, number of hours spent, and a description of the work performed.'" *Reyazuddin*, 2022 WL 4608331, at \*18 (citation omitted). Here, to support A&P's portion of the requested expert costs (\$31,075), Plaintiffs simply submit an "accounting" of their claimed experts' costs, set forth on a spreadsheet with only the total amount sought, the name of the expert, the date of the invoice, and a cursory description of their work. ECF 105-1 at 33-37. For instance, A&P seeks:

- \$8,025 for William Cooper's "Baltimore County Sec 2 Research," invoiced 4/1/2022;
- \$10,000 for Kassra AR Oskooii for "Baltimore Co. racially polarized voting analysis," invoiced 3/11/2022; and
- \$8,800 for Matthew Barreto, also for "Baltimore Co. racially polarized voting analysis," and also invoiced 3/11/2022.

*Id.* at 36. The referenced invoices were not provided.

And, Plaintiffs seek \$10,000 in fees for an expert, Kassra AR Oskooii, who was never disclosed in the litigation, did not appear at either hearing, did not submit any expert declaration

or analysis, and whose work seemed to have been done *after* the Court modified the preliminary injunction ruling. Plaintiffs have not even attempted to explain why his fees are recoverable.

These entries do not provide any specific times when any particular task was performed or for what amount of time, do not sufficiently describe what the experts actually did at any point in time, and give no details about each expert's specific rate or an explanation as to why that rate is reasonable given the expert's credentials and experience. Plaintiffs' "accounting" of their expert costs is wholly insufficient to support Plaintiffs' request. *See Reyazuddin*, 2022 WL 4608331, at \*18 (denying BGL's request for \$302,400 in expert fees in its entirety because "the documentation proffered in support of the award was plainly deficient, in that it failed to itemize the expert's hourly rate, number of hours spent, and a description of the work performed."); *see also Arriwite v. SME Steel Contractors Inc.*, Case No. 4:18-cv-00543-DCN, 2023 WL 4933615 at \*2-3 (D. Idaho August 2, 2023) (denying expert witness fees for drafting reports, reviewing a case, and preparing for trial because the fees were not itemized in a party's submission for attorney's fees).

Second, if the invoice date provides an indication of when the work was performed, then these costs Plaintiffs seek were incurred for work performed *after* the initial preliminary injunction issued—or, at the very least, the billing records are not sufficiently clear to distinguish between the experts' work on the initial preliminary injunction and their work on later, plainly unsuccessful stages of the litigation. Of the \$31,075 in expert fees that A&P seeks, \$26,825 was billed by the experts to Plaintiffs in March and April 2022—while the preliminary injunction motion (with those experts' declarations) was filed in January 2022 and the hearing on it held on February 15, 2022. ECF 105-1 at 36.

Given the dates of the invoices, it appears highly likely that this work was performed not for the initial preliminary injunction, but to oppose the County's motion to modify that injunction.

Because Plaintiffs' opposition to that motion was unsuccessful, and the experts' preparation and testimony did not assist Plaintiffs' efforts to defeat the motion to modify, these fees are not recoverable. *Cf. DeSena v. LePage*, 847 F. Supp. 2d 207, 211 (D. Me. 2012) (denial of expert fees as part of award of attorney fees under § 1988 was warranted where court concluded analysis and map drawing was unnecessary for litigation).

Likewise, to support the ACLU's portion of the requested expert costs (\$40,000), Plaintiffs merely submit the expert engagement letter of Dr. Matthew Barreto, dated and signed December 6, 2021—*before* any work was performed in the case. ECF 105-2 at 28. The engagement letter provides a summary of the expected work to be performed in the litigation and that he would be paid a lump sum of \$40,000 plus expenses for his services. *Id.* Besides the fact that letter does not describe any of the work that Mr. Barreto actually performed, the \$40,000 expert fee is presumptively unreasonable given that it was *guaranteed* regardless of the extent of the work actually performed.

On the whole, Plaintiffs fail to show that their requested expert fees are reasonable or recoverable, and none should be awarded.<sup>22</sup>

### **CONCLUSION**

WHEREFORE, for these reasons, the Court should deny Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses or, in the alternative, reduce the fees and costs requested.

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<sup>22</sup> Plaintiffs seek non-expert costs and expenses (*e.g.*, legal databases, ordering transcripts, and mailing and postage) amounting to \$1,594.24. The County does not contest the reasonableness of these costs.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26th day of February, 2024, a copy of the foregoing Defendant Baltimore County's Opposition to Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses, Exhibits, Request for Hearing, and Proposed Order were served via the Court's CM/ECF system upon all counsel of record.

*/s/ Melissa O. Martinez*

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Melissa O. Martinez



# **EXHIBIT 1**

# BALTIMORE COUNTY: UPHOLD THE VOTING RIGHTS ACT

## Act Now



The Baltimore County redistricting lines were racially biased and illegal, and now a judge just ruled the County Council's redistricting plan violates the Voting Rights Act.

The Council's recommendation of a single Black super-majority district was a mistake they must rectify now – and you can help.

Judge Lydia Kay Griggsby has ruled that the Baltimore County Council must revise the illegal redistricting map first passed back in December. The Council's plan would have packed an excessively large number of Black voters into a single majority-Black district and divide the political power and opportunities of Black voters throughout Baltimore County.

This was a clear violation of the Voting Rights Act in a County that has a history of keeping BIPOC residents from fully participating in their representative government. Even though Baltimore County officials were surely aware that their redistricting plan violated the Voting Rights Act, they

still refused to promote a plan that celebrates and empowers Black, Indigenous, and Residents of Color. Now they must draw a map that is equitable and fair.

**TAKE ACTION: Tell your Baltimore County Council Members to do the right thing. Don't make the same mistake twice! Uphold the Voting Rights Act and create a Baltimore County redistricting map that serves the entire community.**

**Message Recipients:**

Baltimore County Council Members

**YOUR MESSAGE**

Use the form to send a message to your legislator.

**Subject**

We need a redistricting plan that

Dear Baltimore County Council Member,

I am a Baltimore County resident and urge the County Council to uphold the promises of the Voting Rights Act.

Residents have sent messages to Council Members and testified at hearings opposing the County's illegal redistricting plan on the grounds that it would dilute the votes and diminish the political power of BIPOC residents.

Now, Judge Lydia Kay Griggsby just ruled that the Council plan violates the Voting Rights Act. It's illegal because it packs an excessively large number of Black voters into a single majority-Black district, while splitting other Black communities among surrounding districts. This unlawfully dilutes the voices of Black voters and fails to meet the requirements of the Voting Rights Act.

The County has a disgraceful history of locking Black and Brown people out of representative government. As our representatives, it's your duty to change this and advocate on our behalf.

political system that works in the best interest of all constituents. I ask that you please do the right thing. Don't make the same mistake twice.

Thankfully, there are many options to do right by Black voters and to uphold the Voting Rights Act, several of which have been shared with the council by the plaintiffs and community groups. I urge you to take these alternative proposals seriously and pass an equitable redistricting plan.

Sincerely,

[First Name] [Last Name]

**YOUR INFORMATION**

All data you enter here will be shared with the message recipient along with your message, per our [privacy statement](https://www.aclu.org/american-civil-liberties-union-privacy-statement) (<https://www.aclu.org/american-civil-liberties-union-privacy-statement>).

**Salutation \***

(required by some officials)

**First name \***

**Last name \***

**E-mail address \***

**Address \***

**Address Line 2**

**City \***

**State \***

**Zip Code \***

**Phone \***

**Phone Type \***

Show my name in a list of action takers.

Sign me up for ACLU emails so I can stay informed and take action to protect people's rights.

I agree to receive calls and texts (including automated recurring text messages) from the ACLU and its state affiliates at the number I provided above about ways to take action and support the ACLU organizations. Message & Data Rates May Apply. Text STOP to quit. [Privacy Statement \(https://www.aclu.org/american-civil-liberties-union-privacy-statement\)](https://www.aclu.org/american-civil-liberties-union-privacy-statement)

## SEND MESSAGE

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Shawnta J.	Maryland	2 months 12 hours ago
Mairead N.	Maryland	2 months 1 day ago
Lura J.	Maryland	2 months 4 days ago

ACLU OF MARYLAND

3600 Clipper Mill Rd, Suite 350, Baltimore, MD 21211

Go to the website (<http://www.aclu-md.org/>)

WE THE PEOPLE DARE TO CREATE A MORE PERFECT UNION

# **EXHIBIT 2**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

BALTIMORE COUNTY BRANCH )  
OF THE NATIONAL ) Civil Action No. LKG-21-03232  
ASSOCIATION FOR THE )  
ADVANCEMENT OF COLORED )  
PEOPLE, et al., )  
Plaintiffs, ) **STATUS CONFERENCE**  
vs. )  
BALTIMORE COUNTY, )  
MARYLAND, et al., )  
Defendants. )  
\_\_\_\_\_)

Friday, March 11, 2022  
Via Telephone  
Baltimore, Maryland

BEFORE: THE HONORABLE LYDIA K. GRIGGSBY, Judge

For the Plaintiffs:

- Andrew Freeman, Esq.
- Tierney Peprah, Esq.
- Deborah Jeon, Esq.
- Mark Colley, Esq.
- Michael Mazzullo, Esq.
- Youlia Racheva, Esq.

For the Defendants:

- Ava E. Lias Booker, Esq.
- Melissa O. Martinez, Esq.
- Nicholas Jordan, Esq.



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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

Baltimore County Branch of the National Association for the  
Advancement of Colored People, et al., Plaintiffs, versus  
Baltimore County Maryland, et al., Defendants.

Friday, March 11, 2022  
Via Telephone  
Baltimore, Maryland

BEFORE: THE HONORABLE LYDIA K. GRIGGSBY, Judge

(APPEARANCES CONTINUED)

For the Defendants:

James Benjamin, Esq.  
Thomas Bostwick, Esq.  
Legislative Counsel

For the Defendants, Baltimore County Board of Elections

Harry Johnson, Esq.  
Aaron Nichols, Esq.

Also Present:

Chairman Julian Jones  
Millie Graves, Judicial Assistant  
Richard Smith, Law Clerk

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Reported by:

Melissa L. Clark, RPR  
Federal Official Court Reporter  
101 W. Lombard Street, 4th Floor  
Baltimore, Maryland 21201  
410-962-4472

## P R O C E E D I N G S

1  
2           **THE CLERK:** The United States District Court for the  
3 District of Maryland is now in session. The Honorable  
4 Lydia K. Griggsby, presiding.

5           **THE COURT:** Thank you very much and good morning to  
6 counsel and to our court reporter for today's status  
7 conference.

8           Again, the Court is going to kindly request that if you  
9 are not speaking, to please mute your phone. We have a number  
10 of parties on the line and it makes it very difficult to hear,  
11 even with a slight amount of background noise.

12           Before the Court this morning is Civil Action 21-3232,  
13 Baltimore County Branch of the NAACP, et al., vs. Baltimore  
14 County, et al. This is a case brought pursuant to Section 2  
15 of the Voting Rights Act challenging Baltimore County's 2021  
16 redistricting plan.

17           On February 22nd of this year, the Court issued a  
18 memorandum opinion and order that granted the Plaintiffs'  
19 motion for a preliminary injunction in this case. Pursuant to  
20 that order, the Court preliminarily enjoined Defendants from  
21 conducting future elections under the county's current 2021  
22 redistricting plan, directed the county to adopt a  
23 redistricting map that includes either two reasonably compact  
24 black majority districts for the election of county council  
25 member or an additional county district in which black voters

1 otherwise have an opportunity to elect a representative of  
2 their choice and that otherwise comports with the requirements  
3 of the Voting Rights Act and the Constitution. And the Court  
4 asked that the Defendants provide this map by March 8th of  
5 this year, and they have done so.

6 On March 8th, the Defendants filed a proposed  
7 redistricting map, as well as a motion for approval of that  
8 map and to modify certain aspects of the Court's preliminary  
9 injection. On March 10th, Plaintiffs filed a status report  
10 regarding the proposal and they've raised a number of concerns  
11 as we will talk about today. And on March 11th, the  
12 Defendants filed another status report, largely responding to  
13 some of the concerns raised by the Plaintiffs.

14 With that brief overview of our most recent developments  
15 in this case, the Court, again, welcomes counsel and thanks  
16 them for arranging their schedules for today's status  
17 conference. The Court also appreciates that we have a number  
18 of other interested individuals who have joined us, including  
19 Chairman Jones, and the Court particularly wants to thank him  
20 for taking time to be a part of our discussion.

21 With that, we will turn to the formal introduction of  
22 counsel for the record. And the Court will start with counsel  
23 for the Plaintiffs, please.

24 **MR. FREEMAN:** Good morning, Your Honor. Andy  
25 Freeman on behalf of the Plaintiffs. With me are Deborah Jeon

1 and Tierney Peprah from the American Civil Liberties Union and  
2 John Friedman, Mark Colley, Mike Mazzullo, and Youlia Racheva  
3 from Arnold & Porter.

4 **THE COURT:** Good morning, Mr. Freeman. Welcome to  
5 you and to all of your co-counsel.

6 Counsel for Baltimore County, please.

7 **MS. LIAS-BOOKER:** Good morning, Your Honor. This is  
8 Ava Lias-Booker and I am here with Melissa Martinez and Nick  
9 Jordan from my office. Also with us is Chairman Jones in the  
10 office with us. And on the phone with us today are Tom  
11 Bostwick, county legislative attorney, and James Benjamin,  
12 county attorney.

13 **THE COURT:** Thank you so much, Ms. Lias-Booker.  
14 Welcome to you and your co-counsel.

15 And again to Chairman Jones and other representatives of  
16 the county who are joining us today, you are most welcome.

17 Do we also have counsel for the County Board of  
18 Elections?

19 **MR. JOHNSON:** Good morning, Your Honor, Harry  
20 Johnson and Aaron Nichols on behalf of the Board of Elections.

21 **THE COURT:** Good morning, Mr. Johnson. Welcome to  
22 you and to Mr. Nichols.

23 With those introductions now addressed, I'd like to turn  
24 to where we are in this case. The Court mentioned in its  
25 introduction the filing of several important items, including

1 a proposed new map filed by the county on March 8th and  
2 various comments both for and against that map, which has been  
3 submitted to the Court. We are also mindful of the looming  
4 deadlines with regard to the upcoming elections and the  
5 preparations thereto. And in that regard, the Court wants to  
6 thank and acknowledge the helpful information provided by the  
7 county in terms of what its next steps would be should a map  
8 be approved by the Court in terms of taking the necessary  
9 steps to adopt that map through the legislative process.

10 Because we are really starting from a place of  
11 considering the new proposal from the county, Ms. Lias-Booker,  
12 it might make sense, in this circumstance, to start with you  
13 to give your perspective on where things stand, if you want to  
14 talk briefly about the submissions, and then the Court will  
15 also give Mr. Freeman or his co-counsel an opportunity to  
16 share their views.

17 Ms. Lias-Booker?

18 **MS. LIAS-BOOKER:** Thank you, Your Honor. We very  
19 much appreciate the opportunity.

20 As the Court indicated, we submitted the new proposed map  
21 on March 8th and in this morning's submission, I hope the  
22 Court was able to see that we are prepared to have the  
23 Baltimore County Council, all seven members of it, vote on  
24 that map today at 3:00 p.m. should the Court approve the new  
25 proposed map. So we are ready to move as quickly and as

1 expeditiously as possible in light of the looming court  
2 deadline.

3 The map that was submitted, Your Honor, as we've  
4 indicated in our motions papers and our status report, is a  
5 map that represents an opportunity for compromise to bring  
6 about what I think both parties are most interested in. And  
7 that is in maintaining and securing the right of minority  
8 voters, in particular, black voters in Baltimore County to  
9 elect a candidate of choice.

10 The new map does this by enhancing the ability of that to  
11 happen in District 2, which has already demonstrated the  
12 ability to elect candidates of choice for black voters, both  
13 in the current council member that is there and also in other  
14 elections they have indicated that.

15 The new map gives greater numbers to that and therefore  
16 ensures that that will happen in the future. The new map also  
17 reduces, but to a safe margin, the number of black voting age  
18 population to 61 percent. And I say a safe margin, but it's,  
19 quite frankly, a little less than that, so we're hoping that  
20 with crossover votes also in District 4, that should maintain  
21 District 4 as a safe district for the election of candidates  
22 of choice for black voters and, quite frankly, in that county  
23 for the last two decades, it's been a black council member.

24 We looked at the -- both the performance of that new map  
25 and we looked at the core criteria that's important for the

1 Court's constitutional analysis. And, you know, I'm sure I  
2 don't need to remind the Court that as the case law instructs  
3 both from the Fourth Circuit and other circuits, whereas here,  
4 the Court's given a properly drawn map from the appropriate  
5 legislative body, and you've given the first opportunity to  
6 devise an acceptable plan. The Court's ensuing review and  
7 remedial powers are largely dictated by that legislative  
8 body's response, as opposed to the critique that the  
9 Plaintiffs have responded, and I'll get more to that in a  
10 minute.

11 So when we look at the new map, what we see is, in  
12 District 2, a majority minority district where black voting  
13 age population will be 41.2 percent, total minority population  
14 is 54.2 percent, and the white population in that District No.  
15 2 will be at 45.8 percent. In District 4, as I indicated,  
16 61 percent is the black voting age population. When joined  
17 with other minority groups in that company, it goes above the  
18 70 percent threshold. The white vote in that will be  
19 24.8 percent.

20 When we look at the overall population deviation, case  
21 law counsels that we have to be under 10 percent deviation.  
22 District No. 2 comes in at 3.7 percent, District No. 4 comes  
23 in at 1.9 percent.

24 When we look to neighborhood communities and precincts  
25 to determine how much of a split occurred by crafting the new

1 district, again, we fall well within the range of what is  
2 reasonable. Split precincts we maintain a six-foot  
3 community -- or consensus prices, approximately; for community  
4 groups, we hold at 12. And we note that that split occurs  
5 along natural geographic lines and very well-known landmarks.

6 In short, we are able to maintain communities that have  
7 been together together. And that goes to the core retention  
8 numbers, Your Honor, and those core retention numbers, again,  
9 are very high, as they should be. They're at 82 percent from  
10 the 2010 map to now overall. And in District 2, it's  
11 82 percent, specifically; in District 4, it is 84 percent.

12 That is countered by the map that has been proposed this  
13 morning and, quite frankly, the other two maps proposed by the  
14 Plaintiffs in this case. Not one of the three maps proposed  
15 by Plaintiffs, Your Honor, we would argue, would survive a  
16 strict scrutiny analysis and challenge at the next level.

17 And that is for a variety of reasons, but I'm going to  
18 focus on the -- what I'm going to call the Cooper map that was  
19 presented to the Court yesterday. In what can only be a  
20 stunning reversal of position by the groups that are suing the  
21 county, the Cooper map literally uses citizen voting age  
22 population to try to counter the numbers that are in the  
23 county's map.

24 Not only is this a disingenuous effort because common  
25 cause has been a vociferous advocate against using citizen



1 voting age redistricting. And as said on their website and  
2 we've had a link to this, that citizen voting age  
3 redistricting, which is what Cooper uses to try to elevate the  
4 white population vote in District 2 to challenge our map, they  
5 specifically say on their own website that when you use that  
6 kind of thing, it hurts -- everyone who lives in the United  
7 States is hurt by skewing the census count. And that accurate  
8 data is essential to fairly distributing essential resources  
9 and that that kind of redistricting, especially, hurts  
10 communities of color and children and diverts resources away  
11 from communities who need it most.

12 In fact, the second expert, Dr. Barreto, testified in  
13 the Supreme Court case that rejected Trump's attempt to use  
14 citizens of voting age population. Dr. Barreto testified  
15 against it for very similar reasons. But that is the only way  
16 that the Plaintiffs in this case are able to challenge the  
17 percentages that are in the map that was submitted to the  
18 Court.

19 The other thing that we find striking, Your Honor, is  
20 that when we look at the performance analysis that was  
21 provided by the Plaintiffs, the one provided in Dr. Barreto's  
22 new amended supplemental report, and by doing an analysis of  
23 the map ourselves, what we find is pretty much agreement  
24 amongst the parties over the new map.

25 The performance analysis from Plaintiffs indicates that

1 Brown would have won in District 2, and Hogan and Jealous  
2 would have been pretty much head to head in District 4.

3 Remarkably, in all of the performance analyses, whether  
4 we're looking at the Plaintiffs or ours, Congresswoman  
5 Edwards, former Congresswoman Edwards would have lost in any  
6 way that you can figure this. So even their performance  
7 analysis supports and undergirds the map that was proposed by  
8 Baltimore County today.

9 The insistence on a majority black second district is at  
10 best premature and is numerically based, and it puts us  
11 basically in a situation where we're facing -- we may be  
12 staring down a challenge as the Supreme Court dealt with in  
13 the Cooper case, the Shaw case, the Miller case, et cetera.  
14 It elevates race over other traditional redistricting  
15 principles in a way that, as I said, would not survive strict  
16 scrutiny from our position.

17 Notwithstanding the Plaintiffs suggestion that we are  
18 trying to stonewall or delay, nothing could be further from  
19 the truth. We're prepared to act and move today. If the  
20 Court is inclined to grant approval of the new map, we would  
21 also need a modification of the preliminary injunction ruling  
22 that either eliminates or limits the 14-day charter period  
23 required for a public notice, which we think is within the  
24 Court's authority to do. And if the Court does that, the  
25 county council can vote on the map today and enact it under

1 its emergency measures.

2 So in short, we're prepared to move, and we're prepared  
3 to move today if the Court is so inclined.

4 **THE COURT:** Thank you, Ms. Lias-Booker. A few  
5 questions for you before the Court turns to Mr. Freeman to  
6 give his opening thoughts.

7 Just to clarify factually about the proposed map, the  
8 Court is correct in understanding it is not proposing a new  
9 second majority black district in the county; is that correct?

10 **MS. LIAS-BOOKER:** That is correct, Your Honor. We  
11 used the Bartlett case and the actual traditional  
12 redistricting principles to determine how much we could do  
13 with regard to that. And as the Court is well aware, you  
14 know, from the Supreme Court to the Fourth Circuit, we're  
15 counselled against maximizing black voting age population  
16 simply for the sake of maximizing it. However, the new map is  
17 an attempt to certainly increase those numbers and establish  
18 them so that they can function even more effectively than they  
19 were already functioning. So we were able to increase the  
20 black voting age population numbers in District 2, and then  
21 reserve the strength of District 4. So it's what the Courts  
22 call a crossover or coalition district, but it also happens to  
23 be a majority minority district under a Bartlett analysis.

24 **THE COURT:** And can you address a little bit more  
25 how this new district crossover coalition district would allow

1 black voters to have an opportunity to select the candidate of  
2 their choice? That was the concern that the Court raised in  
3 this prior ruling, is how does this new district, as  
4 configured, address that concern?

5 **MS. LIAS-BOOKER:** As the Court might recall, it was  
6 our position that the district -- the map as originally drawn  
7 did that, right? And we pointed to endogenous elections, and  
8 we pointed out that their expert, Dr. Barreto, ignored  
9 endogenous elections. And when you look at endogenous  
10 elections, actual elections within the district, and District  
11 2, what we found is the current councilman for that district,  
12 Izzy Patoka, he wins in black precincts by as high as 90 and  
13 80 percent in those precincts.

14 We also found that Cheryl Pasteur won that district and  
15 she was a black candidate up against a white candidate. And  
16 it matters not, you know, as to whether the other candidate  
17 worked harder or didn't. The case law is very clear that  
18 they're looking at whether the candidate Cheryl Pasteur was  
19 able to secure a victory.

20 Her declaration in this case demonstrates that, you  
21 know, the traditional stuff, if you will, is true; hard work,  
22 knocking on doors, et cetera, can get you elected whether  
23 you're black, white, female, or whatever.

24 What the new map does, as is admitted by the Plaintiffs  
25 in this case, is that it would have changed the results in the

1 Hogan/Brown, and you'll recall those are exogenous, what we  
2 call exogenous elections. They're statewide elections that,  
3 from our perspective, cannot be the basis of a map, but can  
4 certainly inform where you think you are with respect to the  
5 map. And when we look at those numbers, even their numbers,  
6 we perform better than map one, map five or the Cooper map.  
7 And when you look at those numbers in the Hogan/Brown contest  
8 in District 2, Brown would have won.

9 So that directly answers and responds to the Court's  
10 question that with respect to even exogenous or district-wide  
11 or statewide elections -- or statewide elections, I'm sorry,  
12 the black candidate would have prevailed in District 2. So it  
13 flips that result.

14 The same thing is true, Your Honor, with the  
15 Hogan/Jealous election under the new district. While our  
16 numbers are not exactly the same, what's clear is you would  
17 have had a neck-and-neck, head-to-head vote, almost a tie  
18 under our map, and then under the analysis of their map, it  
19 performs slightly less, quite frankly than our map. Under the  
20 Cooper map, there would have been a 51 Hogan, 47 percent  
21 Jealous.

22 And under all of the scenarios, Congresswoman Edwards  
23 just does not prevail, and that may have -- prevail, I'm  
24 sorry, in District 2, and that may have more to do with the  
25 type of candidate and the type of support that she was

1 generating in the black community at the time, because there  
2 was -- that was fairly controversial.

3 So we think we have directly answered the Court's issues  
4 so that the map -- current map as drawn does not run afoul of  
5 those cases raising the issue of racial gerrymander, because  
6 it is narrowly drawn in order to effectuate the goals and aims  
7 of the Voting Rights Act.

8 **THE COURT:** Thank you. And last question for you,  
9 Ms. Lias-Booker, has to do with the process going forward  
10 before Baltimore County. That was included in the discussion  
11 in the motion asking the Court to modify its preliminary  
12 injunction order.

13 Could you talk just a little bit more about what the  
14 process would look like and how -- a time frame of that should  
15 the Court approve the map in terms of having the county adopt  
16 it.

17 **MS. LIAS-BOOKER:** Absolutely, Your Honor. And I  
18 have Councilman Jones -- Chairman Jones sitting here next to  
19 me, so please feel free to stop me if I'm inaccurate in any  
20 way.

21 Your Honor, we were looking for what the -- the most  
22 expeditious and effective way is to get this done as quickly  
23 as possible.

24 There is emergency -- there is a legislation for  
25 emergency action by the council that allows them to rely on

1 that to be able to vote and enact law on an emergency basis.  
2 There is also a charter provision that requires a 14-day  
3 period or two-week period for public comment. And after  
4 looking at the case law, we're comfortable that the Court has  
5 the authority to alter that 14-day period, particularly given  
6 how long the council and various commissions in Baltimore  
7 County have been working on this issue, and there has been  
8 more than enough opportunity for public engagement and public  
9 comment.

10 We're also very mindful of the deadline. March 22nd  
11 remains the deadline for candidate filings, and March 24th  
12 remains the deadline for any appellate relief that we would  
13 seek if we were -- if we have to seek it.

14 So under those circumstances, we looked at it and  
15 decided that we could act as quickly as the Court needs us to  
16 act, and so we canvassed the council. We made sure -- and  
17 Mr. Bostwick and Mr. Benjamin are on the phone today as well,  
18 but we made sure that the council members could act today.  
19 And since this map represents a consensus of all seven  
20 members, we anticipate that the vote would be unanimous.

21 But in any case, Chairman Jones, correct me if I'm wrong,  
22 we need five votes --

23 **CHAIRMAN JONES:** Yes.

24 **MS. LIAS BOOKER:** -- to pass this map. And so we're  
25 pretty comfortable and confident that we can get that done,

1 and we can get that done today.

2 So once the council enacts the map, then it's just a  
3 question of notifying the Board of Elections that we've got  
4 the operable map in place, and that will allow us to proceed  
5 with all of the current dates in place, even if the March 22nd  
6 deadline is extended by a few days to accommodate what's  
7 happening at the state level.

8 **THE COURT:** Thank you. Is there anything that  
9 either Chairman Jones or legislative counsel would like to add  
10 on the process point?

11 **MS. LIAS-BOOKER:** I did get a note -- before you  
12 comment, Chairman Jones -- from Mr. Bostwick. And I just want  
13 to be clear, Your Honor, if I wasn't clear, that we do need,  
14 in the Court's order, that the Court is waiving the public  
15 comment requirement so that we can enact the law today if the  
16 Court is so inclined, or Monday if the Court wants to have the  
17 weekend, but we can certainly move on it today.

18 Anything else, Chairman Jones?

19 **CHAIRMAN JONES:** No, that's it. It just has to be  
20 in the order for us to violate the county code in the charter.

21 **MS. LIAS-BOOKER:** Okay. Mr. Bostwick or  
22 Mr. Benjamin? Anything else that I missed or that we should  
23 add about the process?

24 **MR. BOSTWICK:** This is Tom Bostwick. Thank you.

25 No. In the order, as Mr. Jones said, we would just need



1 the order to specify that the Court is willing to waive  
2 those -- the two-week publishing requirement and allow the  
3 counsel and also Court of Appeals decision from 1995, the  
4 Shaffer case, that says there needs to be that two-week period  
5 between introduction and vote -- I'm sorry, yeah, after  
6 introduction. So if the Court is willing to do that, then we  
7 can introduce the bill and vote on it in which case it would  
8 be enacted on the same day.

9 Thank you.

10 **MS. LIAS-BOOKER:** Thank you, Mr. Bostwick.

11 Your Honor, I should add, I think the *Cooper v. Harris*,  
12 137 Supreme Court 1455, year 2017 helps with this because  
13 there was a similar situation where there was a state court  
14 proceeding going on, then it ruled one way, and I thought that  
15 the Federal Court's reaction to that was that it did not  
16 necessarily govern their actions in their case.

17 So it's our view -- you know, I don't know if the Court  
18 shares it, but it's our view that the Court certainly has the  
19 power -- the inherent power and authority to move forward.

20 **THE COURT:** Thank you, Counsel. And that was one of  
21 the Court's questions, and we may revisit that when we get to  
22 that point.

23 Mr. Freeman, at this time, the Court would like to  
24 recognize you and the Plaintiffs, to, again, give your views  
25 on the status of the case. And since Ms. Lias-Booker did talk

1 about the substance of the proposal, as well as your own  
2 counterproposal, you're also welcome to spend some time on  
3 those points as well.

4 Mr. Freeman?

5 **MR. FREEMAN:** Thank you, Your Honor.

6 So as you referred to earlier, Your Honor, the Court  
7 issued its order a little over two weeks ago. It is  
8 Plaintiffs' position that the county has **violated that order**.  
9 The Court, having found a violation of Section 2 of the Voting  
10 Rights Act, pointed to the fact that the county could remedy  
11 that violation in two ways, either by adopting a map with two  
12 black majority districts or by adopting a second district in  
13 which the black voters had a fair opportunity to elect a  
14 candidate of their choice.

15 The county has done neither. The District 2, as the  
16 county has proposed it, has -- the numbers they put forward is  
17 a 45.8 percent white plurality of the voting age population  
18 and a 41.2 black voting age population.

19 The logical fallacy of the county's arguments is that  
20 somehow there are crossover voters who exist who would bring  
21 that 41 percent black minority up to over 50 percent, and that  
22 is simply untrue. It is particularly untrue -- and this is  
23 where the citizen voting age population becomes relevant,  
24 because 40-some percent of the county's Latino population  
25 county-wide and greater than that in places like Owings Mills

1 are non-citizens.

2 Mr. Cooper included those numbers in his declaration.  
3 Those numbers come from the United States Census's American  
4 Community Survey. It is on the county to show that there  
5 exists crossover voters who might -- who are -- not might, who  
6 are likely to allow black voters to elect the candidate of  
7 their choice. The county has entirely failed to do that. The  
8 county has offered no evidence whatsoever that black voters  
9 are likely to be able to adopt the -- to elect the candidates  
10 of their choice in District 2.

11 Where, again, I guess the evidence they point to is  
12 Ms. Pasteur, and I think we spent enough time at the last  
13 hearing on Ms. Pasteur to establish that there was a Voting  
14 Rights Act violation in District 2. Despite her election,  
15 that same violation occurred with the newly proposed map. The  
16 bottom line, Your Honor, is that applying the same Jingles  
17 analysis to the new map gets us to exactly the same result,  
18 that the newly proposed map, just like the old map, does not  
19 satis- -- or all three of those Jingles criteria apply.

20 There still are sufficient black voters to create a  
21 second majority district and minority. The black voters are  
22 politically cohesive, and the white majority continues to vote  
23 as a block sufficiently to enable it, usually to defeat a  
24 minority's preferred candidate. That is as true of the newly  
25 proposed map as it was of the previously proposed map.

1 I think the black candidate -- black candidates are  
2 likely to reduce by a little bit less to the new map than  
3 under the old, but that's not the criteria for whether there  
4 is a Section 2 violation.

5 The waiting around of the equal protection clause of the  
6 Constitution as some sort of defense has been repeatedly  
7 rejected by the Supreme Court. The Supreme Court has held  
8 that the Voting Rights Act satisfies the constitutional  
9 requirement and justifies and survives strict scrutiny. If  
10 there is a voting rights violation, then race can be taken  
11 into account. That's what Jingles and all of the other cases  
12 we've cited in our brief hold.

13 The Court does -- as I think we're in agreement as  
14 Ms. Booker ended her presentation, the Court has the power to  
15 order a remedy. The county has pointed to the urgency of  
16 adopting a remedy so that the candidates and potential  
17 candidates know what district they're going to. They can  
18 vote -- they can run in. And so we believe that the Court  
19 needs to, at this point, having given the county two bites at  
20 the apple and the county twice having failed to come up with a  
21 map that allows black candidates, black voters to elect the  
22 candidates of their choice, the Court now needs to direct the  
23 county to conduct the election pursuant to one of the three  
24 maps proposed by the Plaintiffs.

25 I do want to go back, just very briefly, Your Honor. I

1 skipped over, with respect to District 2. So I pointed to the  
2 fact that the county's own voting age population numbers show  
3 that there would be a white plurality of 45.8 percent in its  
4 District 2.

5 We presented to the Court in our status report the  
6 citizen voting age population in which there is, in fact, a  
7 white majority. Under the citizen voting age population,  
8 there is a 52.1 percent white population in District 2.

9 The common cause website that the county quotes, they  
10 quote entirely out of context. Common cause and Plaintiffs,  
11 for that matter, opposed using different voting age population  
12 to allocate congressional seats and allocate legislative  
13 districts within a state, those need to be drawn based on  
14 total population, even if the non-citizens can't vote, and we  
15 absolutely agree with that. The question here, however, goes  
16 directly to voting, and the question is whether black citizens  
17 have an opportunity to elect the candidates of their choice  
18 when answering that question who can vote is absolutely  
19 relevant, and so citizen voting age population is absolutely  
20 relevant.

21 We included those CVAP numbers in our -- in all of our  
22 presentations. I'm going back to Mr. Cooper's initial  
23 declaration that included those CVAP numbers. They weren't  
24 particularly relevant in the previous round of litigation,  
25 Your Honor, because simply looking at black voters and white

1 voters, the CVAP numbers and that VAP, the voting age  
2 population numbers are very similar. It's when, however, the  
3 county is making its unsupported allegation that somehow the  
4 other citizens of color, the Latino citizens, and Asian  
5 American -- I'm sorry, not the citizens, the other residents.  
6 Latino residents and Asian residents in the county, when  
7 they're saying that those residents could combine with the  
8 black voting age population to create a majority, that's  
9 simply untrue and unfounded if a significant and portion of  
10 those other residents of color are not citizens.

11 So again, at that point, it is relevant to drill down and  
12 look at the citizen voting age population. The county has  
13 failed to do that. The county has failed to show any evidence  
14 that there exists sufficient non-black voters who would vote  
15 in coalition with the black voters to defeat what we have  
16 shown is the overwhelming and consistent white block voting  
17 which has, in the past, defeated black voters' candidates of  
18 choice.

19 I think I'll pause there to say that -- well, I'll just  
20 pause there to answer questions. Actually, I'll throw in one  
21 point that I don't think is -- no, I'll just stop there.

22 Thank you, Your Honor.

23 **THE COURT:** All right. Thank you very much,  
24 Mr. Freeman.

25 Just to make sure the Court clearly understands the

1 Plaintiffs' position with regard to the map proposed by the  
2 county, the concern seems to largely center on data and  
3 whether or not there is evidence to show that the -- I'll call  
4 it the crossover vote, the coalition vote would coalesce in  
5 this new proposed district in a way that black voters would  
6 have an opportunity to elect a candidate of choice. Is that,  
7 kind of, an oversimplified version? Is that basically what  
8 the concern is?

9 **MR. FREEMAN:** I completely agree with what Your  
10 Honor just said. The one additional point I would say, is  
11 that we think -- is that the new map violates Section 2 of the  
12 Voting Rights Act for all of the same reasons that the Court  
13 already found that the first map did.

14 **THE COURT:** Okay. And in terms of the data, it  
15 appears there is also some disagreement about which data  
16 points should be used. Again, let's get to your point about  
17 whether you're talking about a citizen voter or just a voter  
18 who is of voting age. Can you just, again, explain the  
19 difference and why you feel that matters in the context of the  
20 Court's analysis of the current map before it?

21 **MR. FREEMAN:** Certainly, Your Honor. So the voting  
22 age population does not take into account whether or not a  
23 resident is a citizen. And again, with respect to black  
24 residents of Baltimore County, virtually all of them are  
25 citizens, and therefore when -- if, as we believe, needs to

1 happen, a second majority black district were created, one  
2 doesn't need to drill down further into the citizen voting age  
3 population. By definition, if a majority of the voters in a  
4 district are black, then black voters have the opportunity to  
5 elect the candidate of their choice.

6 It's when, however, the county is trying to satisfy  
7 Section 2 of the Voting Rights Act without creating a second  
8 majority black district by voting age population that it then  
9 turns -- first of all, I want to point out that the county  
10 admits that just voting age population of the District 2 that  
11 it proposes to create, the black population is only  
12 41.2 percent of the voting age population.

13 The county then argues, well, people of color make up  
14 another, I think, it's -- I'm trying to do the math in my head  
15 real quick. So 11 percent, something like that. 13 percent  
16 of the -- of District 2, they, combine with the black voting  
17 age population would be what the county calls a majority  
18 minority district.

19 It's at that point that the Court -- the County should  
20 have and the Court needs to look at an analysis of whether, in  
21 fact, the 41.2 percent black voting age population has a  
22 realistic opportunity to elect the candidates of its choice.  
23 The county says that they can do so by forming coalitions with  
24 crossover voters. In order to create such a coalition, the  
25 crossover voters have to exist. And as we all know, only



1 citizens can vote, and so if over 40 percent of the Latino  
2 population of Baltimore County is non-citizen, then that  
3 40 percent of Latino residents, by definition, cannot form a  
4 coalition with the black residents, the black voters, to elect  
5 the black voters' candidate of choice. That's why we then  
6 look to the citizens -- excuse me, Your Honor -- the citizen  
7 voting age population. And again, when one looks to the  
8 citizen voting age population, who is actually eligible to  
9 vote, under the county's District 2, white voters have a  
10 52 percent majority, not just a plurality.

11 And so again, will black voters -- even if all of the  
12 non-white citizens coalesced around the black voters'  
13 candidate of choice, which by the way the county is not sure  
14 that they would do, but even if they did, white voters would  
15 still have over a 52 percent majority allowing a white block  
16 vote to prevent black voters from electing the candidate of  
17 their choice.

18 So long-winded way of saying that when you're -- if  
19 you're not -- if the county is not proposing to create a  
20 second majority black district, and it's saying that black  
21 candidates -- black voters can elect a candidate of their  
22 choice by forming a coalition, at that point one needs to look  
23 at the citizen voting age population. Who is actually  
24 eligible to vote to cojoin with the black voters, and the  
25 answer in the county's proposed District 2 is there are no

1 such people. The white voters have a 52 percent majority of  
2 the citizen voting age population.

3 Did that answer Your Honor's questions?

4 **THE COURT:** Yes. Thank you very much, Mr. Freeman.

5 And one final question for you before I think it would be  
6 helpful for the Court to share some observations so we can  
7 talk about our next steps.

8 The last question for you, Mr. Freeman, just briefly.  
9 The new Cooper map, I believe, is Exhibit 2A, which was  
10 submitted in connection with the most recent filings from the  
11 Plaintiffs. As the Court understands it, this map largely --  
12 well, why don't you just tell me. What does this map do, your  
13 Map 2A?

14 **MR. FREEMAN:** So what the map does is it starts with  
15 the county's new map and creates a second majority black  
16 district while moving a minimum of three things, and still  
17 conforming to all of the other traditional safeties put forth  
18 before redrawing districts.

19 So we have -- the Plaintiffs have previously produced  
20 what we refer to as Plan 1 and Plan 5 to the Court. This is  
21 simply showing a third way that a second majority black  
22 district could be created using the county's new map as a  
23 starting place.

24 It is not -- it's not our first choice of which map we  
25 think should be adopted, but we wanted to show, again, that

1 it's quite simple to create a second majority black district  
2 with a minimum of changes to the county's new map as a third  
3 alternative to Plans 1 and 5 that we've previously submitted.

4 **THE COURT:** So do the Plaintiffs support Map 2A or  
5 not?

6 **MR. FREEMAN:** The Plaintiffs support any of the  
7 three, Your Honor. Plan 1, Plan 5, or Map 2A. We believe any  
8 of those three is an appropriate remedy to the county's  
9 Section 2 violation. So the answer to your question is, yes,  
10 we do support it. I'm simply trying to make clear that we  
11 don't think it's the -- we think Plan 1 or Plan 5 are equally  
12 or, perhaps, even a little bit better than 2A, but all three  
13 of them comply with the Voting Rights Act while neither of the  
14 county's maps do.

15 **MS. LIAS-BOOKER:** Your Honor --

16 **THE COURT:** Thank you so much, Mr. Freeman. That's  
17 helpful.

18 Did someone speak?

19 **MS. LIAS-BOOKER:** Yes, Your Honor. This is Ava  
20 Lias-Booker. I wanted to be heard if the Court would indulge  
21 me on a couple of things that Mr. Freeman said about the data  
22 on Map 2. And then specifically the -- well, specifically  
23 that, Your Honor, if I could --

24 **THE COURT:** If counsel could hold on one moment  
25 because I think the Court could probably help this a bit with

1 a few observations --

2 **MS. LIAS-BOOKER:** Okay.

3 **THE COURT:** -- then we'll give counsel an  
4 opportunity to speak, but you're not very -- we're not going  
5 to resolve this issue today on the phone, Counsel, obviously.  
6 The Court has had less than 24 hours to review the most recent  
7 papers and there are some important issues, and the Court is  
8 certainly happy and will give all sides an opportunity to  
9 present points today, but we're not going to resolve this  
10 issue today.

11 Where we are is that we had a very thoughtful and helpful  
12 response from the county in terms of how it seeks to comply  
13 with the Court's order. And we also had some thoughtful  
14 comments and concerns that had been expressed by the  
15 Plaintiffs all in a very compressed period of time, and the  
16 Court has certainly endeavored very hard to take in those  
17 comments as quickly as possible. There is going to be some  
18 more time needed to resolve them. So we're going to need to  
19 figure out how we move forward.

20 I wanted to share a few thoughts from the Court as we  
21 start to think about how we move forward. And the first is  
22 that the law and, of course, the Court's strong preference is  
23 to defer to the legislative body in terms of the proposed  
24 remedy in this case. There is no question that the county  
25 counsel has the expertise in developing its redistricting plan

1 and considers many, many factors that come into play in the  
2 course of doing that work. And so as the Court appropriately  
3 did in allowing and requesting the county to propose a remedy  
4 in this case first, which we are considering that was very  
5 important, and the Court feels very strongly to give deference  
6 to the county's wisdom and how it came up with this proposal.

7 That being said, we are unfortunately not at the point  
8 today where the Court can accept the proposal, given the  
9 concerns that have been raised by the Plaintiffs and the need  
10 for the Court, quite frankly, to look more closely at those  
11 concerns and candidly hear from some of the experts again on  
12 some of the data issues that the parties are raising. And so  
13 from the Court's perspective, it will be necessary for us to  
14 do that work before we can reach a resolution.

