

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

DAVID J. RADICH and LI-RONG RADICH,)

Plaintiffs,)

v.)

JAMES C. DELEON GUERRERO, in his)

official capacity as Commissioner of the)

Department of Public Safety of the)

Commonwealth of Northern Mariana)

Islands, and LARRISA LARSON, in her)

official capacity as Secretary of the)

Department of Finance of the)

Commonwealth of Northern Mariana)

Islands,)

Defendants.)

Case No. 1:14-CV-20

MOTION FOR ATTORNEY FEES AND EXPENSES

Come now Plaintiffs, DAVID J. RADICH and LI-RONG RADICH, 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:	109.2 hours x \$500.00/hr	\$ 54,600.00
(through 4/11/16)	102.9 hours x \$250.00/hr	\$ 25,725.00
Daniel T. Guidotti	87.7 hours x \$175.00/hr	\$ 15,347.50
(through 4/5/16)		

Costs:

\$ 8,241.33

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 11, 2016

Respectfully submitted,

/s/ David G. Sigale
One of the Attorneys for Plaintiffs

Lead Counsel

David G. Sigale, Esq. (#6238103 (IL))
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Local Civil Rule 83.5(f) Counsel

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On April 11, 2016, 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