

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DICK ANTHONY HELLER, et al.,)	Case No. 03-CV-0213-EGS
)	
Plaintiffs,)	PLAINTIFF’S MOTION FOR
)	ATTORNEY FEES AND COSTS
v.)	[42 U.S.C. § 1988]
)	
DISTRICT OF COLUMBIA, et al.,)	
)	
Defendants.)	
_____)	

PLAINTIFF’S MOTION FOR ATTORNEY FEES AND COSTS

COME NOW Plaintiff Dick Anthony Heller and his undersigned counsel, and move this Honorable Court to award Plaintiff’s counsel their attorney fees and costs pursuant to 42 U.S.C. § 1988.

This motion is made upon the attached memorandum in support of said motion, declarations, exhibits, the Court’s file, and any other matter deemed relevant to the determination of the motion.

The attorney fees and costs requested by this motion are as follows:

Attorney Fees:

Alan Gura: 1,661 hours x \$557/hr. x 2.0 enhancement = \$1,850,354.00
Clark M. Neily, III: 808.3 hours x \$557/hr. x 2.0 enhancement = \$900,446.20
Robert A. Levy: 595.6 hours x \$557/hr. x 2.0 enhancement = \$663,498.40
Thomas Huff: 153.6 hours x \$285/hr. x 2.0 enhancement = \$87,552.00
Gene Healy: 33.7 hours x \$494/hr. x 2.0 enhancement = \$33,295.60
Laura A. Possesky: 18 hours x \$557/hr. x 2.0 enhancement = \$20,052.00
Christopher M. Day: 3.5 hours x \$557/hr. x 2.0 enhancement = \$3,899.00

Costs Reimbursable to Robert Levy:

Travel expenses: \$3,544.00
Photocopy/printing expenses: \$765.44
Teleconferencing: \$244.00
Postage: \$212.36
Messenger fees: \$124.47
Outside Legal Services: \$7,650.00

Counsel has corresponded with opposing counsel seeking to meet and confer over the subject matter of this motion, and was advised by opposing counsel that a response would be provided, but none has been received. Counsel have previously discussed the issue of attorney fees and costs. Accordingly, Counsel believes that the motion will be opposed.

Wherefore, Plaintiff and Counsel respectfully request that the motion be granted.

Dated: August 25, 2008

Respectfully submitted,

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By: /s/Alan Gura

Alan Gura

Attorneys for Plaintiffs