15 It looked, to the Court, like we have two alternatives  
16 realistically in front of us, just to try to narrow down our  
17 conversation, the proposal from the county which will be  
18 submitted on March the 8th and then Mr. Cooper's most recent  
19 proposal, which was submitted yesterday, which as the Court  
20 understands it, largely works from that, the county's proposal  
21 with a few adjustments that the Plaintiffs find acceptable.  
22 There may be concerns as well with Map 2A and I'm certain  
23 Ms. Lias-Booker will point them out to the Court, and that is  
24 fine, but that is the universe that we are in at this point in  
25 terms of how we reach a resolution in this case.

1           It was the Court's strong hope that during the last two  
2 weeks, when the county was considering a new proposal, that  
3 there would have been an opportunity for the parties to meet  
4 and confer and consult and have some of the conversation that  
5 we're having today in advance. That didn't happen and so we  
6 are at a point now where the Court is trying to catch up a  
7 little bit in terms of what the concerns are going forward.

8           That is a long way of saying, at this point, the Court  
9 would recommend that we're going to have to have another  
10 hearing with the relevant experts to talk about some of the  
11 issues with regards to why the county believes this map is  
12 appropriate and it's the appropriate remedy here and whatever  
13 concerns there might be from the Plaintiff.

14           And also the Court will give both sides an opportunity to  
15 address Map 2A as well so that the Court can rule on the  
16 remedy here, and we can look to whatever our next steps would  
17 be. The Court is in particular mindful of the process that  
18 the county will have to conduct to adopt any map that it  
19 chooses to adopt. And so we want to make sure we can move  
20 very expeditiously with the Court's piece of this in terms of  
21 hearing the evidence, resolving the issue of the map, and  
22 then, of course, giving the county as much time as possible to  
23 proceed how it chooses to do so.

24           So with those, kind of, observations, I'll let  
25 Ms. Lias-Booker, if she wants to make a response at this

1 point, that's welcome. I think you'll have another  
2 opportunity to do that more fully in a couple of days, but  
3 Ms. Lias-Booker, please feel free to go ahead.

4 **MS. LIAS-BOOKER:** Thank you so much, Your Honor.  
5 And I certainly appreciate that the Court wants to make sure  
6 it has an opportunity to examine all of the information that  
7 has been submitted in the last 24 hours. And to that end, I  
8 think it's important for the Court to take a really close look  
9 at some of the data that is being used with the Cooper map.

10 The 42 percent population number we keep hearing from  
11 Mr. Freeman this morning and we saw in support of the Cooper  
12 map. One, I don't think we have any idea where that number  
13 comes from. There's no citation to it in Mr. Cooper's  
14 declaration. We think it comes from a 2017 survey. And as a  
15 consequence, that number is simply not reliable. It's also  
16 not reliable because it's a county-wide number, and it's not a  
17 district number.

18 So it doesn't speak to the 5 percent Hispanic population  
19 in District 2. Mr. Freeman, sitting here today, nor his  
20 expert has any idea what percentage of that population are not  
21 citizens. And that is why the Supreme Court in the Cooper --  
22 in the *Department of Commerce versus New York*, a 2019 case,  
23 rejected citizen voting population -- citizenship, sorry,  
24 voting population numbers and they were not included in the  
25 2020 data. So we don't have 2020 data on this question.

1 Under Maryland law, Section 1-1307 of the code -- of the  
2 Maryland Code, it is clear that you have to use voting age  
3 population data. Indeed, even the case that they rely on, the  
4 Eleventh Circuit case, that would permit the kind of -- the  
5 citizenship data says, and I quote, of course, the requirement  
6 that voting age population data be further refined, but  
7 citizenship data applies only where there is reliable  
8 information indicating a significant difference in citizenship  
9 rates between the majority and the minority population. So  
10 that's very, very important.

11 And when we look at the numbers, I think -- and we'll get  
12 into this in more refinement if we're given an opportunity to  
13 question their experts. When you look at District 2, for some  
14 reason, that is inexplicable to us. They're assuming racial  
15 polarization in a district that is not racially polarized.  
16 The vast majority of white voters in that district are  
17 Democrats, and they often, and usually, cross over, if you  
18 will, and vote with black voters. And that is what we saw --  
19 we see in the Izzy Patoka race, that's what we see in the  
20 Cheryl Pasteur race, and that's what we see even at a  
21 statewide level, if those are relevant.

22 So I wanted to be clear about that, because they keep  
23 carving out the white vote as if there is no white vote  
24 crossover, and the evidence makes it clear otherwise.

25 And then my last point, Your Honor, is that under the



1 Cooper map, the majority population -- black population in  
2 District 4 would be reduced to 52 percent. And that's of  
3 concern to us because most of the empirical studies and case  
4 law out there suggests that to maintain the, quote, unquote,  
5 statements of District 4, we need to be well north of  
6 60 percent. We pushed it to get to 61 percent on the new map,  
7 but to push it as low as 52 percent is to make that county  
8 vulnerable.

9 So -- and I'll -- we very much will appreciate an  
10 opportunity, Your Honor, at a hearing to explore and give the  
11 Court more data on those issues.

12 **THE COURT:** Thank you so much, Ms. Lias-Booker.

13 **MR. FREEMAN:** Your Honor?

14 **THE COURT:** Your comments are very helpful.

15 Mr. Freeman, briefly I hear you -- I think I hear you.  
16 Go ahead.

17 **MR. FREEMAN:** Thank you, Your Honor. Just a couple  
18 of three things.

19 So first of all, there is an inherent contradiction in  
20 what defense counsel just said with response to needing more  
21 than 52 percent in District 4, but somehow 42 percent is  
22 enough in District 2. If the white crossover voters don't  
23 exist in District 4, they certainly don't exist in District 2.  
24 That's No. 1.

25 Number 2 -- and it's our position that you can't -- that

1 two majority black districts can be created where the black  
2 majority, by definition, can elect the candidate of their  
3 choice.

4 Ms. Lias-Booker is conflating how many people have to be  
5 in the district based on its total population with assessing  
6 how a district will perform with respect to whether minority  
7 voters can elect the voters of their choice.

8 Third, Ms. Lias-Booker questioned where our data comes  
9 from. I thought I said that earlier, but I'll say it again,  
10 that it comes from the American Community Survey, which is  
11 conducted by the United States Census. There are, in fact,  
12 some numbers even -- as Your Honor knows, there aren't cities  
13 in Baltimore County, but there are census designated places,  
14 and there are some ACS data for that. I don't have all of it  
15 in front of me, but we're glad to provide it to the Court.

16 I know that, in fact, the Latino population in Owings  
17 Mills is 60 percent non-existent, so it's even -- there are  
18 even fewer Latino residents with whom to perform crossover or  
19 coalition. But again, the county is putting the cart before  
20 the horse. It's their choice not to create a second black  
21 district. When they do that, it's then on them to show that  
22 in that second non-majority black district, that black voters  
23 have a fair opportunity to elect the candidate of their  
24 choice, and they simply cannot show that. We think we  
25 demonstrated that in the previous briefing. We demonstrated

1 that with Professor Barreto's declaration that we filed  
2 yesterday, and we'd be happy to demonstrate that, in more  
3 detail, if Your Honor wishes us to submit another brief in  
4 response to the county's motion.

5 **THE COURT:** Thank you very much, Mr. Freeman. This  
6 is how the Court proposes that we proceed. The Court will set  
7 an evidentiary hearing in this case for next Thursday, March  
8 17, 2022, at 2:00 p.m. That hearing will be via Zoom to  
9 accommodate both pandemic concerns and the need to have --

10 **MS. LIAS-BOOKER:** Your Honor --

11 **THE COURT:** -- witnesses available. I'm sorry, the  
12 Court is speaking --

13 **MS. LIAS-BOOKER:** Your Honor --

14 **THE COURT:** Yes.

15 **MS. LIAS-BOOKER:** I'm sorry, Your Honor.

16 **THE COURT:** Go ahead, Ms. Lias-Booker.

17 **MS. LIAS-BOOKER:** The March 17th deadline is a  
18 problem for me, both in terms of a deposition and in terms of  
19 a family commitment obligation that I have.

20 Is there any way to go sooner than the 17th?

21 **THE COURT:** Probably not, Ms. Lias-Booker,  
22 unfortunately, because the Court has a lot of other  
23 proceedings scheduled. I'm trying to accommodate this case,  
24 and it's going to be very difficult to do that before the  
25 17th.

1 Are you not available the entire day on the 17th?

2 **MS. LIAS-BOOKER:** Yes, I think there is no secret,  
3 Your Honor, my -- and I don't know if the Court is aware of  
4 it -- my son is an NFL combine candidate and his pro day at  
5 Stanford is on March 17th, and he had asked for both parents  
6 to be there.

7 **THE COURT:** Wonderful.

8 **MS. LIAS-BOOKER:** But if we can't, we can't. You  
9 know, the Court's needs come first. And then we've got an  
10 all-day deposition that was already planned for March 17th in  
11 another case pending in this Court.

12 **THE COURT:** Well, in terms of having a hearing next  
13 week, unfortunately, the 17th is the only date the Court is  
14 available. If we can't do it then, it has to move to the  
15 following week. And, of course, we have other issues there,  
16 but the Court will be available to have a hearing on Thursday,  
17 the 17th of March in the afternoon via Zoom, which would  
18 certainly mean that counsel could appear from wherever they  
19 would need to be. Certainly don't want to intrude on the very  
20 important family obligations, don't minimize those at all.

21 **MS. LIAS-BOOKER:** Thank you, Your Honor.

22 **THE COURT:** Otherwise, we're talking about moving  
23 into the next week. And the Court is happy to talk about  
24 that, you know, what that will mean in this case.

25 Is there an opposition to move it to the next week,

1 because that's the only other option that we have?

2 **MS. LIAS-BOOKER:** Your Honor, we have no opposition  
3 to move it to the next week.

4 **THE COURT:** Mr. Freeman?

5 **MR. FREEMAN:** Well, the Plaintiffs do oppose it.  
6 Your Honor, unless the county is going -- and we do have  
7 counsel for Board of Elections on the line. If the county and  
8 the Board of Elections will stipulate that they can move the  
9 filing deadline to after the deferred hearing --

10 **MS. LIAS-BOOKER:** Can I --

11 **MR. FREEMAN:** -- and that they won't raise that --  
12 and if they won't raise that --

13 **THE COURT:** One person at a time so that we're not  
14 talking to each other.

15 Mr. Freeman, talk to the Court. You oppose moving the  
16 date to the week of March 21st; is that correct?

17 **MR. FREEMAN:** We do, Your Honor.

18 **THE COURT:** All right.

19 **MR. FREEMAN:** We do, Your Honor.

20 **THE COURT:** It sounds like there is a concern about  
21 moving some dates. I just want to get that on the record.

22 Ms. Lias-Booker, would you or anyone on your side want to  
23 address the issue of moving dates?

24 **MS. LIAS-BOOKER:** Yes, Your Honor. Thank you. My  
25 apologies for speaking over Mr. Freeman.

1 We could definitely do the hearing on March 21st, the  
2 Monday. As I understand it -- and the Board of Elections is  
3 on, they can certainly speak to this better than I. But there  
4 are two other statewide proceedings going on that may affect  
5 the March 22nd date in terms of extending it. And right now  
6 it's March 22nd, there may be an extension of the deadline,  
7 and I think the Board of Elections is able to do that. Now,  
8 it would be a brief or short extension. But again, the  
9 county, you know, as we said, we could vote today. We could  
10 also vote on Monday, the 21st.

11 **THE COURT:** The problem with that is that assumes  
12 the Court is going to be prepared to rule on Monday after the  
13 hearing. So we need some time to get the evidence in. I want  
14 to give the parties both an opportunity to provide any  
15 supplemental briefs, if you wish to do so, so we're all on the  
16 same page before the hearing.

17 Unfortunately, again, looking at the Court's schedule,  
18 I'm going to have my JA e-mail me so she can give me dates,  
19 because she did not look at the week of March of 21st --  
20 because she really worked to move things around to try to  
21 accommodate the parties for next week -- and see whether we  
22 can do something that week.

23 So Millie, I think you're on the line. I need to know  
24 dates that we would be available to hold a hearing since March  
25 21st is not going to work. Either the 22nd, 23rd, 24th, or

1 possibly 25th.

2 Millie, are you on the line.

3 **MS. GRAVES:** I am, Judge. I'm working on that right  
4 now.

5 **THE COURT:** Okay. Thank you. Let me know when you  
6 e-mail me the dates and we'll try to work it out. Right now  
7 what the Court can propose --

8 **MR. FREEMAN:** Your Honor --

9 **THE COURT:** Yes. Just one second. Let me put out  
10 the dates the Court knows it's available, and then we will see  
11 where we are and hear from other sides.

12 Right now, what the Court was going to propose was to  
13 have the parties provide any briefs by next Tuesday, if you  
14 wish to provide supplemental briefs on the issue, and then  
15 hold an evidentiary hearing the afternoon of March 17th.

16 I'm going to hear from my JA about future dates, but  
17 again, we have a lot of things scheduled for March and we,  
18 frankly moved things around to accommodate this case, and so  
19 it's difficult for me now to try to move those matters again.

20 So there's someone that wished to be recognized. Could  
21 you state your name and then go ahead.

22 **MR. FREEMAN:** Yes, Your Honor. This is Andrew  
23 Freeman again.

24 **THE COURT:** Mr. Freeman?

25 **MR. FREEMAN:** I just wanted to ask a question. I do

1 try to be respectful of other counsel's family obligations --

2 **MS. LIAS-BOOKER:** It's not just family --

3 **MR. FREEMAN:** -- but Ms. Lias-Booker --

4 **THE COURT:** One person at a time. Mr. Freeman, go  
5 ahead. Then we'll let Ms. Lias-Booker respond. Go ahead.

6 **MR. FREEMAN:** Maybe it doesn't work, but what I was  
7 going to say is, if Ms. Lias-Booker were going to be in  
8 California for her son's pro day where, obviously, things are  
9 three hours behind us, whether it might be possible to do it  
10 in the morning before things start happening in California.

11 **THE COURT:** Well, that's a decision Ms. Lias-Booker  
12 could make.

13 Ms. Lias-Booker -- and again, you know, she's indicated  
14 her availability for that date and so we know that, but  
15 Ms. Lias-Booker, if you want to respond, you're welcome to.

16 **MS. LIAS-BOOKER:** Yes, Your Honor. The one other  
17 problem is my co-counsel in this case, Melissa Martinez, is  
18 taking the deposition in the other case, as Mr. Freeman knows.  
19 And, therefore, she is completely unavailable.

20 So she is unavailable, and I'll be in California on the  
21 17th, that's why I was trying to push it into the 21st, if at  
22 all possible. It's not just a family commitment. I can make  
23 myself available. It's another case commitment, and we can't  
24 move the deposition, unless Mr. Freeman is willing to move it  
25 here on the phone. So if he's willing to move the date of



1 that deposition, then that frees up Ms. Martinez for the 17th  
2 as well.

3 **THE COURT:** Thank you, Ms. Lias-Booker.

4 **MS. LIAS-BOOKER:** You're welcome, Your Honor.

5 **MR. JOHNSON:** Your Honor?

6 **THE COURT:** Yes, go ahead, Mr. Freeman --

7 **MR. JOHNSON:** This is Harry Johnson, and I represent  
8 the Board of Elections.

9 **THE COURT:** -- Mr. Johnson.

10 **MR. JOHNSON:** Good morning, Your Honor. I just  
11 wanted to clear up one point that's been referenced several  
12 times and I think it's incorrect. There's been a  
13 representation that the Board of Elections can move the date.  
14 We're currently looking at March 22nd. Actually, that has to  
15 be done by the State Board of Elections, and permission has to  
16 be obtained to do so. And as Ms. Lias-Booker said, there are  
17 other actions going on which affect that.

18 There is a letter that was written by the Maryland  
19 Association of Election Officials talking about the  
20 complications in moving the date. It's a public document. I  
21 know that Baltimore County's counsel has it. I'll be happy to  
22 provide it to everyone. But Baltimore County's Board of  
23 Elections can not unilaterally move the date set for filing.  
24 It has to be a date that is approved to be moved by the State  
25 Board of Elections. I just wanted the Court to be aware of

1 that.

2 **THE COURT:** Thank you so much, Counsel. And your  
3 information is very helpful and appreciated. And the Court is  
4 looking at availability then the week of March 21st, with some  
5 more informed information from my judicial assistant. There  
6 is no date that week, because of other proceedings, which,  
7 again, were moved to accommodate this case that we could do  
8 something, because the Court is not going to be available on  
9 Friday.

10 So the only option would be possibly something on Monday,  
11 March 21st. Again, looking at what we have on this calendar,  
12 that's the only date I might be able to move things around.  
13 So it kind of makes some difficulty, but, again, if you have a  
14 hearing on March 21st, the Court can't say it's going to rule  
15 on March 21st. The Court was giving it a few days after our  
16 hearing to sort this out, but we can try.

17 Let's try it again. March 21st, Mr. Freeman, are you  
18 available in the afternoon, 2 o'clock?

19 **MR. FREEMAN:** Your Honor, I'm available. If I -- my  
20 concern is not only, obviously, with giving the Court adequate  
21 time to rule, but also giving candidates adequate time to know  
22 whether or not they want to file to run and what districts  
23 they're going to run in as of the 22nd.

24 I actually will volunteer, although I'm not directly  
25 involved. If we could do the morning of the 17th, I would

1 volunteer to ask my co-counsel in the case in which  
2 Ms. Martinez is taking the deposition on the 17th to start in  
3 the afternoon if we could all do this in the morning or vice  
4 versa. Ms. Martinez, you know, if you wanted to start early  
5 and commit to finish by a particular time for that deposition,  
6 I think we could accommodate that as well. But I very much  
7 think that anything later than the 17th, Your Honor, we are  
8 inviting trouble, both in leaving the Court adequate time to  
9 issue its decision by the 22nd and also leaving potential  
10 candidates adequate time to decide whether or not to file and  
11 run by the 22nd.

12 **THE COURT:** Ms. Lias-Booker?

13 **MS. LIAS-BOOKER:** Thank you, Your Honor.

14 We need to move that deposition in its entirety. That's  
15 an expert deposition. It's going to take seven hours, and we  
16 just got to be practical if he wants to proceed on the 17th.  
17 Otherwise, we are completely open on the 21st. We could start  
18 as early on the 21st as the Court would allow us. It also  
19 gives us time to make sure the experts are available. It  
20 gives the Court time to review our briefing, and I'm not  
21 rushing the Court in terms of a decision. There are some  
22 realities we have to these dates. But I think all of the  
23 parties would be better equipped and prepared to move forward  
24 on the 21st. We can't -- you know, it's just impossible to do  
25 five things at the same time, and the solution offered is not

1 a solution. He's got to move that date entirely or --

2 **THE COURT:** All right. This is what the Court is  
3 going to do. We're going to set the hearing for March 21st.  
4 Can't do the morning, so it's going to have to be the  
5 afternoon, March 21st at 2:00 p.m.

6 It's going to be an evidentiary hearing, we'll go as long  
7 as we need to. The Court is going to request, and this will  
8 be in the Court order, that the following individuals be  
9 present to provide testimony to either questions from the  
10 Court or from the parties: Mr. Cooper, Dr. Gimpel,  
11 Dr. Barreto. And the Court will also invite Chairman Jones.  
12 If he is available, he is also welcome to attend this hearing.  
13 We'll do it by Zoom, as we did last time, which hopefully will  
14 accommodate anyone who may not physically be local to join us  
15 at that time.

16 The Court will issue an order, as we did last time, with  
17 the details in terms of how to join the Zoom hearing, et  
18 cetera. I'm going to set a date of -- this is March the 21st.  
19 We'll set a date of Friday -- no, let's do Thursday,  
20 March 17th for the parties to get in any supplemental briefs  
21 they wish the Court to consider in advance of our discussion  
22 or any PowerPoints, et cetera, that you might want to use for  
23 the hearing, that would be helpful so the Court can review  
24 that material in advance of our discussion on Monday, March 21  
25 at 2:00 p.m.

1 Is there any further questions about the schedule for  
2 both briefs and the hearing that we're going to have from the  
3 Plaintiffs, Mr. Freeman?

4 **MR. FREEMAN:** There is not, Your Honor, other than I  
5 am not directly involved in that deposition on the 17th, but  
6 if I could impose on the Court to simply put me on hold for  
7 two minutes, I could call counsel who was doing that, my  
8 co-counsel, and see if --

9 **THE COURT:** Why don't we do this, Mr. Freeman -- why  
10 don't we do this, Mr. Freeman, because working that out would  
11 obviously involve engaging both sides. If the parties are  
12 able to work out the 17th, you can report back to the Court  
13 and we can look at that as an option. But right now, we're  
14 going to go with March 21 at 2 o'clock. The briefs are due  
15 March 17th by 5:00 p.m.

16 You know, there's been a history in this case of  
17 deadlines being moved because there are a lot of moving pieces  
18 to the election, as everyone knows. I suspect we may not have  
19 to worry about March 22nd, so I think we'll be okay. And if  
20 you're able to work out something with counsel that works for  
21 the 17th, then you can report back to the Court and the Court  
22 will, you know, work with the parties on that. It sounds  
23 like, you know, we can get this done on the 21st.

24 **MR. FREEMAN:** Thank you, Your Honor. And just so I  
25 understand your direction, the parties are to submit cross

1 briefs with respect to the two maps on the 17th -- the 17th at  
2 5:00 p.m., did I understand that correctly?

3 **THE COURT:** Yes, I'll refer to them as supplemental  
4 briefs. If you wish to do so, the Court is certainly not  
5 requiring you to do so, but a lot of argument has obviously  
6 already occurred in the status reports. We've been calling  
7 them status reports, so I think, perhaps, with having a clean  
8 brief from each side where you now both have all of the  
9 information to address the points you've raised with the Court  
10 today would be helpful. And obviously, your witnesses will be  
11 speaking to some of these issues during the actual evidentiary  
12 hearing.

13 So if you wish to do so, C.O.B. 5:00 p.m., March 17, a  
14 supplemental brief, each side is welcome to file that, just  
15 one brief. We'll have the evidentiary hearing starting at  
16 2 o'clock on March 21st, via Zoom. Again, Dr. Gimpel,  
17 Mr. Cooper, Dr. Barreto, and Chairman Jones is also invited to  
18 participate.

19 **MS. LIAS-BOOKER:** Your Honor, all of that is fine  
20 with us except for the 5:00 p.m. deadline. As we all know,  
21 I'm going to be in California. So I would really appreciate  
22 not having a 5:00 p.m. deadline, but the normal court filing  
23 deadline or --

24 **THE COURT:** Well, unfortunately with this case,  
25 Ms. Lias-Booker, the Court is going to require 5:00 p.m.,

1 because the Court needs to be able to look at the papers. So,  
2 perhaps, work with your co-counsel, but I'm going to set a  
3 5:00 p.m. deadline, both so it's fair to both sides and so the  
4 Court has an opportunity to review the papers, as much time as  
5 possible because it's really hard for us to keep up.

6 **MS. LIAS-BOOKER:** Understood, Your Honor. Thank  
7 you.

8 **THE COURT:** Thank you so much.

9 So we have a schedule for our next hearing and an  
10 opportunity for the parties to provide any papers they wish to  
11 provide in advance of that hearing.

12 Again, Mr. Freeman, if you-all work out something else  
13 for the 17th, just file a status report with the Court and let  
14 us know. I think we'll be okay with the schedule that we  
15 have. And again, the Court will be asking the parties to  
16 focus in particular on the proposal submitted by the county,  
17 as well as Mr. Cooper's most recent map. That's really where  
18 we are focusing right now in terms of any issues of what map  
19 the Court will ultimately approve as the remedy in this case.

20 With that, are there any other issues that we can  
21 address today before adjourning from the perspective of the  
22 Plaintiffs, please?

23 **CHAIRMAN JONES:** Judge Griggsby?

24 **MR. FREEMAN:** No, Your Honor.

25 **CHAIRMAN JONES:** Judge Griggsby --

1           **THE COURT:** Just a second. Let me --

2           **MR. JONES:** -- this is Council Chairman Julian  
3 Jones.

4           **THE COURT:** Yes, Mr. Jones. Go ahead.

5           **CHAIRMAN JONES:** I just wanted to thank you so much  
6 for your kind words in welcoming me today and giving me an  
7 opportunity to participate. Thank you very much.

8           **THE COURT:** Thank you so much, Chairman, and you're  
9 most welcome to be here today.

10           Mr. Freeman?

11           **MR. FREEMAN:** Nothing further from the Plaintiffs,  
12 Your Honor. Thank you.

13           **THE COURT:** Thank you so much.

14           Ms. Lias-Booker?

15           **MS. LIAS-BOOKER:** Nothing further from Baltimore  
16 County, Your Honor. Thank you again.

17           **THE COURT:** Thank you so much.

18           And counsel for the Board of Elections, please.

19           Mr. Johnson?

20           **MR. JOHNSON:** Thank you, Your Honor. Nothing  
21 further from me at this point.

22           **THE COURT:** Thank you so much. Again, thanks again  
23 to counsel and to all of the parties. We all have been  
24 working very hard under an expedited schedule. The Court  
25 appreciates your work and your time on this case. Look



1 forward to hearing from the parties next week in terms of your  
2 supplemental brief, and we will reconvene on March 21.  
3 Between now and then, the Court encourages the parties to  
4 please continue to talk to each other and see if you can reach  
5 a resolution of this case. That conversation will only aid us  
6 in our work next week.

7 With that, we are adjourned and the Court wishes everyone  
8 a very good afternoon.

9 **MR. FREEMAN:** Thank you, Your Honor.

10 **MS. LIAS-BOOKER:** Thank you, Your Honor.

11 (Proceedings concluded.)  
12  
13

14 I, Melissa L. Clark, RPR, do hereby certify that the  
15 foregoing is a correct transcript from the stenographic record  
16 of proceedings in the above-entitled matter.  
17

18 *Melissa L. Clark*  
19 \_\_\_\_\_  
20 Melissa L. Clark  
21 Official Court Reporter  
22  
23  
24  
25

# **EXHIBIT 3**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

3	BALTIMORE COUNTY BRANCH OF THE NATIONAL)	)
4	ASSOCIATION FOR THE ADVANCEMENT OF	)
4	COLORED PEOPLE, ET AL.	)
5	Plaintiffs,	)
5	vs.	) CIVIL NO.
6	BALTIMORE COUNTY, MARYLAND, ET AL.	) 1:21-cv-03232-LGK
6	Defendants.	)

March 24, 2022  
2:05 p.m.

THE ABOVE-ENTITLED MATTER CAME ON FOR  
TELECONFERENCE  
BEFORE THE HONORABLE LYDIA K. GRIGGSBY

A P P E A R A N C E S

On Behalf of the Plaintiff:

ANDREW D. FREEMAN, ESQUIRE  
DEBORAH A. JEON, ESQUIRE  
TIERNEY PEPRAH, ESQUIRE  
MICHAEL MAZZULLO, ESQUIRE  
YOULIA RACHEVA, ESQUIRE  
MARK COLLEY, ESQUIRE

On Behalf of the Defendant Baltimore County, Maryland:

AVA E. LIAS-BOOKER, ESQUIRE  
MELISSA O. MARTINEZ, ESQUIRE

On Behalf of the Defendant Baltimore County Board of Elections:

HARRY S. JOHNSON, ESQUIRE  
AARON A. NICHOLS, ESQUIRE  
WARREN WEAVER, ESQUIRE

Also Present:

THOMAS H. BOSTWICK, ESQUIRE  
ADAM M. PHILLIPS, ESQUIRE  
JAMES BENJAMIN, JR., ESQUIRE  
JULIAN E. JONES, CHAIRMAN BALTIMORE COUNTY COUNCIL  
ISRAEL (IZZY) PATOKA, CHAIRMAN DISTRICT 2 BALTIMORE COUNTY

(Computer-aided transcription of stenotype notes)

Reported by:

Ronda J. Thomas, RMR, CRR  
Federal Official Reporter  
101 W. Lombard Street, 4th Floor  
Baltimore, Maryland 21201

P R O C E E D I N G S

1  
2           **LAW CLERK:** The United States District Court for the  
3 District of Maryland is now in session. The Honorable Lydia K.  
4 Griggsby is now presiding.

5           **THE COURT:** Thank you so much. And, again, good  
6 afternoon to counsel and to the parties in this matter. Before  
7 the Court this afternoon is Civil Action Number 21-3232,  
8 Baltimore County Branch of the NAACP v. Baltimore County, et  
9 al.

10           As the parties are aware, this is a Voting Rights Act case  
11 involving a challenge to the Baltimore County 2021  
12 redistricting plan that has been brought by black citizens of  
13 Baltimore County as well as several civil rights organizations.

14           On February 22nd of this year, the Court issued a  
15 Memorandum Opinion and Order in this case that granted  
16 Plaintiffs' Motion for a Preliminary Injunction.

17           In that Order, the Court preliminarily enjoined the  
18 Defendants from conducting future elections under the County's  
19 2021 redistricting plan. The Court also directed the County to  
20 adopt a redistricting plan that includes either two  
21 reasonably-compact majority-black districts for the election of  
22 County Council members, or an additional County district in  
23 which black voters otherwise have an opportunity to elect a  
24 representative of their choice and that otherwise comports with  
25 the Voting Rights Act and relevant constitutional and statutory

1 requirements. And the Court also directed the Defendants to  
2 provide that map on or before March 8, 2022. The County has  
3 done so.

4 On March 8th the County filed a proposed redistricting map  
5 and a motion for approval of that map and to modify the Court's  
6 Preliminary Injunction Order.

7 On March 10th Plaintiffs filed a status report regarding  
8 the County's proposal; and on March 11th the County filed a  
9 response to that status report.

10 More recently, on March 21st of this year, the Court held  
11 an evidentiary hearing regarding the County map as well as an  
12 alternative map proposed by the Plaintiffs. Subsequent to that  
13 hearing on March 22nd the County filed additional evidence  
14 regarding its map.

15 On March 23rd the Plaintiffs also filed additional  
16 evidence regarding both its proposal and the County's map.

17 On March 24th the County filed additional material  
18 relevant to their map.

19 The Court again welcomes the County and the parties and  
20 thanks them for arranging their schedules for today's status  
21 conference. The Court has very carefully reviewed all of the  
22 materials and evidence submitted in this case, and most  
23 recently in connection with our evidentiary hearing, which was  
24 held Monday. And the purpose of our status conference today is  
25 for the Court to rule on Defendants' Motion for Approval to

1 County Map and to Modify the Preliminary Injunction.

2 At this time the Court is going to recognize counsel for  
3 the parties to be introduced for the record. And we will start  
4 with counsel for the Plaintiffs, please?

5 **MR. FREEMAN:** Good afternoon, Your Honor. This is  
6 Andrew Freeman for the Plaintiffs. I'm joined today by  
7 Ms. Jeon, Mr. Colley, Mr. Mazzullo, Ms. Racheva and Ms. Peprah.  
8 Unfortunately, Mr. Freedman was not available this afternoon,  
9 but we're prepared to proceed without him. Thank you.

10 **THE COURT:** Thank you so much, Mr. Freeman. And  
11 welcome back to you and all of your co-counsel.

12 Counsel for Defendant Baltimore County, please?

13 **MS. LIAS-BOOKER:** Good afternoon, Your Honor. This is  
14 Ava Lias-Booker, and I am joined by Melissa Martinez. And also  
15 on the line with us, Your Honor, is James Benjamin, County  
16 attorney. Tom Bostwick, legislative attorney for Baltimore  
17 County.

18 **THE COURT:** Good afternoon, Ms. Lias-Booker. Welcome  
19 to you and your co-counsel and the other counsel that you have  
20 identified.

21 Do we also have counsel for the Board of Elections on the  
22 line?

23 **MR. JOHNSON:** Good afternoon, Your Honor. This is  
24 Harry Johnson. Along with me are Warren Weaver and Aaron  
25 Nichols, counsel for the Baltimore County Board of Elections.

1           **THE COURT:** Good afternoon, and welcome to you. The  
2 Court also understands we have some members of the County  
3 Council present. Would you please introduce yourselves for the  
4 record?

5           **MR. JONES:** Yes. Good afternoon, everyone. My name  
6 is Julian Jones, Chairman of the Baltimore County Council.

7           **THE COURT:** Welcome, Chairman Jones.

8           **MR. PATOKA:** Your Honor, my name is Izzy Patoka and  
9 I'm Chairman for the Second District in Baltimore County.

10          **THE COURT:** Welcome, Councilman Patoka.

11          **MR. PATOKA:** Thank you.

12          **THE COURT:** Are there any members of the Council  
13 present? Very good.

14          Mr. Freeman and Ms. Ava Lias-Booker, I believe you'll be  
15 the main speakers today. I believe where we are, there's a  
16 need for the Court to resolve a pending motion from the County  
17 regarding the proposed remedial redistricting plan in light of  
18 various deadlines in the case.

19          Is that correct from the perspective of the Plaintiff,  
20 Mr. Freeman?

21          **MR. FREEMAN:** Yes, Your Honor.

22          **THE COURT:** Ms. Ava Lias-Booker?

23          **MS. LIAS-BOOKER:** Yes, Your Honor.

24          **THE COURT:** All right. Well, the Court is prepared to  
25 rule. And if there are no preliminary questions the Court will

1 do so. But, just in case, are there any preliminary issues we  
2 should discuss before the Court issues its ruling in this case  
3 from the perspective of the Plaintiff, Mr. Freeman?

4 **MR. FREEMAN:** No, Your Honor.

5 **THE COURT:** Anything from the Defendant,  
6 Ms. Lias-Booker?

7 **MS. LIAS-BOOKER:** Your Honor, only one thing I was  
8 just made aware of is that the Supreme Court issued a ruling in  
9 the *Wisconsin Legislature v. Wisconsin Election Commission*, the  
10 Court may already be aware of that ruling. It was entered very  
11 late last night. And it is a case involving a similar  
12 circumstance to our own where the Court reversed the  
13 district -- I guess reversed the district court and remanded  
14 the case for further proceedings on the Voting Rights Act. And  
15 I don't know if the Court was aware of it, but I wanted to make  
16 sure that you were before the ruling today.

17 **THE COURT:** Thank you so very much, Ms. Lias-Booker.

18 Is there anything further from Defendant Baltimore County  
19 before the Court rules.

20 **MS. LIAS-BOOKER:** Not at this time, Your Honor. We  
21 will await the Court's ruling.

22 **THE COURT:** All right. Mr. Johnson, anything further  
23 from you?

24 **MR. FREEDMAN:** Nothing further from us, Your Honor.  
25 Thank you.



1           **THE COURT:** All right. Very good. The Court will  
2 issue an oral ruling on the County's proposed redistricting,  
3 remedial redistricting plan as well as the County's motion to  
4 modify the Court's preliminary injunction in this case. This  
5 oral ruling will be followed by a written ruling, but in light  
6 of the time sensitivities in this case, the Court will proceed  
7 orally at this time.

8           With this, the Court will now issue its ruling.

9           This case involves a challenge to Baltimore County 2021  
10 redistricting plan brought by black citizens of Baltimore  
11 County and several civil rights organizations pursuant to § 2  
12 of the Voting Rights Act.

13           On March 8th of 2022, the County submitted a proposed  
14 redistricting map, which the Court will refer to as the County  
15 map, pursuant to the Court's February 22, 2022 Memorandum  
16 Opinion and Order directing the County to, quote, "adopt and to  
17 file, by March 8, 2022, a redistricting map that either  
18 includes two reasonably-compact majority-black districts for  
19 the election of County Council members or an additional County  
20 district in which black voters otherwise have an opportunity to  
21 elect a representative of their choice, and otherwise comports  
22 with the requirements of the Voting Rights Act, and other  
23 relevant constitutional and statutory requirements."

24           The County has moved for the Court to approve the County  
25 map and to modify the preliminary injunction entered in this

1 case to allow the Baltimore County Council to enact the County  
2 map into law, and to also allow the County to conduct future  
3 elections pursuant to the County map.

4 Plaintiffs object to the County map, and they propose an  
5 alternative redistricting map, which the Court will refer to as  
6 the alternative map.

7 On March 17, the parties submitted supplemental briefs on  
8 the issue of whether the County map and the alternative map  
9 provide an additional County district in which black voters  
10 otherwise have an opportunity to elect a representative of  
11 their choice, and that comports with the requirements of the  
12 Voting Rights Act, and other relevant constitutional and  
13 statutory requirements.

14 The parties have also submitted several declarations and  
15 other evidence regarding these two proposals. The Court had an  
16 evidentiary hearing on March 21st of this year. For the  
17 reasons that follow, the Court approves the County map and  
18 grants the County's Motion for Approval of the Proposed  
19 Redistricting Map and to Modify the Preliminary Injunction.

20 As factual background for the Court's decision, a detailed  
21 factual background for the case is of course included in the  
22 Court prior Memorandum Opinion Order.

23 Relevant here, the County's remedial redistricting plan  
24 proposes to reconfigure District 2 to contain a black voting  
25 age population of 41.2 percent, a total minority voting age

1 population of 54.2, and a white voting age population of  
2 45.8 percent, while maintaining District 4 as a majority-black  
3 district.

4 The County represents to the Court that its new  
5 redistricting map is the culmination of work by the Baltimore  
6 County Councilmanic Redistricting Commission as well as the  
7 County Council, which began last year in March of 2021.

8 The County also argues that the proposed new District 2,  
9 which was in the map, would be a, quote, "stronger crossover  
10 district," end quote, as well as a coalition district. And  
11 that the County map, quote, "also removed any threat of white  
12 bloc voting that may defeat black voters' candidate of choice,"  
13 end quote.

14 In this regard, the County argued that the black County  
15 voters in District 2 will be further bolstered by increased  
16 crossover voting. In addition, the County contends that the  
17 black -- sorry -- the proposed redistricting map retains  
18 District 4 as a base majority-black district where black County  
19 voters will make up 61 percent of the voting age population in  
20 that district; and that its remedial map also comports with  
21 traditional redistricting principles.

22 And so the County argued that the County map, quote,  
23 "Reflects the considered policy choices of the Council's seven  
24 members in seeking both to comply with the Court's order to  
25 create an additional district that affords black voters an

1 opportunity to elect a representative of their choice, and that  
2 comports with the requirements of the Voting Rights Act," end  
3 quote.

4 Plaintiffs object to the County map. And they argue,  
5 among other things, that the County map fails to remedy the § 2  
6 violation that has been found in this case by the Court because  
7 it does not provide black County voters with a meaningful  
8 opportunity to elect candidates of their choice.

9 So Plaintiffs request that the Court reject the County map  
10 and keep the preliminary injunction in this case in place. And  
11 they also proposed an alternative redistricting map. That map  
12 would reconfigure District 2 to have a black voting age  
13 population of 53.77 percent, and also reconfigure District 4 to  
14 have a black voting age population of 53.18 percent, thereby  
15 creating a second majority-black district on the western side  
16 of the County.

17 The standards that the Court applies in assessing the  
18 County's map are well-known to the parties in *McGhee v.*  
19 *Granville County*, North Carolina, the United States Court of  
20 Appeals for the Fourth Circuit address the standard and held  
21 that the controlling principles respecting judicial review of  
22 legislative plans submitted in obedience to court decrees to  
23 remedy judicially-established violations of the § 2 of the  
24 Voting Rights Act.

25 The purpose of these principles -- pursuant to these

1 principles when the Court has properly given the appropriate  
2 legislative body the first opportunity to devise an acceptable  
3 remedial plan, the Court's ensuing review and remedial powers  
4 are largely dictated by the legislative body's response.

5 So if the legislative body fails to respond, or responds  
6 with a legally-unacceptable remedy, the responsibility falls on  
7 this Court to exercise its discretion in fashioning a mere  
8 optimal plan.

9 However, if the legislative body does respond with a  
10 proposed remedy, the Court may not substitute its judgment  
11 regarding a more equitable remedy for that of the legislative  
12 body. Rather, the Court may only consider whether the proper  
13 remedial plan is legally unacceptable because it violates the  
14 new constitutional or statutory voting rights, i.e., it  
15 violates the Voting Rights Act.

16 So if the remedial plan presented here meets the standards  
17 under the Voting Rights Act, the Court must accord great  
18 deference to the legislative judgments about the exact nature  
19 and scope of the proposed remedy.

20 Applying these principles to this case, the Court is  
21 satisfied that the County's proposal meets the relevant  
22 standards and complies with § 2 of the Voting Rights Act.

23 As an initial matter, as the Court just stated, it's  
24 important to recognize that the Court's review is limited in  
25 this case in determining only whether the County map is legally

1 acceptable, that is whether the map violates the Voting Rights  
2 Act.

3 So if the County can show that the map complies with the  
4 Voting Rights Act, and other relevant constitutional and  
5 statutory requirements, the Court may not substitute its  
6 judgment for that of the Baltimore County Council to fashion  
7 another remedy in this case.

8 The County has made such a showing here for several  
9 reasons: First, the County has shown that the County map  
10 creates an additional County district in which black voters  
11 otherwise have an opportunity to elect a representative of  
12 their choice because the County map increases the percentage of  
13 black county voters in District 2. Under the County's proposed  
14 plan, a reconfigured District 2 will increase the black voting  
15 age population in that district to 41.2 percent, and will also  
16 increase the total minority voting age population in the  
17 district to 54.2 percent, thereby making District 2 a minority  
18 district. And so the black voting age population in District 2  
19 will increase by approximately 10 percent when compared to the  
20 County's 2021 redistricting plan.

21 Second, the County has shown that there will be sufficient  
22 crossover voting by white county voters in District 2 to allow  
23 the black county voters in that district to elect their  
24 candidates of choice.

25 A crossover district is a district in which the minority

1 population, at least potentially, is large enough to elect the  
2 candidate of its choice with help from voters who are members  
3 of the majority and who cross over to support the  
4 minority-preferred candidate.

5 During the evidentiary hearing held in this matter on  
6 March 21st, the County argued that the demographics for  
7 District 2 include a significant white Jewish population that  
8 has historically voted with black county voters in that  
9 district to elect their shared candidate of choice.

10 For example, the County points to the declaration of  
11 Councilman Patoka in which he states that his 2018 election, as  
12 the Councilmember for District 2, shows that black and Jewish  
13 communities in that district, quote, "Typically vote in tandem  
14 for like-minded candidates," end quote.

15 The evidence before the Court shows that Councilmember  
16 Patoka was the candidate of choice by an overwhelming margin in  
17 the five precincts within District 2 that have the highest  
18 percentage of black voters. He was also the candidate of  
19 choice for white voters in District 2.

20 So this record evidence certainly lends credence to the  
21 County's argument that crossover voting by white Jewish voters  
22 will work to allow black-preferred candidates to win within  
23 District 2.

24 The evidence before the Court regarding the 2014 election  
25 of Councilmember Vicki Almond, who is also from District 2, and

1 Cheryl Pasteur election in 2018, also indicate that at least  
2 some crossover voting occurred within District 2.

3 Dr. Gimpel opined in his supplemental declaration to the  
4 Court that Councilmember Almond and Ms. Pasteur were the  
5 preferred candidates in the precincts within District 2 that  
6 had the highest percentage of black voters. These precincts  
7 include Old Court Middle Cafeteria, Woodlands, Sudbrook, and  
8 Milbrook Elementary, while these candidates also won sufficient  
9 votes in precincts that have the highest percentage of Jewish  
10 voters.

11 Dr. Gimpel also explained that Councilmember Almond won  
12 her election with 67 percent of the votes, and that she carried  
13 26 out of the 35 precincts in District 2.

14 Dr. Gimpel further explains that Ms. Pasteur won the  
15 election with 66 percent of the vote and that she carried all  
16 35 precincts in District 2. So this evidence also supports the  
17 County's argument that white voters in District 2 will often  
18 join with black voters in that district to elect shared  
19 preferred candidates of choice.

