UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

OHN W. JACKSON and SECOND)
AMENDMENT FOUNDATION, INC.,)
Plaintiffs,)
-against-)
GORDON E. EDEN, in his Official Capacity as Director of the Special Investigations Division of the New Mexico Department of) Case No. 1:12-CV-421-MCA-RHS
Public Safety,)
)
Defendant.)

MOTION FOR ATTORNEY FEES AND EXPENSES

Come now Plaintiffs, JOHN W. JACKSON and SECOND AMENDMENT FOUNDATION, INC., by and through counsel, and respectfully move this Honorable Court to award Plaintiffs' 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:

David G. Sigale: (through 4/22/14)	63.8 hours x \$500.00/hr 13.4 travel hours x \$250.00/hr	\$ 31,900.00 \$ 3,350.00
Paul M. Kienzle, III (through 3/31/14)	16.2 hours x \$275.00/hr	\$ 4,455.00
Costs:		\$ 1,331.08

As noted in the attached declarations, attorney fees are requested at present rates.

Plaintiffs reserve the right to supplement this request as additional time is incurred litigating the

fee dispute, and to seek adjustments for present value based on either rate updates or prejudgment interest.

Dated: April 30, 2014

David G. Sigale, Esq. (#6238103 (IL)) LAW FIRM OF DAVID G. SIGALE, P.C. 739 Roosevelt Road, Suite 304 Glen Ellyn, IL 60137 630.452.4547 dsigale@sigalelaw.com Admitted *pro hac vice* Respectfully submitted,

Paul M. Kienzle, III., Esq. (#7592 (NM)) SCOTT & KIENZLE, P.A. P.O. Box 587 Albuquerque, NM 87103 (505) 246-8600 paul@kienzlelaw.com

By: /s/ David G. Sigale
David G. Sigale

Attorneys for Plaintiffs

CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

- 1. On April 30, 2014, the foregoing document was electronically filed with the District Court Clerk via CM/ECF filing system;
- 2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
David G. Sigale