

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 (\$589/hr. *Laffey* + \$201/hr *Perdue* adjustment) = \$1,312,190
Clark Neily: 808.3 hours x (\$589/hr. *Laffey* + \$201/hr *Perdue* adjustment) = \$638,557
Robert Levy: 595.6 hours x (\$589/hr. *Laffey* + \$201/hr *Perdue* adjustment) = \$470,524
Thomas Huff: 153.6 hours x (\$361/hr. *Laffey* + \$39/hr. *Perdue* adjustment) = \$61,440
Gene Healy: 33.7 hours x (\$589/hr. *Laffey* + \$201/hr *Perdue* adjustment) = \$26,623
Laura Possessky: 18 hours x (\$589/hr. *Laffey* + \$201/hr *Perdue* adjustment) = \$14,220

The base attorney fees total \$2,523,554.

Perdue Interest

The *Perdue* interest charge (3 year excessive delay, 7.25% compounded) is \$589,627.95.

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

The cost bill on file, including these above expenses, totals \$13,215.30.

The total amount sought is \$3,126,397.25.

Defendants oppose this motion.

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

Dated: June 18, 2010

Respectfully submitted,

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By: /s/Alan Gura
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