20 The performance analysis conducted by Plaintiffs's expert,  
21 Dr. Barreto, which was not offered for the purpose of  
22 supporting the County's map, but it also suggests that the  
23 County's proposed District 2 can perform for black voters.

24 In his performance analysis of District 2, Dr. Barreto  
25 analyzes the 2014 gubernatorial election between



1 Governor Larry Hogan and Anthony Brown, the 2016 Democratic  
2 Senate Primary Election between then Congressman Chris Van  
3 Hollen and Congresswoman Donna Edwards, and the 2018  
4 gubernatorial election between Governor Hogan and Ben Jealous.  
5 This performance analysis finds that under the County's  
6 proposed map Mr. Brown would have won District 2 by a 53 to  
7 45 percent margin. Again, indicating that at least some  
8 crossover voting would occur in this district.

9 Dr. Barreto's performance analysis also shows that while  
10 Congresswoman Edwards and Mr. Jealous would still lose their  
11 election in the proposed new District 2, both candidates would  
12 increase their overall vote percentages by approximately 10  
13 percentage points.

14 Dr. Gimpel also observed in his second supplemental  
15 declaration to the Court that the political performance of the  
16 new District 2 proposed under both the County map and  
17 Plaintiffs's alternative map do not reveal striking  
18 differences.

19 Dr. Gimpel explains that the reason for the similarity and  
20 the election outcome under both proposals is largely due to the  
21 significant Democratic party affiliation by both black and  
22 white county voters on the western side of the county,  
23 including within District 2.

24 The Court recognizes that the black-preferred candidate  
25 does not always win in the County's proposed District 2. A

1 point that Plaintiffs correctly make in this case. But there  
2 can be no genuine dispute that black-preferred candidates'  
3 chances of winning in District 2 improves considerably under  
4 the County's revised map, particularly when compared to the  
5 actual election results the Court has just highlighted.

6 Given this, the evidence before the Court shows that the  
7 County's proposed District 2 can perform for black county  
8 voters. The parties also agree that the County's remedial  
9 redistricting plan will maintain District 4 as the  
10 majority-black district. Notably the black voting age  
11 population in District 4 will be 61.1 percent of the population  
12 under the County map. And so the County map will allow the  
13 black county voters in District 4 to continue to elect the  
14 candidates of their choice.

15 A careful review of the County map also made clear that  
16 this remedial redistricting plan adheres to traditional  
17 redistricting principles by keeping the population deviation  
18 below 10 percent, maintaining a compactness, as well as  
19 limiting the splitting of precincts and census population. The  
20 County also note that the core retention rate on the map has an  
21 average of 82 percent.

22 And so for all of these reasons, and based upon all of the  
23 evidence submitted to the Court, the County has shown that the  
24 County map will create an additional County district in which  
25 black voters otherwise have an opportunity to elect a

1 representative of their choice in compliance with § 2 of the  
2 Voting Rights Act, as well as the Court's February 22nd, 2022  
3 Memorandum Opinion and Order.

4 As a final matter, the Court has carefully considered the  
5 arguments put forward by Plaintiffs to show that the County map  
6 is not a proper remedy for the § 2 voting rights violation  
7 found in this case.

8 The Court agrees with Plaintiff that creating a second  
9 majority-black district in the County could remedy such a  
10 violation and comply with the Court order. But as the Court's  
11 Memorandum Opinion and Order also makes clear, the County may  
12 also remedy this violation by proposing a remedial  
13 redistricting plan that provides an additional County district  
14 in which black county voters have an opportunity to elect a  
15 representative of their choice and that comports with the  
16 requirements of the Voting Rights Act. Because the Court  
17 concludes that the County has done so here, the Court will  
18 accord great deference to the County Council's legislative  
19 judgment about the exact nature and scope of the proposed  
20 remedy in this case.

21 And so for these reasons, the Court approves the County  
22 map. The Court grants the County's Motion for Approval of its  
23 Proposed Redistricting Plan and to Modify the Preliminary  
24 Injunction. The Court extends the deadline for the County  
25 Council to adopt a final redistricting plan. And the Court

1 modifies its February 22nd, 2022, Preliminary Injunction to  
2 allow the Council to follow the requirements of the Baltimore  
3 County Charter to pass the final redistricting plan into law  
4 and to allow the County to conduct a 2022 election, and all  
5 future elections pursuant to the County map.

6 Lastly, the Court will direct the parties to file a joint  
7 status report with the Court on or before April 29, 2022,  
8 stating their view on whether this matter should be dismissed  
9 or, if warranted, proposing a schedule for further proceedings.

10 This concludes the Court's oral ruling. A written ruling  
11 will be issued shortly consistent with that oral ruling.

12 At this time the Court will inquire as to whether there  
13 are any questions or comments from the parties. And we'll  
14 start with the Plaintiff, please, Mr. Freeman?

15 **MR. FREEMAN:** No questions, Your Honor. Thank you.

16 **THE COURT:** Thank you so much, Mr. Freeman.

17 Ms. Lias-Booker?

18 **MS. LIAS-BOOKER:** Your Honor, on behalf of Baltimore  
19 County we'd like to express our admiration and our thanks to  
20 the Court for approving the County's new map. We will act  
21 expeditiously barring any further appeal to implement the  
22 Court's order.

23 I don't know if any of my colleagues, Mr. Benjamin or  
24 Mr. Bostwick, have anything to say or, more importantly,  
25 Mr. Jones, Chairman of the Baltimore County Council.

1 Do you gentlemen have anything to add?

2 **MR. JONES:** This is Council Chairman Julian Jones.  
3 Thank you, Your Honor, for your judgment. The only question I  
4 have is I was a little confused about the following the charter  
5 requirements. I guess what I'm saying is we can do this sooner  
6 if you give us an order to do so, or we would have to follow  
7 the charter's requirements, which would take somewhere around  
8 two weeks to pass the map.

9 **THE COURT:** Ms. Lias-Booker, do you want to address  
10 that briefly because the Court relied on the submissions from  
11 the County in drafting what I read.

12 **MS. LIAS-BOOKER:** Your Honor, I am confident and  
13 comfortable that we can act within the time -- within the time  
14 constraints that remain at this point given the fact that the  
15 primary date has been moved. And I believe that the filing  
16 deadline for candidates have been moved.

17 As I understand it, we have emergency authorization  
18 authority to act very quickly. And we can act sooner than the  
19 two-week requirement. I took the Court's Order to be that we  
20 can act expeditiously. That we're not -- and I understand  
21 Councilman Jones's confusion -- that we're not constrained to  
22 follow the charter if we have an emergency option that we can  
23 utilize to pass the new map into law.

24 **THE COURT:** That was certainly the Court's intention.

25 **MS. LIAS-BOOKER:** Great. Given that that is the

1 Court's intention we can act accordingly and will act  
2 accordingly.

3 And I assume the Court is going to issue the order today?

4 **THE COURT:** Within the next 24 hours, counsel.

5 **MS. LIAS-BOOKER:** Yes, Your Honor.

6 **THE COURT:** The order has been issued orally and the  
7 reason the Court did that is so that we can have the time to  
8 get it out.

9 **MS. LIAS-BOOKER:** I understand. I will speak with my  
10 clients as soon as we get off this call, Your Honor, but the  
11 oral ruling operates as an Order.

12 **THE COURT:** Correct.

13 **MS. LIAS-BOOKER:** Thank you. We can act according to  
14 the Order, Chairman Jones. And I will talk with my clients,  
15 Your Honor, following conclusion of today's status conference.  
16 But, again, our thanks.

17 **THE COURT:** Thank you.

18 Mr. Johnson, anything further from the County Board?

19 **MR. JOHNSON:** Yes, Your Honor. Thank you for asking.

20 There was a motion pending that was filed jointly with --  
21 between the Board and the Plaintiffs extending the time for the  
22 Board to respond to the complaint that was filed. That may  
23 well be moot now, but I just wanted to make sure that the Court  
24 was aware that that motion is pending before the Court. Based  
25 on your ruling today, that motion may well be withdrawn from

1 the parties. But I have not had an opportunity to speak to  
2 Plaintiffs's counsel about that yet. But based on your ruling  
3 I don't know that it would be necessary for us to file an  
4 answer in the case. But I will speak to Plaintiffs's counsel  
5 and advise the Court promptly whether we need the Court to rule  
6 on that motion or not.

7 **THE COURT:** Very good. And the Court is aware of the  
8 motion and as well the status report that the Court requests  
9 will also be an opportunity for the parties to report back if  
10 there are additional housekeeping items we need to take care of  
11 should the case not be dismissed.

12 **MR. JONES:** Thank you, Your Honor. I appreciate it.

13 **THE COURT:** I believe that covers all parties.

14 Again, the Court wants to thank counsel, the parties, all  
15 of the witnesses who have participated in the various  
16 proceedings in this case. The quality of the work has been  
17 excellent throughout. We have all been working very hard under  
18 our important and very busy deadlines. And so the Court  
19 certainly appreciates all of your efforts. With that, the  
20 Court wishes everyone a very good evening. And we are  
21 adjourned.

22 (All Counsel - "Thank you, Your Honor.")

23 (Concluded at 3:30 p.m.)

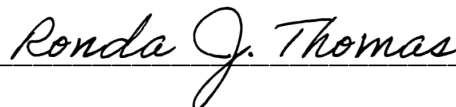
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CERTIFICATE OF OFFICIAL REPORTER

I, Ronda J. Thomas, Registered Merit Reporter, Certified Realtime Reporter, in and for the United States District Court for the District of Maryland, do hereby certify, pursuant to 28 U.S.C. § 753, that the foregoing is a true and correct transcript of the stenographically-reported proceedings held in the above-entitled matter and the transcript page format is in conformance with the regulations of the Judicial Conference of the United States.

Dated this 25th day of April 2022.



Ronda J. Thomas, RMR, CRR  
Federal Official Reporter



# **EXHIBIT 4**

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
2	8/25/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Demographer; attend virtual redistricting committee meeting	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
3	8/26/2021	ACLU	Debbie Jeon	Legal Director	Case Development	team call and call with Cliff Collins	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
4	8/27/2021	ACLU	Debbie Jeon	Legal Director	Case Development	work with Demographer on mapping cognizant of incumbent addresses; research on redistricting process in Baltico	3.5	\$650.00	\$2,275.00	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
5	8/28/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ clients and potential co-counsel re. plans and strategy	2.9	\$650.00	\$1,885.00	20	\$300.00	\$475.00	\$870.00	\$1,377.50
6	8/28/2021	BGL	Andrew Freeman	Partner	Case Development	Call with D. Jeon re Baltimore County redistricting	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
7	8/28/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from D. Jeon with e-mails re Baltimore County redistricting	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
8	8/29/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer with demographers and NAACP about possible maps;	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
9	9/7/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ NAACP re. next steps	0.8	\$650.00	\$520.00	20	\$300.00	\$475.00	\$240.00	\$380.00
10	9/17/2021	ACLU	Debbie Jeon	Legal Director	Case Development	prep letter/ proposal to commission; phone w/ Collins re. same	4	\$650.00	\$2,600.00	20	\$300.00	\$475.00	\$1,200.00	\$1,900.00
11	9/18/2021	ACLU	Debbie Jeon	Legal Director	Case Development	prep letter/proposal to Commission	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
12	9/19/2021	ACLU	Debbie Jeon	Legal Director	Case Development	prep letter/proposal to commission; email to from Cooper and partners re. same	3.5	\$650.00	\$2,275.00	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
13	9/20/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Cooper, NAACP about alternative maps	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
14	9/22/2021	ACLU	Debbie Jeon	Legal Director	Case Development	phone w/ Cliff Collins re. plans	0.5	\$650.00	\$325.00	20	\$300.00	\$475.00	\$150.00	\$237.50
15	9/23/2021	ACLU	Debbie Jeon	Legal Director	Case Development	call with NAACP to discuss plans	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
16	9/24/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer with colleagues, prep submission	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
17	9/26/2021	ACLU	Debbie Jeon	Legal Director	Case Development	review video from commission meeting; revise and edit submission	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
18	9/28/2021	ACLU	Debbie Jeon	Legal Director	Case Development	finalize and send letter and attachments; multiple phone and email communications to/from colleagues re. same	2.7	\$650.00	\$1,755.00	20	\$300.00	\$475.00	\$810.00	\$1,282.50
19	9/30/2021	ACLU	Debbie Jeon	Legal Director	Case Development	calls/emails, to/from NAACP re. County actions	2.4	\$650.00	\$1,560.00	20	\$300.00	\$475.00	\$720.00	\$1,140.00
20	10/2/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ partners re. case developments	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
21	10/4/2021	ACLU	Debbie Jeon	Legal Director	Case Development	conf. call with Sen. Sydnor and ACLU team; review County data; emails, phone to/from NAACP partners	1.9	\$650.00	\$1,235.00	20	\$300.00	\$475.00	\$570.00	\$902.50
22	10/6/2021	ACLU	Debbie Jeon	Legal Director	Case Development	team call re. strategy	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
23	10/7/2021	ACLU	Debbie Jeon	Legal Director	Case Development	planning call with Andy Freeman	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
24	10/7/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Cooper and NAACP; legal research on 65 percent rule; emails to experts	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
25	10/7/2021	BGL	Andrew Freeman	Partner	Case Development	Call with D. Jeon re issues for Voting Rights Act lawsuit	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
26	10/7/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon with letter to redistricting commission; review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
27	10/8/2021	ACLU	Debbie Jeon	Legal Director	Case Development	Phone w/ Lawyers' Committee; client and team; research for litigation	5.5	\$650.00	\$3,575.00	20	\$300.00	\$475.00	\$1,650.00	\$2,612.50
28	10/11/2021	ACLU	Debbie Jeon	Legal Director	Case Development	calls with partners, review and analysis of draft plans/ prep talking points; comparison of options	2.9	\$650.00	\$1,885.00	20	\$300.00	\$475.00	\$870.00	\$1,377.50
29	10/11/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon with proposed map no. 5 (prioritizing keeping communities together); review same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
30	10/12/2021	ACLU	Debbie Jeon	Legal Director	Case Development	research on history of discrimination in Baltimore County	2	\$650.00	\$1,300.00	20	\$300.00	\$475.00	\$600.00	\$950.00
31	10/13/2021	ACLU	Debbie Jeon	Legal Director	Case Development	legal/factual research on history of discrimination in Baltimore County	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
32	10/13/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to J. Benjamin re scheduling time to talk re redistricting	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
33	10/13/2021	BGL	Andrew Freeman	Partner	Case Development	Draft e-mail to J. Benjamin re scheduling time for him to meet with me and D. Jeon; call with D. Jeon re same; revise and send e-mail to J. Benjamin	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
34	10/14/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon re submitting three alternative maps; review same; e-mail to D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
35	10/18/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer with partners, prep for call with county attorney re case	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
36	10/19/2021	ACLU	Debbie Jeon	Legal Director	Case Development	prep, call with county atty and follow up	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
37	10/19/2021	BGL	Andrew Freeman	Partner	Case Development	Follow-up call with D. Jeon re next steps	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
38	10/19/2021	BGL	Andrew Freeman	Partner	Case Development	Initial Zoom call with J. Benjamin, G. Marrow, and D. Jeon to discuss redistricting/VRA issues	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
39	10/20/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Freeman and Cooper re. mapping options, strategy; phone w/ NAACP re. same	3	\$650.00	\$1,950.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
40	10/21/2021	ACLU	Debbie Jeon	Legal Director	Case Development	finalize and update proposed map; prep legal letter to County attorney; phone with Sydnor re. Bevins residency issues	3.8	\$650.00	\$2,470.00	20	\$300.00	\$475.00	\$1,140.00	\$1,805.00
41	10/21/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon re draft maps	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
42	10/22/2021	ACLU	Debbie Jeon	Legal Director	Case Development	prep legal letter	3	\$650.00	\$1,950.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
43	10/23/2021	ACLU	Debbie Jeon	Legal Director	Case Development	prep. legal letter and MPIA request for shapefiles; communicate with colleagues re. same	5	\$650.00	\$3,250.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
44	10/24/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w. partners; update redistricting letter;	1.9	\$650.00	\$1,235.00	20	\$300.00	\$475.00	\$570.00	\$902.50
45	10/25/2021	ACLU	Debbie Jeon	Legal Director	Case Development	finalize letter to County; phone w/ co-counsel, coalition partners re. same	3.5	\$650.00	\$2,275.00	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
46	10/25/2021	BGL	Andrew Freeman	Partner	Case Development	Review final version of letter to J. Benjamin and County Council	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
47	10/25/2021	BGL	Andrew Freeman	Partner	Case Development	Call from J. Benjamin re status, requesting our legal authority (0.1), follow-up call to D. Jeon (0.1)	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
48	10/25/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon with draft letter to J. Benjamin and County Council re redistricting; call with D. Jeon re same; edit letter	1.2	\$725.00	\$870.00	20	\$300.00	\$475.00	\$360.00	\$570.00
49	10/25/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon with draft MPIA request; e-mail to/from D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
50	10/26/2021	ACLU	Debbie Jeon	Legal Director	Case Development	phone w/ partners; attend Council redistricting hearing	2	\$650.00	\$1,300.00	20	\$300.00	\$475.00	\$600.00	\$950.00
51	10/27/2021	ACLU	Debbie Jeon	Legal Director	Case Development	hearing follow up with partners	0.7	\$650.00	\$455.00	20	\$300.00	\$475.00	\$210.00	\$332.50
52	10/29/2021	ACLU	Debbie Jeon	Legal Director	Case Development	emails to/from partners re. response to community comments	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
53	10/31/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ colleagues re. new plans	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
54	11/1/2021	ACLU	Debbie Jeon	Legal Director	Case Development	emails, telephone to/from partners; prep and submit fifth alternative plan	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
55	11/2/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer with partners re maps, release	0.7	\$650.00	\$455.00	20	\$300.00	\$475.00	\$210.00	\$332.50
56	11/2/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from D. Jeon re map no. 5 (keeping communities together) and partisan analysis of same; e-mails to D. Jeon re same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
57	11/3/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Cooper and coalition partners re. outreach/advocacy plans	0.7	\$650.00	\$455.00	20	\$300.00	\$475.00	\$210.00	\$332.50
58	11/15/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from D. Jeon re County's latest plan	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
59	11/16/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon re County Council's proposed map	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
60	11/17/2021	ACLU	Debbie Jeon	Legal Director	Case Development	reviw plan; confer with coalition partners via phone and email; prep case summary for naacp	2.9	\$650.00	\$1,885.00	20	\$300.00	\$475.00	\$870.00	\$1,377.50
61	11/17/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from D. Jeon with e-mails re Baltimore County redistricting	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
62	11/19/2021	BGL	Andrew Freeman	Partner	Case Development	Zoom call with J. Benjamin and D. Jeon re VRA violation, letter to Benjamin setting out our case	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
63	11/19/2021	BGL	Andrew Freeman	Partner	Case Development	Call with D. Jeon re our call with Benjamin, potential experts, next steps	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
64	11/19/2021	BGL	Andrew Freeman	Partner	Case Development	Research re potential experts	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
65	11/19/2021	BGL	Andrew Freeman	Partner	Case Development	Review complaint in Texas VRA case	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
66	11/20/2021	ACLU	Debbie Jeon	Legal Director	Case Development	Update letter to County attorney; phone w/ Bill Cooper	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
67	11/22/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from J. Benjamin re Council's schedule for work session and vote; respond to same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
68	11/29/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	Prep complaint and coordinate with clients and co-counsel	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
69	11/29/2021	BGL	Andrew Freeman	Partner	Case Development	Call with D. Jeon re hiring expert, determining prior races to evaluate, drafting complaint	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
70	11/29/2021	BGL	Andrew Freeman	Partner	Case Development	Zoom call with D. Jeon, T. Fugett, C. Jacob re races to evaluate, potential plaintiffs	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
71	11/30/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	prep complaint; meeting with expert; confer w. clients and co-counsel	5	\$650.00	\$3,250.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
72	11/30/2021	BGL	Andrew Freeman	Partner	Case Development	Zoom call with D. Jeon and M. Barreto re Barreto serving as expert (.8); follow-up discussion with D. Jeon (.1)	0.9	\$725.00	\$652.50	20	\$300.00	\$475.00	\$270.00	\$427.50
73	12/1/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	prep complaint	2.9	\$650.00	\$1,885.00	20	\$300.00	\$475.00	\$870.00	\$1,377.50
74	12/1/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to D. Jeon re adding League of Women Voters as plaintiff	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
75	12/1/2021	BGL	Andrew Freeman	Partner	Case Development	Edit Barreto expert retainer agreement	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
76	12/2/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	Prep complaint; fact research for same	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
77	12/2/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to D. Jeon re M. Barreto retainer	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
78	12/2/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon re co-counsel	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
79	12/2/2021	BGL	Andrew Freeman	Partner	Case Development	Edit expert retainer letter; e-mails to/from M. Barreto re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
80	12/2/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails re League of Women Voters joining as plaintiff	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
81	12/3/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Participate in video conference with J. Freedman to discuss involvement in pro bono matter and potential litigation.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
82	12/3/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	prep complaint; prep demand letter; phone with clients and Freeman re. same; strategic planning meeting re. same	5	\$650.00	\$3,250.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
83	12/3/2021	BGL	Andrew Freeman	Partner	Case Development	Edit letter to J. Benjamin; e-mails to/from D. Jeon re same; phone call with D. Jeon re same; finalize and send to J. Benjamin	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
84	12/3/2021	BGL	Andrew Freeman	Partner	Pleadings	Edit Complaint	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
85	12/7/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon with e-mail re County's potential defense	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
86	12/7/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to/from M. Barreto re commencing work	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
87	12/8/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	fact research for litigation; confer with colleagues re. meeting with officials;	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
88	12/8/2021	BGL	Andrew Freeman	Partner	Pleadings	Edit Complaint	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
89	12/9/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	review and prep complaint	5	\$650.00	\$3,250.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
90	12/9/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon re latest developments re County Council	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
91	12/9/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails to/from D. Jeon re confirming J. Benjamin's receipt of our letter	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
92	12/9/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails to/from/to J. Benjamin and D. Jeon confirming receipt of our letter and scheduling time to talk	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
93	12/10/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	Prep complaint; confer with clients and co-counsel	6	\$650.00	\$3,900.00	20	\$300.00	\$475.00	\$1,800.00	\$2,850.00
94	12/11/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	creation of charts; confer with clients about charts	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
95	12/12/2021	BGL	Andrew Freeman	Partner	Case Development	Watch Council Chair Jones' video re reasons he says can't have two majority-Black districts	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
96	12/12/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail to D. Jeon re Jones' video, next steps	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
97	12/13/2021	ACLU	Debbie Jeon	Legal Director	Case Development	redistricting hearing preparation with team	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
98	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails re rebutting County's claims	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
99	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	Read Baltimore Sun lead article re Baltimore County redistricting	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
100	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	Call with D. Jeon to prepare for call with J. Benjamin	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
101	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	Zoom call with J. Benjamin and D. Jeon re plaintiffs' claims, next steps	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
102	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	Call with D. Jeon re next steps	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
103	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	Draft alternative statement for ACLU for tomorrow's hearing	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
104	12/13/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon to J. Benjamin with Attorney General's opinion re Maryland congressional districts; review same; e-mail to D. Jeon re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
105	12/14/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Review Redistricting Letter from ACLU/NAACP and draft Complaint in preparation of 12/15/2021 video conference with team.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
106	12/14/2021	ACLU	Debbie Jeon	Legal Director	Case Development	attend redistricting hearing	5.5	\$650.00	\$3,575.00	20	\$300.00	\$475.00	\$1,650.00	\$2,612.50
107	12/14/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails to/from D. Jeon re prep for this evening's County Council workgroup meeting	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
108	12/14/2021	BGL	Andrew Freeman	Partner	Case Development	Listen to Baltimore County Council workgroup meeting	1.5	\$725.00	\$1,087.50	20	\$300.00	\$475.00	\$450.00	\$712.50
109	12/15/2021	A&P	Racheva, Youlia S.	Associate	Pleadings	Background reading & follow-up team meeting amongst A&P team to discuss next steps.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
110	12/15/2021	A&P	Colley, Mark D.	Partner	Pleadings	Background reading; telephone conference with ACLU counsel; telephone conference with A&P team; review draft complaint.	4.4	\$760.00	\$3,344.00	20	\$300.00	\$475.00	\$1,320.00	\$2,090.00
111	12/15/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Participate in video conference with ACLU and Brown Goldstein co-counsel to discuss strategy for filing Complaint and anticipated Motion for a Preliminary Injunction.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
112	12/15/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Participate in video conference with internal team to discuss strategy for filing Complaint and anticipated Motion for a Preliminary Injunction.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
113	12/15/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Review materials provided by ACLU including past, Council-proposed, and ACLU-proposed maps; letters on behalf of ACLU; and County's bill incorporating proposed map.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
114	12/15/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Review Redistricting Letter from ACLU/NAACP and draft Complaint in preparation of video conference with team.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
115	12/15/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Review Voting Rights Act statute and Supreme Court's Arlington Heights decision.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
116	12/15/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Revise draft Complaint.	1.7	\$536.00	\$911.20	4	\$150.00	\$225.00	\$255.00	\$382.50
117	12/15/2021	A&P	Racheva, Youlia S.	Associate	Pleadings	Initial team meeting with A&P, ACLU, and Baltimore counsel.	0.9	\$502.00	\$451.80	1	\$150.00	\$225.00	\$135.00	\$202.50
118	12/15/2021	A&P	Freedman, John A.	Senior Counsel	Pleadings	Review and revise complaint.	1.8	\$787.00	\$1,416.60	20	\$300.00	\$475.00	\$540.00	\$855.00
119	12/15/2021	BGL	Andrew Freeman	Partner	Case Development	Review Maryland Matters article re last night's County work session Development	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
120	12/15/2021	BGL	Andrew Freeman	Partner	Case Development	Initial Zoom call with J. Freedman and Arnold & Porter team	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
121	12/15/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from J. Freedman re background documents for A&P team; e-mail from D. Jeon with same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
122	12/15/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to L. Brown re possibly serving as history expert	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
123	12/16/2021	A&P	Racheva, Youlia S.	Associate	Pleadings	Review and edit draft Complaint.	1.4	\$502.00	\$702.80	1	\$150.00	\$225.00	\$210.00	\$315.00
124	12/16/2021	A&P	Freedman, John A.	Senior Counsel	Pleadings	Review and revise complaint.	1.8	\$787.00	\$1,416.60	20	\$300.00	\$475.00	\$540.00	\$855.00
125	12/16/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	confer with clients and co-counsel	2	\$650.00	\$1,300.00	20	\$300.00	\$475.00	\$600.00	\$950.00
126	12/16/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from J. Freedman re transcribing hearings	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
127	12/16/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from L. Brown re possibly serving as expert; e-mails to/from D. Jeon and J. Freedman re same; e-mail to L. Brown re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
128	12/16/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review sample expert reports from D. Jeon and J. Freedman	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
129	12/16/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Research re Baltimore County's history of segregation and discrimination; e-mails to co-counsel re same	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
130	12/16/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to M. Barreto re scheduling time to talk	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
131	12/17/2021	A&P	Freedman, John A.	Senior Counsel	Pleadings	Review and revise complaint.	3.5	\$787.00	\$2,754.50	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
132	12/17/2021	ACLU	Debbie Jeon	Legal Director	Case Development	confer with experts, clients re case; prep complaint	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
133	12/17/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Barreto, K. Oskooi, D. Jeon	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
134	12/17/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with L. Brown, D. Jeon, J. Freedman re Professor Brown testifying as historian expert	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
135	12/17/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Follow-up e-mails to L. Brown	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
136	12/18/2021	A&P	Freedman, John A.	Senior Counsel	Pleadings	Review and revise complaint.	3.3	\$787.00	\$2,597.10	20	\$300.00	\$475.00	\$990.00	\$1,567.50
137	12/18/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	prep complaint; confer with clients re. same	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
138	12/19/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	prep complaint; confer with clients, co-counsel and experts re same	6.5	\$650.00	\$4,225.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
139	12/19/2021	BGL	Andrew Freeman	Partner	Pleadings	E-mail from D. Jeon with revised Complaint; edit same	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
140	12/19/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon re Baltimore County plan's split districts; research re same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
141	12/20/2021	A&P	Colley, Mark D.	Partner	Pleadings	Background reading and case law review.	3.5	\$760.00	\$2,660.00	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
142	12/20/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Draft civil cover sheet and summonses, send to Managing Attorneys' Office for review.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
143	12/20/2021	A&P	Racheva, Youlia S.	Associate	Pleadings	Review and edit revised Complaint draft.	1.6	\$502.00	\$803.20	1	\$150.00	\$225.00	\$240.00	\$360.00
144	12/20/2021	A&P	Freedman, John A.	Senior Counsel	Pleadings	Review and revise complaint.	1.3	\$787.00	\$1,023.10	20	\$300.00	\$475.00	\$390.00	\$617.50
145	12/20/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review materials provided by team in preparation of draft Complaint and forthcoming Preliminary Injunction motion, including local press reports, expert declarations and reports, and motion papers from other actions.	2.1	\$536.00	\$1,125.60	4	\$150.00	\$225.00	\$315.00	\$472.50
146	12/20/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Review new version of draft Complaint after A&P team's revision.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
147	12/20/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Revise draft Complaint and revert to A&P team.	2.3	\$536.00	\$1,232.80	4	\$150.00	\$225.00	\$345.00	\$517.50
148	12/20/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	Prep. complaint; confer w/ co-counsel. and client re. same	6.5	\$650.00	\$4,225.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
149	12/21/2021	A&P	Colley, Mark D.	Partner	Pleadings	Assist with finalizing complaint.	1.4	\$760.00	\$1,064.00	20	\$300.00	\$475.00	\$420.00	\$665.00
150	12/21/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Coordinate with Business Resource Center to obtain filing-ready versions of civil cover sheet and summonses.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
151	12/21/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Coordinate with Managing Attorneys' Office to prepare, review, and file Complaint and accompanying documents.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
152	12/21/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft email to Research Services to pull sample preliminary injunction briefs to assist in preparing Preliminary Injunction Motion.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
153	12/21/2021	A&P	Freedman, John A.	Senior Counsel	Pleadings	Finalize complaint and filing logistics.	1.9	\$787.00	\$1,495.30	20	\$300.00	\$475.00	\$570.00	\$902.50
154	12/21/2021	A&P	Racheva, Youlia S.	Associate	Pleadings	Finalize Complaint for filing this morning.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
155	12/21/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Organize and participate in video conference with full team to discuss status of action and next steps in preparing Preliminary Injunction Motion.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
156	12/21/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review sample preliminary injunction briefs provided by J. Freedman to assist in preparing Preliminary Injunction Motion.	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
157	12/21/2021	A&P	Mazzullo, Michael L.	Associate	Pleadings	Revise new versions of Complaint in light of team's ongoing feedback prior to filing.	2.4	\$536.00	\$1,286.40	4	\$150.00	\$225.00	\$360.00	\$540.00
158	12/21/2021	ACLU	Debbie Jeon	Legal Director	Pleadings	final prep of lawsuit and confer w/ clients re. same	4	\$650.00	\$2,600.00	20	\$300.00	\$475.00	\$1,200.00	\$1,900.00
159	12/21/2021	BGL	Andrew Freeman	Partner	Case Development	Zoom call with clients re filing of lawsuit	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
160	12/21/2021	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon to clients and experts with as-filed lawsuit	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
161	12/21/2021	BGL	Andrew Freeman	Partner	Case Development	Zoom call with co-counsel re next steps	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
162	12/21/2021	BGL	Andrew Freeman	Partner	Case Development	Review Baltimore Sun article	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
163	12/21/2021	BGL	Andrew Freeman	Partner	Pleadings	Numerous e-mails re finalizing and filing Complaint	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
164	12/21/2021	BGL	Andrew Freeman	Partner	Pleadings	E-mails re assignment to Judge Grigsby	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
165	12/21/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re next steps, schedule for filing motion for preliminary injunction	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
166	12/21/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to L. Brown with retainer letter	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
167	12/22/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Call with Mike to discuss next steps and action items for PI brief.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
168	12/22/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Prepare for and participate in video conference with Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
169	12/22/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review dockets of Alabama litigations involving Voting Rights Act claims to prepare for Preliminary Injunction Motion.	1.8	\$536.00	\$964.80	4	\$150.00	\$225.00	\$270.00	\$405.00
170	12/22/2021	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer w/ experts and co-counsel; review materials and legal research	3.9	\$650.00	\$2,535.00	20	\$300.00	\$475.00	\$1,170.00	\$1,852.50
171	12/22/2021	BGL	Andrew Freeman	Partner	Case Development	Entry of appearance	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
172	12/22/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon re shape files, information from B. Cooper	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
173	12/22/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to L. Brown re timing of drafting declaration; e-mail to co-counsel re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
174	12/23/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Create PI brief shell to begin drafting on Monday 12/27.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
175	12/23/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to L. Brown's graduate student	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
176	12/27/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Check-in call with Mike on current outstanding to-do items.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
177	12/27/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft emails to D. Jeon and A. Freeman re preparation of Brown and Cooper expert reports.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
178	12/27/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Meet with Mark C. and Mike M. to discuss next steps on PI brief and expert declarations.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
179	12/27/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with D. Jeon to discuss Dr. Brown's expert report.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
180	12/27/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with M. Colley and Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.3	\$536.00	\$160.80	4	\$150.00	\$225.00	\$45.00	\$67.50
181	12/27/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Prepare for and participate in telephone conference with Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
182	12/27/2021	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Reading and analysis regarding PI motion and related planning call; review draft Cooper declaration.	5.6	\$760.00	\$4,256.00	20	\$300.00	\$475.00	\$1,680.00	\$2,660.00
183	12/27/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review draft expert report of Dr. Brown emailed from D. Jeon.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
184	12/27/2021	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	Work with Cooper on report; legal research; phone w/ Mazzoulo re. next steps	6	\$650.00	\$3,900.00	20	\$300.00	\$475.00	\$1,800.00	\$2,850.00
185	12/27/2021	BGL	Andrew Freeman	Partner	Pleadings	Summonses from clerk	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
186	12/27/2021	BGL	Andrew Freeman	Partner	Pleadings	E-mail to J. Benjamin re acceptance of service	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
187	12/28/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Check in with Mike and Mark on PI draft action items and progress.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
188	12/28/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	(co-counsel) re effectuating service; email Deborah Jeon (ACLU) on status of Mr. Baretto's expert report.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
189	12/28/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with M. Colley and Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.3	\$536.00	\$160.80	4	\$150.00	\$225.00	\$45.00	\$67.50
190	12/28/2021	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Reading and analysis regarding PI motion; drafting and research.	5.3	\$760.00	\$4,028.00	20	\$300.00	\$475.00	\$1,590.00	\$2,517.50
191	12/28/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review Cooper expert declaration for edits.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
192	12/28/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Work on PI Brief.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
193	12/28/2021	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to J. Benjamin re arranging for service of process	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
194	12/28/2021	BGL	Andrew Freeman	Partner	Case Development	Call to Nira Pughsley, e-mails to/from Jackie Hector re arranging for process server to serve summons and complaint	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
195	12/28/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Case management order from Judge Grigsby; e-mail from M. Mazzulo re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
196	12/29/2021	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Correspond with team re: expert analysis.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
197	12/29/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with A. Freeman to discuss Mr. Baretto's expert report.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
198	12/29/2021	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Reading and analysis regarding PI motion and related planning call.	3.7	\$760.00	\$2,812.00	20	\$300.00	\$475.00	\$1,110.00	\$1,757.50
199	12/29/2021	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer with co-counsel re. RPV analysis; legal research	3.5	\$650.00	\$2,275.00	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
200	12/29/2021	BGL	Andrew Freeman	Partner	Pleadings	E-mails from/to J. Hector re service of process on County	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
201	12/29/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzoulo re working with experts on draft reports	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
202	12/29/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to/from co-counsel re list of elections for experts to analyze	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
203	12/29/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to M. Barreto and K. Oskooii with list of elections to analyze; e-mail from M. Barreto re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
204	12/29/2021	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to T. Fugett re list of elections to analyze	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
205	12/30/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft standards for preliminary injunction into shell of draft brief.	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
206	12/30/2021	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review emails from experts Kassra Oskooii and Matt Baretto regarding their anticipated report.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
207	12/30/2021	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer w/ experts and co-counsel, and clients re. RPV analysis	3	\$650.00	\$1,950.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
208	12/31/2021	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer with team re: expert analysis, preliminary injunction draft.	0.5	\$787.00	\$393.50	20	\$300.00	\$475.00	\$150.00	\$237.50
209	12/31/2021	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review team updates on PI Brief drafting plan.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
210	1/2/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft pre-motion Notice re Motion for Preliminary Injunction in compliance with Judge Griggsby's Case Management Order.	2.5	\$536.00	\$1,340.00	4	\$150.00	\$225.00	\$375.00	\$562.50
211	1/2/2022	BGL	Andrew Freeman	Partner	Case Development	E-mail to co-counsel re my call with A. Bailey, counsel to the Board of Elections	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
212	1/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to J. Freedman, et al. re tasks and deadlines for our experts	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
213	1/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Complete drafting pre-motion Notice re Motion for Preliminary Injunction in compliance with Judge Griggsby's Case Management Order and send to team for review.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
214	1/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Complete follow-up from video conference with full team, namely review edits to pre-motion Notice to Court.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
215	1/3/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: developments; work on preliminary injunction motion; attention to Bill Cooper analysis; edit pre-motion conference letter.	2.8	\$787.00	\$2,203.60	20	\$300.00	\$475.00	\$840.00	\$1,330.00
216	1/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with experts Oskooii/Cooper to discuss their forthcoming expert declaration.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
217	1/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with full team to discuss next steps re drafting Motion for Preliminary Injunction.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
218	1/3/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Review and edit PI brief and related research; review and edit Cooper declaration; telephone conference with team regarding status, plans and misc. issues.	4.7	\$760.00	\$3,572.00	20	\$300.00	\$475.00	\$1,410.00	\$2,232.50
219	1/3/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team meeting on progress and action items for PI Brief and expert reports. Drafting Senate Factors section of PI brief.	2.4	\$502.00	\$1,204.80	1	\$150.00	\$225.00	\$360.00	\$540.00
220	1/3/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	phone with co-counsel and experts; legal research on county history for PI brief and declarations	5	\$650.00	\$3,250.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
221	1/3/2022	BGL	Andrew Freeman	Partner	Case Development	Research re deadline for filing Certificate of Candidacy; e-mail to M. Mazzullo re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
222	1/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Team Zoom call re tasks for motion for preliminary injunction and expert declarations	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
223	1/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with RPV experts M. Barreto and K. Oskooii, D. Jeon, M. Mazzullo	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
224	1/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon with article re Baltimore County history of segregation	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
225	1/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to M. Colley re B. Cooper declaration	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
226	1/4/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Further edits to PMC letter.	0.2	\$787.00	\$157.40	20	\$300.00	\$475.00	\$60.00	\$95.00
227	1/4/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Review and edit PI brief and related research; review and edit Cooper declarations.	2.3	\$760.00	\$1,748.00	20	\$300.00	\$475.00	\$690.00	\$1,092.50
228	1/4/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Work on draft of PI Brief.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
229	1/4/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	work with experts on reports; legal research, confer with clients and co-counsel re. next steps	6.5	\$650.00	\$4,225.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
230	1/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from K. Oskooii and D. Jeon re precinct-level data	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
231	1/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon re map of cracked neighborhoods	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
232	1/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with draft letter to Judge Griggsby re Motion for Preliminary Injunction; e-mail from D. Jeon with edits to same; edit same	1.3	\$725.00	\$942.50	20	\$300.00	\$475.00	\$390.00	\$617.50
233	1/5/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft Facts Section for Motion for Preliminary Injunction.	2.4	\$536.00	\$1,286.40	4	\$150.00	\$225.00	\$360.00	\$540.00
234	1/5/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft Preliminary Statement for Motion for Preliminary Injunction.	1.1	\$536.00	\$589.60	4	\$150.00	\$225.00	\$165.00	\$247.50
235	1/5/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Drafting PI Brief.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
236	1/5/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Further edits to PMC letter.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
237	1/5/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with experts Oskooii/Cooper to discuss their forthcoming expert declaration.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
238	1/5/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Review revised Cooper declaration.	0.1	\$760.00	\$76.00	20	\$300.00	\$475.00	\$30.00	\$47.50
239	1/5/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise pre-motion Notice re Motion for Preliminary Injunction in light of feedback from team and provide clean copy for review.	1.9	\$536.00	\$1,018.40	4	\$150.00	\$225.00	\$285.00	\$427.50
240	1/5/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep. declarations, legal research, phone, email to/from clients and co- counsel	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
241	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to J. Benjamin with electronic copy of CMO; follow-up e-mail re personal service of same along with summons and complaint	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
242	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit W. Cooper declaration	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
243	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with revised letter to Judge Griggsby, review same, e-mail to M. Mazzullo re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
244	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to J. Freedman, et al. re scheduling meet and confer	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
245	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit another draft of Cooper declaration	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
246	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit letter to Judge Griggsby; e-mail to M. Mazzullo re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
247	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to J. Benjamin re scheduling meet and confer	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
248	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from J. Benjamin re County hiring McGuire Woods, inquiring re CMO	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
249	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Barreto, K. Oskooii, D. Jeon, and M. Mazzullo re racially polarized voting analysis	0.9	\$725.00	\$652.50	20	\$300.00	\$475.00	\$270.00	\$427.50
250	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to J. Benjamin re scheduling conference call re preliminary injunction	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
251	1/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to/from M. Martinez and A. Lias-Booker re scheduling conference call re preliminary injunction; e-mails to/from co-counsel re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
252	1/6/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer team re: preliminary injunction brief; finalization of PMC letter.	1	\$787.00	\$787.00	20	\$300.00	\$475.00	\$300.00	\$475.00
253	1/6/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft Gingles 1 argument for Motion for Preliminary Injunction.	2.3	\$536.00	\$1,232.80	4	\$150.00	\$225.00	\$345.00	\$517.50
254	1/6/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft Gingles 2 argument for Motion for Preliminary Injunction.	2.1	\$536.00	\$1,125.60	4	\$150.00	\$225.00	\$315.00	\$472.50
255	1/6/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Drafting PI Brief.	2.1	\$502.00	\$1,054.20	1	\$150.00	\$225.00	\$315.00	\$472.50
256	1/6/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with opposing counsel to meet and confer on Motion for Preliminary Injunction.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
257	1/6/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Conference.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
258	1/6/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Work on PI Brief.	2.1	\$502.00	\$1,054.20	1	\$150.00	\$225.00	\$315.00	\$472.50
259	1/6/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep declarations, legal research; phone w/ Barreto and Oskooii	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
260	1/6/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Review and edit Bill Cooper Declaration	2	\$350.00	\$700.00	8	\$165.00	\$300.00	\$330.00	\$600.00
261	1/6/2022	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to A. Bailey and A. Trento re Trento entering appearance for State Board of Elections	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
262	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Meet-and-confer call with A. Lias-Booker, M. Martinez, et al. re preliminary injunction, revising map	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
263	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Follow-up call with D. Jeon, then D. Jeon and M. Mazzullo re call with defense counsel	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
264	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Martinez with Marylanders for Fair Representation v.Schaefer opinion, review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
265	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon, J. Freedman re responding to M. Martinez re request to dismiss councilmembers	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
266	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Graves (Judge Griggsby's assistant) re scheduling pre-motion conference for January 19; e-mails to/from co-counsel re same; draft and send response to Ms. Graves	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
267	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Martinez to M. Graves re pre-motion conference	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
268	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Graves responding to M. Martinez's and my e-mails re possibility of earlier status conference; forward same to co-counsel	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
269	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Order scheduling pre-motion conference, e-mail from M. Graves re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
270	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call to M. Graves re possibility of filing motion for leave to file; e-mail to co-counsel re same; e-mail from J. Freedman re same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
271	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re filing motion for leave to file p.i. motion	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
272	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Barreto re initial draft of expert report; review and edit same	1.1	\$725.00	\$797.50	20	\$300.00	\$475.00	\$330.00	\$522.50
273	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon and M. Barreto re Barreto expert report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
274	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with letter to Judge Griggsby; edit and return same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
275	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon re obtaining declaration from T. Fugett	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
276	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Request for Pre-Motion Conference and Notice of Intention to File a Motion for Preliminary Injunction	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
277	1/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to/from J. Freedman re serving Request for Pre-Motion Conference re P.I. on defense counsel; e-mail to defense counsel with same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
278	1/7/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with full team to discuss next steps re drafting Motion for Preliminary Injunction.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
279	1/7/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review Baretto analysis; review and comment on PI motion; team call.	2.4	\$787.00	\$1,888.80	20	\$300.00	\$475.00	\$720.00	\$1,140.00
280	1/7/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review edits to PI Brief draft.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
281	1/7/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team meeting on next steps for expert reports and PI brief.	0.9	\$502.00	\$451.80	1	\$150.00	\$225.00	\$135.00	\$202.50
282	1/7/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	Prep. Fugett declaration; review and edit PI brief' phone with clients and co-counsel re. declaration and PI motion;	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
283	1/7/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	confer w/ co-counsel re. PI brief	0.9	\$350.00	\$315.00	8	\$165.00	\$300.00	\$148.50	\$270.00
284	1/7/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Phone call Tony to prep declaration	1.1	\$350.00	\$385.00	8	\$165.00	\$300.00	\$181.50	\$330.00
285	1/7/2022	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to A. Trento re Maryland Board of Elections not intervening	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
286	1/7/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re draft Preliminary Injunction brief	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
287	1/7/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to K. Oskooii re Olszewski-Jealous drop-off analysis	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
288	1/8/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	update resource documents for Fugett declaration; prep. introduction to Preliminary Injunction brief; phone, email to/from clients and co-counsel re. same	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
289	1/8/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re preliminary injunction motion	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
290	1/8/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon with revised introduction to Preliminary Injunction memo; review, edit, and return same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
291	1/8/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review T. Fugett declaration	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
292	1/8/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit L. Brown declaration	2	\$725.00	\$1,450.00	20	\$300.00	\$475.00	\$600.00	\$950.00
293	1/9/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer w/ co-counsel re. materials to support PI; confer w. clients and expert re. same; legal research re. legislative immunity	5.6	\$650.00	\$3,640.00	20	\$300.00	\$475.00	\$1,680.00	\$2,660.00
294	1/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit L. Brown declaration, forward to L. Brown	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
295	1/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from D. Jeon, B. Samuels re L. Brown declaration, documents and research supporting same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
296	1/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon re T. Fugett declaration	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
297	1/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon re B. Cooper declaration	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
298	1/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to B. Samuels re Baltimore County history and demographics	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
299	1/10/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Catch up on team progress on PI Brief and naming council members as defendants legal issue.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
300	1/10/2022	A&P	Mazzullo, Michael L.	Associate	Pleadings	Research caselaw on legislative immunity and legislative privilege to counter individual defendants' proposed dispositive motion.	1.7	\$536.00	\$911.20	4	\$150.00	\$225.00	\$255.00	\$382.50
301	1/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review current draft of Barreto Declaration.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
302	1/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review current draft of Brown Declaration.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
303	1/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review current draft of Cooper Declaration.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
304	1/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise Facts Section for Motion for Preliminary Injunction.	2.1	\$536.00	\$1,125.60	4	\$150.00	\$225.00	\$315.00	\$472.50
305	1/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise Senate Factors argument of Motion for Preliminary Injunction.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
306	1/10/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI brief.	0.7	\$787.00	\$550.90	20	\$300.00	\$475.00	\$210.00	\$332.50
307	1/10/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep PI brief and exhibits	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
308	1/10/2022	BGL	Andrew Freeman	Partner	Case Development	Call from A. Lias-Booker re defendants' request that we dismiss councilmembers, legislative immunity cases (.2), issues regarding maps/concerns of split Black vote, next steps (.5)	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
309	1/10/2022	BGL	Andrew Freeman	Partner	Case Development	E-mail to co-counsel re call with A. Lias-Booker re request that we dismiss councilmembers, legislative immunity vs. privilege; e-mail from D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
310	1/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to co-counsel re call with A. Lias-Booker re merits of claims	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
311	1/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from M. Hill with research from HUD case; review same	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
312	1/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit T. Fugett declaration	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
313	1/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from L. Brown with draft declaration, review same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
314	1/11/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with full team to discuss next steps re drafting Motion for Preliminary Injunction.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
315	1/11/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review and organize next steps in PI brief.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
316	1/11/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review defendants' legislative immunity / privilege argument and case law.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
317	1/11/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review issue of legislative immunity/privilege and draft email to team re same.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
318	1/11/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft Motion for Preliminary Injunction.	1.6	\$536.00	\$857.60	4	\$150.00	\$225.00	\$240.00	\$360.00
319	1/11/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	reports.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
320	1/11/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Telephone conference with team regarding status and plan.	0.5	\$760.00	\$380.00	20	\$300.00	\$475.00	\$150.00	\$237.50
321	1/11/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI brief.	2.5	\$787.00	\$1,967.50	20	\$300.00	\$475.00	\$750.00	\$1,187.50
322	1/11/2022	ACLU	Amy Cruice	Paralegal	Motion for Preliminary Injunction	prep for meeting; attend mtg	1.8	\$220.00	\$396.00	non-lawyer	\$95.00	\$150.00	\$171.00	\$270.00
323	1/11/2022	BGL	Andrew Freeman	Partner	Case Development	E-mail from D. Jeon re dismissing individual councilmembers	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
324	1/11/2022	BGL	Andrew Freeman	Partner	Case Development	E-mail from M. Mazzullo re legislative immunity research	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
325	1/11/2022	BGL	Andrew Freeman	Partner	Case Development	Draft response to M. Martinez e-mail re legislative immunity, forward same to co-counsel	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
326	1/11/2022	BGL	Andrew Freeman	Partner	Case Development	Team Zoom call re responding to defendants re their request to dismiss councilmembers (.3) and re tasks related to finalizing expert reports, Preliminary Injunction motion and memo, and motion for leave to file (.6)	0.9	\$725.00	\$652.50	20	\$300.00	\$475.00	\$270.00	\$427.50
327	1/11/2022	BGL	Andrew Freeman	Partner	Case Development	E-mails from/to D. Jeon and J. Freedman re edits to my e-mail to M. Martinez and A. Lias-Booker re law re suit against councilmembers in official capacity, conditions for dismissal of same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
328	1/11/2022	BGL	Andrew Freeman	Partner	Case Development	Finalize and send e-mail to M. Martinez and A. Lias-Booker re dismissal of suit against councilmembers in official capacity	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
329	1/11/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon re responding to A. Lias-Booker's arguments re merits	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
330	1/12/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Research and drafting on PI brief.	1.2	\$760.00	\$912.00	20	\$300.00	\$475.00	\$360.00	\$570.00
331	1/12/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Research Fourth Circuit caselaw applying Gingles preconditions to redistricting cases.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
332	1/12/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft Motion for Preliminary Injunction and incorporate new iteration of Gingles 1 argument.	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
333	1/12/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Revised PI Brief Senate Factors section.	4.7	\$502.00	\$2,359.40	1	\$150.00	\$225.00	\$705.00	\$1,057.50
334	1/12/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI brief.	0.4	\$787.00	\$314.80	20	\$300.00	\$475.00	\$120.00	\$190.00
335	1/12/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from M. Mazzullo, D. Jeon, J. Freedman re Preliminary Injunction brief, declarations	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
336	1/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	declarations.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
337	1/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Work on and discuss next steps for PI Brief.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
338	1/13/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI brief.	2.7	\$787.00	\$2,124.90	20	\$300.00	\$475.00	\$810.00	\$1,282.50
339	1/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Work on PI Brief.	0.9	\$502.00	\$451.80	1	\$150.00	\$225.00	\$135.00	\$202.50
340	1/13/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	review and edit PI motion; confer with co-counsel and experts	5.5	\$650.00	\$3,575.00	20	\$300.00	\$475.00	\$1,650.00	\$2,612.50
341	1/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re Preliminary Injunction motion and expert declarations	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
342	1/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit preliminary injunction brief	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
343	1/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to M. Mazzullo re schedule for completing and filing Preliminary Injunction motion and memo	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
344	1/14/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: expert reports and status.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
345	1/14/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with A. Freeman to discuss next steps re drafting Motion for Preliminary Injunction.	0.3	\$536.00	\$160.80	4	\$150.00	\$225.00	\$45.00	\$67.50
346	1/14/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review Defendants' Court filing of pre-motion notice re anticipated motion to dismiss and draft email to team re same.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
347	1/14/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review Defendants' Notice of Motion to Dismiss. Draft proposed edits summary for DJ on Fugett declaration to accompany PI Brief.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
348	1/14/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review status of all declarations - Fuggett, Brown, Cooper, and Barreto.	1.1	\$536.00	\$589.60	4	\$150.00	\$225.00	\$165.00	\$247.50
349	1/14/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft of Motion for Preliminary Injunction in light of team's feedback.	4.1	\$536.00	\$2,197.60	4	\$150.00	\$225.00	\$615.00	\$922.50
350	1/14/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team decision on filing timeline for PI brief.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
351	1/14/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Update citations in PI Brief.	3.5	\$502.00	\$1,757.00	1	\$150.00	\$225.00	\$525.00	\$787.50
352	1/14/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	review and edit PI motion; confer re. same	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
353	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to M. Mazzullo and J. Freedman re timing of filing motion for preliminary injunction	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
354	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to co-counsel with proposed edit to preliminary injunction motion; e-mail from J. Freedman re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
355	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review Barreto declaration	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
356	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from Y. Racheva with revised preliminary injunction brief, review same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
357	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re remaining tasks to finalize memo and exhibits	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
358	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from A. Lias-Booker with letter to court re defendants' intention to file motion to dismiss councilmembers	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
359	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from M. Mazzullo and K. Oskooii re Barretto expert report	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
360	1/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo re responding to argument re "NAACP drew the map"	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
361	1/15/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft of Motion for Preliminary Injunction in light of team's feedback.	3.7	\$536.00	\$1,983.20	4	\$150.00	\$225.00	\$555.00	\$832.50
362	1/15/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	Review edits to Cooper report and supporting materials	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
363	1/15/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit L. Brown declaration; e-mail to L. Brown re same	1.8	\$725.00	\$1,305.00	20	\$300.00	\$475.00	\$540.00	\$855.00
364	1/15/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon, to/from/to B. Samuels re Brown declaration	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
365	1/16/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review and comment on expert reports.	1.3	\$787.00	\$1,023.10	20	\$300.00	\$475.00	\$390.00	\$617.50
366	1/16/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review declarations - individual Fugett and experts Barreto and Cooper - to provide feedback in preparation of Motion for Preliminary Injunction.	1.1	\$536.00	\$589.60	4	\$150.00	\$225.00	\$165.00	\$247.50
367	1/16/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft of Motion for Preliminary Injunction in light of team's feedback.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
368	1/16/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	review and edit drafts of Cooper report; research and draft updates to Fugett declaration	3.9	\$650.00	\$2,535.00	20	\$300.00	\$475.00	\$1,170.00	\$1,852.50
369	1/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to B. Cooper and D. Jeon re edits to Cooper declaration	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
370	1/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with revised Preliminary Injunction Brief and re remaining tasks	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
371	1/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit L. Brown Declaration; e-mail to B. Samuels re same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
372	1/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with B. Samuels re Baltimore County history (.5), further research re same (.4)	0.9	\$725.00	\$652.50	20	\$300.00	\$475.00	\$270.00	\$427.50
373	1/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit Preliminary Injunction memo; edit Barreto and Brown Declarations, e-mail edits to Barreto and to co-counsel	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
374	1/17/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft proposed order and motion for Motion for Preliminary Injunction and send to team for review.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
375	1/17/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with expert M. Barreto to discuss final steps of declaration in support of Motion for Preliminary Injunction.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
376	1/17/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review Barreto declaration to provide feedback in preparation of Motion for Preliminary Injunction.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
377	1/17/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review draft expert reports.	0.5	\$787.00	\$393.50	20	\$300.00	\$475.00	\$150.00	\$237.50
378	1/17/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review team status updates & drafts.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
379	1/17/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft of Motion for Preliminary Injunction in light of team's feedback.	1.8	\$536.00	\$964.80	4	\$150.00	\$225.00	\$270.00	\$405.00
380	1/17/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep motions papers, exhibits, memorandum for filing	5.8	\$650.00	\$3,770.00	20	\$300.00	\$475.00	\$1,740.00	\$2,755.00
381	1/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re next steps	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
382	1/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom with M. Barreto, D. Jeon, and M. Mazzullo re Barreto's declaration (left before end)	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
383	1/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit Brown Declaration, e-mail same to L. Brown	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
384	1/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit Preliminary Injunction memo	4	\$725.00	\$2,900.00	20	\$300.00	\$475.00	\$1,200.00	\$1,900.00
385	1/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit Barreto and Fugett Declarations	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
386	1/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with draft motion and order	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
387	1/18/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize PI Brief & citations.	1.3	\$502.00	\$652.60	1	\$150.00	\$225.00	\$195.00	\$292.50
388	1/18/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with team to discuss next steps re drafting Motion for Preliminary Injunction and prepare for Court hearing.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
389	1/18/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Prepare for video conference with team to discuss next steps re drafting Motion for Preliminary Injunction by reviewing outstanding items.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
390	1/18/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review declarations - individual Fugett and experts Barreto and Cooper - to finalize and prepare for filing with legal assistant and Managing Attorneys' Office.	2.2	\$536.00	\$1,179.20	4	\$150.00	\$225.00	\$330.00	\$495.00
391	1/18/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review final draft of Baretto declaration. Start drafting Dismissal Without Prejudice of the Individual Defendants.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
392	1/18/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft of Motion for Preliminary Injunction in light of team's feedback.	3.2	\$536.00	\$1,715.20	4	\$150.00	\$225.00	\$480.00	\$720.00
393	1/18/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Revise PI Brief draft.	2.3	\$502.00	\$1,154.60	1	\$150.00	\$225.00	\$345.00	\$517.50
394	1/18/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revised proposed order and motion for Motion for Preliminary Injunction in light of team's feedback.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
395	1/18/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team meeting on final steps to finalize PI brief and prep for hearing tomorrow.	1.2	\$502.00	\$602.40	1	\$150.00	\$225.00	\$180.00	\$270.00
396	1/18/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI brief; prep call re: court conference.	1.5	\$787.00	\$1,180.50	20	\$300.00	\$475.00	\$450.00	\$712.50
397	1/18/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	finalize motions papers for filing; phone, email, to/from clients and co-counsel re same	10.5	\$650.00	\$6,825.00	20	\$300.00	\$475.00	\$3,150.00	\$4,987.50
398	1/18/2022	BGL	Andrew Freeman	Partner	Case Development	Draft response to A. Lias-Book re dismissal of suit against individual councilmembers (.4); e-mails from co-council with edits to same; finalize and send same to A. Lias-Booker (.2)	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
399	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Team Zoom call re finalizing motion for Preliminary Injunction (.2), responding to defendants re dismissing suit against councilmembers (.1), proposed schedule for briefing and hearing on Preliminary Injunction (.2)	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
400	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail fr M. Mazzullo with draft motion for Preliminary Injunction and draft order; review and edit same; e-mails to/fr co-counsel re my proposed edits	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
401	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/fr Y. Racheva re drafting dismissal of individual defendants	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
402	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail fr D. Jeon with draft edits to T. Fugett declaration; review and revise same; e-mail fr M. Mazzullo re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
403	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with A. Lias-Booker re briefing schedule (.3); e-mails to/fr co-counsel re same (.2)	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
404	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit B. Cooper declaration; e-mails fr/to D. Jeon and B. Cooper re same	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
405	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail fr A. Bailey to M. Graves re participating in tomorrow's call with Judge Griggsby; e-mail response fr M. Graves	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
406	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with A-Lias-Booker re briefing schedule, merits of case	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
407	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Texts to/fr A. Lias-Booker dismissal of individual defendants without prejudice (.1); call and e-mail to M. Mazzullo re same, review final version of Stipulation of Dismissal (.1)	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
408	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re edits to Preliminary Injunction brief	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
409	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Research re Baltimore County history; edit L. Brown declaration; e-mail to L. Brown re same	2	\$725.00	\$1,450.00	20	\$300.00	\$475.00	\$600.00	\$950.00
410	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit Preliminary Injunction brief	2	\$725.00	\$1,450.00	20	\$300.00	\$475.00	\$600.00	\$950.00
411	1/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit T. Fugett declaration	1.5	\$725.00	\$1,087.50	20	\$300.00	\$475.00	\$450.00	\$712.50
412	1/19/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Attend court conference; work on finalizing brief and expert reports.	2.1	\$787.00	\$1,652.70	20	\$300.00	\$475.00	\$630.00	\$997.50
413	1/19/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Complete final review of all papers to be filed in moving papers for Motion for Preliminary Injunction.	2.7	\$536.00	\$1,447.20	4	\$150.00	\$225.00	\$405.00	\$607.50
414	1/19/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Final PI Brief round of edits. Coordinate sending courtesy copies to Judge Griggsby's chambers.	2.2	\$502.00	\$1,104.40	1	\$150.00	\$225.00	\$330.00	\$495.00
415	1/19/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize PI Brief citations.	1.2	\$502.00	\$602.40	1	\$150.00	\$225.00	\$180.00	\$270.00
416	1/19/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in Court conference before Judge Griggsby to discuss forthcoming Motion for Preliminary Injunction.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
417	1/19/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with team to debrief conference before Judge Griggsby and discuss next steps.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
418	1/19/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Prep for conference with judge; conference with judge on PI Brief and briefing schedule; post- conference team call to set next steps for filing.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
419	1/19/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise draft Motion for Preliminary Injunction in light of edits to Fugett and Brown declarations.	2.3	\$536.00	\$1,232.80	4	\$150.00	\$225.00	\$345.00	\$517.50
420	1/19/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Supervise Managing Attorneys' Office in its review and filing of moving papers for Motion for Preliminary Injunction.	1.9	\$536.00	\$1,018.40	4	\$150.00	\$225.00	\$285.00	\$427.50
421	1/19/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep for hearing; attend hearing; finalize pi papers for filing; communications with clients and co-counsel re filing and court rulings	8.5	\$650.00	\$5,525.00	20	\$300.00	\$475.00	\$2,550.00	\$4,037.50
422	1/19/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	prep for and attend court hearing and debrief	4.5	\$350.00	\$1,575.00	8	\$165.00	\$300.00	\$742.50	\$1,350.00
423	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Follow-up call with D. Jeon re next steps, potential maps	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
424	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Scheduling Order from Judge Griggsby	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
425	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re today's call with Judge Griggsby, finalizing brief	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
426	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re finalizing brief, upcoming call with Judge	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
427	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit brief	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
428	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Prepare for hearing with Judge Griggsby	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
429	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Conference call with Judge Griggsby and all counsel re status, briefing schedule for motion for preliminary injunction	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
430	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Follow-up call with co-counsel re call with Judge Griggsby	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
431	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit final version of Preliminary Injunction memo; e-mail to co-counsel re finalizing and filing same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
432	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re finalizing and filing Preliminary Injunction brief; texts from/to Y. Racheva re courtesy copies	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
433	1/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon to clients re filing of Preliminary Injunction motion; responses from clients	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
434	1/20/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft email to experts regarding remaining schedule and proceedings re Motion for Preliminary Injunction.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
435	1/20/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Research materials to assist presentation for February 15, 2022 hearing re Motion for Preliminary Injunction.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
436	1/20/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re yesterday's filing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
437	1/20/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to M. Barreto and K. Oskooii re schedule for briefs and hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
438	1/20/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon re Council's control of zoning and appointments to commissions	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
439	1/21/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon with reply brief from Alabama congressional redistricting case, review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
440	1/21/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re issues to research	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
441	1/21/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Conference call with C. Sydnor, D. Jeon, T. Peprah re factual questions regarding Baltimore County districts	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
442	1/21/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review spreadsheet re demographic makeup of new Maryland legislative districts in Baltimore County (0.1); call with E. Aemero re revising same (.2)	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
443	1/21/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call from witness from community association in Northwest Baltimore County re potentially helpful evidence	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
444	1/22/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon re Baltimore County demographics and history; research re same	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
445	1/23/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: PI reply brief.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
446	1/23/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	legal research for reply brief; email to/from co-counsel re same	6.5	\$650.00	\$4,225.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
447	1/23/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon and J. Freedman re planning for reply brief	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
448	1/24/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	Call with election board lawyers; legal research and prep for PI reply; correspondence to clients and co-counsel re. same; review Alabama decision	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
449	1/24/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	review final brief, research for reply	2	\$350.00	\$700.00	8	\$165.00	\$300.00	\$330.00	\$600.00
450	1/24/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re our claims, arguments, caselaw	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
451	1/24/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails (2) from D. Jeon re C. Pasteur	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
452	1/24/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon with ruling granting preliminary injunction in Alabama case; e-mails to/from co-counsel re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
453	1/24/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Initial review of Alabama decision granting preliminary injunction	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
454	1/24/2022	BGL	Marie Bauer	Paralegal	Motion for Preliminary Injunction	Download Plaintiffs' supporting cases from Westlaw; create subfolders for Plaintiffs' and Defendant's cases in Research; upload cases to DMS; e-mail Andrew D. Freeman re case upload	1	\$220.00	\$220.00	non-lawye	\$95.00	\$150.00	\$95.00	\$150.00
455	1/25/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer team re PI reply.	0.7	\$787.00	\$550.90	20	\$300.00	\$475.00	\$210.00	\$332.50
456	1/25/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Injunction.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
457	1/25/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Planning call with legal team.	0.7	\$760.00	\$532.00	20	\$300.00	\$475.00	\$210.00	\$332.50

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
458	1/25/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review opinion coming from Northern District of Alabama enjoining Congressional map to assist in drafting reply to Motion for Preliminary Injunction.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
459	1/25/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review sample reply brief and prep for reply brief drafting.	1.4	\$502.00	\$702.80	1	\$150.00	\$225.00	\$210.00	\$315.00
460	1/25/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review supplemental expert report from demographer Bill Cooper from Northern District of Alabama to assist in drafting reply to Motion for Preliminary Injunction.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
461	1/25/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team meeting on reply brief strategy and next steps to prep for hearing on PI brief.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
462	1/25/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	team planning meeting; legal research for reply brief, communicate with experts	3.9	\$650.00	\$2,535.00	20	\$300.00	\$475.00	\$1,170.00	\$1,852.50
463	1/25/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	data collection and display for the County 2018 race and redistricting memos.	5.5	\$220.00	\$1,210.00	non-lawye	\$95.00	\$150.00	\$522.50	\$825.00
464	1/25/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	meeting with counsel to prep reply and hearing	2	\$220.00	\$440.00	non-lawye	\$95.00	\$150.00	\$190.00	\$300.00
465	1/25/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	strategy meeting with counsel team	1	\$350.00	\$350.00	8	\$165.00	\$300.00	\$165.00	\$300.00
466	1/25/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	legal research for PI brief	4.2	\$350.00	\$1,470.00	8	\$165.00	\$300.00	\$693.00	\$1,260.00
467	1/25/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to LaClaudia Dyson and Shiloh Nelson re preparing pleading binder for hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
468	1/25/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Team Zoom call re preparing for our reply brief and hearing	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
469	1/25/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon and B. Cooper re possibility of Cooper testifying at hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
470	1/25/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from B. Cooper with correction to exhibits; e-mail to co-counsel re filing same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
471	1/25/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Begin to review Alabama decision (225 pages)	2.3	\$725.00	\$1,667.50	20	\$300.00	\$475.00	\$690.00	\$1,092.50
472	1/25/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review B. Cooper declaration	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
473	1/26/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Plan/brainstorm for PPT for Feb 15 hearing on PI Brief.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
474	1/26/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review and respond to emails re corrected exhibits to Cooper's declaration in support of Motion for Preliminary Injunction.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
475	1/26/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	legal research, prep. memo re. Gingles 1 arguments for reply	3.5	\$650.00	\$2,275.00	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
476	1/26/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	legal research for response brief PI	1.5	\$350.00	\$525.00	8	\$165.00	\$300.00	\$247.50	\$450.00
477	1/26/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Draft e-mail to M. Barreto and K. Oskooii re upcoming tasks for reply brief; e-mails from/to/from D. Jeon re same; e-mails to/from M. Barreto and K. Oskooii re same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
478	1/26/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from M. Barreto to/from B. Cooper re effectiveness analysis	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
479	1/26/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from M. Mazzullo re correction to Cooper exhibits	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
480	1/26/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from M. Mazzullo and Y. Racheva re brainstorming for hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
481	1/26/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Read portion of Alabama opinion	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
482	1/27/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Brainstorm PPT ideas with Mike for upcoming hearing on Feb. 15.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
483	1/27/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft and send for review corrected exhibits to Cooper's declaration in support of Motion for Preliminary Injunction.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
484	1/27/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with Y. Racheva to discuss strategy re presentation at Preliminary Injunction hearing.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
485	1/27/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep memo on Gingles 1 issues	4.2	\$650.00	\$2,730.00	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
486	1/27/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Legal research for reply	3.1	\$350.00	\$1,085.00	8	\$165.00	\$300.00	\$511.50	\$930.00
487	1/27/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with Notice of corrected exhibits; e-mail from/to D.Jeon and B. Cooper re same; e-mails to/from Mazzullo and Jeon and call with M. Mazzullo re filing same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
488	1/27/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon wit F. Mullally memo re reply brief, review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
489	1/28/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Draft shell PPT and brainstorm on PPT for hearing with Mike and Andy.	1.2	\$502.00	\$602.40	1	\$150.00	\$225.00	\$180.00	\$270.00
490	1/28/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with Y. Racheva and A. Freedman to prepare presentation for hearing re Motion for Preliminary Injunction.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
491	1/28/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Submit notice of corrected exhibits for filing.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
492	1/28/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	review materials from Mullally; confer w/ Barreto re. same; phone w/ Mullally	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
493	1/28/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Research and prep memo	3.5	\$350.00	\$1,225.00	8	\$165.00	\$300.00	\$577.50	\$1,050.00
494	1/28/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to/from D. Jeon, M. Barreto, K. Oskooii re racial polarization	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
495	1/28/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with D. Jeon and F. Mullally re racial polarization	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
496	1/28/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Mazzullo and Y. Racheva re preparing PowerPoint for hearing	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
497	1/30/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Continue reviewing opinion granting preliminary injunction in Alabama, review our experts' declarations	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
498	1/31/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer w. clients, co-counsel re. opp to PI	1.7	\$650.00	\$1,105.00	20	\$300.00	\$475.00	\$510.00	\$807.50
499	1/31/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review Sun article re County Council elections; e-mails to/from D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
500	2/1/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Begin drafting reply in support of Motion for Preliminary Injunction.	3.2	\$536.00	\$1,715.20	4	\$150.00	\$225.00	\$480.00	\$720.00
501	2/1/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Develop reply to County opposition; related research and drafting.	8.3	\$760.00	\$6,308.00	20	\$300.00	\$475.00	\$2,490.00	\$3,942.50
502	2/1/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with A. Freedman and D. Jeon regarding drafting reply in support of Motion for Preliminary Injunction.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
503	2/1/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Plan draft of shell reply brief for PI motion.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
504	2/1/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review Defendants' response to PI Brief and draft Plaintiffs' Reply Brief shell.	1.1	\$502.00	\$552.20	1	\$150.00	\$225.00	\$165.00	\$247.50
505	2/1/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review PI opposition.	0.5	\$787.00	\$393.50	20	\$300.00	\$475.00	\$150.00	\$237.50
506	2/1/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	review opp to m/PI; legal research for same; correspond with clientst, experts and co-counsel re same	6.5	\$650.00	\$4,225.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
507	2/1/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	Researching and writing the case memo.	5	\$220.00	\$1,100.00	non-lawye	\$95.00	\$150.00	\$475.00	\$750.00
508	2/1/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	Background reading for memo.	1	\$220.00	\$220.00	non-lawye	\$95.00	\$150.00	\$95.00	\$150.00
509	2/1/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Read Defendants responses to complaint to prep for PI opp	3	\$350.00	\$1,050.00	8	\$165.00	\$300.00	\$495.00	\$900.00
510	2/1/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Voting rights research for response to defendants	2	\$350.00	\$700.00	8	\$165.00	\$300.00	\$330.00	\$600.00
511	2/1/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Baltimore County's opposition to motion for preliminary injunction; e-mail s re same from/to J. Freedman and D. Jeon; forward same to M. Barreto and K. Oskooii	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
512	2/1/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review Baltimore County's opposition memo and exhibits in support	2	\$725.00	\$1,450.00	20	\$300.00	\$475.00	\$600.00	\$950.00
513	2/1/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon (.4), then with D. Jeon and M. Mazzullo (.7) re our reply to County's opposition to motion for preliminary injunction	1.1	\$725.00	\$797.50	20	\$300.00	\$475.00	\$330.00	\$522.50
514	2/1/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Draft and send e-mails to M. Barreto and K. Oskooii, to C. Sydnor, and to T. Fugett, all re declarations in reply to County's expert and arguments	1.2	\$725.00	\$870.00	20	\$300.00	\$475.00	\$360.00	\$570.00
515	2/1/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to M. Colley re next steps in drafting reply brief	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
516	2/2/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft reply in support of Motion for Preliminary Injunction.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
517	2/2/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft reply in support of Motion for Preliminary Injunction.	1.7	\$536.00	\$911.20	4	\$150.00	\$225.00	\$255.00	\$382.50
518	2/2/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft reply in support of Motion for Preliminary Injunction.	3.8	\$536.00	\$2,036.80	4	\$150.00	\$225.00	\$570.00	\$855.00
519	2/2/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Meet w/ team to go over PI reply brief needs, status, to dos.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
520	2/2/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Meeting with Senator Sydnor re his declaration for PI Reply.	1.5	\$502.00	\$753.00	1	\$150.00	\$225.00	\$225.00	\$337.50
521	2/2/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with team regarding drafting reply in support of Motion for Preliminary Injunction.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
522	2/2/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Planning call with legal team; analysis, research and drafting re reply brief; telephone conferences with expert witnesses.	6.5	\$760.00	\$4,940.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
523	2/2/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review materials for meeting with Sen. Sydnor re his declaration.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
524	2/2/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer w/ clients, co-counsel, experts, court re. responde to opp to PI motion; legal, fact research re. same	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
525	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with Sen. Sydnor re reviewing maps, providing declaration	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
526	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Graves (Judge Griggsby's assistant) re live testimony at hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
527	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with co-counsel re reply brief	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
528	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with A. Trento re filing deadline	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
529	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon and M. Hill re declaration re County's failure to comply with housing Voluntary Compliance Agreement	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
530	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Barreto, K. Oskooii, and co-counsel re responding to Gimpel's expert report	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
531	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon to M. Graves re plaintiffs' witnesses' availability to testify; e-mail from A. Lias-Booker re cross-examination and re Gimpel's availability to testify, response from M. Graves	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
532	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review Cooper's maps vs. County's map	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
533	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to Sen. Sydnor re issues for him to review; call with Sen. Sydnor re same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
534	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with Sen. Sydnor, D. Jeon, and Y. Racheva re the ways each map affects westside communities, re racially polarized voting, and re Sydnor declaration	1.3	\$725.00	\$942.50	20	\$300.00	\$475.00	\$390.00	\$617.50
535	2/2/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Texts from/to C. Pasteur re potential declaration	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
536	2/3/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Call w/ Cheryl Pasteur re potential declaration in support of reply brief.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
537	2/3/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize Cheryl Pasteur declaration draft.	1.4	\$502.00	\$702.80	1	\$150.00	\$225.00	\$210.00	\$315.00
538	2/3/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize first draft of Sen. Sydnor declaration and send to team for further edits.	3.4	\$502.00	\$1,706.80	1	\$150.00	\$225.00	\$510.00	\$765.00
539	2/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with A. Freeman to discuss status.	0.3	\$536.00	\$160.80	4	\$150.00	\$225.00	\$45.00	\$67.50
540	2/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
541	2/3/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Planning call with legal team; analysis, research and drafting re reply brief; telephone conferences with expert witnesses; draft reply re Gingles I.	10.9	\$760.00	\$8,284.00	20	\$300.00	\$475.00	\$3,270.00	\$5,177.50
542	2/3/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review Andy edits to Pasteur declaration.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
543	2/3/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review newly drafted declarations for reply from Matt Hill, Charles Sydnor, and Cheryl Pasteur.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
544	2/3/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team check-in on status of reply brief and expert declarations. Follow-up meeting with Kassra on analysis of voting patterns and declaration drafting progress. Drafting Senator Sydnor declaration.	4.3	\$502.00	\$2,158.60	1	\$150.00	\$225.00	\$645.00	\$967.50
545	2/3/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI reply brief.	1.8	\$787.00	\$1,416.60	20	\$300.00	\$475.00	\$540.00	\$855.00
546	2/3/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep PI opp reply; confer with clients, co-counsel, witnesses and experts re. same; legal research, prep and review drafts of brief and declarations	6.8	\$650.00	\$4,420.00	20	\$300.00	\$475.00	\$2,040.00	\$3,230.00
547	2/3/2022	ACLU	Elsha Aemero	Paralegal	Motion for Preliminary Injunction	Case memo for PI filing	5	\$220.00	\$1,100.00	non-lawye	\$95.00	\$150.00	\$475.00	\$750.00
548	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with draft reply brief	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
549	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Team Zoom call re next steps on reply brief	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
550	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo and A&P production department re providing larger copies of maps to Judge Griggsby; call to M. Graves re same; e-mail to/from M. Mazzullo re same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
551	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re talking to K. Oskooii, B. Cooper, C. Pasteur	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
552	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with K. Oskooii re rebutting Gimpel	1.2	\$725.00	\$870.00	20	\$300.00	\$475.00	\$360.00	\$570.00
553	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with C. Pasteur and Y. Racheva re Pasteur's school board campaign, providing declaration	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
554	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with B. Cooper, D. Jeon, and M. Colley re additional maps and reply declaration from Cooper	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
555	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from Y. Racheva with draft Declaration of C. Sydnor; e-mail from D. Jeon with edits to same; edit same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
556	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to Sen. Sydnor with draft declaration; texts from/to Sen. Sydnor re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
557	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re reply brief	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
558	2/3/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from Y. Racheva with draft C. Pasteur declaration; edit same	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
559	2/3/2022	BGL	Marie Bauer	Paralegal	Motion for Preliminary Injunction	Determine which defendant cases are already downloaded to DMS in Plaintiff's cases folder and which ones are still needed	0.4	\$220.00	\$88.00	non-lawye	\$95.00	\$150.00	\$38.00	\$60.00
560	2/3/2022	BGL	Marie Bauer	Paralegal	Motion for Preliminary Injunction	Research cases cited by Defense in opposition; download cases; upload case to DMS; e-mail Andrew D. Freeman re uploaded cases	0.7	\$220.00	\$154.00	non-lawye	\$95.00	\$150.00	\$66.50	\$105.00
561	2/4/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Call with Cheryl Pasteur and Andy to discuss her brief but had to jump off to another meeting.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
562	2/4/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Early morning team status check on PI reply and declarations. Attempt to call Cheryl Pasteur re her declaration draft immediately after end of team call. Another brief team call to follow this afternoon.	0.7	\$502.00	\$351.40	1	\$150.00	\$225.00	\$105.00	\$157.50

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
563	2/4/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Final conversation with Cheryl Pasteur re her declaration. Final edits to her declaration.	1.4	\$502.00	\$702.80	1	\$150.00	\$225.00	\$210.00	\$315.00
564	2/4/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
565	2/4/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
566	2/4/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Planning calls with legal team; analysis, research and drafting re reply brief; telephone conference with Bill Cooper and draft declaration.	4.2	\$760.00	\$3,192.00	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
567	2/4/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise reply brief in support of Motion for Preliminary Injunction.	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
568	2/4/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise reply in support of Motion for Preliminary Injunction.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
569	2/4/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team check-in on PI reply and declarations.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
570	2/4/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep; reply brief; confer with clients, witnesses, experts and co-counsel re. same	7.9	\$650.00	\$5,135.00	20	\$300.00	\$475.00	\$2,370.00	\$3,752.50
571	2/4/2022	ACLU	Elsha Aemero	Paralegal	Motion for Preliminary Injunction	Correspond w/plaintiffs re hearing	1	\$220.00	\$220.00	non-lawye	\$95.00	\$150.00	\$95.00	\$150.00
572	2/4/2022	ACLU	Elsha Aemero	Paralegal	Motion for Preliminary Injunction	Prep memo on demographic and map changes.	6	\$220.00	\$1,320.00	non-lawye	\$95.00	\$150.00	\$570.00	\$900.00
573	2/4/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Review and edit plaintiffs reply brief	2	\$350.00	\$700.00	8	\$165.00	\$300.00	\$330.00	\$600.00
574	2/4/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Review and edit plaintiffs declarations for the response brief	1.5	\$350.00	\$525.00	8	\$165.00	\$300.00	\$247.50	\$450.00
575	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to B. Cooper re revised maps to combine Districts 1, 2, and 4 and map of % Black	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
576	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Team Zoom meeting re reply brief, supporting declarations	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
577	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit M. Hill declaration	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
578	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with C. Pasteur re her declaration	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
579	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Order from Judge Griggsby re schedule for February 15 hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
580	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Text from Sen. Sydnor re his declaration; e-mails to/from D. Jeon and Y.Racheva and to Sen. Sydnor re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
581	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon with M. Hill's revised declaration	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
582	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from B. Cooper and co-counsel re revising maps, second declaration	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
583	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Second and third calls with C. Pasteur and Y. Racheva re revisions to Pasteur declaration; e-mails to/from/to/from C. Pasteur with revisions to same	1.1	\$725.00	\$797.50	20	\$300.00	\$475.00	\$330.00	\$522.50
584	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with B. Cooper, D. Jeon, and M. Colley re revisions to maps for reply and re Cooper Second Declaration; edit Cooper Second Declaration	1.4	\$725.00	\$1,015.00	20	\$300.00	\$475.00	\$420.00	\$665.00
585	2/4/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit Plaintiffs' Reply Brief	2.1	\$725.00	\$1,522.50	20	\$300.00	\$475.00	\$630.00	\$997.50
586	2/5/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review circulated edits/updates of reply brief draft.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
587	2/5/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise reply in support of Motion for Preliminary Injunction.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
588	2/5/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Work on PI reply brief.	2.3	\$787.00	\$1,810.10	20	\$300.00	\$475.00	\$690.00	\$1,092.50
589	2/5/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep reply brief; confer with clients, witnesses,, co-counsel and experts re same;	6.5	\$650.00	\$4,225.00	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
590	2/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from B. Cooper with revised maps combining westside district borders and % Black; review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
591	2/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from J. Freedman with edits and comments to reply brief; review and edit same	2.5	\$725.00	\$1,812.50	20	\$300.00	\$475.00	\$750.00	\$1,187.50
592	2/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit C. Sydnor declaration, send same to Sydnor; review and edit M. Hill declaration; review and edit M. Barreto declaration; call with K. Oskooii re Barreto declaration	2	\$725.00	\$1,450.00	20	\$300.00	\$475.00	\$600.00	\$950.00
593	2/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Further edits to reply brief	1.3	\$725.00	\$942.50	20	\$300.00	\$475.00	\$390.00	\$617.50
594	2/5/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from co-counsel re declarations	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
595	2/6/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review and revise PI reply brief.	2.3	\$787.00	\$1,810.10	20	\$300.00	\$475.00	\$690.00	\$1,092.50
596	2/6/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review team updates to reply brief draft.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
597	2/6/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Revise and edit reply brief; misc. communications with legal team.	1.6	\$760.00	\$1,216.00	20	\$300.00	\$475.00	\$480.00	\$760.00
598	2/6/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise reply in support of Motion for Preliminary Injunction.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
599	2/6/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise Second Declaration of expert Matthew Barreto in support of Motion for Preliminary Injunction.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
600	2/6/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep reply brief; work with experts and co-counsel to prep exhibits; review and edit same	7.2	\$650.00	\$4,680.00	20	\$300.00	\$475.00	\$2,160.00	\$3,420.00
601	2/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Edit Barreto declaration, e-mails re same to/from K. Oskooii, further edits to same, e-mails to/from co-counsel re same	2.5	\$725.00	\$1,812.50	20	\$300.00	\$475.00	\$750.00	\$1,187.50
602	2/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from co-counsel with edits to reply brief, edit same	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
603	2/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Further e-mails re edits to Barreto declaration and reply brief	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
604	2/6/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail to co-counsel re deadline for naming witnesses	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
605	2/7/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Complete final revisions to reply papers in support of Motion for Preliminary Injunction.	3.8	\$536.00	\$2,036.80	4	\$150.00	\$225.00	\$570.00	\$855.00
606	2/7/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Final cite check of reply brief draft and update of Barreto and Pasteur declarations to fix mistakes.	2	\$502.00	\$1,004.00	1	\$150.00	\$225.00	\$300.00	\$450.00
607	2/7/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize PI reply brief & exhibits. Coordinate with Mike re sending courtesy copies.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
608	2/7/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review new SCOTUS ruling on Alabama VRA case that parallels ours and affects our arguments in upcoming hearing.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
609	2/7/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Review reply and related communications with legal team.	0.4	\$760.00	\$304.00	20	\$300.00	\$475.00	\$120.00	\$190.00
610	2/7/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep. reply; consult with clients, co-counsel, re. same; review Alabama ruling; confer re. same	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
611	2/7/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Review and edit final draft of response	2	\$350.00	\$700.00	8	\$165.00	\$300.00	\$330.00	\$600.00
612	2/7/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re edits to Barreto's second declaration, review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
613	2/7/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re edits to reply brief, review same, call with M. Mazzullo re finalizing same	1.7	\$725.00	\$1,232.50	20	\$300.00	\$475.00	\$510.00	\$807.50
614	2/7/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review Supreme Court's decision in Alabama case (.3); e-mails re same (.2)	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
615	2/8/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Coordinate courtesy copies & blown up Cooper exhibits to be sent to courthouse, Andy, and opposing counsel.	1.3	\$502.00	\$652.60	1	\$150.00	\$225.00	\$195.00	\$292.50
616	2/8/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	hearing.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
617	2/8/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Refile reply papers in support of Motion for Preliminary Injunction after initial filing returned by Clerk's quality control message.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
618	2/8/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Team meeting to discuss notices to judge, PPT presentation, Barreto testimony at hearing.	1.3	\$502.00	\$652.60	1	\$150.00	\$225.00	\$195.00	\$292.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
619	2/8/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer with clients, co-counsel re. case developments, Alabama ruling; prep. message re. same to clients	2.7	\$650.00	\$1,755.00	20	\$300.00	\$475.00	\$810.00	\$1,282.50
620	2/8/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	Prep memo for PI reply hearing	6	\$220.00	\$1,320.00	non-lawyer	\$95.00	\$150.00	\$570.00	\$900.00
621	2/8/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Mazzullo, Y. Racheva, and D. Jeon (who left early) re preparing for next week's hearing, notifying court re calling Barreto as witness	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
622	2/9/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Call with team & Matt & Kassra re strategy for Matt's testimony at next week's hearing. Review defendants' filing based on new SCOTUS Alabama ruling and our potential responses.	1.1	\$502.00	\$552.20	1	\$150.00	\$225.00	\$165.00	\$247.50
623	2/9/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Draft letter to Judge Griggsby re request to examine Dr. Barreto at Preliminary Injunction hearing.	1.1	\$536.00	\$589.60	4	\$150.00	\$225.00	\$165.00	\$247.50
624	2/9/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference to prepare Dr. Barreto for expert testimony.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
625	2/9/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	confer w. co-counsel, experts re. prep for court hearing	2.2	\$650.00	\$1,430.00	20	\$300.00	\$475.00	\$660.00	\$1,045.00
626	2/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from A. Trento re SBOE's position re timing; forward same to co-counsel	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
627	2/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Baltimore County's Notice of Supplemental Authority re Supreme Court's stay of Alabama case; review same; e-mails to/from co-counsel re responding to same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
628	2/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re preparing for hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
629	2/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re prep for M. Barreto testimony	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
630	2/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Barreto, K. Oskooii, and co-counsel re prep for Barreto testimony at hearing	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
631	2/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with draft letter to Judge Griggsby re Barreto testifying at hearing, edit same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
632	2/10/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: supplemental authority.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
633	2/10/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Develop response to Baltimore County supplemental authority and related research.	5	\$760.00	\$3,800.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
634	2/10/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review team correspondence re strategy meetings pre hearing next week.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
635	2/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise letter to Judge Griggsby re request to examine Dr. Barreto at Preliminary Injunction hearing and submit for filing.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
636	2/10/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Milligan.	1.8	\$536.00	\$964.80	4	\$150.00	\$225.00	\$270.00	\$405.00
637	2/10/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	Prep follow up memo.	4.5	\$220.00	\$990.00	non-lawyer	\$95.00	\$150.00	\$427.50	\$675.00
638	2/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails re our points for letter responding to County's notice of supplemental authority re Alabama stay	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
639	2/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review and edit draft response to County's notice of supplemental authority	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
640	2/10/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon with edits to letter to Judge Griggsby re Barreto testimony; e-mail from J. Freedman re same; edit same; e-mails from/to/from M. Mazzullo re filing same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
641	2/11/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: supplemental authority.	0.5	\$787.00	\$393.50	20	\$300.00	\$475.00	\$150.00	\$237.50
642	2/11/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	hearing.	2.2	\$502.00	\$1,104.40	1	\$150.00	\$225.00	\$330.00	\$495.00
643	2/11/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	witness perp with Tony Fugett; client communications; prep brief re. supplemental authority, review CoA order extending election deadlines	4.2	\$650.00	\$2,730.00	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
644	2/11/2022	ACLU	Elisha Aemero	Paralegal	Motion for Preliminary Injunction	Prep memo	7	\$220.00	\$1,540.00	non-lawyer	\$95.00	\$150.00	\$665.00	\$1,050.00
645	2/11/2022	ACLU	Tierney Pephrah	Staff Attorney	Motion for Preliminary Injunction	Meeting with Tony Fugett for hearing prep	1	\$650.00	\$350.00	8	\$165.00	\$300.00	\$165.00	\$300.00
646	2/11/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with edits to response to County's notice; edit same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
647	2/11/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from Y. Racheva, D. Jeon, M. Colley with edits to response to County's notice	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
648	2/11/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with A. Trento re schedule for Maryland state redistricting cases	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
649	2/12/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: supplemental authority.	0.2	\$787.00	\$157.40	20	\$300.00	\$475.00	\$60.00	\$95.00
650	2/12/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Draft PPT for Tuesday's PI hearing.	2.6	\$502.00	\$1,305.20	1	\$150.00	\$225.00	\$390.00	\$585.00
651	2/12/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Review and comment on draft supplemental authority response.	0.3	\$760.00	\$228.00	20	\$300.00	\$475.00	\$90.00	\$142.50
652	2/12/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Revise response to Baltimore County's supplemental authority and additional declarations.	2.1	\$536.00	\$1,125.60	4	\$150.00	\$225.00	\$315.00	\$472.50
653	2/12/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep. brief re. supplemental authority; review declarations and new filing	3.2	\$650.00	\$2,080.00	20	\$300.00	\$475.00	\$960.00	\$1,520.00
654	2/12/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review County's submission of declarations from councilmembers	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
655	2/12/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from D. Jeon with revisions to response to County's notice of supplemental authority	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
656	2/12/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from co-counsel re councilmembers' declarations, responding to same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
657	2/12/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Prepare for hearing	1.5	\$725.00	\$1,087.50	20	\$300.00	\$475.00	\$450.00	\$712.50
658	2/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Continue drafting PPT for upcoming PI hearing.	1.1	\$502.00	\$552.20	1	\$150.00	\$225.00	\$165.00	\$247.50
659	2/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Continue drafting/editing PPT for upcoming PI hearing.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
660	2/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Edit PPT for PI hearing on Tuesday and send to Mike M. for review and additional edits.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
661	2/13/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize PPT for PI hearing with Andy and Mike. Meetings/calls re same going through entire PPT and making final edits.	8.1	\$502.00	\$4,066.20	1	\$150.00	\$225.00	\$1,215.00	\$1,822.50
662	2/13/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conference with A. Freeman to prepare presentation for Preliminary Injunction hearing.	3.5	\$536.00	\$1,876.00	4	\$150.00	\$225.00	\$525.00	\$787.50
663	2/13/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Review and revise response regarding supplemental authority.	0.5	\$760.00	\$380.00	20	\$300.00	\$475.00	\$150.00	\$237.50
664	2/13/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Revise response to supplemental authority brief.	2.3	\$787.00	\$1,810.10	20	\$300.00	\$475.00	\$690.00	\$1,092.50
665	2/13/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep and edit drafts of brief re. supplemental authority, declarations; client communications re. samel	4.9	\$650.00	\$3,185.00	20	\$300.00	\$475.00	\$1,470.00	\$2,327.50
666	2/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from J. Freedman with revisions to response to County's supplemental authority and declarations; review and edit same	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
667	2/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with M. Mazzullo and Y. Racheva to revise PowerPoint for hearing, discuss my opening statement and examination of M. Barreto	3.5	\$725.00	\$2,537.50	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
668	2/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from D. Jeon and M. Colley with edits to response to County's supplemental authority	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
669	2/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Colley with motion for leave to file response; review and edit same	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
670	2/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from Y. Racheva with revised PowerPoint; review and edit same; call with Y. Racheva re same; e-mails from Y. Racheva and D. Jeon with further edits to same	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
671	2/13/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Prepare for hearing	2.4	\$725.00	\$1,740.00	20	\$300.00	\$475.00	\$720.00	\$1,140.00
672	2/14/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Confer re: oral argument plan.	0.4	\$787.00	\$314.80	20	\$300.00	\$475.00	\$120.00	\$190.00

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
673	2/14/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Finalize and file Pltfs Mtn for Leave to File Response to Def's Notice of Supplemental Authority. Edit PPT for Hearing. Meet with Andy, Mike and Debbie re same. Review interim settlement offer from Defs and emails with team re same.	5	\$502.00	\$2,510.00	1	\$150.00	\$225.00	\$750.00	\$1,125.00
674	2/14/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in video conferences with A. Freeman to prepare argument/presentation for Preliminary Injunction hearing.	3.6	\$536.00	\$1,929.60	4	\$150.00	\$225.00	\$540.00	\$810.00
675	2/14/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep for court hearing; meetings with co-counsel and witnesses	8.5	\$650.00	\$5,525.00	20	\$300.00	\$475.00	\$2,550.00	\$4,037.50
676	2/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Prepare for hearing	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
677	2/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Prepare for hearing	1.8	\$725.00	\$1,305.00	20	\$300.00	\$475.00	\$540.00	\$855.00
678	2/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom calls (2) with M. Barreto, et al., to review Barreto's testimony for hearing (note: I missed part of call while on the phone with A. Lias-Booker)	1.8	\$725.00	\$1,305.00	20	\$300.00	\$475.00	\$540.00	\$855.00
679	2/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to M. Graves re witnesses at hearing, non-sequestration	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
680	2/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Zoom call with D. Jeon, M. Mazzullo, and Y. Racheva to review PowerPoint and prepare presentation for tomorrow's hearing	2.2	\$725.00	\$1,595.00	20	\$300.00	\$475.00	\$660.00	\$1,045.00
681	2/14/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Mazzullo with draft e-mail to deputy clerk re witnesses and exhibits	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
682	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Call from A. Lias-Booker re possible settlement	0.9	\$725.00	\$652.50	20	\$300.00	\$475.00	\$270.00	\$427.50
683	2/14/2022	BGL	Andrew Freeman	Partner	ADR	E-mail to co-counsel re call from A. Lias-Booker re possible settlement	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
684	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Draft e-mail to A. Lias-Booker summarizing terms of possible settlement (.5); e-mails to/from D. Jeon and J. Freedman re same; revise same; call with D. Jeon re same; finalize and send same to A. Lias-Booker, et al. (.7)	1.2	\$725.00	\$870.00	20	\$300.00	\$475.00	\$360.00	\$570.00
685	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Second call from A. Lias-Booker and M. Martinez re possible settlement	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
686	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Draft second e-mail to A. Lias-Booker re terms of settlement (.5); e-mails to/from D. Jeon and J. Freedman re same; revise same, further e-mails re responding to County's proposal (.6)	1.1	\$725.00	\$797.50	20	\$300.00	\$475.00	\$330.00	\$522.50
687	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Third call from A. Lias-Booker re settlement (.4), e-mail to co-counsel re same (.2)	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
688	2/15/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Attend oral argument; debrief.	2	\$787.00	\$1,574.00	20	\$300.00	\$475.00	\$600.00	\$950.00
689	2/15/2022	A&P	Colley, Mark D.	Partner	Motion for Preliminary Injunction	Attend PI Hearing and follow up debriefing.	4.2	\$760.00	\$3,192.00	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
690	2/15/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Correspond via email and telephone with team as part of final preparation for in Preliminary Injunction hearing before Judge Griggsby.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
691	2/15/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Email and e-file presentation that was used in Preliminary Injunction hearing before Judge Griggsby.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
692	2/15/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Final prep for & attend court hearing on Pltfs PI Brief. Post-hearing debrief with team.	5.5	\$502.00	\$2,761.00	1	\$150.00	\$225.00	\$825.00	\$1,237.50
693	2/15/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in Preliminary Injunction hearing before Judge Griggsby.	3.9	\$536.00	\$2,090.40	4	\$150.00	\$225.00	\$585.00	\$877.50
694	2/15/2022	ACLU	Debbie Jeon	Legal Director	Motion for Preliminary Injunction	prep for, attend and debrief from court hearing on PI motion; emails to/from clients and co-counsel re. same	7.5	\$650.00	\$4,875.00	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
695	2/15/2022	ACLU	Elsha Aemero	Paralegal	Motion for Preliminary Injunction	Redistricting memo and attend court hearing for the Baltimore County redistricting case.	6	\$220.00	\$1,320.00	non-lawyer	\$95.00	\$150.00	\$570.00	\$900.00
696	2/15/2022	ACLU	Tierney Peprah	Staff Attorney	Motion for Preliminary Injunction	Baltimore County Redistricting hearing	3	\$650.00	\$1,050.00	8	\$165.00	\$300.00	\$495.00	\$900.00
697	2/15/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Prepare for hearing	5	\$725.00	\$3,625.00	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
698	2/15/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Hearing on motion for preliminary injunction	3.4	\$725.00	\$2,465.00	20	\$300.00	\$475.00	\$1,020.00	\$1,615.00
699	2/15/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Post-hearing Zoom call with co-counsel and clients	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
700	2/16/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer with co-counsel and clients re. next steps	1.6	\$650.00	\$1,040.00	20	\$300.00	\$475.00	\$480.00	\$760.00
701	2/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re yesterday's hearing, next steps	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
702	2/16/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review Maryland Matters and Baltimore Sun articles re yesterday's hearing	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
703	2/17/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Follow up on oral argument.	0.5	\$787.00	\$393.50	20	\$300.00	\$475.00	\$150.00	\$237.50
704	2/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from D. Jeon re schedule in state redistricting cases, possible notice of supplemental authority re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
705	2/17/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with A. Trento re schedule in state redistricting cases	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
706	2/18/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with C. Sydnor re status and next steps	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
707	2/19/2022	ACLU	Debbie Jeon	Legal Director	Case Development	secure and review court transcript of hearing; phone, email to/from clients re. case status	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
708	2/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Notice of preparation of transcript	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
709	2/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails to/from M. Clarke (court reporter) re ordering transcript	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
710	2/19/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mail from M. Clarke with transcript, forward same to co-counsel	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
711	2/21/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review and revise letter to court.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
712	2/22/2022	A&P	Freedman, John A.	Senior Counsel	Motion for Preliminary Injunction	Review decision and email to team.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
713	2/22/2022	A&P	Racheva, Youlia S.	Associate	Motion for Preliminary Injunction	Review Judge Griggsby's order granting our PI Motion.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
714	2/22/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Review opinion from Judge Griggsby granting Motion for Preliminary Injunction.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
715	2/22/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review court ruling; confer w/ clients and co-counsel re. same	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
716	2/22/2022	ACLU	Tierney Peprah	Staff Attorney	Case Development	Read court opinion Baltimore County redistricting	1.5	\$650.00	\$525.00	8	\$165.00	\$300.00	\$247.50	\$450.00
717	2/22/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to clients and experts re opinion	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
718	2/22/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Read Judge Griggsby's opinion granting preliminary injunction	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
719	2/22/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with D. Jeon re opinion, next steps	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
720	2/23/2022	A&P	Mazzullo, Michael L.	Associate	Motion for Preliminary Injunction	Participate in telephone conference with A. Freeman to discuss potential next steps in action.	0.3	\$536.00	\$160.80	4	\$150.00	\$225.00	\$45.00	\$67.50
721	2/23/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Call with M. Mazzullo re preparing for potential next steps	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
722	2/23/2022	BGL	Andrew Freeman	Partner	ADR	Call re potential settlement	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
723	2/23/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon and clients re next steps	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
724	2/23/2022	BGL	Andrew Freeman	Partner	ADR	Call re potential settlement	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
725	2/24/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review County Executive's statement re redistricting	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
726	2/24/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Review County Executive's statement re redistricting	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
727	2/28/2022	ACLU	Debbie Jeon	Legal Director	Response to Court's Order	check in with clients and partners	0.8	\$650.00	\$520.00	20	\$300.00	\$475.00	\$240.00	\$380.00
728	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order		0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
729	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call with D. Jeon re next steps, preparation in case of new map or in case of appeal	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
730	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails re Baltimore County's next steps, tonight's council hearing	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
731	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails between D. Jeon and K. Oskooii re readiness for performance review of any new map	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
732	3/2/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Call re: next steps and County compliance.	0.7	\$787.00	\$550.90	20	\$300.00	\$475.00	\$210.00	\$332.50
733	3/2/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in video conference with team to discuss potential next steps in action.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
734	3/2/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Review team updates re check in meeting, newest filings, state court's decision not to appoint Gimpel as advisor.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
735	3/2/2022	ACLU	Debbie Jeon	Legal Director	Response to Court's Order	confer w/ clients and co-counsel; team strategy call	1.7	\$650.00	\$1,105.00	20	\$300.00	\$475.00	\$510.00	\$807.50
736	3/2/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from D. Jeon re preparing for County's next steps; call with D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
737	3/2/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Zoom call with D. Jeon, J. Freedman, M. Mazzullo, T. Fugett re possible next steps	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
738	3/4/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Voice mail message to A. Lias-Booker; texts to/from A. Lias-Booker re status of County Council drawing a new map	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
739	3/4/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mail from D. Jeon with County's retainer agreement with McGuire Woods and January bill from same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
740	3/4/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Draft e-mail to A. Lias-Booker inquiring re status; forward same to co-counsel	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
741	3/5/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from D. Jeon and J. Freedman re my draft e-mail to A. Lias-Booker inquiring re status of County's new map; edit, finalize, and send same to A. Lias-Booker, et al.	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
742	3/5/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Voice mail message to A. Lias-Booker and J. Benjamin inquiring re status of map	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
743	3/6/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from/to M. Barretto, D. Jeon re next steps	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
744	3/7/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Drafting portion of joint status letter to Court in accordance with Court's preliminary injunction order.	2.1	\$536.00	\$1,125.60	4	\$150.00	\$225.00	\$315.00	\$472.50
745	3/7/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in telephone conference with A. Freeman and D. Jeon team to discuss next steps in drafting portion of joint status letter to Court.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
746	3/7/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Review updates from Andy re conversations with defense counsel and status notification due to court.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
747	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call from A. Lias-Booker and M. Martinez re status report and map due tomorrow	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
748	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call to K. Oskooii re anticipated receipt of map tomorrow	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
749	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Draft e-mail to co-counsel re my call with A. Lias-Booker and M. Martinez, with draft e-mail to Lias-Booker and Martinez requesting map and data	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
750	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from/to co-counsel re edits to A. Lias-Booker and M. Martinez requesting precinct data and shapefiles for Council's new proposed map; edit same	1.8	\$725.00	\$1,305.00	20	\$300.00	\$475.00	\$540.00	\$855.00
751	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call with D. Jeon and M. Mazzullo re responding to County re details of new map, drafting plaintiffs' portion of status report re how the matter should proceed	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
752	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails to/from B. Cooper re plaintiff's shapefiles; e-mail from B. Cooper with same; e-mail to A. Lias-Booker and M. Martinez re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
753	3/8/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Attention to County compliance and confer team re: same.	1.8	\$787.00	\$1,416.60	20	\$300.00	\$475.00	\$540.00	\$855.00
754	3/8/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Edit draft status report; analysis and drafting on response to County motion arguments/cases.	2.1	\$760.00	\$1,596.00	20	\$300.00	\$475.00	\$630.00	\$997.50
755	3/8/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Injunction.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
756	3/8/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Review team emails re Defendant's status report and motion enclosing new proposed map.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
757	3/8/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Revise status report to Court in accordance with Court's preliminary injunction order.	1.1	\$536.00	\$589.60	4	\$150.00	\$225.00	\$165.00	\$247.50
758	3/8/2022	ACLU	Debbie Jeon	Legal Director	Response to Court's Order	confer w/ clients and co-counsel re. case filing, how to respond	3.4	\$650.00	\$2,210.00	20	\$300.00	\$475.00	\$1,020.00	\$1,615.00
759	3/8/2022	ACLU	Tierney Peprah	Staff Attorney	Response to Court's Order	legal research	1	\$650.00	\$350.00	8	\$165.00	\$300.00	\$165.00	\$300.00
760	3/8/2022	ACLU	Tierney Peprah	Staff Attorney	Response to Court's Order	Reviewed plaintiffs and defendants status report to the court	0.5	\$350.00	\$175.00	8	\$165.00	\$300.00	\$82.50	\$150.00
761	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from M. Mazzullo and D. Jeon with draft plaintiffs' section of joint status report; edit same	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
762	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Draft e-mail to A. Lias-Booker and M. Martinez again requesting defendants' section of joint status report and map data	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
763	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call with M. Mazzullo re edits to joint status report; e-mails to/from M. Mazzullo and D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
764	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Edits to status report from M. Mazzullo, D. Jeon, J. Freedman, M. Colley; further edits by me, finalize and file	1.2	\$725.00	\$870.00	20	\$300.00	\$475.00	\$360.00	\$570.00
765	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from D. Jeon to clients re today's filing, e-mails from clients in response	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
766	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mail from A. Lias-Booker re County's proposed draft joint status report and next steps, review same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
767	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mail from M. Graves re scheduling conference call with Judge Griggsby for Friday	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
768	3/9/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Attention to County proposed map; confer team re: same; work on response.	2.4	\$787.00	\$1,888.80	20	\$300.00	\$475.00	\$720.00	\$1,140.00
769	3/9/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Develop and draft response to County motion/new map; related research and communications.	6	\$760.00	\$4,560.00	20	\$300.00	\$475.00	\$1,800.00	\$2,850.00
770	3/9/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Defendants' revised map. Review Defendant's Motion including the revised map and exhibits in support.	1.8	\$502.00	\$903.60	1	\$150.00	\$225.00	\$270.00	\$405.00
771	3/9/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in video conference to discuss strategy for responding to Baltimore County's motion to modify the preliminary injunction.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
772	3/9/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Research and draft report to Court on whether Baltimore County's newly-proposed map is compliant with the Voting Rights Act/Court's prior order.	3.6	\$536.00	\$1,929.60	4	\$150.00	\$225.00	\$540.00	\$810.00
773	3/9/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Research question of remedy when non-compliant map is proposed [.9], provide research to team re same [.3], and review Court's Order/correspondence regarding March 11, 2022 conference [.2].	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
774	3/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Baltimore County's Status Report and motion for approval of new map (filed last night)	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
775	3/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from co-counsel re draft response to County's new proposal	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
776	3/10/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Develop and draft response to County motion/new map; related research and communications.	1.4	\$760.00	\$1,064.00	20	\$300.00	\$475.00	\$420.00	\$665.00
777	3/10/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Report.	6.3	\$502.00	\$3,162.60	1	\$150.00	\$225.00	\$945.00	\$1,417.50
778	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Draft and review emails with internal team on March 10, 2022 status letter on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
779	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in telephone conferences with A. Freeman re March 10, 2022 status letter on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	0.3	\$536.00	\$160.80	4	\$150.00	\$225.00	\$45.00	\$67.50
780	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	and expert declarations on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
781	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Revise and prepare for filing Third Barreto Declaration in support of March 10, 2022 status letter on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
782	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Revise and prepare for filing Third Cooper Declaration (and exhibits) in support of March 10, 2022 status letter on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
783	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Revise report to Court on whether Baltimore County's newly-proposed map is compliant with the Voting Rights Act/Court's prior order.	3.2	\$536.00	\$1,715.20	4	\$150.00	\$225.00	\$480.00	\$720.00
784	3/10/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Work on response to County map, including reviewing and revising submission.	3.1	\$787.00	\$2,439.70	20	\$300.00	\$475.00	\$930.00	\$1,472.50
785	3/10/2022	BGL	Andrew Freeman	Partner	Pleadings	Edit Status Report (1.5), call with M. Mazzullo re same (.1)	1.6	\$725.00	\$1,160.00	20	\$300.00	\$475.00	\$480.00	\$760.00
786	3/11/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Analyze strategy for drafting supplemental brief in accordance with Court's March 11, 2022 Order.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
787	3/11/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Attend court status conference on parties' status reports re Defendants' revised map. Debrief with Pltfs team re same. Team emails re same. Begin drafting Pltfs' brief in response to Defs motion for approval of map and to revise preliminary injunction.	1.7	\$502.00	\$853.40	1	\$150.00	\$225.00	\$255.00	\$382.50
788	3/11/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Draft Plaintiffs' supplemental brief in preparation for March 21 hearing. Call with M. Mazzullo re same.	3.2	\$502.00	\$1,606.40	1	\$150.00	\$225.00	\$480.00	\$720.00
789	3/11/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Meet with team to prepare for today's court status conference.	0.7	\$502.00	\$351.40	1	\$150.00	\$225.00	\$105.00	\$157.50
790	3/11/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in telephone conference with Y. Racheva to discuss next steps in drafting supplemental brief in accordance with Court's March 11, 2022 Order.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
791	3/11/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Prep for hearing; hearing; follow up re: same.	3.5	\$787.00	\$2,754.50	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
792	3/11/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Prepare for and participate in Court conference re whether Baltimore County's newly-proposed map is compliant with the Voting Rights Act/Court's prior order.	2.6	\$536.00	\$1,393.60	4	\$150.00	\$225.00	\$390.00	\$585.00
793	3/11/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Telephone conference with legal team in advance of hearing; court status conference.	1.8	\$760.00	\$1,368.00	20	\$300.00	\$475.00	\$540.00	\$855.00
794	3/25/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer with clients and co-counsel re. next steps	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
795	3/29/2022	ACLU	Debbie Jeon	Legal Director	Case Development	client communications	0.9	\$650.00	\$585.00	20	\$300.00	\$475.00	\$270.00	\$427.50
796	3/30/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer with clients re. next steps	1.3	\$650.00	\$845.00	20	\$300.00	\$475.00	\$390.00	\$617.50
797	3/31/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft email to Y. Racheva and begin reviewing caselaw on issue of recovering attorneys' fees.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
798	3/31/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in video conference with team to discuss next steps.	0.1	\$536.00	\$53.60	4	\$150.00	\$225.00	\$15.00	\$22.50
799	3/31/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Team call re: next step.	0.8	\$787.00	\$629.60	20	\$300.00	\$475.00	\$240.00	\$380.00
800	3/31/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Team meeting re next steps. Research "prevailing party" case law re claiming attorney's fees after win on preliminary injunction but before a final judgment.	2.1	\$502.00	\$1,054.20	1	\$150.00	\$225.00	\$315.00	\$472.50
801	3/31/2022	A&P	Colley, Mark D.	Partner	Fee Petition	Telephone conference with legal team regarding strategy for next steps/options.	0.6	\$760.00	\$456.00	20	\$300.00	\$475.00	\$180.00	\$285.00
802	3/31/2022	ACLU	Debbie Jeon	Legal Director	Case Development	team call and follow up research re. next steps	2.3	\$650.00	\$1,495.00	20	\$300.00	\$475.00	\$690.00	\$1,092.50
803	3/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re research re fees for obtaining preliminary injunction and permanent change	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
804	4/1/2022	ACLU	Debbie Jeon	Legal Director	Case Development	client meeting	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
805	4/1/2022	ACLU	Elsha Aemero	Paralegal	Case Development	Debrief and Next Steps Meeting w/clients	1	\$220.00	\$220.00	non-lawye	\$95.00	\$150.00	\$95.00	\$150.00
806	4/1/2022	ACLU	Tierney Peprah	Staff Attorney	Case Development	client meeting	1.6	\$650.00	\$560.00	8	\$165.00	\$300.00	\$264.00	\$480.00
807	4/4/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Research "prevailing party" case law in civil rights fee reimbursement cases post preliminary injunction but pre final judgment.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
808	4/5/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	payment.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
809	4/7/2022	ACLU	Amy Cruice	Paralegal	Fee Petition	Case hours and fees for fee letter	0.5	\$220.00	\$110.00	non-lawye	\$95.00	\$150.00	\$47.50	\$75.00
810	4/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with ACLU fees through March	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
811	4/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from J. Freedman with A&P fees and hours through March	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
812	4/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft quarterly fee letter	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
813	4/8/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize quarterly fee letter	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
814	4/8/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker, et al. with quarterly fee letter	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
815	4/13/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Research fourth circuit law on whether a plaintiff can be a "prevailing party" for purpose of fee shifting after winning PI but before final judgment.	1.2	\$502.00	\$602.40	1	\$150.00	\$225.00	\$180.00	\$270.00
816	4/14/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Legal research on fourth circuit precedent re whether a plaintiff prevailing on a PI can be considered a 'prevailing party' for the purpose of fees. Email to team re same.	5.9	\$502.00	\$2,961.80	1	\$150.00	\$225.00	\$885.00	\$1,327.50
817	4/14/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Rachova with memo re attorneys' fees for preliminary injunction; review attached cases (Stinnie, Smyth, Veasy, Lefemine); e-mail to co-counsel re same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
818	4/15/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	same.	1.7	\$502.00	\$853.40	1	\$150.00	\$225.00	\$255.00	\$382.50
819	4/15/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from D. Jeon and Y. Racheva re caselaw re attorneys' fees for successful preliminary injunction	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
820	4/22/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Freedman and Freeman re. case strategy; prep client correspondence re. same	1.5	\$650.00	\$975.00	20	\$300.00	\$475.00	\$450.00	\$712.50
821	4/22/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon and J. Freedman re next steps, fee petition	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
822	4/25/2022	BGL	Andrew Freeman	Partner	Pleadings	E-mail from A. Nichols with draft Stipulation of Dismissal; review same; e-mails from/to D. Jeon re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
823	4/25/2022	BGL	Andrew Freeman	Partner	Pleadings	Edit BOE's draft stipulation of dismissal; e-mail to co-counsel re same; finalize and send to defense counsel	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
824	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo re preparing status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
825	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from D. Jeon re reaching out to defense counsel re next steps, status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
826	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon re sending e-mail to attorneys for County re next steps; draft e-mail re same and send to co-counsel	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
827	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise and send e-mail to defense counsel re next steps re wrapping up case and motion for attorneys' fees	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
828	4/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review Fourth Circuit's new decision in Grabarczyk	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
829	4/27/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ co-counsel, review drafts re. joint status report; payment of experts	1.1	\$650.00	\$715.00	20	\$300.00	\$475.00	\$330.00	\$522.50
830	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker and M. Martinez re preparing status report	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
831	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Lias-Booker re status report, dismissal, and attorneys' fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
832	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from/to/from co-counsel re responding to County re status report	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
833	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft response to A. Lias-Booker re stipulation re fee negotiation and potential dismissal	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
834	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review appellant's briefs in Stinnie v. Holcomb re attorneys' fees for preliminary injunction	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
835	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman with edits to response to A. Lias-Booker's e-mail re status report and next steps	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
836	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re preparing status report	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
837	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit, finalize, and send e-mail to A. Lias-Booker re next steps, negotiation or mediation of attorneys' fees	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
838	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Lias-Booker re County's refusal to negotiate or mediate re fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
839	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker re status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
840	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Colley with draft statement for status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
841	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft Plaintiffs' statement for status report	1.3	\$725.00	\$942.50	20	\$300.00	\$475.00	\$390.00	\$617.50
842	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon re revisions to status report	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
843	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise Plaintiffs' draft status report, send to co-counsel	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
844	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit multiple drafts of Plaintiffs' section of status report; multiple e-mails from and to M. Martinez re shell of Joint Status Report and process for filing; finalize Joint Status Report with Plaintiffs' section included and send to M. Martine	2.3	\$725.00	\$1,667.50	20	\$300.00	\$475.00	\$690.00	\$1,092.50
845	5/2/2022	ACLU	Tierney Peprah	Staff Attorney	Case Development	Reviewed status report	0.5	\$650.00	\$175.00	8	\$165.00	\$300.00	\$82.50	\$150.00
846	5/4/2022	BGL	Andrew Freeman	Partner	Fee Petition	Listen to portion of 4th Circuit oral argument in Stinnie	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
847	5/5/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	attend Stinnie hearing; conter with Freeman re. same	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
848	5/5/2022	BGL	Andrew Freeman	Partner	Case Development	Review Baltimore County's status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
849	5/6/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review draft brief sections.	0.4	\$787.00	\$314.80	20	\$300.00	\$475.00	\$120.00	\$190.00
850	5/8/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review and comment on draft brief.	2.5	\$787.00	\$1,967.50	20	\$300.00	\$475.00	\$750.00	\$1,187.50
851	5/9/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review court ruling, prep client correspondence re. same	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
852	5/9/2022	BGL	Andrew Freeman	Partner	Fee Petition	Court's Order dismissing case and setting schedule for fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
853	5/12/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft/review emails with Y. Racheva on attorneys' fees petition and participate in telephone conference with Y. Racheva re same.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
854	5/12/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Meet with team to discuss next steps for fee petition. Call with M. Mazzullo re same. Emails re same.	1.3	\$502.00	\$652.60	1	\$150.00	\$225.00	\$195.00	\$292.50
855	5/12/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Team call re: fee petition.	0.6	\$787.00	\$472.20	20	\$300.00	\$475.00	\$180.00	\$285.00
856	5/12/2022	ACLU	Amy Cruice	Paralegal	Fee Petition	fee petition plans and prep	1	\$220.00	\$220.00	non-lawyer	\$95.00	\$150.00	\$95.00	\$150.00
857	5/12/2022	ACLU	Tierney Peprah	Staff Attorney	Fee Petition	Petition strategy Meeting w/co-counsel re fee petition	1	\$650.00	\$350.00	8	\$165.00	\$300.00	\$165.00	\$300.00
858	5/12/2022	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re preparing fee motion and memo	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
859	5/12/2022	BGL	Andrew Freeman	Partner	Fee Petition	Research re serving subpoena for defendant's attorneys' billing records	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
860	5/13/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft subpoena to McGuireWoods for billing rates.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
861	5/17/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Emails with team re draft of subpoena to McGuireWoods re fees. Review case law on topic forwarded by A. Freeman.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
862	5/17/2022	BGL	Andrew Freeman	Partner	Fee Petition	Research re subpoena for opponent's fee records	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
863	5/18/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	same.	0.7	\$502.00	\$351.40	1	\$150.00	\$225.00	\$105.00	\$157.50
864	5/18/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	fees.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
865	5/18/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with Y. Racheva re subpoena and cover letter to County re fees	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
866	5/19/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft letter to opposing counsel requesting billing and time keeping records.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
867	5/20/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with Y. Racheva re letter to Defendant Baltimore County on our fee petition enclosing subpoena (.40), and provide revisions to draft letter and revert to Y. Racheva (.90).	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
868	5/20/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft letter to opposing counsel requesting billing rates and times. Conduct legal research for same.	3	\$502.00	\$1,506.00	1	\$150.00	\$225.00	\$450.00	\$675.00
869	5/21/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on letter re: fee demand and subpoena.	0.8	\$787.00	\$629.60	20	\$300.00	\$475.00	\$240.00	\$380.00
870	5/21/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit billing records to exercise billing judgment	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
871	5/21/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva (from yesterday evening) with draft letter to defense counsel re fees, discovery of defense fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
872	5/21/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from D. Jeon and J. Freedman re edits to letter to defense counsel re whether contesting reasonableness of plaintiffs' rates and hours	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
873	5/22/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit letter to defense counsel re possible discovery of their rates and hours	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
874	5/23/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise letter to opposing counsel requesting billing rates and records.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
875	5/23/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit correspondence to McGuire Woods re. fees and subpoena	0.8	\$650.00	\$520.00	20	\$300.00	\$475.00	\$240.00	\$380.00
876	5/23/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with further edits to letter to defense counsel re discovery relating to fees; review same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
877	5/23/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re additional tasks re letter to defense counsel re fee discovery	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
878	5/23/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit time records for fee petition	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
879	5/26/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise letter to opposing counsel seeking production of billing rates.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
880	5/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise letter to defense counsel re discovery re their fees	1.9	\$725.00	\$1,377.50	20	\$300.00	\$475.00	\$570.00	\$902.50
881	5/27/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise draft letter and subpoenas to Baltimore County re reasonableness of rates/hours, participate in telephone conference with A. Freeman re same.	1.3	\$536.00	\$696.80	4	\$150.00	\$225.00	\$195.00	\$292.50
882	5/27/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on fee letter.	0.1	\$787.00	\$78.70	20	\$300.00	\$475.00	\$30.00	\$47.50
883	5/27/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit letter with subpoenas for fee records; phone w/ Freeman re. same	1.1	\$650.00	\$715.00	20	\$300.00	\$475.00	\$330.00	\$522.50
884	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon and J. Freedman with edits to cover letter with subpoenas to McGuireWoods and County re attorneys' bills and related documents	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
885	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from C. McLamb with BGL time divided between fees sought and not sought; review same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
886	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit letter to defense counsel and subpoenas	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
887	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call from M. Mazzullo re final edits to letter re subpoena; e-mail from M. Mazzullo with edits to same, review and accept same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
888	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with M. Mazzullo re preparing interrogatories and document requests to County re County's fees; edit same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
889	5/30/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft First Set of Requests for Production and Interrogatories to Baltimore County re fee petition.	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
890	5/31/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Research and review example motions for attorneys' fees. Email with D. Jeon and A. Freeman re same. Review draft requests for production to Baltimore County in preparation for fee petition.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
891	5/31/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit subpoena	0.5	\$650.00	\$325.00	20	\$300.00	\$475.00	\$150.00	\$237.50
892	5/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo with draft discovery requests re County's fees; edit same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
893	5/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon and Y. Racheva re finalizing discovery requests re County's fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
894	6/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise, finalize, and send interrogatories and document requests to Baltimore County re McGuire Woods' fees	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
895	6/2/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft motion for attorneys' fees. Emails with team revising same.	1.9	\$502.00	\$953.80	1	\$150.00	\$225.00	\$285.00	\$427.50
896	6/2/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise Motion for Award of Reasonable Attorneys' Fees and Litigation Expenses and correspond with Y. Racheva and internal team re same.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
897	6/3/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review motion for fees.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
898	6/3/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise Motion for Award of Reasonable Attorneys' Fees and Litigation Expenses and correspond with Y. Racheva and internal team re same.	0.7	\$536.00	\$375.20	4	\$150.00	\$225.00	\$105.00	\$157.50
899	6/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re edits to motion for attorneys' fees, review and edit same and circulate edits	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
900	6/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re time periods and tasks to include in request for fees	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
901	6/6/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Finalize and submit for filing Plaintiffs' motion for fees.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
902	6/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo with revised motion for attorneys' fees; review and edit same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
903	6/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon re McGuireWoods' hourly rates	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
904	6/7/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Meet with team re next steps for drafting fee petition due July 11.	0.9	\$502.00	\$451.80	1	\$150.00	\$225.00	\$135.00	\$202.50
905	6/7/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in video conference with internal team re fee petition strategy and memorialize next steps and action items re same.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
906	6/7/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Team call re: fee petition.	0.8	\$787.00	\$629.60	20	\$300.00	\$475.00	\$240.00	\$380.00
907	6/7/2022	A&P	Colley, Mark D.	Partner	Fee Petition	Telephone conference with team regarding attorneys fee recovery.	0.7	\$760.00	\$532.00	20	\$300.00	\$475.00	\$210.00	\$332.50
908	6/7/2022	ACLU	Amy Cruice	Paralegal	Fee Petition	meeting and prep re fee petition	0.8	\$220.00	\$176.00	non-lawye	\$95.00	\$150.00	\$76.00	\$120.00
909	6/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re planning for fee petition	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
910	6/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to Michael Gill re research re McGuireWoods' hourly rates	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
911	6/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Research re McGuireWoods' billing rates	0.7	\$725.00	\$507.50	20	\$300.00	\$475.00	\$210.00	\$332.50
912	6/10/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call to M. Mazzullo re research re McGuireWoods' billing rates; e-mails to/from M. Mazzullo re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
913	6/10/2022	BGL	Andrew Freeman	Partner	Fee Petition	Lengthy letter from A. Lias-Booker refusing to comply with subpoenas or document requests re McGuireWoods fees, time	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
914	6/13/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with M. Mazzullo re next steps. Email with Research team re examples of McGuireWoods billing statements.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
915	6/14/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	statements.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
916	6/14/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with research re McGuireWoods rates; review same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
917	6/15/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Meet with M. Mazzullo to discuss next steps. Related follow-up and start drafting process for Plaintiffs' brief in support of fee petition.	0.7	\$502.00	\$351.40	1	\$150.00	\$225.00	\$105.00	\$157.50
918	6/15/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	and Declarations in Support of Motion for Award of Reasonable Attorneys' Fees and Litigation Expenses.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
919	6/21/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft memo in support of Plaintiffs' fee petition.	8.3	\$502.00	\$4,166.60	1	\$150.00	\$225.00	\$1,245.00	\$1,867.50
920	6/21/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Y. Racheva re McGuireWoods' hourly rates	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
921	6/22/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft brief in support of fee petition.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
922	6/22/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft brief in support of fee petition.	1	\$502.00	\$502.00	1	\$150.00	\$225.00	\$150.00	\$225.00
923	6/22/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	draft fee affidavit	2.5	\$650.00	\$1,625.00	20	\$300.00	\$475.00	\$750.00	\$1,187.50
924	6/22/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva re additional research re McGuireWoods rates	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
925	6/24/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Work on fee petition draft.	2	\$502.00	\$1,004.00	1	\$150.00	\$225.00	\$300.00	\$450.00
926	6/25/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft fee petition.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
927	6/26/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft fee petition.	9.4	\$502.00	\$4,718.80	1	\$150.00	\$225.00	\$1,410.00	\$2,115.00
928	6/26/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft preliminary statement and facts section of fee petition memo of law.	1.9	\$536.00	\$1,018.40	4	\$150.00	\$225.00	\$285.00	\$427.50
929	6/27/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Read Fourth Circuit opinion in Stinnie v. Holcomb. Email with team re same and next steps given this new precedent.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
930	6/27/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review Stinnie decision.	0.2	\$787.00	\$157.40	20	\$300.00	\$475.00	\$60.00	\$95.00
931	6/27/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	prep. declaration; review Stinnie ruling, confer w/ co-counsel re. same	3.9	\$650.00	\$2,535.00	20	\$300.00	\$475.00	\$1,170.00	\$1,852.50
932	6/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review 4th Circuit's opinion in Stinnie v. Holcomb	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
933	6/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re next steps in light of Stinnie	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
934	6/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft e-mail to opposing counsel proposing stay of briefing schedule re attorneys' fees; e-mails to/from co-counsel re same; edit, finalize, and send same to opposing counsel	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
935	6/28/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team following Fourth Circuit decision in Stinnie v. Holcomb and confer on next steps.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
936	6/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re writing Judge Griggsby re motion to stay fee petition; call to D. Jeon re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
937	6/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	Voice mail messages (2) to A. Lias-Booker re proposed stay of fee petition; text from A. Lias-Booker re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
938	6/29/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team re next steps given decision in Stinnie v. Holcomb.	0.5	\$502.00	\$251.00	1	\$150.00	\$225.00	\$75.00	\$112.50
939	6/29/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in telephone conference with A. Freeman re letter to court regarding fee petition memo of law [.4] and revise same [.5].	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
940	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Lias-Booker re County's opposition to extension of time for fee memo	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
941	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman re County's opposition to extension of time, our next steps	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
942	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft pre-filing letter to Judge Griggsby re Plaintiffs' request to file motion for extension of time and for expedited briefing of same	1.6	\$725.00	\$1,160.00	20	\$300.00	\$475.00	\$480.00	\$760.00



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
943	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re edits to letter to Judge Griggsby	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
944	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with M. Mazzullo re edits to letter to Judge Griggsby in light of CMO exception for motions for extension of time	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
945	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize letter to Judge Griggsby re motion for extension of time; e-mails to/from co-counsel re same; finalize and file same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
946	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker, M. Martinez, and J. Benjamin with letter to Judge Griggsby re extension of time for fee memo	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
947	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft response to A. Lias-Booker's e-mail re reasons to extend time to file fee memo	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
948	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re possible e-mail to defense counsel responding to A. Lias-Booker's e-mail re Stinnie	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
949	6/30/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise Plaintiffs' fee petition in light of Stinnie decision.	3.2	\$502.00	\$1,606.40	1	\$150.00	\$225.00	\$480.00	\$720.00
950	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re draft e-mail to A. Lias-Booker in response to her e-mail re Stinnie	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
951	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit and send e-mail to A. Lias-Booker in response to her e-mail re Stinnie	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
952	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with draft of memo in support of motion for fees; review and initial edits of same	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
953	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo re next steps for fee memo	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
954	7/1/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Call with A. Freedman re motion for extension of time. Review emails from team re same.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
955	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Calls (2) with C. McL and call to LaClaudia Dyson re revisions to BGL's fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
956	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit BGL's draft bill	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
957	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Voice mail message to Judge Griggsby's chambers re request for extension of time	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
958	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call from M. Graves (Judge's assistant) re filing a motion for extension of time without waiting for response to my letter	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
959	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with Y. Racheva re drafting motion for extension of time	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
960	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Craft and send email to co-counsel re my call with Ms. Graves, proposal for drafting and filing motion for extension of time and request for expedited ruling; email fr M. Mazzullo re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
961	7/2/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft Plaintiffs' motion for extension of time to file fee petition.	5.9	\$502.00	\$2,961.80	1	\$150.00	\$225.00	\$885.00	\$1,327.50
962	7/2/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit motion for extension of time	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
963	7/3/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team re filing of motion for extension of time to file fee petition.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
964	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with draft Motion for Extension of Time to File Memo in Support of Motion for Attorneys' Fees; edit same and circulate to co-counsel	1.1	\$725.00	\$797.50	20	\$300.00	\$475.00	\$330.00	\$522.50
965	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from D. Jeon, J. Freedman, Y. Racheva re edits to Motion for Extension of Time	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
966	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft Proposed Orders and further edits to Motion for Extension of Time	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
967	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize and file Motion for Extension of Time	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
968	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit draft Memorandum in Support of Motion for Attorneys' Fees and Expenses	2.2	\$725.00	\$1,595.00	20	\$300.00	\$475.00	\$660.00	\$1,045.00
969	7/5/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review team edits to fee petition. Revise same. Email with team re same.	1.6	\$502.00	\$803.20	1	\$150.00	\$225.00	\$240.00	\$360.00
970	7/5/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on attorneys fee brief; attention to motion to stay.	2	\$787.00	\$1,574.00	20	\$300.00	\$475.00	\$600.00	\$950.00
971	7/5/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review court order; confer w/ co-counsel re. same	0.9	\$650.00	\$585.00	20	\$300.00	\$475.00	\$270.00	\$427.50
972	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft Andrew D. Freeman declaration in support of motion for attorneys' fees	2	\$725.00	\$1,450.00	20	\$300.00	\$475.00	\$600.00	\$950.00
973	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman with comments on memo in support of attorneys' fees, review same, edit same	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
974	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call to M. Graves (Judge Griggsby's assistant) re pending motion for extension of time	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
975	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Graves re Judge Griggsby's ruling on motion for extension of time	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
976	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with declaration in support of fees, review same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
977	7/6/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review court order staying case. Email with legal assistants re drafting bill of costs for fee petition.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
978	7/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit BGL's fee invoice	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
979	7/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review Judge Griggsby's Stay Order	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
980	7/11/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review Stinnie en banc petition	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
981	7/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review petition for rehearing en banc in Stinnie v. Holcomb	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
982	7/25/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review correspondence from D. Jeon and A. Freeman.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
983	7/28/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review 4th Circuit opinion in Holloway v. City of Virginia Beach on mootness from intervening legislation. Circulate same to team.	0.7	\$502.00	\$351.40	1	\$150.00	\$225.00	\$105.00	\$157.50
984	7/28/2022	BGL	Andrew Freeman	Partner	Case Development	E-mail from Y. Racheva re yesterday's 4th Circuit decision re mootness	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
985	8/9/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team re upcoming team meeting, upcoming tasks, and status of Stinnie en banc review.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
986	8/9/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon re 4th Circuit granting rehearing en banc in Stinnie v. Holcomb, review order re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
987	8/10/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review emails from team re upcoming meeting.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
988	8/11/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Attend team meeting re strategy, next steps, upcoming status report deadline.	0.7	\$502.00	\$351.40	1	\$150.00	\$225.00	\$105.00	\$157.50
989	8/11/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Prepare for and participate in video conference with team to discuss fee petition and next steps in litigation, memorialize notes re same, and review emails on follow-up.	1.2	\$536.00	\$643.20	4	\$150.00	\$225.00	\$180.00	\$270.00
990	8/11/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	legal team call re. next steps following Stinnie en banc ruling; primary elections	0.5	\$650.00	\$325.00	20	\$300.00	\$475.00	\$150.00	\$237.50
991	8/11/2022	ACLU	Tierney Peprah	Staff Attorney	Fee Petition	Team meeting to discuss fee petition	1	\$650.00	\$350.00	8	\$165.00	\$300.00	\$165.00	\$300.00
992	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re next steps re fee petition	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
993	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon re quarterly fee letter, discovery re fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
994	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re quarterly fee letter and discovery re defendants' fees	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
995	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to C. Smith re declaration in support of fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
996	8/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon re reaching out to County's attorneys re September 6 joint status report re fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
997	8/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo with draft email to A. Lias-Booker re joint status report; emails fr D. Jeon and M. Colley re same; review and respond to same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
998	8/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize and send email to A. Lias-Booker, et al. re joint status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
999	8/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker re Joint Status Report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1000	8/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from I556 re Joint Status Report re fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
1001	8/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with A. Lias-Booker re Joint Status Report re fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1002	8/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re next steps re joint status report in light of Lias Booker's email	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1003	9/6/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review and edit joint status report re. Stinnie; confer w/ co-counsel re. same	0.6	\$650.00	\$390.00	20	\$300.00	\$475.00	\$180.00	\$285.00
1004	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re joint status report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1005	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with draft Joint Status Report; edit same; email fr D. Jeon with further edits, review and edit same	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
1006	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker with shell for Joint Status Report	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1007	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	Calls (2) from A. Lias-Booker re completion and filing of Joint Status Report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1008	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Martinez with County's draft Joint Status Report; review same, authorize M. Martinez to file same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1009	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re County's section of Joint Status Report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1010	9/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review "Stay Order" from Judge Griggsby extending stay on fee memorandum	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1011	9/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re order extending stay	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1012	9/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon to clients re Judge Griggsby's stay order	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1013	10/11/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with A. Cruice and R. Campbell re attorney hours records.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
1014	10/19/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with A. Cruice and call with R. Campbell re ACLU rates history request.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
1015	10/20/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with A. Cruice re attorney hours records.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
1016	12/12/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with Y. Racheva re next steps in preparing fee petition in light of forthcoming rehearing en banc in Stinnie v. Holcomb before Fourth Circuit.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
1017	1/4/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Create time line and task list for fee petition in light of Stinnie's upcoming oral arguments. Call with M. Mazzullo re same. Email with legal assistants re same.	1.3	\$502.00	\$652.60	1	\$150.00	\$225.00	\$195.00	\$292.50
1018	1/4/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Prepare for, participate in, and memorialize notes from video conference with Y. Racheva re next steps in preparing fee petition in light of forthcoming rehearing en banc in Stinnie v. Holcomb before Fourth Circuit.	0.9	\$536.00	\$482.40	4	\$150.00	\$225.00	\$135.00	\$202.50
1019	1/25/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Observe portions of Fourth Circuit argument in Stinnie v. Holcomb to assess forthcoming fee petition, draft and review emails re same.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
1020	1/25/2023	BGL	Andrew Freeman	Partner	Fee Petition	Listen to en banc Fourth Circuit oral argument in Stinnie	1.5	\$725.00	\$1,087.50	20	\$300.00	\$475.00	\$450.00	\$712.50
1021	1/25/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re takeaways from Stinnie oral argument	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1022	2/5/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re quarterly fee letter; e-mail from D. Jeon re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1023	2/6/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to J. Freedman re A&P's time and fees for quarterly fee letter	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1024	2/6/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Cruice re ACLU's time and fees for quarterly fee letter	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1025	2/9/2023	BGL	Andrew Freeman	Partner	Fee Petition	Calculate, draft and send quarterly fee letter to defense counsel	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
1026	7/17/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Discuss and set out next steps in case with M. Mazzullo and J. Freedman.	0.8	\$502.00	\$401.60	1	\$150.00	\$225.00	\$120.00	\$180.00
1027	8/3/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with McGuire Woods' latest bill to the County	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1028	8/7/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review Stinnie decision, email to team re: next steps.	0.4	\$787.00	\$314.80	20	\$300.00	\$475.00	\$120.00	\$190.00
1029	8/7/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with Stinnie opinion, review same	0.8	\$725.00	\$580.00	20	\$300.00	\$475.00	\$240.00	\$380.00
1030	8/7/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon, Y. Racheva, and J. Freedman re next steps, joint status report, schedule for briefing re attorneys' fees	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1031	8/10/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review Stinnie v. Holcomb decision.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
1032	8/10/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review Stinnie v. Holcomb decision.	0.4	\$502.00	\$200.80	1	\$150.00	\$225.00	\$60.00	\$90.00
1033	8/14/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	confer with co-counsel, collect and review materials for fee petition	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
1034	8/14/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon re next steps in preparation of fee petition, proposed schedule for same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1035	8/17/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	same.	2	\$502.00	\$1,004.00	1	\$150.00	\$225.00	\$300.00	\$450.00
1036	8/17/2023	A&P	Racheva, Youlia S.	Associate	Case Development	Review en banc opinion in Stinnie v. Holcomb and prepare to re-draft fee petition to comport with same.	2	\$502.00	\$1,004.00	1	\$150.00	\$225.00	\$300.00	\$450.00
1037	8/29/2023	BGL	Andrew Freeman	Partner	Fee Petition	Draft e-mail to Ava Lias-Booker and Melissa Martinez re briefing schedule for fee petition; e-mail to co-counsel re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1038	8/30/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Confer team re: upcoming status report.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
1039	8/30/2023	A&P	Freedman, John A.	Senior Counsel	Case Development	Confer team re: upcoming status report.	0.3	\$787.00	\$236.10	20	\$300.00	\$475.00	\$90.00	\$142.50
1040	8/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman re schedule for briefing fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1041	8/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	Finalize and send e-mail to A. Lias-Booker and M. Martinez re schedule for briefing fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1042	8/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to M. Martinez re fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1043	9/5/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in internal team status call to discuss fee petition (.70); participate in meet and confer with opposing counsel re fee petition (.30); draft and revise joint status letter (1.0); review past work product on fee petition (.80).	2.8	\$536.00	\$1,500.80	4	\$150.00	\$225.00	\$420.00	\$630.00
1044	9/5/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in internal team status call to discuss fee petition (.70); participate in meet and confer with opposing counsel re fee petition (.30); draft and revise joint status letter (1.0); review past work product on fee petition (.80).	2.8	\$536.00	\$1,500.80	4	\$150.00	\$225.00	\$420.00	\$630.00
1045	9/5/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review Stinnie order and draft petition; team call re: fee petition.	1.9	\$787.00	\$1,495.30	20	\$300.00	\$475.00	\$570.00	\$902.50
1046	9/5/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Participate in team calls re fee petition and next steps.	2.2	\$502.00	\$1,104.40	1	\$150.00	\$225.00	\$330.00	\$495.00
1047	9/5/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	call with legal team about fees	0.7	\$220.00	\$154.00	non-lawyer	\$95.00	\$150.00	\$66.50	\$105.00
1048	9/5/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	confer with colleagues, review drafts of status report, discuss next steps	1	\$650.00	\$650.00	20	\$300.00	\$475.00	\$300.00	\$475.00
1049	9/5/2023	BGL	Andrew Freeman	Partner	ADR	Call from Ava Lias-Booker re potentially mediating fee petition; discuss same with co-counsel; second call with A. Lias-Booker re same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1050	9/5/2023	BGL	Andrew Freeman	Partner	ADR	WebEx call with defense counsel re joint status report, requesting mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1051	9/5/2023	BGL	Andrew Freeman	Partner	ADR	Call with Michael Mazzullo re drafting Joint Status Report	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1052	9/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from M. Mazzullo with draft Joint Status Report; review and edit same; e-mails to/from co-counsel re same; call with D. Jeon re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1053	9/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mail to A. Lias-Booker and M. Martinez with draft Joint Status Report	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1054	9/5/2023	BGL	Andrew Freeman	Partner	ADR	Third call with A. Lias-Booker re Joint Status Report, e-mail to co-counsel re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
1055	9/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from M. Mazzullo and J. Freedman re need to file Joint Status Report on docket; e-mail to A. Lias-Booker and M. Martinez re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1056	9/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from A. Lias-Booker with draft Joint Status Report and draft letter to Judge Griggsby re mediation of fees; review same; texts from/to D. Jeon re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1057	9/5/2023	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re fee petition	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
1058	9/6/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with internal team, A. Freeman, and D. Jeon re preparing fee petition.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
1059	9/6/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with internal team, A. Freeman, and D. Jeon re preparing fee petition.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
1060	9/6/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Confer team re: fee petition, stay.	1	\$787.00	\$787.00	20	\$300.00	\$475.00	\$300.00	\$475.00
1061	9/6/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with M. Mazzullo and team re next steps for fee petition and review current draft of same.	0.6	\$502.00	\$301.20	1	\$150.00	\$225.00	\$90.00	\$135.00
1062	9/6/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	review drafts, confer with co-counsel re. status report and next steps in fee negotiations/resolution	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
1063	9/6/2023	BGL	Andrew Freeman	Partner	ADR	Review e-mail from Ava Lias-Booker with draft Joint Status Report and letter to Judge Griggsby; e-mails from/to D. Jeon and J. Freedman re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1064	9/6/2023	BGL	Andrew Freeman	Partner	ADR	Edit County's draft Joint Status Report and Ava Lias-Booker's draft letter	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1065	9/6/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from co-counsel re responding to County re mediation; call with D. Jeon re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1066	9/6/2023	BGL	Andrew Freeman	Partner	ADR	Call with Ava Lias-Booker re Joint Status Report and letter to Judge Griggsby re mediation	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
1067	9/6/2023	BGL	Andrew Freeman	Partner	ADR	Further edits to JSR and letter to Judge; e-mail same to Ava Lias-Booker; e-mail from A. Lias-Booker agreeing to same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1068	9/6/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez to Judge Griggsby with letter re referral to mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1069	9/7/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with internal team re preparing fee petition and potential legal arguments in support (.80); analyze McGuire Woods' fees to show comparison to fees sought (.60).	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
1070	9/7/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with internal team re preparing fee petition and potential legal arguments in support (.80); analyze McGuire Woods' fees to show comparison to fees sought (.60).	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
1071	9/7/2023	BGL	Andrew Freeman	Partner	ADR	Order from Judge Griggsby continuing stay	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1072	9/7/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from Michael Mazzullo, et al. re issues for fee petition	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1073	9/8/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	prep fee affidavit	0.9	\$650.00	\$585.00	20	\$300.00	\$475.00	\$270.00	\$427.50
1074	9/10/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review and analyze time entries and expenses in preparation for fee petition, communicate with Y. Racheva and J. Ferrer re same.	3.1	\$536.00	\$1,661.60	4	\$150.00	\$225.00	\$465.00	\$697.50
1075	9/11/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review and analyze time entries and expenses in preparation for fee petition, communicate with internal team and co-counsel re same.	4.4	\$536.00	\$2,358.40	4	\$150.00	\$225.00	\$660.00	\$990.00
1076	9/11/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise fee petition draft.	9.3	\$502.00	\$4,668.60	1	\$150.00	\$225.00	\$1,395.00	\$2,092.50
1077	9/11/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Mike Mazzullo and John Freedman re organization of fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1078	9/12/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	support staff to gather necessary information for fees and expenses (1.20); revise and update spreadsheet compiling fees and expenses (1.30); review draft declarations of A. Freeman and D. Jeon (.50).	5.1	\$536.00	\$2,733.60	4	\$150.00	\$225.00	\$765.00	\$1,147.50
1079	9/12/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise fee petition draft.	6.4	\$502.00	\$3,212.80	1	\$150.00	\$225.00	\$960.00	\$1,440.00
1080	9/12/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	fee petition work; run time	0.5	\$220.00	\$110.00	non-lawye	\$95.00	\$150.00	\$47.50	\$75.00
1081	9/13/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and revise brief in support of fee petition (4.60); revise declaration for J. Freedman to support fee petition (.60); correspond with internal team and support staff to gather necessary information for fees and expenses (.70) and participate in videoconference with J. Ferrer and Y. Racheva re same (.40); revise and update spreadsheet compiling fees and expenses (.60); research caselaw on prevailing party status and recovery of attorneys' fee (1.20).	8.1	\$536.00	\$4,341.60	4	\$150.00	\$225.00	\$1,215.00	\$1,822.50
1082	9/13/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Mazzullo.	1.8	\$502.00	\$903.60	1	\$150.00	\$225.00	\$270.00	\$405.00
1083	9/14/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and revise brief in support of fee petition (6.20); revise declaration for J. Freedman to support fee petition (1.10); revise and update spreadsheet compiling fees and expenses (.50); research caselaw on prevailing party status and recovery of attorneys' fee (.90); draft email to J. Freedman compiling draft fee petition materials and explaining methodology (1.20).	9.9	\$536.00	\$5,306.40	4	\$150.00	\$225.00	\$1,485.00	\$2,227.50
1084	9/14/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review and revise draft fee petition; call and email with M. Mazzullo re same.	1.6	\$502.00	\$803.20	1	\$150.00	\$225.00	\$240.00	\$360.00
1085	9/19/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with Y. Racheva and J. Freedman re fee petition.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
1086	9/19/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with M. Mazzullo and J. Freedman re fee petition draft.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
1087	9/20/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review and revise fee petition brief and Freedman declaration.	5.1	\$502.00	\$2,560.20	1	\$150.00	\$225.00	\$765.00	\$1,147.50
1088	9/20/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise brief and declaration in support of fee petition, and correspond with Y. Racheva and J. Ferrer re same.	1	\$536.00	\$536.00	4	\$150.00	\$225.00	\$150.00	\$225.00
1089	9/20/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review and revise motion for fees and declaration; confer team re: same.	2.8	\$787.00	\$2,203.60	20	\$300.00	\$475.00	\$840.00	\$1,330.00
1090	9/21/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise brief and declaration in support of fee petition, and correspond with J. Freedman and Y. Racheva re same.	2.2	\$536.00	\$1,179.20	4	\$150.00	\$225.00	\$330.00	\$495.00
1091	9/21/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Conduct legal research for precedent regarding attorneys fees and voting rights cases.	0.9	\$502.00	\$451.80	1	\$150.00	\$225.00	\$135.00	\$202.50
1092	9/21/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from Millie Graves re assignment to magistrate judge for mediation	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1093	9/21/2023	BGL	Andrew Freeman	Partner	ADR	Order of reference to Judge Copperthite for mediation; e-mails from/to D. Jeon and co-counsel re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1094	9/22/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review J. Freedman edits to fee petition and declaration drafts; email with D. Jeon and A. Freeman re same.	1.2	\$502.00	\$602.40	1	\$150.00	\$225.00	\$180.00	\$270.00
1095	9/22/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva re draft fee petition, obtaining declaration in support of rates; respond to same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1096	9/23/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review D. Jeon edits to fee petition draft.	0.2	\$502.00	\$100.40	1	\$150.00	\$225.00	\$30.00	\$45.00
1097	9/23/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit fee petition; review time records, exercise billing judgment	4.5	\$650.00	\$2,925.00	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
1098	9/25/2023	ACLU	Nick Steiner	Legal Director	Fee Petition	reviewing fee petition brief	2.2	\$650.00	\$825.00	7	\$165.00	\$300.00	\$363.00	\$660.00
1099	9/27/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	Run and export hours and create spreadsheet	1.1	\$220.00	\$242.00	non-lawye	\$95.00	\$150.00	\$104.50	\$165.00
1100	9/27/2023	BGL	Andrew Freeman	Partner	ADR	Call from Judge Copperthite re mediation; e-mail to co-counsel re same; e-mail from Debbie Jeon re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1101	9/28/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	export and format all ACLU time in case	1.5	\$220.00	\$330.00	non-lawye	\$95.00	\$150.00	\$142.50	\$225.00
1102	10/1/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	organize fee records, exercise billing judgment for ACLU staff	1.7	\$650.00	\$1,105.00	20	\$300.00	\$475.00	\$510.00	\$807.50
1103	10/2/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise draft exhibit of opposing counsel's fees; draft and review emails with administrative staff re preparation of same.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
1104	10/2/2023	ACLU	Amy Cruice	Paralegal	Case Development	edit fee spreadsheet	0.8	\$220.00	\$176.00	non-lawye	\$95.00	\$150.00	\$76.00	\$120.00
1105	10/2/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	finalize ACLU time charts	0.5	\$650.00	\$325.00	20	\$300.00	\$475.00	\$150.00	\$237.50
1106	10/3/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review and analyze compilation of opposing counsel's fees; draft and review emails with administrative staff re preparation of same.	0.6	\$536.00	\$321.60	4	\$150.00	\$225.00	\$90.00	\$135.00
1107	10/3/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Amy Cruice with Debbie Jeon's spreadsheet re ACLU's time for fee petition; review same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1108	10/3/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from Debbie Jeon and John Freedman re next steps re fee petition and mediation of fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1109	10/3/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to D. Jeon, J. Freedman, et al. re next steps for fee petition and mediation; e-mail from J. Freedman re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1110	10/5/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review Court order re mediation session and draft emails to team re same.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
1111	10/5/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review court filing and team correspondence re scheduled settlement conference.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
1112	10/5/2023	BGL	Andrew Freeman	Partner	ADR	Letter-order from Judge Copperthite scheduling mediation, review same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1113	10/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mail to Judge Copperthite re mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1114	10/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from/to D. Jeon and M. Mazzullo re mediation	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1115	10/12/2023	BGL	Andrew Freeman	Partner	ADR	from D. Jeon re same; e-mail to co-counsel re same; respond to Melissa Martinez re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1116	10/12/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez with letter to Magistrate Judge Copperthite requesting in-person mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1117	10/25/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Magistrate Judge Copperthite re format of mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1118	10/25/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from D. Jeon and J. Freedman re responding to Judge Copperthite re Zoom vs. in-person mediation; e-mails from/to Melissa Martinez re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1119	10/26/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Debbie Jeon re responding to M.J. Copperthite re holding mediation via Zoom; call with D. Jeon re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1120	10/26/2023	BGL	Andrew Freeman	Partner	ADR	Draft letter to M.J. Copperthite re holding mediation by Zoom	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1121	10/26/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from co-counsel re my draft letter to M.J. Copperthite	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1122	10/26/2023	BGL	Andrew Freeman	Partner	ADR	E-mail to Melissa Martinez re draft letter to Judge Copperthite	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1123	10/27/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez declining to agree to Zoom mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1124	10/27/2023	BGL	Andrew Freeman	Partner	ADR	Edit letter to Judge Copperthite re Zoom mediation; e-mails to/from John Freedman and Debbie Jeon re same; finalize and send to Judge Copperthite	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1125	10/27/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez to Judge Copperthite with letter re County's desire for in-person mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1126	10/27/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Judge Copperthite re next steps in mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1127	10/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Debbie Jeon forwarding McGuire Woods' latest bill to Baltimore County	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1128	10/30/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review and analyze compilation of opposing counsel's fees; draft and review emails with administrative staff re preparation of same.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
1129	10/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	Multiple e-mails from/to D. Jeon, M. Mazzullo, and John Freedman re contents and timing of pre-mediation submission to County	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
1130	10/31/2023	BGL	Andrew Freeman	Partner	ADR	Draft e-mail to Melissa Martinez and Ava Lias-Booker re extension of time for exchange of information for mediation; finalize and send same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1131	11/1/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez agreeing to modified dates for exchanging proposals re attorneys' fees; respond to same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1132	11/6/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails re opposing counsel's fees (.40); review proposed status letter and correspond with team and opposing counsel re same (.30).	0.7	\$536.00	\$749.20	4	\$150.00	\$225.00	\$105.00	\$157.50
1133	11/6/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez with draft Joint Status Report re stay pending mediation; review same; e-mails from Mike Mazzullo and Debbie Jeon re approving same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1134	11/6/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Mike Mazzullo re compiling McGuire Woods' fee data	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1135	11/7/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with administrative team re compiling and tallying opposing counsel's fees.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
1136	11/8/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails re petition for attorneys' fees.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
1137	11/19/2023	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit memorandum in support of attorneys' fees	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1138	11/19/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to Angel Breeden re BGL's fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1139	11/20/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Freedman and Y. Racheva re same (.40); review and analyze draft brief in support of fee petition (.50).	1.4	\$536.00	\$750.40	4	\$150.00	\$225.00	\$210.00	\$315.00
1140	11/20/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Angel Breeden re BGL's draft bill	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1141	11/20/2023	BGL	Andrew Freeman	Partner	Fee Petition	Call with Michael Mazzullo re edits to fee petition, next steps re same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1142	11/20/2023	BGL	Andrew Freeman	Partner	Fee Petition	Edit fee petition	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
1143	11/21/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	entries.	0.8	\$536.00	\$428.80	4	\$150.00	\$225.00	\$120.00	\$180.00
1144	11/22/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Correspond with D. Jeon and team re preparing draft of fee petition.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
1145	11/22/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Correspond with D. Jeon and team re preparing draft of fee petition.	0.5	\$536.00	\$268.00	4	\$150.00	\$225.00	\$75.00	\$112.50
1146	11/22/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Michael Mazzullo re next steps in completing fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1147	11/26/2023	BGL	Andrew Freeman	Partner	Fee Petition	Review declarations of Deborah Jeon and John Freedman; draft and edit ADF declaration in support of fee petition	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
1148	11/27/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise draft memo of law and Freedman declaration in support of fee petition (2.20); correspond with A. Freeman and team re preparing draft of fee petition (.70).	2.9	\$536.00	\$1,632.70	4	\$150.00	\$225.00	\$435.00	\$652.50
1149	11/27/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	time reports, edit spreadsheet and emails	3	\$220.00	\$660.00	non-lawye	\$95.00	\$150.00	\$285.00	\$450.00
1150	11/27/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	finalize and review fee magterials	2.3	\$650.00	\$1,495.00	20	\$300.00	\$475.00	\$690.00	\$1,092.50
1151	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	Call with M. Mazzullo re fee petition	0.4	\$725.00	\$290.00	20	\$300.00	\$475.00	\$120.00	\$190.00
1152	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	Call with Deborah Jeon re fee petition	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1153	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	Edit BGL fees	3.4	\$725.00	\$2,465.00	20	\$300.00	\$475.00	\$1,020.00	\$1,615.00
1154	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	Edit fee petition	1	\$725.00	\$725.00	20	\$300.00	\$475.00	\$300.00	\$475.00
1155	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Michael Mazzullo re next steps in completing fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1156	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	Call with Michael Mazzullo re edits to fee petition, next steps re same	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1157	11/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Angel Breeden re BGL's draft bill	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50



	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
1158	11/28/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise and compile materials supporting fee petition, including memo of law, declarations, and supporting exhibits, and correspond with team re same.	4.1	\$536.00	\$2,197.60	4	\$150.00	\$225.00	\$615.00	\$922.50
1159	11/28/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review and comment on draft fee petition.	0.9	\$787.00	\$708.30	20	\$300.00	\$475.00	\$270.00	\$427.50
1160	11/28/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	time reports and edit spreadsheet and tc w/DJ	0.9	\$220.00	\$198.00	non-lawye	\$95.00	\$150.00	\$85.50	\$135.00
1161	11/28/2023	BGL	Andrew Freeman	Partner	Fee Petition	Edit my declaration in support of fee petition; review and edit BGL fee records; e-mails from and to Katherine E. Garvey re same	3.2	\$725.00	\$2,320.00	20	\$300.00	\$475.00	\$960.00	\$1,520.00
1162	11/29/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise and compile materials supporting fee petition, including memo of law, declarations, and supporting exhibits, and correspond with team re same.	3.8	\$536.00	\$2,036.80	4	\$150.00	\$225.00	\$570.00	\$855.00
1163	11/29/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on fee petition, including confer co-counsel.	1.6	\$220.00	\$252.00	20	\$300.00	\$475.00	\$480.00	\$760.00
1164	11/29/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	final material review/ confer with clients	0.8	\$650.00	\$520.00	20	\$300.00	\$475.00	\$240.00	\$380.00
1165	11/29/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from Melissa Martinez re one-day delay in Plaintiffs providing justification for their fees	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1166	11/29/2023	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit "final" draft of fee petition and exhibits; calls with Mike Mazzullo and Debbie Jeon re same; e-mails to/from D. Jeon re revision to her declaration; e-mail to M. Mazzullo re revision to fee petition	1.5	\$725.00	\$1,087.50	20	\$300.00	\$475.00	\$450.00	\$712.50
1167	11/29/2023	BGL	Andrew Freeman	Partner	Fee Petition	Edit memo in support of fee petition and my declaration in support; calls with Katherine E. Garvey re edits to spreadsheets of BGL time for exhibits to my declaration; calls with Mike Mazzullo re same	3.5	\$725.00	\$2,537.50	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
1168	11/30/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise and compile materials supporting fee petition, including memo of law, declarations, and supporting exhibits, and correspond with team re submitting same to opposing counsel.	3.8	\$536.00	\$2,036.80	4	\$150.00	\$225.00	\$570.00	\$855.00
1169	11/30/2023	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review and revise fee petition brief and declaration; confer co-counsel re: strategy.	1.1	\$787.00	\$865.70	20	\$300.00	\$475.00	\$330.00	\$522.50
1170	11/30/2023	ACLU	Amy Cruice	Paralegal	Fee Petition	diagnose miscalculation and fix charts	0.5	\$220.00	\$110.00	non-lawye	\$95.00	\$150.00	\$47.50	\$75.00
1171	11/30/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	finalize and correct fee materials	0.6	\$650.00	\$390.00	20	\$300.00	\$475.00	\$180.00	\$285.00
1172	11/30/2023	BGL	Andrew Freeman	Partner	ADR	Draft e-mail to Ava Lias-Booker and Melissa Martinez re fees and expenses sought by Plaintiffs in mediation; e-mails to/from co-counsel re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1173	11/30/2023	BGL	Andrew Freeman	Partner	ADR	Finalize and send e-mail to A. Lias-Booker and M. Martinez re fees and expenses sought by Plaintiffs in mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1174	11/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	Calls and e-mails with Mike Mazzullo re edits to fee memo, finalizing same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1175	11/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit fee memo; e-mail to Mike Mazzullo re same	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00
1176	11/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	Multiple e-mails re edits to declarations and exhibits, finalizing memorandum in support of motion for fees	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1177	12/14/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Melissa Martinez requesting extension of time to respond re Plaintiffs' draft fee petition; respond to same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1178	12/20/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Ava Lias-Booker with letter responding to Plaintiffs' proposal re attorneys' fees; review same; e-mail to co-counsel re same	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1179	12/21/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from D. Jeon re responding to A. Lias-Booker's letter re mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1180	12/29/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from/to Mike Mazzullo and Debbie Jeon re drafting mediation letter to Judge Copperthite	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1181	1/2/2024	A&P	Mazzullo, Michael L.	Associate	ADR	Revise draft ex parte submission to Judge Copperthite ahead of mediation.	0.7	\$536.00	\$275.20	4	\$150.00	\$225.00	\$105.00	\$157.50
1182	1/2/2024	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit letter to magistrate judge	0.8	\$650.00	\$520.00	20	\$300.00	\$475.00	\$240.00	\$380.00
1183	1/2/2024	BGL	Andrew Freeman	Partner	ADR	Draft ex parte letter to Judge Copperthite for settlement conference	3	\$725.00	\$2,175.00	20	\$300.00	\$475.00	\$900.00	\$1,425.00
1184	1/2/2024	BGL	Andrew Freeman	Partner	ADR	E-mails from Debbie Jeon and Mike Mazzullo re ex parte letter	0.2	\$725.00	\$145.00	20	\$300.00	\$475.00	\$60.00	\$95.00
1185	1/3/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer team re: upcoming mediation.	0.5	\$787.00	\$393.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1186	1/3/2024	BGL	Andrew Freeman	Partner	ADR	E-mail to Judge Copperthite with ex parte letter	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1187	1/3/2024	BGL	Andrew Freeman	Partner	ADR	E-mails from Debbie Jeon with further edits to ex parte letter; incorporate same; call with Debbie Jeon re same; finalize letter	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1188	1/3/2024	BGL	Andrew Freeman	Partner	ADR	E-mail from John Freedman with edits to ex parte letter; revise ex parte letter	1.2	\$725.00	\$870.00	20	\$300.00	\$475.00	\$360.00	\$570.00
1189	1/12/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer co-counsel re: upcoming mediation.	0.2	\$787.00	\$157.40	20	\$300.00	\$475.00	\$60.00	\$95.00
1190	1/12/2024	A&P	Racheva, Youlia S.	Associate	ADR	Email with M. Mazzullo and J. Freedman re prep for mediation.	0.1	\$502.00	\$50.20	1	\$150.00	\$225.00	\$15.00	\$22.50
1191	1/12/2024	BGL	Andrew Freeman	Partner	ADR	E-mail to Judge Copperthite re upcoming mediation	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1192	1/16/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer re: status of mediation.	0.4	\$787.00	\$314.80	20	\$300.00	\$475.00	\$120.00	\$190.00
1193	1/16/2024	ACLU	Debbie Jeon	Legal Director	Fee Petition	emails to/from co-counsel, ourt re. mediation cancelation	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
1194	1/16/2024	BGL	Andrew Freeman	Partner	ADR	E-mail from Judge Copperthite re scheduling conference call; e-mails from/to Melissa Martinez and Judge Copperthite re same (0.1, n/c)	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1195	1/16/2024	BGL	Andrew Freeman	Partner	ADR	Conference call with Judge Copperthite, Ava Lias-Booker, Melissa Martinez re parties' positions on attorneys' fees, cancellation of tomorrow's mediation	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1196	1/16/2024	BGL	Andrew Freeman	Partner	ADR	E-mail to co-counsel re conference call with Judge Copperthite, et al.	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1197	1/17/2024	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in video conference with team re next steps on fee petition.	0.4	\$536.00	\$214.40	4	\$150.00	\$225.00	\$60.00	\$90.00
1198	1/17/2024	A&P	Racheva, Youlia S.	Associate	Fee Petition	Call and email with team re mediation, fee petition, and next steps.	1.6	\$502.00	\$803.20	1	\$150.00	\$225.00	\$240.00	\$360.00
1199	1/17/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Follow up on mediation cancellation, team call re: same.	0.9	\$787.00	\$708.30	20	\$300.00	\$475.00	\$270.00	\$427.50
1200	1/17/2024	ACLU	Debbie Jeon	Legal Director	Fee Petition	team meeting and follow up re. next steps	1.2	\$650.00	\$780.00	20	\$300.00	\$475.00	\$360.00	\$570.00
1201	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re fee petition	0.5	\$725.00	\$362.50	20	\$300.00	\$475.00	\$150.00	\$237.50
1202	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	Draft and send e-mail to M. Martinez and A. Lias-Booker re status report, briefing schedule for fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1203	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Judge Copperthite to Melissa Martinez re County's letter; e-mails from and to D. Jeon and J. Freedman re same	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1204	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	Letter from Ava Lias-Booker with County's response and counter-offer to Plaintiffs' fee demand; review same; e-mails from/to John Freedman and Debbie Jeon re same	0.3	\$725.00	\$217.50	20	\$300.00	\$475.00	\$90.00	\$142.50
1205	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from John Freedman re next steps for fee petition	0.1	\$725.00	\$72.50	20	\$300.00	\$475.00	\$30.00	\$47.50
1206	1/18/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer team re: status report.	0.8	\$787.00	\$629.60	20	\$300.00	\$475.00	\$240.00	\$380.00
1207	1/18/2024	A&P	Racheva, Youlia S.	Associate	ADR	Review draft status report.	0.3	\$502.00	\$150.60	1	\$150.00	\$225.00	\$45.00	\$67.50
1208	1/18/2024	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Melissa Martinez with draft Joint Status Report re schedule for briefing fee petition; review and edit same; e-mails to/from Debbie Jeon, Youlia Racheva, and John Freedman re same; further edits to same	0.6	\$725.00	\$435.00	20	\$300.00	\$475.00	\$180.00	\$285.00





# **EXHIBIT 4A**

**Exhibit 4A – Plaintiffs’ Attorneys’ Fees Incurred in Opposing the County’s Motion for Approval of New Map and to Modify the Preliminary Injunction**

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
729	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call with D. Jeon re next steps, preparation in case of new map or in case of appeal	0.2	\$725.00	\$145.00
731	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails between D. Jeon and K. Oskooii re readiness for performance review of any new map	0.1	\$725.00	\$72.50
732	3/2/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Call re: next steps and County compliance.	0.7	\$787.00	\$550.90
738	3/4/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Voice mail message to A. Lias-Booker; texts to/from A. Lias-Booker re status of County Council drawing a new map	0.1	\$725.00	\$72.50
741	3/5/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from D. Jeon and J. Freedman re my draft e-mail to A. Lias-Booker inquiring re status of County's new map; edit, finalize, and send same to A. Lias-Booker, et al.	0.2	\$725.00	\$145.00
742	3/5/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Voice mail message to A. Lias-Booker and J. Benjamin inquiring re status of map	0.1	\$725.00	\$72.50
744	3/7/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Drafting portion of joint status letter to Court in accordance with Court's preliminary injunction order.	2.1	\$536.00	\$1,125.60
745	3/7/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in telephone conference with A. Freeman and D. Jeon team to discuss next steps in drafting portion of joint status letter to Court.	0.8	\$536.00	\$428.80
746	3/7/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Review updates from Andy re conversations with defense counsel and status notification due to court.	0.1	\$502.00	\$50.20
747	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call from A. Lias-Booker and M. Martinez re status report and map due tomorrow	0.3	\$725.00	\$217.50
748	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call to K. Oskooii re anticipated receipt of map tomorrow	0.1	\$725.00	\$72.50
749	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Draft e-mail to co-counsel re my call with A. Lias-Booker and M. Martinez, with draft e-mail to Lias-Booker and Martinez requesting map and data	0.5	\$725.00	\$362.50
750	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from/to co-counsel re edits to A. Lias-Booker and M. Martinez requesting precinct data and shapefiles for Council's new proposed map; edit same	1.8	\$725.00	\$1,305.00
751	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call with D. Jeon and M. Mazzullo re responding to County re details of new map, drafting plaintiffs' portion of status report re how the matter should proceed	0.7	\$725.00	\$507.50
752	3/7/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails to/from B. Cooper re plaintiff's shapefiles; e-mail from B. Cooper with same; e-mail to A. Lias-Booker and M. Martinez re same	0.2	\$725.00	\$145.00
753	3/8/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Attention to County compliance and confer team re: same.	1.8	\$787.00	\$1,416.60
754	3/8/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Edit draft status report; analysis and drafting on response to County motion arguments/cases.	2.1	\$760.00	\$1,596.00
756	3/8/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Review team emails re Defendant's status report and motion enclosing new proposed map.	1	\$502.00	\$502.00
757	3/8/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Revise status report to Court in accordance with Court's preliminary injunction order.	1.1	\$536.00	\$589.60
758	3/8/2022	ACLU	Debbie Jeon	Legal Director	Response to Court's Order	confer w/ clients and co-counsel re. case filing, how to respond	3.4	\$650.00	\$2,210.00
761	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from M. Mazzullo and D. Jeon with draft plaintiffs' section of joint status report; edit same	1	\$725.00	\$725.00
762	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Draft e-mail to A. Lias-Booker and M. Martinez again requesting defendants' section of joint status report and map data	0.5	\$725.00	\$362.50
763	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Call with M. Mazzullo re edits to joint status report; e-mails to/from M. Mazzullo and D. Jeon re same	0.2	\$725.00	\$145.00
764	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Edits to status report from M. Mazzullo, D. Jeon, J. Freedman, M. Colley; further edits by me, finalize and file	1.2	\$725.00	\$870.00
765	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from D. Jeon to clients re today's filing, e-mails from clients in response	0.3	\$725.00	\$217.50
766	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mail from A. Lias-Booker re County's proposed draft joint status report and next steps, review same	0.2	\$725.00	\$145.00
767	3/8/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mail from M. Graves re scheduling conference call with Judge Griggsby for Friday	0.1	\$725.00	\$72.50
768	3/9/2022	A&P	Freedman, John A.	Senior Counsel	Response to Court's Order	Attention to County proposed map; confer team re: same; work on response.	2.4	\$787.00	\$1,888.80
769	3/9/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Develop and draft response to County motion/new map; related research and communications.	6	\$760.00	\$4,560.00
770	3/9/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Defendants' revised map. Review Defendant's Motion including the revised map and exhibits in support.	1.8	\$502.00	\$903.60
771	3/9/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in video conference to discuss strategy for responding to Baltimore County's motion to modify the preliminary injunction.	0.6	\$536.00	\$321.60
772	3/9/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Research and draft report to Court on whether Baltimore County's newly-proposed map is compliant with the Voting Rights Act/Court's prior order.	3.6	\$536.00	\$1,929.60
773	3/9/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Research question of remedy when non-compliant map is proposed [.9], provide research to team re same [.3], and review Court's Order/correspondence regarding March 11, 2022 conference [.2].	1.4	\$536.00	\$750.40
774	3/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	Baltimore County's Status Report and motion for approval of new map (filed last night)	0.4	\$725.00	\$290.00
775	3/9/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from co-counsel re draft response to County's new proposal	0.2	\$725.00	\$145.00
776	3/10/2022	A&P	Colley, Mark D.	Partner	Response to Court's Order	Develop and draft response to County motion/new map; related research and communications.	1.4	\$760.00	\$1,064.00
778	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Draft and review emails with internal team on March 10, 2022 status letter on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	0.8	\$536.00	\$428.80
779	3/10/2022	A&P	Mazzullo, Michael L.	Associate	Response to Court's Order	Participate in telephone conferences with A. Freeman re March 10, 2022 status letter on whether remedial map is compliant with the Voting Rights Act/Court's prior order.	0.3	\$536.00	\$160.80



# **EXHIBIT 4B**

## Exhibit 4B – Plaintiffs’ Attorneys’ Fees Incurred for Tasks Unrelated to Obtaining the Preliminary Injunction

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
723	2/23/2022	BGL	Andrew Freeman	Partner	Motion for Preliminary Injunction	E-mails from/to D. Jeon and clients re next steps	0.2	\$725.00	\$145.00
727	2/28/2022	ACLU	Debbie Jeon	Legal Director	Response to Court's Order	check in with clients and partners	0.8	\$650.00	\$520.00
730	3/1/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails re Baltimore County’s next steps, tonight’s council hearing	0.2	\$725.00	\$145.00
734	3/2/2022	A&P	Racheva, Youlia S.	Associate	Response to Court's Order	Review team updates re check in meeting, newest filings, state court's decision not to appoint Gimpel as advisor.	0.1	\$502.00	\$50.20
736	3/2/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from D. Jeon re preparing for County’s next steps; call with D. Jeon re same	0.2	\$725.00	\$145.00
740	3/4/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	Draft e-mail to A. Lias-Booker inquiring re status; forward same to co-counsel	0.3	\$725.00	\$217.50
743	3/6/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mails from/to M. Barretto, D. Jeon re next steps	0.1	\$725.00	\$72.50
759	3/8/2022	ACLU	Tierney Peprah	Staff Attorney	Response to Court's Order	legal research	1	\$650.00	\$350.00
760	3/8/2022	ACLU	Tierney Peprah	Staff Attorney	Response to Court's Order	Reviewed plaintiffs and defendants status report to the court	0.5	\$350.00	\$175.00
785	3/10/2022	BGL	Andrew Freeman	Partner	Pleadings	Edit Status Report (1.5), call with M. Mazzullo re same (.1)	1.6	\$725.00	\$1,160.00
794	3/25/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer with clients and co-counsel re. next steps	1.2	\$650.00	\$780.00
795	3/29/2022	ACLU	Debbie Jeon	Legal Director	Case Development	client communications	0.9	\$650.00	\$585.00
796	3/30/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer with clients re. next steps	1.3	\$650.00	\$845.00
797	3/31/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft email to Y. Racheva and begin reviewing caselaw on issue of recovering attorneys' fees.	0.7	\$536.00	\$375.20
801	3/31/2022	A&P	Colley, Mark D.	Partner	Fee Petition	Telephone conference with legal team regarding strategy for next steps/options.	0.6	\$760.00	\$456.00
802	3/31/2022	ACLU	Debbie Jeon	Legal Director	Case Development	team call and follow up research re. next steps	2.3	\$650.00	\$1,495.00
804	4/1/2022	ACLU	Debbie Jeon	Legal Director	Case Development	client meeting	1.5	\$650.00	\$975.00
805	4/1/2022	ACLU	Elsha Aemero	Paralegal	Case Development	Debrief and Next Steps Meeting w/clients	1	\$220.00	\$220.00
806	4/1/2022	ACLU	Tierney Peprah	Staff Attorney	Case Development	client meeting	1.6	\$650.00	\$560.00
820	4/22/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ Freedman and Freeman re. case strategy; prep client correspondence re. same	1.5	\$650.00	\$975.00
821	4/22/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon and J. Freedman re next steps, fee petition	0.5	\$725.00	\$362.50
822	4/25/2022	BGL	Andrew Freeman	Partner	Pleadings	E-mail from A. Nichols with draft Stipulation of Dismissal; review same; e-mails from/to D. Jeon re same	0.1	\$725.00	\$72.50
823	4/25/2022	BGL	Andrew Freeman	Partner	Pleadings	Edit BOE’s draft stipulation of dismissal; e-mail to co-counsel re same; finalize and send to defense counsel	0.3	\$725.00	\$217.50
824	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo re preparing status report	0.1	\$725.00	\$72.50
825	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from D. Jeon re reaching out to defense counsel re next steps, status report	0.1	\$725.00	\$72.50
826	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon re sending e-mail to attorneys for County re next steps; draft e-mail re same and send to co-counsel	0.4	\$725.00	\$290.00
829	4/27/2022	ACLU	Debbie Jeon	Legal Director	Case Development	confer w/ co-counsel, review drafts re. joint status report; payment of experts	1.1	\$650.00	\$715.00
830	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker and M. Martinez re preparing status report	0.2	\$725.00	\$145.00
831	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Lias-Booker re status report, dismissal, and attorneys’ fees	0.1	\$725.00	\$72.50
832	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from/to/from co-counsel re responding to County re status report	0.4	\$725.00	\$290.00
833	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft response to A. Lias-Booker re stipulation re fee negotiation and potential dismissal	0.4	\$725.00	\$290.00
835	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman with edits to response to A. Lias-Booker’s e-mail re status report and next steps	0.1	\$725.00	\$72.50
836	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re preparing status report	0.2	\$725.00	\$145.00
839	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker re status report	0.1	\$725.00	\$72.50
840	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Colley with draft statement for status report	0.1	\$725.00	\$72.50
841	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft Plaintiffs’ statement for status report	1.3	\$725.00	\$942.50
842	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon re revisions to status report	0.4	\$725.00	\$290.00
843	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise Plaintiffs’ draft status report, send to co-counsel	0.4	\$725.00	\$290.00
844	4/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit multiple drafts of Plaintiffs’ section of status report; multiple e-mails from and to M. Martinez re shell of Joint Status Report and process for filing; finalize Joint Status Report with Plaintiffs’ section included and send to M. Martine	2.3	\$725.00	\$1,667.50
845	5/2/2022	ACLU	Tierney Peprah	Staff Attorney	Case Development	Reviewed status report	0.5	\$650.00	\$175.00
848	5/5/2022	BGL	Andrew Freeman	Partner	Case Development	Review Baltimore County’s status report	0.1	\$725.00	\$72.50
849	5/6/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review draft brief sections.	0.4	\$787.00	\$314.80
850	5/8/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review and comment on draft brief.	2.5	\$787.00	\$1,967.50
851	5/9/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review court ruling, prep client correspondence re. same	1.2	\$650.00	\$780.00
942	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft pre-filing letter to Judge Griggsby re Plaintiffs’ request to file motion for extension of time and for expedited briefing of same	1.6	\$725.00	\$1,160.00
943	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re edits to letter to Judge Griggsby	0.3	\$725.00	\$217.50
944	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with M. Mazzullo re edits to letter to Judge Griggsby in light of CMO exception for motions for extension of time	0.4	\$725.00	\$290.00
945	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize letter to Judge Griggsby re motion for extension of time; e-mails to/from co-counsel re same; finalize and file same	0.2	\$725.00	\$145.00



	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
946	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker, M. Martinez, and J. Benjamin with letter to Judge Griggsby re extension of time for fee memo	0.1	\$725.00	\$72.50
947	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft response to A. Lias-Booker's e-mail re reasons to extend time to file fee memo	0.3	\$725.00	\$217.50
954	7/1/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Call with A. Freedman re motion for extension of time. Review emails from team re same.	0.2	\$502.00	\$100.40
957	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Voice mail message to Judge Griggsby's chambers re request for extension of time	0.1	\$725.00	\$72.50
958	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call from M. Graves (Judge's assistant) re filing a motion for extension of time without waiting for response to my letter	0.2	\$725.00	\$145.00
959	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with Y. Racheva re drafting motion for extension of time	0.2	\$725.00	\$145.00
960	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Craft and send email to co-counsel re my call with Ms. Graves, proposal for drafting and filing motion for extension of time and request for expedited ruling; email fr M. Mazzullo re same	0.3	\$725.00	\$217.50
961	7/2/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft Plaintiffs' motion for extension of time to file fee petition.	5.9	\$502.00	\$2,961.80
962	7/2/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit motion for extension of time	0.8	\$725.00	\$580.00
963	7/3/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team re filing of motion for extension of time to file fee petition.	0.2	\$502.00	\$100.40
964	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with draft Motion for Extension of Time to File Memo in Support of Motion for Attorneys' Fees; edit same and circulate to co-counsel	1.1	\$725.00	\$797.50
965	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from D. Jeon, J. Freedman, Y. Racheva re edits to Motion for Extension of Time	0.2	\$725.00	\$145.00
966	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft Proposed Orders and further edits to Motion for Extension of Time	0.8	\$725.00	\$580.00
967	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize and file Motion for Extension of Time	0.3	\$725.00	\$217.50
971	7/5/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review court order; confer w/ co-counsel re. same	0.9	\$650.00	\$585.00
974	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call to M. Graves (Judge Griggsby's assistant) re pending motion for extension of time	0.1	\$725.00	\$72.50
975	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Graves re Judge Griggsby's ruling on motion for extension of time	0.1	\$725.00	\$72.50
977	7/6/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review court order staying case. Email with legal assistants re drafting bill of costs for fee petition.	0.3	\$502.00	\$150.60
979	7/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review Judge Griggsby's Stay Order	0.1	\$725.00	\$72.50
982	7/25/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review correspondence from D. Jeon and A. Freeman.	0.1	\$502.00	\$50.20
987	8/10/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review emails from team re upcoming meeting.	0.1	\$502.00	\$50.20
988	8/11/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Attend team meeting re strategy, next steps, upcoming status report deadline.	0.7	\$502.00	\$351.40
997	8/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo with draft email to A. Lias-Booker re joint status report; emails fr D. Jeon and M. Colley re same; review and respond to same	0.1	\$725.00	\$72.50
998	8/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize and send email to A. Lias-Booker, et al. re joint status report	0.1	\$725.00	\$72.50
999	8/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker re Joint Status Report	0.1	\$725.00	\$72.50
1000	8/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from I556 re Joint Status Report re fee petition	0.1	\$725.00	\$72.50
1001	8/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with A. Lias-Booker re Joint Status Report re fee petition	0.1	\$725.00	\$72.50
1002	8/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re next steps re joint status report in light of Lias Booker's email	0.2	\$725.00	\$145.00
1003	9/6/2022	ACLU	Debbie Jeon	Legal Director	Case Development	review and edit joint status report re. Stinnie; confer w/ co-counsel re. same	0.6	\$650.00	\$390.00
1004	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re joint status report	0.1	\$725.00	\$72.50
1005	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with draft Joint Status Report; edit same; email fr D. Jeon with further edits, review and edit same	0.6	\$725.00	\$435.00
1006	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker with shell for Joint Status Report	0.3	\$725.00	\$217.50
1007	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	Calls (2) from A. Lias-Booker re completion and filing of Joint Status Report	0.1	\$725.00	\$72.50
1008	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Martinez with County's draft Joint Status Report; review same, authorize M. Martinez to file same	0.3	\$725.00	\$217.50
1009	9/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re County's section of Joint Status Report	0.1	\$725.00	\$72.50
1010	9/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review "Stay Order" from Judge Griggsby extending stay on fee memorandum	0.1	\$725.00	\$72.50
1011	9/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re order extending stay	0.1	\$725.00	\$72.50
1012	9/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon to clients re Judge Griggsby's stay order	0.1	\$725.00	\$72.50
1026	7/17/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Discuss and set out next steps in case with M. Mazzullo and J. Freedman.	0.8	\$502.00	\$401.60
1206	1/18/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer team re: status report.	0.8	\$787.00	\$629.60
1207	1/18/2024	A&P	Racheva, Youlia S.	Associate	ADR	Review draft status report.	0.3	\$502.00	\$150.60
1244						<b>SUBTOTAL</b>	<b>51.5</b>		<b>\$32,663.00</b>

# **EXHIBIT 4C**

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**Exhibit 4C – Plaintiffs’ Attorneys’ Fees Incurred for Unsuccessful Mediation**

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
682	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Call from A. Lias-Booker re possible settlement	0.9	\$725.00	\$652.50
685	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Second call from A. Lias-Booker and M. Martinez re possible settlement	0.5	\$725.00	\$362.50
687	2/14/2022	BGL	Andrew Freeman	Partner	ADR	Third call from A. Lias-Booker re settlement (.4), e-mail to co-counsel re same (.2)	0.6	\$725.00	\$435.00
722	2/23/2022	BGL	Andrew Freeman	Partner	ADR	Call re potential settlement	0.2	\$725.00	\$145.00
724	2/23/2022	BGL	Andrew Freeman	Partner	ADR	Call re potential settlement	0.2	\$725.00	\$145.00
1049	9/5/2023	BGL	Andrew Freeman	Partner	ADR	Call from Ava Lias-Booker re potentially mediating fee petition; discuss same with co-counsel; second call with A. Lias-Booker re same	0.5	\$725.00	\$362.50
1050	9/5/2023	BGL	Andrew Freeman	Partner	ADR	WebEx call with defense counsel re joint status report, requesting mediation	0.1	\$725.00	\$72.50
1056	9/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from A. Lias-Booker with draft Joint Status Report and draft letter to Judge Griggsby re mediation of fees; review same; texts from/to D. Jeon re same	0.2	\$725.00	\$145.00
1062	9/6/2023	ACLU	Debbie Jeon	Legal Director	Fee Petition	review drafts, confer with co-counsel re. status report and next steps in fee negotiations/resolution	1.2	\$650.00	\$780.00
1065	9/6/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from co-counsel re responding to County re mediation; call with D. Jeon re same	0.3	\$725.00	\$217.50
1066	9/6/2023	BGL	Andrew Freeman	Partner	ADR	Call with Ava Lias-Booker re Joint Status Report and letter to Judge Griggsby re mediation	0.4	\$725.00	\$290.00
1068	9/6/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez to Judge Griggsby with letter re referral to mediation	0.1	\$725.00	\$72.50
1092	9/21/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from Millie Graves re assignment to magistrate judge for mediation	0.2	\$725.00	\$145.00
1093	9/21/2023	BGL	Andrew Freeman	Partner	ADR	Order of reference to Judge Copperthite for mediation; e-mails from/to D. Jeon and co-counsel re same	0.1	\$725.00	\$72.50
1100	9/27/2023	BGL	Andrew Freeman	Partner	ADR	Call from Judge Copperthite re mediation; e-mail to co-counsel re same; e-mail from Debbie Jeon re same	0.3	\$725.00	\$217.50
1109	10/3/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to D. Jeon, J. Freedman, et al. re next steps for fee petition and mediation; e-mail from J. Freedman re same	0.3	\$725.00	\$217.50
1110	10/5/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review Court order re mediation session and draft emails to team re same.	0.4	\$536.00	\$214.40
1111	10/5/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review court filing and team correspondence re scheduled settlement conference.	0.3	\$502.00	\$150.60
1112	10/5/2023	BGL	Andrew Freeman	Partner	ADR	Letter-order from Judge Copperthite scheduling mediation, review same	0.1	\$725.00	\$72.50
1113	10/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mail to Judge Copperthite re mediation	0.1	\$725.00	\$72.50
1114	10/5/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from/to D. Jeon and M. Mazzullo re mediation	0.2	\$725.00	\$145.00
1116	10/12/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez with letter to Magistrate Judge Copperthite requesting in-person mediation	0.1	\$725.00	\$72.50
1117	10/25/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Magistrate Judge Copperthite re format of mediation	0.1	\$725.00	\$72.50
1118	10/25/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from D. Jeon and J. Freedman re responding to Judge Copperthite re Zoom vs. in-person mediation; e-mails from/to Melissa Martinez re same	0.1	\$725.00	\$72.50
1119	10/26/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Debbie Jeon re responding to M.J. Copperthite re holding mediation via Zoom; call with D. Jeon re same	0.1	\$725.00	\$72.50
1120	10/26/2023	BGL	Andrew Freeman	Partner	ADR	Draft letter to M.J. Copperthite re holding mediation by Zoom	0.3	\$725.00	\$217.50
1121	10/26/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from co-counsel re my draft letter to M.J. Copperthite	0.1	\$725.00	\$72.50
1122	10/26/2023	BGL	Andrew Freeman	Partner	ADR	E-mail to Melissa Martinez re draft letter to Judge Copperthite	0.1	\$725.00	\$72.50
1123	10/27/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez declining to agree to Zoom mediation	0.1	\$725.00	\$72.50
1124	10/27/2023	BGL	Andrew Freeman	Partner	ADR	Edit letter to Judge Copperthite re Zoom mediation; e-mails to/from John Freedman and Debbie Jeon re same; finalize and send to Judge Copperthite	0.5	\$725.00	\$362.50
1125	10/27/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez to Judge Copperthite with letter re County’s desire for in-person mediation	0.1	\$725.00	\$72.50
1126	10/27/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Judge Copperthite re next steps in mediation	0.1	\$725.00	\$72.50
1129	10/30/2023	BGL	Andrew Freeman	Partner	Fee Petition	Multiple e-mails from/to D. Jeon, M. Mazzullo, and John Freedman re contents and timing of pre-mediation submission to County	0.4	\$725.00	\$290.00
1130	10/31/2023	BGL	Andrew Freeman	Partner	ADR	Draft e-mail to Melissa Martinez and Ava Lias-Booker re extension of time for exchange of information for mediation; finalize and send same	0.2	\$725.00	\$145.00
1131	11/1/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez agreeing to modified dates for exchanging proposals re attorneys’ fees; respond to same	0.1	\$725.00	\$72.50
1133	11/6/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from Melissa Martinez with draft Joint Status Report re stay pending mediation; review same; e-mails from Mike Mazzullo and Debbie Jeon re approving same	0.1	\$725.00	\$72.50
1165	11/29/2023	BGL	Andrew Freeman	Partner	ADR	E-mails to/from Melissa Martinez re one-day delay in Plaintiffs providing justification for their fees	0.1	\$725.00	\$72.50
1172	11/30/2023	BGL	Andrew Freeman	Partner	ADR	Draft e-mail to Ava Lias-Booker and Melissa Martinez re fees and expenses sought by Plaintiffs in mediation; e-mails to/from co-counsel re same	0.3	\$725.00	\$217.50
1173	11/30/2023	BGL	Andrew Freeman	Partner	ADR	Finalize and send e-mail to A. Lias-Booker and M. Martinez re fees and expenses sought by Plaintiffs in mediation	0.1	\$725.00	\$72.50
1179	12/21/2023	BGL	Andrew Freeman	Partner	ADR	E-mail from D. Jeon re responding to A. Lias-Booker’s letter re mediation	0.1	\$725.00	\$72.50
1180	12/29/2023	BGL	Andrew Freeman	Partner	ADR	E-mails from/to Mike Mazzullo and Debbie Jeon re drafting mediation letter to Judge Copperthite	0.1	\$725.00	\$72.50
1181	1/2/2024	A&P	Mazzullo, Michael L.	Associate	ADR	Revise draft ex parte submission to Judge Copperthite ahead of mediation.	0.7	\$536.00	\$275.20



	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
1182	1/2/2024	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit letter to magistrate judge	0.8	\$650.00	\$520.00
1183	1/2/2024	BGL	Andrew Freeman	Partner	ADR	Draft ex parte letter to Judge Copperthite for settlement conference	3	\$725.00	\$2,175.00
1184	1/2/2024	BGL	Andrew Freeman	Partner	ADR	E-mails from Debbie Jeon and Mike Mazzullo re ex parte letter	0.2	\$725.00	\$145.00
1185	1/3/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer team re: upcoming mediation.	0.5	\$787.00	\$393.50
1186	1/3/2024	BGL	Andrew Freeman	Partner	ADR	E-mail to Judge Copperthite with ex parte letter	0.1	\$725.00	\$72.50
1187	1/3/2024	BGL	Andrew Freeman	Partner	ADR	E-mails from Debbie Jeon with further edits to ex parte letter; incorporate same; call with Debbie Jeon re same; finalize letter	0.5	\$725.00	\$362.50
1188	1/3/2024	BGL	Andrew Freeman	Partner	ADR	E-mail from John Freedman with edits to ex parte letter; revise ex parte letter	1.2	\$725.00	\$870.00
1189	1/12/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer co-counsel re: upcoming mediation.	0.2	\$787.00	\$157.40
1190	1/12/2024	A&P	Racheva, Youlia S.	Associate	ADR	Email with M. Mazzullo and J. Freedman re prep for mediation.	0.1	\$502.00	\$50.20
1191	1/12/2024	BGL	Andrew Freeman	Partner	ADR	E-mail to Judge Copperthite re upcoming mediation	0.1	\$725.00	\$72.50
1192	1/16/2024	A&P	Freedman, John A.	Senior Counsel	ADR	Confer re: status of mediation.	0.4	\$787.00	\$314.80
1193	1/16/2024	ACLU	Debbie Jeon	Legal Director	Fee Petition	emails to/from co-counsel, ocourt re. mediation cancelation	1.2	\$650.00	\$780.00
1194	1/16/2024	BGL	Andrew Freeman	Partner	ADR	E-mail from Judge Copperthite re scheduling conference call; e-mails from/to Melissa Martinez and Judge Copperthite re same (0.1, n/c)	0.1	\$725.00	\$72.50
1195	1/16/2024	BGL	Andrew Freeman	Partner	ADR	Conference call with Judge Copperthite, Ava Lias-Booker, Melissa Martinez re parties' positions on attorneys' fees, cancellation of tomorrow's mediation	0.5	\$725.00	\$362.50
1196	1/16/2024	BGL	Andrew Freeman	Partner	ADR	E-mail to co-counsel re conference call with Judge Copperthite, et al.	0.3	\$725.00	\$217.50
1203	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Judge Copperthite to Melissa Martinez re County's letter; e-mails from and to D. Jeon and J. Freedman re same	0.1	\$725.00	\$72.50
1204	1/17/2024	BGL	Andrew Freeman	Partner	Fee Petition	Letter from Ava Lias-Booker with County's response and counter-offer to Plaintiffs' fee demand; review same; e-mails from/to John Freedman and Debbie Jeon re same	0.3	\$725.00	\$217.50
1213	1/22/2024	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from Debbie Jeon and John Freedman re edits to e-mail to defense counsel re County's settlement offer re fees; finalize and send e-mail	0.2	\$725.00	\$145.00
1214	1/22/2024	BGL	Andrew Freeman	Partner	Fee Petition	Draft e-mail to defense counsel responding to their fee offer; e-mail to co-counsel re same	0.5	\$725.00	\$362.50
1222	1/26/2024	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Melissa Martinez conveying County's rejection of Plaintiffs' proposal regarding further settlement negotiations	0.1	\$725.00	\$72.50
1244	<b>SUBTOTAL</b>						<b>21.5</b>		<b>\$15,018.60</b>

# **EXHIBIT 4D**

## Exhibit 4D – Plaintiffs’ Attorneys’ Fees Incurred on Improper Subpoenas and Discovery Requests for the County’s Counsel’s Fees

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
739	3/4/2022	BGL	Andrew Freeman	Partner	Response to Court's Order	E-mail from D. Jeon with County’s retainer agreement with McGuire Woods and January bill from same	0.1	\$725.00	\$72.50
859	5/12/2022	BGL	Andrew Freeman	Partner	Fee Petition	Research re serving subpoena for defendant’s attorneys’ billing records	0.3	\$725.00	\$217.50
860	5/13/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft subpoena to McGuireWoods for billing rates.	0.4	\$502.00	\$200.80
861	5/17/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Emails with team re draft of subpoena to McGuireWoods re fees. Review case law on topic forwarded by A. Freeman.	0.3	\$502.00	\$150.60
862	5/17/2022	BGL	Andrew Freeman	Partner	Fee Petition	Research re subpoena for opponent’s fee records	0.5	\$725.00	\$362.50
865	5/18/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with Y. Racheva re subpoena and cover letter to County re fees	0.3	\$725.00	\$217.50
866	5/19/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft letter to opposing counsel requesting billing and time keeping records.	0.6	\$502.00	\$301.20
868	5/20/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft letter to opposing counsel requesting billing rates and times. Conduct legal research for same.	3	\$502.00	\$1,506.00
869	5/21/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on letter re: fee demand and subpoena.	0.8	\$787.00	\$629.60
871	5/21/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva (from yesterday evening) with draft letter to defense counsel re fees, discovery of defense fees	0.1	\$725.00	\$72.50
873	5/22/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit letter to defense counsel re possible discovery of their rates and hours	0.5	\$725.00	\$362.50
874	5/23/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise letter to opposing counsel requesting billing rates and records.	1	\$502.00	\$502.00
875	5/23/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit correspondence to McGuire Woods re. fees and subpoena	0.8	\$650.00	\$520.00
876	5/23/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with further edits to letter to defense counsel re discovery relating to fees; review same	0.1	\$725.00	\$72.50
877	5/23/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re additional tasks re letter to defense counsel re fee discovery	0.1	\$725.00	\$72.50
879	5/26/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise letter to opposing counsel seeking production of billing rates.	0.6	\$502.00	\$301.20
880	5/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise letter to defense counsel re discovery re their fees	1.9	\$725.00	\$1,377.50
881	5/27/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise draft letter and subpoenas to Baltimore County re reasonableness of rates/hours, participate in telephone conference with A. Freeman re same.	1.3	\$536.00	\$696.80
882	5/27/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on fee letter.	0.1	\$787.00	\$78.70
883	5/27/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit letter with subpoenas for fee records; phone w/ Freeman re. same	1.1	\$650.00	\$715.00
884	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon and J. Freedman with edits to cover letter with subpoenas to McGuireWoods and County re attorneys’ bills and related documents	0.2	\$725.00	\$145.00
886	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit letter to defense counsel and subpoenas	0.6	\$725.00	\$435.00
887	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call from M. Mazzullo re final edits to letter re subpoena; e-mail from M. Mazzullo with edits to same, review and accept same	0.2	\$725.00	\$145.00
888	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with M. Mazzullo re preparing interrogatories and document requests to County re County’s fees; edit same	0.1	\$725.00	\$72.50
889	5/30/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft First Set of Requests for Production and Interrogatories to Baltimore County re fee petition.	1.4	\$536.00	\$750.40
890	5/31/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Research and review example motions for attorneys' fees. Email with D. Jeon and A. Freeman re same. Review draft requests for production to Baltimore County in preparation for fee petition.	1	\$502.00	\$502.00
891	5/31/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit subpoena	0.5	\$650.00	\$325.00
892	5/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo with draft discovery requests re County’s fees; edit same	0.3	\$725.00	\$217.50
893	5/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon and Y. Racheva re finalizing discovery requests re County’s fees	0.1	\$725.00	\$72.50
894	6/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise, finalize, and send interrogatories and document requests to Baltimore County re McGuire Woods’ fees	0.4	\$725.00	\$290.00
903	6/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon re McGuireWoods’ hourly rates	0.1	\$725.00	\$72.50
910	6/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to Michael Gill re research re McGuireWoods’ hourly rates	0.1	\$725.00	\$72.50
911	6/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Research re McGuireWoods’ billing rates	0.7	\$725.00	\$507.50
912	6/10/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call to M. Mazzullo re research re McGuireWoods’ billing rates; e-mails to/from M. Mazzullo re same	0.1	\$725.00	\$72.50
913	6/10/2022	BGL	Andrew Freeman	Partner	Fee Petition	Lengthy letter from A. Lias-Booker refusing to comply with subpoenas or document requests re McGuireWoods fees, time	0.2	\$725.00	\$145.00
914	6/13/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with M. Mazzullo re next steps. Email with Research team re examples of McGuireWoods billing statements.	0.2	\$502.00	\$100.40
916	6/14/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with research re McGuireWoods rates; review same	0.2	\$725.00	\$145.00
920	6/21/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to Y. Racheva re McGuireWoods’ hourly rates	0.1	\$725.00	\$72.50
924	6/22/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva re additional research re McGuireWoods rates	0.1	\$725.00	\$72.50
1027	8/3/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with McGuire Woods’ latest bill to the County	0.1	\$725.00	\$72.50
1106	10/3/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review and analyze compilation of opposing counsel's fees; draft and review emails with administrative staff re preparation of same.	0.6	\$536.00	\$321.60
1127	10/27/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Debbie Jeon forwarding McGuire Woods’ latest bill to Baltimore County	0.1	\$725.00	\$72.50
1128	10/30/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Review and analyze compilation of opposing counsel's fees; draft and review emails with administrative staff re preparation of same.	0.5	\$536.00	\$268.00

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
<a href="#">1132</a>	11/6/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails re opposing counsel's fees (.40); review proposed status letter and correspond with team and opposing counsel re same (.30).	0.7	\$536.00	\$749.20
<a href="#">1134</a>	11/6/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Mike Mazzullo re compiling McGuire Woods' fee data	0.1	\$725.00	\$72.50
<a href="#">1135</a>	11/7/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with administrative team re compiling and tallying opposing counsel's fees.	0.4	\$536.00	\$214.40
<a href="#">1244</a>	<b>SUBTOTAL</b>						<b>23</b>		<b>\$14,415.40</b>

# **EXHIBIT 4E**

Exhibit 4E – Plaintiffs’ Attorneys’ Fees Incurred Researching and Drafting Motion for Fees Prior to *Stinnie v. Holcomb*

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
800	3/31/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Team meeting re next steps. Research "prevailing party" case law re claiming attorney's fees after win on preliminary injunction but before a final judgment.	2.1	\$502.00	\$1,054.20
803	3/31/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re research re fees for obtaining preliminary injunction and permanent change	0.2	\$725.00	\$145.00
807	4/4/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Research "prevailing party" case law in civil rights fee reimbursement cases post preliminary injunction but pre final judgment.	0.3	\$502.00	\$150.60
809	4/7/2022	ACLU	Amy Cruice	Paralegal	Fee Petition	Case hours and fees for fee letter	0.5	\$220.00	\$110.00
810	4/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with ACLU fees through March	0.1	\$725.00	\$72.50
811	4/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from J. Freedman with A&P fees and hours through March	0.1	\$725.00	\$72.50
812	4/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft quarterly fee letter	0.3	\$725.00	\$217.50
813	4/8/2022	BGL	Andrew Freeman	Partner	Fee Petition	Finalize quarterly fee letter	0.1	\$725.00	\$72.50
814	4/8/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to A. Lias-Booker, et al. with quarterly fee letter	0.1	\$725.00	\$72.50
815	4/13/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Research fourth circuit law on whether a plaintiff can be a "prevailing party" for purpose of fee shifting after winning PI but before final judgment.	1.2	\$502.00	\$602.40
816	4/14/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Legal research on fourth circuit precedent re whether a plaintiff prevailing on a PI can be considered a 'prevailing party' for the purpose of fees. Email to team re same.	5.9	\$502.00	\$2,961.80
817	4/14/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with memo re attorneys' fees for preliminary injunction; review attached cases (Stinnie, Smyth, Veasy, Lefemine); e-mail to co-counsel re same	0.5	\$725.00	\$362.50
819	4/15/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from D. Jeon and Y. Racheva re caselaw re attorneys' fees for successful preliminary injunction	0.2	\$725.00	\$145.00
827	4/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	Revise and send e-mail to defense counsel re next steps re wrapping up case and motion for attorneys' fees	0.2	\$725.00	\$145.00
828	4/26/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review Fourth Circuit's new decision in Grabarczyk	0.2	\$725.00	\$145.00
834	4/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review appellant's briefs in Stinnie v. Holcomb re attorneys' fees for preliminary injunction	0.3	\$725.00	\$217.50
837	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit, finalize, and send e-mail to A. Lias-Booker re next steps, negotiation or mediation of attorneys' fees	0.5	\$725.00	\$362.50
838	4/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Lias-Booker re County's refusal to negotiate or mediate re fees	0.1	\$725.00	\$72.50
846	5/4/2022	BGL	Andrew Freeman	Partner	Fee Petition	Listen to portion of 4th Circuit oral argument in Stinnie	0.5	\$725.00	\$362.50
847	5/5/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	attend Stinnie hearing; conter with Freeman re. same	1	\$650.00	\$650.00
852	5/9/2022	BGL	Andrew Freeman	Partner	Fee Petition	Court's Order dismissing case and setting schedule for fee petition	0.1	\$725.00	\$72.50
853	5/12/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft/review emails with Y. Racheva on attorneys' fees petition and participate in telephone conference with Y. Racheva re same.	0.6	\$536.00	\$321.60
854	5/12/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Meet with team to discuss next steps for fee petition. Call with M. Mazzullo re same. Emails re same.	1.3	\$502.00	\$652.60
855	5/12/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Team call re: fee petition.	0.6	\$787.00	\$472.20
856	5/12/2022	ACLU	Amy Cruice	Paralegal	Fee Petition	fee petition plans and prep	1	\$220.00	\$220.00
857	5/12/2022	ACLU	Tierney Peprah	Staff Attorney	Fee Petition	Petition strategy Meeting w/co-counsel re fee petition	1	\$650.00	\$350.00
858	5/12/2022	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re preparing fee motion and memo	0.6	\$725.00	\$435.00
867	5/20/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with Y. Racheva re letter to Defendant Baltimore County on our fee petition enclosing subpoena (.40), and provide revisions to draft letter and revert to Y. Racheva (.90).	1.3	\$536.00	\$696.80
870	5/21/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review and edit billing records to exercise billing judgment	2.5	\$650.00	\$1,625.00
872	5/21/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from D. Jeon and J. Freedman re edits to letter to defense counsel re whether contesting reasonableness of plaintiffs' rates and hours	0.2	\$725.00	\$145.00
878	5/23/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit time records for fee petition	0.4	\$725.00	\$290.00
885	5/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from C. McLamb with BGL time divided between fees sought and not sought; review same	0.2	\$725.00	\$145.00
895	6/2/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft motion for attorneys' fees. Emails with team revising same.	1.9	\$502.00	\$953.80
896	6/2/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise Motion for Award of Reasonable Attorneys' Fees and Litigation Expenses and correspond with Y. Racheva and internal team re same.	0.7	\$536.00	\$375.20
897	6/3/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review motion for fees.	0.3	\$787.00	\$236.10
898	6/3/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Revise Motion for Award of Reasonable Attorneys' Fees and Litigation Expenses and correspond with Y. Racheva and internal team re same.	0.7	\$536.00	\$375.20
899	6/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re edits to motion for attorneys' fees, review and edit same and circulate edits	0.3	\$725.00	\$217.50
900	6/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re time periods and tasks to include in request for fees	0.2	\$725.00	\$145.00
901	6/6/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Finalize and submit for filing Plaintiffs' motion for fees.	0.5	\$502.00	\$251.00
902	6/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo with revised motion for attorneys' fees; review and edit same	0.2	\$725.00	\$145.00



	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
904	6/7/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Meet with team re next steps for drafting fee petition due July 11.	0.9	\$502.00	\$451.80
905	6/7/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in video conference with internal team re fee petition strategy and memorialize next steps and action items re same.	1	\$536.00	\$536.00
906	6/7/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Team call re: fee petition.	0.8	\$787.00	\$629.60
907	6/7/2022	A&P	Colley, Mark D.	Partner	Fee Petition	Telephone conference with team regarding attorneys fee recovery.	0.7	\$760.00	\$532.00
908	6/7/2022	ACLU	Amy Cruice	Paralegal	Fee Petition	meeting and prep re fee petition	0.8	\$220.00	\$176.00
909	6/7/2022	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re planning for fee petition	0.8	\$725.00	\$580.00
917	6/15/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Meet with M. Mazzullo to discuss next steps. Related follow-up and start drafting process for Plaintiffs' brief in support of fee petition.	0.7	\$502.00	\$351.40
918	6/15/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	and Declarations in Support of Motion for Award of Reasonable Attorneys' Fees and Litigation Expenses.	0.4	\$536.00	\$214.40
919	6/21/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft memo in support of Plaintiffs' fee petition.	8.3	\$502.00	\$4,166.60
921	6/22/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft brief in support of fee petition.	0.5	\$502.00	\$251.00
922	6/22/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft brief in support of fee petition.	1	\$502.00	\$502.00
923	6/22/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	draft fee affidavit	2.5	\$650.00	\$1,625.00
925	6/24/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Work on fee petition draft.	2	\$502.00	\$1,004.00
926	6/25/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft fee petition.	0.2	\$502.00	\$100.40
927	6/26/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Draft fee petition.	9.4	\$502.00	\$4,718.80
928	6/26/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft preliminary statement and facts section of fee petition memo of law.	1.9	\$536.00	\$1,018.40
929	6/27/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Read Fourth Circuit opinion in Stinnie v. Holcomb. Email with team re same and next steps given this new precedent.	0.8	\$502.00	\$401.60
930	6/27/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Review Stinnie decision.	0.2	\$787.00	\$157.40
931	6/27/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	prep. declaration; review Stinnie ruling, confer w/ co-counsel re. same	3.9	\$650.00	\$2,535.00
932	6/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review 4th Circuit's opinion in Stinnie v. Holcomb	0.2	\$725.00	\$145.00
933	6/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to co-counsel re next steps in light of Stinnie	0.1	\$725.00	\$72.50
934	6/27/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft e-mail to opposing counsel proposing stay of briefing schedule re attorneys' fees; e-mails to/from co-counsel re same; edit, finalize, and send same to opposing counsel	0.4	\$725.00	\$290.00
935	6/28/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team following Fourth Circuit decision in Stinnie v. Holcomb and confer on next steps.	0.8	\$502.00	\$401.60
936	6/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re writing Judge Griggsby re motion to stay fee petition; call to D. Jeon re same	0.1	\$725.00	\$72.50
937	6/28/2022	BGL	Andrew Freeman	Partner	Fee Petition	Voice mail messages (2) to A. Lias-Booker re proposed stay of fee petition; text from A. Lias-Booker re same	0.1	\$725.00	\$72.50
938	6/29/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team re next steps given decision in Stinnie v. Holcomb.	0.5	\$502.00	\$251.00
939	6/29/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Participate in telephone conference with A. Freeman re letter to court regarding fee petition memo of law [.4] and revise same [.5].	0.9	\$536.00	\$482.40
940	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Lias-Booker re County's opposition to extension of time for fee memo	0.1	\$725.00	\$72.50
941	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman re County's opposition to extension of time, our next steps	0.1	\$725.00	\$72.50
948	6/29/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re possible e-mail to defense counsel responding to A. Lias-Booker's e-mail re Stinnie	0.1	\$725.00	\$72.50
949	6/30/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Revise Plaintiffs' fee petition in light of Stinnie decision.	3.2	\$502.00	\$1,606.40
950	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails to/from co-counsel re draft e-mail to A. Lias-Booker in response to her e-mail re Stinnie	0.1	\$725.00	\$72.50
951	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	Edit and send e-mail to A. Lias-Booker in response to her e-mail re Stinnie	0.1	\$725.00	\$72.50
952	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from Y. Racheva with draft of memo in support of motion for fees; review and initial edits of same	0.6	\$725.00	\$435.00
953	6/30/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from M. Mazzullo re next steps for fee memo	0.1	\$725.00	\$72.50
955	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Calls (2) with C. McL and call to LaClaudia Dyson re revisions to BGL's fees	0.1	\$725.00	\$72.50
956	7/1/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit BGL's draft bill	0.5	\$725.00	\$362.50
968	7/3/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit draft Memorandum in Support of Motion for Attorneys' Fees and Expenses	2.2	\$725.00	\$1,595.00
969	7/5/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review team edits to fee petition. Revise same. Email with team re same.	1.6	\$502.00	\$803.20
970	7/5/2022	A&P	Freedman, John A.	Senior Counsel	Fee Petition	Work on attorneys fee brief; attention to motion to stay.	2	\$787.00	\$1,574.00
972	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	Draft Andrew D. Freeman declaration in support of motion for attorneys' fees	2	\$725.00	\$1,450.00
973	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from J. Freedman with comments on memo in support of attorneys' fees, review same, edit same	1	\$725.00	\$725.00
976	7/5/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon with declaration in support of fees, review same	0.3	\$725.00	\$217.50
978	7/6/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review and edit BGL's fee invoice	0.4	\$725.00	\$290.00
980	7/11/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	review Stinnie en banc petition	1.2	\$650.00	\$780.00
981	7/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	Review petition for rehearing en banc in Stinnie v. Holcomb	0.3	\$725.00	\$217.50

	B	C	D	E	F	G	H	I	J
1	Date	Firm	Name	Title	Litigation Phase	Description	Hours	Rate	Amount Billed
983	7/28/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Review 4th Circuit opinion in Holloway v. City of Virginia Beach on mootness from intervening legislation. Circulate same to team.	0.7	\$502.00	\$351.40
984	7/28/2022	BGL	Andrew Freeman	Partner	Case Development	E-mail from Y. Racheva re yesterday's 4th Circuit decision re mootness	0.1	\$725.00	\$72.50
985	8/9/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with team re upcoming team meeting, upcoming tasks, and status of Stinnie en banc review.	0.3	\$502.00	\$150.60
986	8/9/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from D. Jeon re 4th Circuit granting rehearing en banc in Stinnie v. Holcomb, review order re same	0.1	\$725.00	\$72.50
989	8/11/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Prepare for and participate in video conference with team to discuss fee petition and next steps in litigation, memorialize notes re same, and review emails on follow-up.	1.2	\$536.00	\$643.20
990	8/11/2022	ACLU	Debbie Jeon	Legal Director	Fee Petition	legal team call re. next steps following Stinnie en banc ruling; primary elections	0.5	\$650.00	\$325.00
991	8/11/2022	ACLU	Tierney Peprah	Staff Attorney	Fee Petition	Team meeting to discuss fee petition	1	\$650.00	\$350.00
992	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	Zoom call with co-counsel re next steps re fee petition	0.4	\$725.00	\$290.00
993	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	Call with D. Jeon re quarterly fee letter, discovery re fees	0.1	\$725.00	\$72.50
994	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re quarterly fee letter and discovery re defendants' fees	0.2	\$725.00	\$145.00
995	8/11/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to C. Smith re declaration in support of fee petition	0.1	\$725.00	\$72.50
996	8/25/2022	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to D. Jeon re reaching out to County's attorneys re September 6 joint status report re fee petition	0.1	\$725.00	\$72.50
1013	10/11/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with A. Cruice and R. Campbell re attorney hours records.	0.2	\$502.00	\$100.40
1014	10/19/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with A. Cruice and call with R. Campbell re ACLU rates history request.	0.1	\$502.00	\$50.20
1015	10/20/2022	A&P	Racheva, Youlia S.	Associate	Fee Petition	Email with A. Cruice re attorney hours records.	0.1	\$502.00	\$50.20
1016	12/12/2022	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Draft and review emails with Y. Racheva re next steps in preparing fee petition in light of forthcoming rehearing en banc in Stinnie v. Holcomb before Fourth Circuit.	0.4	\$536.00	\$214.40
1017	1/4/2023	A&P	Racheva, Youlia S.	Associate	Fee Petition	Create time line and task list for fee petition in light of Stinnie's upcoming oral arguments. Call with M. Mazzullo re same. Email with legal assistants re same.	1.3	\$502.00	\$652.60
1018	1/4/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Prepare for, participate in, and memorialize notes from video conference with Y. Racheva re next steps in preparing fee petition in light of forthcoming rehearing en banc in Stinnie v. Holcomb before Fourth Circuit.	0.9	\$536.00	\$482.40
1019	1/25/2023	A&P	Mazzullo, Michael L.	Associate	Fee Petition	Observe portions of Fourth Circuit argument in Stinnie v. Holcomb to assess forthcoming fee petition, draft and review emails re same.	0.8	\$536.00	\$428.80
1020	1/25/2023	BGL	Andrew Freeman	Partner	Fee Petition	Listen to en banc Fourth Circuit oral argument in Stinnie	1.5	\$725.00	\$1,087.50
1021	1/25/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re takeaways from Stinnie oral argument	0.2	\$725.00	\$145.00
1022	2/5/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail to co-counsel re quarterly fee letter; e-mail from D. Jeon re same	0.1	\$725.00	\$72.50
1023	2/6/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mails from/to J. Freedman re A&P's time and fees for quarterly fee letter	0.1	\$725.00	\$72.50
1024	2/6/2023	BGL	Andrew Freeman	Partner	Fee Petition	E-mail from A. Cruice re ACLU's time and fees for quarterly fee letter	0.1	\$725.00	\$72.50
1025	2/9/2023	BGL	Andrew Freeman	Partner	Fee Petition	Calculate, draft and send quarterly fee letter to defense counsel	0.4	\$725.00	\$290.00
1244	<b>SUBTOTAL</b>						<b>95.9</b>		<b>\$54,757.70</b>



**EXHIBIT 4F**

## Exhibit 4F – Plaintiffs’ Attorneys’ Fees Incurred for Hearings, Meetings, and Conference Calls with Multiple Attorneys

Date	Firm	Name	Title	Description	Hours	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
<del>10/7/2021</del>	<del>ACLU</del>	<del>Debbie Jeon</del>	<del>Legal Director</del>	<del>planning call with Andy Freeman</del>	<del>1</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$300.00</del>	<del>\$475.00</del>
10/7/2021	BGL	Andrew Freeman	Partner	Call with D. Jeon re issues for Voting Rights Act lawsuit	0.8	20	\$300.00	\$475.00	\$240.00	\$380.00
10/19/2021	ACLU	Debbie Jeon	Legal Director	prep, call with county atty and follow up	2.5	20	\$300.00	\$475.00	\$750.00	\$1,187.50
<del>10/19/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Follow up call with D. Jeon re next steps</del>	<del>0.6</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$180.00</del>	<del>\$285.00</del>
11/29/2021	ACLU	Debbie Jeon	Legal Director	Prep complaint and coordinate with clients and co-counsel	4.5	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
<del>11/29/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with D. Jeon re hiring expert, determining prior rates to evaluate, drafting complaint</del>	<del>0.4</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$120.00</del>	<del>\$190.00</del>
11/30/2021	ACLU	Debbie Jeon	Legal Director	prep complaint; meeting with expert; confer w. clients and co-counsel	5	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
<del>11/30/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Zoom call with D. Jeon and M. Barreto re Barreto serving as expert (.8); follow up discussion with D. Jeon (.1)</del>	<del>0.9</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$270.00</del>	<del>\$427.50</del>
12/3/2021	ACLU	Debbie Jeon	Legal Director	prep complaint; prep demand letter; phone with clients and Freeman re. same; strategic planning meeting re. same	5	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
<del>12/3/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Edit letter to J. Benjamin; e-mails to/from D. Jeon re same; phone call with D. Jeon re same; finalize and send to J. Benjamin</del>	<del>0.8</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$240.00</del>	<del>\$380.00</del>
12/13/2021	ACLU	Debbie Jeon	Legal Director	redistricting hearing preparation with team	1	20	\$300.00	\$475.00	\$300.00	\$475.00
<del>12/13/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with D. Jeon to prepare for call with J. Benjamin</del>	<del>0.2</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$60.00</del>	<del>\$95.00</del>
12/14/2021	ACLU	Debbie Jeon	Legal Director	attend redistricting hearing	5.5	20	\$300.00	\$475.00	\$1,650.00	\$2,612.50
<del>12/14/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Listen to Baltimore County Council workgroup meeting</del>	<del>1.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$450.00</del>	<del>\$712.50</del>
<del>12/15/2021</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Background reading &amp; follow up team meeting amongst A&amp;P team to discuss next steps.</del>	<del>0.8</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$120.00</del>	<del>\$180.00</del>
12/15/2021	A&P	Colley, Mark D.	Partner	Background reading; telephone conference with ACLU counsel; telephone conference with A&P team; review draft complaint.	4.4	20	\$300.00	\$475.00	\$1,320.00	\$2,090.00
<del>12/15/2021</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with internal team to discuss strategy for filing Complaint and anticipated Motion for a Preliminary Injunction.</del>	<del>0.7</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$105.00</del>	<del>\$157.50</del>
<del>12/15/2021</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with ACLU and Brown Goldstein co-counsel to discuss strategy for filing Complaint and anticipated Motion for a Preliminary Injunction.</del>	<del>1</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$150.00</del>	<del>\$225.00</del>
<del>12/15/2021</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Initial team meeting with A&amp;P, ACLU, and Baltimore counsel.</del>	<del>0.9</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$135.00</del>	<del>\$202.50</del>
12/15/2021	BGL	Andrew Freeman	Partner	Initial Zoom call with J. Freedman and Arnold & Porter team	0.8	20	\$300.00	\$475.00	\$240.00	\$380.00
12/17/2021	ACLU	Debbie Jeon	Legal Director	confer with experts, clients re case; prep complaint	4.5	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
<del>12/17/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Zoom call with M. Barreto, K. Oskooi, D. Jeon</del>	<del>0.7</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$210.00</del>	<del>\$332.50</del>
<del>12/17/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Zoom call with L. Brown, D. Jeon, J. Freedman re Professor Brown testifying as historian expert</del>	<del>1</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$300.00</del>	<del>\$475.00</del>
12/21/2021	ACLU	Debbie Jeon	Legal Director	final prep of lawsuit and confer w/ clients re. same	4	20	\$300.00	\$475.00	\$1,200.00	\$1,900.00
<del>12/21/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Zoom call with clients re filing of lawsuit</del>	<del>0.6</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$180.00</del>	<del>\$285.00</del>
<del>12/21/2021</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Organize and participate in video conference with full team to discuss status of action and next steps in preparing Preliminary Injunction Motion.</del>	<del>1</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$150.00</del>	<del>\$225.00</del>
12/21/2021	BGL	Andrew Freeman	Partner	Zoom call with co-counsel re next steps	0.7	20	\$300.00	\$475.00	\$210.00	\$332.50
12/21/2021	BGL	Andrew Freeman	Partner	Call with D. Jeon re next steps, schedule for filing motion for preliminary injunction	0.2	20	\$300.00	\$475.00	\$60.00	\$95.00
<del>12/22/2021</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Call with Mike to discuss next steps and action items for PI brief.</del>	<del>0.5</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$75.00</del>	<del>\$112.50</del>
12/22/2021	A&P	Mazzullo, Michael L.	Associate	Prepare for and participate in video conference with Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.7	4	\$150.00	\$225.00	\$105.00	\$157.50
<del>12/27/2021</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Check in call with Mike on current outstanding to do items.</del>	<del>0.3</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$45.00</del>	<del>\$67.50</del>
12/27/2021	A&P	Mazzullo, Michael L.	Associate	Prepare for and participate in telephone conference with Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.6	4	\$150.00	\$225.00	\$90.00	\$135.00
<del>12/27/2021</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Meet with Mark C. and Mike M. to discuss next steps on PI brief and expert declarations.</del>	<del>0.3</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$45.00</del>	<del>\$67.50</del>
<del>12/27/2021</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with M. Colley and Y. Racheva to discuss drafting of Motion for Preliminary Injunction.</del>	<del>0.3</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$45.00</del>	<del>\$67.50</del>
12/27/2021	A&P	Colley, Mark D.	Partner	Reading and analysis regarding PI motion and related planning call; review draft Cooper declaration.	5.6	20	\$300.00	\$475.00	\$1,680.00	\$2,660.00
<del>12/27/2021</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in telephone conference with D. Jeon to discuss Dr. Brown's expert report.</del>	<del>0.5</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$75.00</del>	<del>\$112.50</del>
12/27/2021	ACLU	Debbie Jeon	Legal Director	Work with Cooper on report; legal research; phone w/ Mazzoulo re. next steps	6	20	\$300.00	\$475.00	\$1,800.00	\$2,850.00
<del>12/28/2021</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Check in with Mike and Mark on PI draft action items and progress.</del>	<del>0.4</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$60.00</del>	<del>\$90.00</del>
12/28/2021	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with M. Colley and Y. Racheva to discuss drafting of Motion for Preliminary Injunction.	0.3	4	\$150.00	\$225.00	\$45.00	\$67.50
<del>12/29/2021</del>	<del>A&amp;P</del>	<del>Freedman, John A.</del>	<del>Senior Counsel</del>	<del>Correspond with team re: expert analysis.</del>	<del>0.3</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$90.00</del>	<del>\$142.50</del>
<del>12/29/2021</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in telephone conference with A. Freeman to discuss Mr. Baretto's expert report.</del>	<del>0.4</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$60.00</del>	<del>\$90.00</del>
12/29/2021	A&P	Colley, Mark D.	Partner	Reading and analysis regarding PI motion and related planning call.	3.7	20	\$300.00	\$475.00	\$1,110.00	\$1,757.50
<del>12/29/2021</del>	<del>ACLU</del>	<del>Debbie Jeon</del>	<del>Legal Director</del>	<del>confer with co-counsel re. RPV analysis; legal research</del>	<del>3.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$1,050.00</del>	<del>\$1,662.50</del>
<del>12/29/2021</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with M. Mazzoulo re working with experts on draft reports</del>	<del>0.3</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$90.00</del>	<del>\$142.50</del>
<del>1/3/2022</del>	<del>A&amp;P</del>	<del>Freedman, John A.</del>	<del>Senior Counsel</del>	<del>Confer re: developments; work on preliminary injunction motion; attention to Bill Cooper analysis; edit pre-motion conference letter.</del>	<del>2.8</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$840.00</del>	<del>\$1,330.00</del>
<del>1/3/2022</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Team meeting on progress and action items for PI Brief and expert reports. Drafting Senate Factors section of PI brief.</del>	<del>2.4</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$360.00</del>	<del>\$540.00</del>
<del>1/3/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with full team to discuss next steps re drafting Motion for Preliminary Injunction.</del>	<del>0.7</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$105.00</del>	<del>\$157.50</del>

Date	Firm	Name	Title	Description	Hours	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
1/3/2022	A&P	Colley, Mark D.	Partner	Review and edit PI brief and related research; review and edit Cooper declaration; telephone conference with team regarding status, plans and misc. issues.	4.7	20	\$300.00	\$475.00	\$1,410.00	\$2,232.50
<del>1/3/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Team Zoom call re tasks for motion for preliminary injunction and expert declarations</del>	<del>0.7</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$210.00</del>	<del>\$332.50</del>
<del>1/3/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with experts Oskooii/Cooper to discuss their forthcoming expert declaration.</del>	<del>0.9</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$135.00</del>	<del>\$202.50</del>
1/3/2022	ACLU	Debbie Jeon	Legal Director	phone with co-onsel and experts; legal research on county history for PI brief and declarations	5	20	\$300.00	\$475.00	\$1,500.00	\$2,375.00
<del>1/3/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Zoom call with RPV experts M. Barreto and K. Oskooii, D. Jeon, M. Mazzullo</del>	<del>0.8</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$240.00</del>	<del>\$380.00</del>
<del>1/5/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with experts Oskooii/Cooper to discuss their forthcoming expert declaration.</del>	<del>0.9</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$135.00</del>	<del>\$202.50</del>
1/5/2022	ACLU	Debbie Jeon	Legal Director	prep. declarations, legal research, phone, email to/from clients and co- counsel	4.5	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
<del>1/5/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Zoom call with M. Barreto, K. Oskooii, D. Jeon, and M. Mazzullo re racially polarized voting analysis</del>	<del>0.9</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$270.00</del>	<del>\$427.50</del>
1/6/2022	BGL	Andrew Freeman	Partner	Meet-and-confer call with A. Lias-Booker, M. Martinez, et al. re preliminary injunction, revising map	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
<del>1/6/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in telephone conference with opposing counsel to meet and confer on Motion for Preliminary Injunction.</del>	<del>0.5</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$75.00</del>	<del>\$112.50</del>
1/6/2022	A&P	Freedman, John A.	Senior Counsel	Confer team re: preliminary injunction brief; finalization of PMC letter.	1	20	\$300.00	\$475.00	\$300.00	\$475.00
<del>1/6/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with M. Mazzullo re filing motion for leave to file p.i. motion</del>	<del>0.1</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$30.00</del>	<del>\$47.50</del>
1/6/2022	ACLU	Debbie Jeon	Legal Director	prep declarations, legal research; phone w/ Barreto and Oskooii	7.5	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
<del>1/6/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Follow up call with D. Jeon, then D. Jeon and M. Mazzullo re call with defense counsel</del>	<del>0.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$150.00</del>	<del>\$237.50</del>
<del>1/7/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with full team to discuss next steps re drafting Motion for Preliminary Injunction.</del>	<del>0.8</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$120.00</del>	<del>\$180.00</del>
<del>1/7/2022</del>	<del>A&amp;P</del>	<del>Freedman, John A.</del>	<del>Senior Counsel</del>	<del>Review Baretto analysis; review and comment on PI motion; team call.</del>	<del>2.4</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$720.00</del>	<del>\$1,140.00</del>
<del>1/7/2022</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Team meeting on next steps for expert reports and PI brief.</del>	<del>0.9</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$135.00</del>	<del>\$202.50</del>
1/7/2022	ACLU	Debbie Jeon	Legal Director	Prep. Fugett declaration; review and edit PI brief phone with clients and co-counsel re. declaration and PI motion;	7.5	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
<del>1/7/2022</del>	<del>ACLU</del>	<del>Tierney Peprah</del>	<del>Staff Attorney</del>	<del>confer w/ co counsel re. PI brief</del>	<del>0.9</del>	<del>8</del>	<del>\$165.00</del>	<del>\$300.00</del>	<del>\$148.50</del>	<del>\$270.00</del>
<del>1/7/2022</del>	<del>ACLU</del>	<del>Tierney Peprah</del>	<del>Staff Attorney</del>	<del>Phone call Tony to prep declaration</del>	<del>1.1</del>	<del>8</del>	<del>\$165.00</del>	<del>\$300.00</del>	<del>\$181.50</del>	<del>\$330.00</del>
1/8/2022	ACLU	Debbie Jeon	Legal Director	update resource documents for Fugett declaration; prep. introduction to Preliminary Injunction brief; phone, email to/from clients and co-counsel re. same	4.5	20	\$300.00	\$475.00	\$1,350.00	\$2,137.50
<del>1/8/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with D. Jeon re preliminary injunction motion</del>	<del>0.1</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$30.00</del>	<del>\$47.50</del>
<del>1/11/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with full team to discuss next steps re drafting Motion for Preliminary Injunction.</del>	<del>1</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$150.00</del>	<del>\$225.00</del>
<del>1/11/2022</del>	<del>A&amp;P</del>	<del>Colley, Mark D.</del>	<del>Partner</del>	<del>Telephone conference with team regarding status and plan.</del>	<del>0.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$150.00</del>	<del>\$237.50</del>
<del>1/11/2022</del>	<del>ACLU</del>	<del>Amy Cruice</del>	<del>Paralegal</del>	<del>prep for meeting; attend mtg</del>	<del>1.8</del>	<del>n-lawyer</del>	<del>\$95.00</del>	<del>\$150.00</del>	<del>\$171.00</del>	<del>\$270.00</del>
1/11/2022	BGL	Andrew Freeman	Partner	Team Zoom call re responding to defendants re their request to dismiss councilmembers (.3) and re tasks related to finalizing expert reports, Preliminary Injunction motion and memo, and motion for leave to file (.6)	0.9	20	\$300.00	\$475.00	\$270.00	\$427.50
1/13/2022	ACLU	Debbie Jeon	Legal Director	review and edit PI motion; confer with co-counsel and experts	5.5	20	\$300.00	\$475.00	\$1,650.00	\$2,612.50
<del>1/13/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with D. Jeon re Preliminary Injunction motion and expert declarations</del>	<del>0.2</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$60.00</del>	<del>\$95.00</del>
<del>1/14/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in telephone conference with A. Freeman to discuss next steps re drafting Motion for Preliminary Injunction.</del>	<del>0.3</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$45.00</del>	<del>\$67.50</del>
1/14/2022	BGL	Andrew Freeman	Partner	Call with M. Mazzullo re remaining tasks to finalize memo and exhibits	0.3	20	\$300.00	\$475.00	\$90.00	\$142.50
<del>1/17/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with expert M. Barreto to discuss final steps of declaration in support of Motion for Preliminary Injunction.</del>	<del>0.6</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$90.00</del>	<del>\$135.00</del>
1/17/2022	BGL	Andrew Freeman	Partner	Zoom with M. Barreto, D. Jeon, and M. Mazzullo re Barreto's declaration (left before end)	0.5	20	\$300.00	\$475.00	\$150.00	\$237.50
<del>1/18/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in video conference with team to discuss next steps re drafting Motion for Preliminary Injunction and prepare for Court hearing.</del>	<del>0.6</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$90.00</del>	<del>\$135.00</del>
<del>1/18/2022</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Team meeting on final steps to finalize PI brief and prep for hearing tomorrow.</del>	<del>1.2</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$180.00</del>	<del>\$270.00</del>
1/18/2022	ACLU	Debbie Jeon	Legal Director	finalize motions papers for filing; phone, email, to/from clients and co- counsel re same	10.5	20	\$300.00	\$475.00	\$3,150.00	\$4,987.50
<del>1/18/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Team Zoom call re finalizing motion for Preliminary Injunction (.2), responding to defendants re dismissing suit against councilmembers (.1), proposed schedule for briefing and hearing on Preliminary Injunction (.2)</del>	<del>0.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$150.00</del>	<del>\$237.50</del>
<del>1/19/2022</del>	<del>A&amp;P</del>	<del>Freedman, John A.</del>	<del>Senior Counsel</del>	<del>Attend court conference; work on finalizing brief and expert reports.</del>	<del>2.1</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$630.00</del>	<del>\$997.50</del>
<del>1/19/2022</del>	<del>A&amp;P</del>	<del>Mazzullo, Michael L.</del>	<del>Associate</del>	<del>Participate in Court conference before Judge Griggsby to discuss forthcoming Motion for Preliminary Injunction.</del>	<del>0.6</del>	<del>4</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$90.00</del>	<del>\$135.00</del>
<del>1/19/2022</del>	<del>A&amp;P</del>	<del>Racheva, Youlia S.</del>	<del>Associate</del>	<del>Prep for conference with judge; conference with judge on PI Brief and briefing schedule; post conference team call to set next steps for filing.</del>	<del>1</del>	<del>1</del>	<del>\$150.00</del>	<del>\$225.00</del>	<del>\$150.00</del>	<del>\$225.00</del>
1/19/2022	ACLU	Debbie Jeon	Legal Director	prep for hearing; attend hearing; finalize pi papers for filing; communications with clients and co-counsel re filing and court rulings	8.5	20	\$300.00	\$475.00	\$2,550.00	\$4,037.50
<del>1/19/2022</del>	<del>ACLU</del>	<del>Tierney Peprah</del>	<del>Staff Attorney</del>	<del>prep for and attend court hearing and debrief</del>	<del>4.5</del>	<del>8</del>	<del>\$165.00</del>	<del>\$300.00</del>	<del>\$742.50</del>	<del>\$1,350.00</del>
<del>1/19/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Conference call with Judge Griggsby and all counsel re status, briefing schedule for motion for preliminary injunction</del>	<del>0.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$150.00</del>	<del>\$237.50</del>
<del>1/19/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Follow up call with D. Jeon re next steps, potential maps</del>	<del>0.2</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$60.00</del>	<del>\$95.00</del>
<del>1/19/2022</del>	<del>BGL</del>	<del>Andrew Freeman</del>	<del>Partner</del>	<del>Call with D. Jeon re today's call with Judge Griggsby, finalizing brief</del>	<del>0.5</del>	<del>20</del>	<del>\$300.00</del>	<del>\$475.00</del>	<del>\$150.00</del>	<del>\$237.50</del>

Date	Firm	Name	Title	Description	Hours	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
1/19/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team to debrief conference before Judge Griggsby and discuss next steps.	0.6	4	\$150.00	\$225.00	\$90.00	\$135.00
1/19/2022	BGL	Andrew Freeman	Partner	Call with M. Mazzullo re finalizing brief, upcoming call with Judge	0.1	20	\$300.00	\$475.00	\$30.00	\$47.50
1/19/2022	BGL	Andrew Freeman	Partner	Follow-up call with co-counsel re call with Judge Griggsby	0.2	20	\$300.00	\$475.00	\$60.00	\$95.00
1/19/2022	BGL	Andrew Freeman	Partner	Call with M. Mazzullo re finalizing and filing Preliminary Injunction brief; texts from/to Y. Racheva re courtesy copies	0.1	20	\$300.00	\$475.00	\$30.00	\$47.50
1/25/2022	A&P	Freedman, John A.	Senior Counsel	Confer team re PI reply.	0.7	20	\$300.00	\$475.00	\$210.00	\$332.50
1/25/2022	A&P	Colley, Mark D.	Partner	Planning call with legal team.	0.7	20	\$300.00	\$475.00	\$210.00	\$332.50
1/25/2022	A&P	Racheva, Youlia S.	Associate	Team meeting on reply brief strategy and next steps to prep for hearing on PI brief.	0.8	4	\$150.00	\$225.00	\$120.00	\$180.00
1/25/2022	ACLU	Debbie Jeon	Legal Director	team planning meeting; legal research for reply brief, communicate with experts	3.9	20	\$300.00	\$475.00	\$1,170.00	\$1,852.50
1/25/2022	ACLU	Elsha Aemero	Paralegal	meeting with counsel to prep reply and hearing	2	n-lawyer	\$95.00	\$150.00	\$190.00	\$300.00
1/25/2022	ACLU	Tierney Peprah	Staff Attorney	strategy meeting with counsel team	1	8	\$165.00	\$300.00	\$165.00	\$300.00
1/25/2022	BGL	Andrew Freeman	Partner	Team Zoom call re preparing for our reply brief and hearing	0.8	20	\$300.00	\$475.00	\$240.00	\$380.00
1/27/2022	A&P	Racheva, Youlia S.	Associate	Brainstorm PPT ideas with Mike for upcoming hearing on Feb. 15.	0.6	4	\$150.00	\$225.00	\$90.00	\$135.00
1/27/2022	A&P	Mazzullo, Michael L.	Associate	Participate in telephone conference with Y. Racheva to discuss strategy re presentation at Preliminary Injunction hearing.	0.6	4	\$150.00	\$225.00	\$90.00	\$135.00
1/28/2022	A&P	Racheva, Youlia S.	Associate	Draft shell PPT and brainstorm on PPT for hearing with Mike and Andy.	1.2	4	\$150.00	\$225.00	\$180.00	\$270.00
1/28/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with Y. Racheva and A. Freedman to prepare presentation for hearing re Motion for Preliminary Injunction.	1	4	\$150.00	\$225.00	\$150.00	\$225.00
1/28/2022	BGL	Andrew Freeman	Partner	Zoom call with M. Mazzullo and Y. Racheva re preparing PowerPoint for hearing	0.5	20	\$300.00	\$475.00	\$150.00	\$237.50
2/1/2022	A&P	Mazzullo, Michael L.	Associate	Participate in telephone conference with A. Freedman and D. Jeon regarding drafting reply in support of Motion for Preliminary Injunction.	0.8	4	\$150.00	\$225.00	\$120.00	\$180.00
2/1/2022	ACLU	Debbie Jeon	Legal Director	review opp to m/PI; legal research for same; correspond with clientst, experts and co-counsel re same	6.5	20	\$300.00	\$475.00	\$1,950.00	\$3,087.50
2/1/2022	BGL	Andrew Freeman	Partner	Call with D. Jeon (.4), then with D. Jeon and M. Mazzullo (.7) re our reply to County's opposition to motion for preliminary injunction	1.1	20	\$300.00	\$475.00	\$330.00	\$522.50
2/2/2022	A&P	Racheva, Youlia S.	Associate	Meet w/ team to go over PI reply brief needs, status, to dos.	0.8	4	\$150.00	\$225.00	\$120.00	\$180.00
2/2/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team regarding drafting reply in support of Motion for Preliminary Injunction.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
2/2/2022	ACLU	Debbie Jeon	Legal Director	confer w/ clients, co-counsel, experts, court re. responde to opp to PI motion; legal, fact research re. same	7.5	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
2/2/2022	BGL	Andrew Freeman	Partner	Zoom call with co-counsel re reply brief	0.7	20	\$300.00	\$475.00	\$210.00	\$332.50
2/2/2022	BGL	Andrew Freeman	Partner	Zoom call with M. Barreto, K. Oskooii, and co-counsel re responding to Gimpel's expert report	0.7	20	\$300.00	\$475.00	\$210.00	\$332.50
2/2/2022	A&P	Racheva, Youlia S.	Associate	Meeting with Senator Sydnor re his declaration for PI Reply.	1.5	4	\$150.00	\$225.00	\$225.00	\$337.50
2/2/2022	BGL	Andrew Freeman	Partner	Call with Sen. Sydnor re reviewing maps, providing declaration	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
2/2/2022	BGL	Andrew Freeman	Partner	Zoom call with Sen. Sydnor, D. Jeon, and Y. Racheva re the ways each map affects westside communities, re racially polarized voting, and re Sydnor declaration	1.3	20	\$300.00	\$475.00	\$390.00	\$617.50
2/3/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.	0.7	4	\$150.00	\$225.00	\$105.00	\$157.50
2/3/2022	A&P	Colley, Mark D.	Partner	Planning call with legal team; analysis, research and drafting re reply brief; telephone conferences with expert witnesses; draft reply re Gingles I.	10.9	20	\$300.00	\$475.00	\$3,270.00	\$5,177.50
2/3/2022	A&P	Racheva, Youlia S.	Associate	Team check in on status of reply brief and expert declarations. Follow up meeting with Kassra on analysis of voting patterns and declaration drafting progress. Drafting Senator Sydnor declaration.	4.3	4	\$150.00	\$225.00	\$645.00	\$967.50
2/3/2022	ACLU	Debbie Jeon	Legal Director	prep PI opp reply; confer with clients, co-counsel, witnesses and experts re. same; legal research, prep and review drafts of brief and declarations	6.8	20	\$300.00	\$475.00	\$2,040.00	\$3,230.00
2/3/2022	BGL	Andrew Freeman	Partner	Team Zoom call re next steps on reply brief	0.7	20	\$300.00	\$475.00	\$210.00	\$332.50
2/3/2022	BGL	Andrew Freeman	Partner	Zoom call with B. Cooper, D. Jeon, and M. Colley re additional maps and reply declaration from Cooper	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
2/3/2022	BGL	Andrew Freeman	Partner	Zoom call with K. Oskooii re rebutting Gimpel	1.2	20	\$300.00	\$475.00	\$360.00	\$570.00
2/3/2022	BGL	Andrew Freeman	Partner	Call with C. Pasteur and Y. Racheva re Pasteur's school board campaign, providing declaration	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
2/3/2022	BGL	Andrew Freeman	Partner	Call with M. Mazzullo and A&P production department re providing larger copies of maps to Judge Griggsby; call to M. Graves re same; e-mail to/from M. Mazzullo re same	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
2/3/2022	A&P	Mazzullo, Michael L.	Associate	Participate in telephone conference with A. Freeman to discuss status.	0.3	4	\$150.00	\$225.00	\$45.00	\$67.50
2/3/2022	BGL	Andrew Freeman	Partner	Call with M. Mazzullo re reply brief	0.3	20	\$300.00	\$475.00	\$90.00	\$142.50
2/4/2022	A&P	Racheva, Youlia S.	Associate	Call with Cheryl Pasteur and Andy to discuss her brief but had to jump off to another meeting.	0.2	4	\$150.00	\$225.00	\$30.00	\$45.00
2/4/2022	BGL	Andrew Freeman	Partner	Call with C. Pasteur re her declaration	0.1	20	\$300.00	\$475.00	\$30.00	\$47.50
2/4/2022	BGL	Andrew Freeman	Partner	Second and third calls with C. Pasteur and Y. Racheva re revisions to Pasteur declaration; e-mails to/from/to/from C. Pasteur with revisions to same	1.1	20	\$300.00	\$475.00	\$330.00	\$522.50



Date	Firm	Name	Title	Description	Hours	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
2/4/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
2/4/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team to discuss status of reply brief in support of Motion for Preliminary Injunction.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
2/4/2022	A&P	Colley, Mark D.	Partner	Planning calls with legal team; analysis, research and drafting re reply brief; telephone conference with Bill Cooper and draft declaration.	4.2	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
2/4/2022	A&P	Racheva, Youlia S.	Associate	Team check in on PI reply and declarations.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
2/4/2022	ACLU	Elsha Aemero	Paralegal	Correspond w/plaintiffs re hearing	1	n-lawyer	\$95.00	\$150.00	\$95.00	\$150.00
2/4/2022	BGL	Andrew Freeman	Partner	Team Zoom meeting re reply brief, supporting declarations	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
2/4/2022	BGL	Andrew Freeman	Partner	Zoom call with B. Cooper, D. Jeon, and M. Colley re revisions to maps for reply and re Cooper Second Declaration; edit Cooper Second Declaration	1.4	20	\$300.00	\$475.00	\$420.00	\$665.00
2/8/2022	A&P	Racheva, Youlia S.	Associate	Team meeting to discuss notices to judge, PPT presentation, Barreto testimony at hearing.	1.3	4	\$150.00	\$225.00	\$195.00	\$292.50
2/8/2022	ACLU	Debbie Jeon	Legal Director	confer with clients, co-counsel re. case developments, Alabama ruling; prep. message re. same to clients	2.7	20	\$300.00	\$475.00	\$810.00	\$1,282.50
2/8/2022	BGL	Andrew Freeman	Partner	Zoom call with M. Mazzullo, Y. Racheva, and D. Jeon (who left early) re preparing for next week's hearing, notifying court re calling Barreto as witness	1	20	\$300.00	\$475.00	\$300.00	\$475.00
2/9/2022	A&P	Racheva, Youlia S.	Associate	Call with team & Matt & Kassra re strategy for Matt's testimony at next week's hearing. Review defendants' filing based on new SCOTUS Alabama ruling and our potential responses.	1.1	4	\$150.00	\$225.00	\$165.00	\$247.50
2/9/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference to prepare Dr. Barreto for expert testimony.	0.9	4	\$150.00	\$225.00	\$135.00	\$202.50
2/9/2022	ACLU	Debbie Jeon	Legal Director	confer w. co-counsel, experts re. prep for court hearing	2.2	20	\$300.00	\$475.00	\$660.00	\$1,045.00
2/9/2022	BGL	Andrew Freeman	Partner	Zoom call with M. Barreto, K. Oskooii, and co-counsel re prep for Barreto testimony at hearing	0.8	20	\$300.00	\$475.00	\$240.00	\$380.00
2/11/2022	ACLU	Debbie Jeon	Legal Director	witness perp with Tony Fugett; client communications; prep brief re. supplemental authority, review CoA order extending election deadlines	4.2	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
2/11/2022	ACLU	Tierney Peprah	Staff Attorney	Meeting with Tony Fugett for hearing prep	1	8	\$165.00	\$300.00	\$165.00	\$300.00
2/13/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with A. Freeman to prepare presentation for Preliminary Injunction hearing.	3.5	4	\$150.00	\$225.00	\$525.00	\$787.50
2/13/2022	BGL	Andrew Freeman	Partner	Zoom call with M. Mazzullo and Y. Racheva to revise PowerPoint for hearing, discuss my opening statement and examination of M. Barreto	3.5	20	\$300.00	\$475.00	\$1,050.00	\$1,662.50
2/14/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conferences with A. Freeman to prepare argument/presentation for Preliminary Injunction hearing.	3.6	4	\$150.00	\$225.00	\$540.00	\$810.00
2/14/2022	ACLU	Debbie Jeon	Legal Director	prep for court hearing; meetings with co-counsel and witnesses	8.5	20	\$300.00	\$475.00	\$2,550.00	\$4,037.50
2/14/2022	BGL	Andrew Freeman	Partner	Zoom calls (2) with M. Barreto, et al., to review Barreto's testimony for hearing (note: I missed part of call while on the phone with A. Lias Booker)	1.8	20	\$300.00	\$475.00	\$540.00	\$855.00
2/14/2022	BGL	Andrew Freeman	Partner	Zoom call with D. Jeon, M. Mazzullo, and Y. Racheva to review PowerPoint and prepare presentation for tomorrow's hearing	2.2	20	\$300.00	\$475.00	\$660.00	\$1,045.00
2/15/2022	A&P	Freedman, John A.	Senior Counsel	Attend oral argument; debrief.	2	20	\$300.00	\$475.00	\$600.00	\$950.00
2/15/2022	A&P	Colley, Mark D.	Partner	Attend PI Hearing and follow up debriefing.	4.2	20	\$300.00	\$475.00	\$1,260.00	\$1,995.00
2/15/2022	A&P	Racheva, Youlia S.	Associate	Final prep for & attend court hearing on Pltfs PI Brief. Post hearing debrief with team.	5.5	4	\$150.00	\$225.00	\$825.00	\$1,237.50
2/15/2022	A&P	Mazzullo, Michael L.	Associate	Participate in Preliminary Injunction hearing before Judge Griggsby.	3.9	4	\$150.00	\$225.00	\$585.00	\$877.50
2/15/2022	ACLU	Debbie Jeon	Legal Director	prep for, attend and debrief from court hearing on PI motion; emails to/from clients and co-counsel re. same	7.5	20	\$300.00	\$475.00	\$2,250.00	\$3,562.50
2/15/2022	ACLU	Elsha Aemero	Paralegal	Redistricting memo and attend court hearing for the Baltimore County redistricting case.	6	n-lawyer	\$95.00	\$150.00	\$570.00	\$900.00
2/15/2022	ACLU	Tierney Peprah	Staff Attorney	Baltimore County Redistricting hearing	3	8	\$165.00	\$300.00	\$495.00	\$900.00
2/15/2022	BGL	Andrew Freeman	Partner	Hearing on motion for preliminary injunction	3.4	20	\$300.00	\$475.00	\$1,020.00	\$1,615.00
2/15/2022	BGL	Andrew Freeman	Partner	Post hearing Zoom call with co-counsel and clients	0.5	20	\$300.00	\$475.00	\$150.00	\$237.50
2/16/2022	ACLU	Debbie Jeon	Legal Director	confer with co-counsel and clients re. next steps	1.6	20	\$300.00	\$475.00	\$480.00	\$760.00
2/16/2022	BGL	Andrew Freeman	Partner	Call with D. Jeon re yesterday's hearing, next steps	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
2/22/2022	A&P	Racheva, Youlia S.	Associate	Review Judge Griggsby's order granting our PI Motion.	0.3	4	\$150.00	\$225.00	\$45.00	\$67.50
2/22/2022	A&P	Mazzullo, Michael L.	Associate	Review opinion from Judge Griggsby granting Motion for Preliminary Injunction.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
2/22/2022	ACLU	Debbie Jeon	Legal Director	review court ruling; confer w/ clients and co-counsel re. same	2.5	20	\$300.00	\$475.00	\$750.00	\$1,187.50
2/22/2022	ACLU	Tierney Peprah	Staff Attorney	Read court opinion Baltimore County redistricting	1.5	8	\$165.00	\$300.00	\$247.50	\$450.00
2/22/2022	BGL	Andrew Freeman	Partner	Read Judge Griggsby's opinion granting preliminary injunction	0.8	20	\$300.00	\$475.00	\$240.00	\$380.00
2/22/2022	BGL	Andrew Freeman	Partner	Call with D. Jeon re opinion, next steps	0.2	20	\$300.00	\$475.00	\$60.00	\$95.00
2/23/2022	A&P	Mazzullo, Michael L.	Associate	Participate in telephone conference with A. Freeman to discuss potential next steps in action.	0.3	4	\$150.00	\$225.00	\$45.00	\$67.50
2/23/2022	BGL	Andrew Freeman	Partner	Call with M. Mazzullo re preparing for potential next steps	0.2	20	\$300.00	\$475.00	\$60.00	\$95.00
3/2/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team to discuss potential next steps in action.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
3/2/2022	ACLU	Debbie Jeon	Legal Director	confer w/ clients and co-counsel; team strategy call	1.7	20	\$300.00	\$475.00	\$510.00	\$807.50

Date	Firm	Name	Title	Description	Hours	Years Exp.	MD Rate (Low)	MD Rate (High)	Adj. Amt. (Low)	Adj. Amt. (High)
3/2/2022	BGL	Andrew Freeman	Partner	Zoom call with D. Jeon, J. Freedman, M. Mazzullo, T. Fugett re possible next steps	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
3/31/2022	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team to discuss next steps.	0.1	4	\$150.00	\$225.00	\$15.00	\$22.50
3/31/2022	A&P	Freedman, John A.	Senior Counsel	Team call re: next step.	0.8	20	\$300.00	\$475.00	\$240.00	\$380.00
9/5/2023	A&P	Racheva, Youlia S.	Associate	Participate in team calls re fee petition and next steps.	2.2	1	\$150.00	\$225.00	\$330.00	\$495.00
9/5/2023	ACLU	Amy Cruice	Paralegal	call with legal team about fees	0.7	n-lawyer	\$95.00	\$150.00	\$66.50	\$105.00
9/5/2023	ACLU	Debbie Jeon	Legal Director	confer with colleagues, review drafts of status report, discuss next steps	1	20	\$300.00	\$475.00	\$300.00	\$475.00
9/5/2023	BGL	Andrew Freeman	Partner	Zoom call with co-counsel re fee petition	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
11/27/2023	A&P	Mazzullo, Michael L.	Associate	Revise draft memo of law and Freedman declaration in support of fee petition (2.20); correspond with A. Freeman and team re preparing draft of fee petition (.70).	2.9	4	\$150.00	\$225.00	\$435.00	\$652.50
11/27/2023	BGL	Andrew Freeman	Partner	Call with M. Mazzullo re fee petition	0.4	20	\$300.00	\$475.00	\$120.00	\$190.00
11/30/2023	A&P	Mazzullo, Michael L.	Associate	Revise and compile materials supporting fee petition, including memo of law, declarations, and supporting exhibits, and correspond with team re submitting same to opposing counsel.	3.8	4	\$150.00	\$225.00	\$570.00	\$855.00
11/30/2023	BGL	Andrew Freeman	Partner	Calls and e-mails with Mike Mazzullo re edits to fee memo, finalizing same	0.3	20	\$300.00	\$475.00	\$90.00	\$142.50
1/17/2024	A&P	Mazzullo, Michael L.	Associate	Participate in video conference with team re next steps on fee petition.	0.4	4	\$150.00	\$225.00	\$60.00	\$90.00
1/17/2024	A&P	Racheva, Youlia S.	Associate	Call and email with team re mediation, fee petition, and next steps.	1.6	1	\$150.00	\$225.00	\$240.00	\$360.00
1/17/2024	A&P	Freedman, John A.	Senior Counsel	Follow up on mediation cancellation, team call re: same.	0.9	20	\$300.00	\$475.00	\$270.00	\$427.50
1/17/2024	ACLU	Debbie Jeon	Legal Director	team meeting and follow up re. next steps	1.2	20	\$300.00	\$475.00	\$360.00	\$570.00
1/17/2024	BGL	Andrew Freeman	Partner	Zoom call with co-counsel re fee petition.	0.5	20	\$300.00	\$475.00	\$150.00	\$237.50
1/23/2024	A&P	Mazzullo, Michael L.	Associate	Participate in office conference with Y. Racheva re next steps on fee petition.	0.5	4	\$150.00	\$225.00	\$75.00	\$112.50
1/23/2024	A&P	Racheva, Youlia S.	Associate	Meet with M. Mazzullo and coordinate next steps for fee petition filing.	0.9	1	\$150.00	\$225.00	\$135.00	\$202.50
Total sought (all timekeepers)					346.2				\$89,202.50	\$140,857.50
( – additional timekeepers)					152.6				\$31,527.50	\$49,572.50
<b>TOTAL (only one timekeeper)</b>					<b>193.6</b>				<b>\$57,675.00</b>	<b>\$91,285.00</b>

**EXHIBIT 4G**





**EXHIBIT 4H**



# **EXHIBIT 5**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

YASMIN REYAZUDDIN

Plaintiff

v.

MONTGOMERY COUNTY, MARYLAND

Defendant

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Civil Action No. 8:11-cv-00951-DKC

**AFFIDAVIT OF KEVIN B. KARPINSKI**

I, Kevin Bock Karpinski, depose and state that:

1. I am over the age of eighteen.
2. I have personal knowledge of the facts set forth in this Affidavit.
3. I am competent to testify to the facts set forth in this Affidavit.
4. In 1993, I graduated from the University of Baltimore Law School.
5. I am licensed to practice law, and a member in good standing, before the following state and federal courts: Maryland Court of Appeals, U.S. District Court for the District of Maryland, the United States Court of Appeals for the Fourth Circuit, the District of Columbia; U.S. Court of Appeals for the Third Circuit; U.S. District Court for the District of Columbia; and the Supreme Court of the United States.
6. For the last 28 years I have been actively engaged in the practice of civil litigation. This includes significant discovery, motions, trials and appeals

in state and federal court. The subject matter of my cases and those handled by my firm includes civil rights, insurance defense, employment, premises liability and general tort litigation.

7. I am the Managing Partner in the law firm of Karpinski, Cornbrooks & Karp, P.A., a firm which provides legal advice and litigation defense to Montgomery County, Maryland and other local government employers throughout Maryland regarding, *inter alia*, employment law matters. Our work includes providing legal services in cases pending in the courts in Montgomery County, Maryland, which is the county where the Reyazuddin incident took place, and in the U.S. District Court for the District of Maryland, the jurisdiction where the Reyazuddin case is pending.
8. Geographically, our firm is located in the same building as Brown, Goldstein and Levy, at 120 East Baltimore Street, Baltimore, Maryland 21202.
9. I, personally, and other attorneys in my current and predecessor firm (Karpinski, Colaresi & Karp, P.A.), have litigated employment law matters in both Montgomery County and the U.S. District Court for the District of Maryland as well as other jurisdictions.
10. With respect to the nature of claims involving employment and disability discrimination, our attorneys have handled matters including wrongful discharge, employment discrimination claims under Maryland and Federal statutes such as Title VII, the Family and Medical Leave Act



("FMLA"), the Vocational Rehabilitation Act, the Americans With Disabilities Act ("ADA"), the Fair Labor Standards Act ("FLSA") and the Age Discrimination in Employment Act ("ADEA"). Our attorneys possess significant experience in administrative agency proceedings as well, such as before the Equal Employment Opportunity Commission ("EEOC") and the Maryland Commission on Civil Rights ("MCCR").

11. Our current and predecessor firms have successfully defended employment and/or disability discrimination matters on behalf of most County governments in the State of Maryland, including Montgomery County.
12. Our firm is routinely engaged as defense counsel by LGIT (Local Government Insurance Trust) and by Travelers Insurance Company to defend cases brought against their insureds. Those cases include claims alleging disability and employment discrimination.
13. During the time the Reyazuddin litigation has been pending (2011-2021), our firm has defended two civil rights/disability discrimination cases brought by Brown, Goldstein and Levy. The cases were Robert Saylor v. Regal Cinemas, Inc., et al., case number: 1:13-cv-03809-ELH and Deborah Benton, et al. v. Correct Care Solutions, LLC, et al., case number 8:16-cv-02177-GJH. Daniel Karp was the lead attorney in Saylor and I was the lead attorney in Benton. In Saylor, our firm charged one hundred eighty-five (\$185.00) for partners and one hundred fifty dollars (\$150.00) for associates up until 2019 and then charged two hundred



dollars (\$200.00) for partners and one hundred sixty-five dollars (\$165.00) for associates. In Benton, our firm charged two hundred twenty-eight dollars (\$228.00) for partners and one hundred eighty dollars (\$180.00) for associates. In both cases we charged an hourly rate of sixty-five dollars (\$65.00) and ninety-four dollars (\$94.00), respectively for paralegal support.

14. We have achieved successful results for Montgomery County and our other clients defending employment and disability discrimination cases, charging rates below the Fee Guidelines set forth in Appendix B of the Local Rules of the United States District Court for the District of Maryland.

15. Throughout my 28 years of practice, including the defense of fee-shifting cases alleging disability and employment discrimination, I am generally familiar with billing rates of employment attorneys in Montgomery County and those appearing before the U.S. District Court for the District of Maryland.

16. From my experience, law firms with experienced attorneys who handle employment law cases in Montgomery County and who appear in the U.S. District Court for the District of Maryland generally charge rates consistent with the Fee Guidelines specified in Appendix B of the Local Rules. Our experience with billing practices in Baltimore is the same.

17. During the time frame of 2011 to 2016, partners at Karpinski, Colaresi & Karp, P.A. charged Montgomery County a blended rate of two

hundred thirty-five dollars (\$235.00) per hour and charged ninety-five (\$95.00) per hour for our paralegals. In my opinion, this was the customary rate in the industry for defending governmental entities in employment and disability discrimination cases in Montgomery County and in the United States District Court for the District of Maryland in Greenbelt and in Baltimore during this window of time.

18. This rate remained in place until October 1, 2019, at which time Karpinski, Cornbrooks & Karp increased the rate for Montgomery County to two hundred seventy-five dollars (\$275.00) per hour. The paralegal rate has not changed.

19. I have been advised that in support of the fee petition submitted in this employment and disability discrimination case, Plaintiff is seeking the following rates in the 2010-2016 time frame: \$525/hour for one associate with 0-6 years of experience; \$450/hour for two other associates with 2-3 years of experience, \$390/hour for an associate with 2 years of experience, \$475/hour for an associate with 6-9 years of experience; \$265 for two paralegals and \$240 for a third; and \$625 and \$595 for the two lead partners with over 20 years of experience, Daniel Goldstein and Joseph Espo respectively. All of these requested rates exceed the rates set forth under the Fee Guidelines in Appendix B of the Local Rules and also exceed rates typically charged by talented and skilled attorneys pursuing and defending employment and disability discrimination cases in Montgomery County and in the United States

District Court for the District of Maryland. In my experience, attorneys in these jurisdictions who routinely pursue or defend employment and disability discrimination cases do so at or below the Fee Guidelines, and Plaintiff's desired rates as identified in paragraph 19 are unreasonable.

I DO SOLEMNLY DECLARE AND AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT.



12/21/21

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KEVIN BOCK KARPINSKI, ESQUIRE

Managing Partner,

Karpinski, Cornbrooks & Karp, P.A.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BALTIMORE COUNTY BRANCH OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
*et al.*,

Plaintiffs,

v.

BALTIMORE COUNTY, MARYLAND,  
*et al.*,

Defendants.

Civil Action No. 1:21-cv-03232-LKG

**DEFENDANT BALTIMORE COUNTY'S  
REQUEST FOR HEARING**

Defendant Baltimore County, Maryland ("Baltimore County"), pursuant to U.S. District Court for the District of Maryland Local Rule 105.6, respectfully requests that the Court hold an in-person hearing on Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses (ECF 86).

Dated: February 26, 2024

Respectfully submitted,

/s/ Ava E. Lias-Booker

Ava E. Lias-Booker (Fed. Bar No. 05022)

Melissa O. Martinez (Fed. Bar No. 28975)

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*Counsel for Defendant*

*Baltimore County, Maryland*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BALTIMORE COUNTY BRANCH OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
*et al.*,

Plaintiffs,

v.

BALTIMORE COUNTY, MARYLAND,  
*et al.*,

Defendants.

Civil Action No. 1:21-cv-03232-LKG

**ORDER DENYING PLAINTIFFS' MOTION FOR ATTORNEYS'  
FEES AND LITIGATION EXPENSES**

UPON CONSIDERATION of Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses, Baltimore County's Opposition to Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses, and any reply thereto, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2024, hereby:

**ORDERED** that Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses is **DENIED**.

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HON. LYDIA KAY GRIGGSBY  
United States District Judge

cc: All Counsel of Record