

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MEMPHIS A. PHILLIP RANDOLPH
INSTITUTE, *et al.*,

Plaintiffs,

v.

TRE HARGETT, *et al.*,

Defendants.

Civil No. 3:20-cv-0374
JUDGE RICHARDSON
MAGISTRATE JUDGE FRENSELY

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES

Pursuant to Federal Rule of Civil Procedure 54(d)(2) and Local Rule 54.01(b)(1), Plaintiffs hereby respectfully move this Court under 42 U.S.C. § 1988 and other authority for an award of attorneys' fees. The attorneys' fees requested are \$99,222.13. Plaintiffs do not seek any enhancement from the lodestar amount. As demonstrated in the supporting memorandum, which is incorporated by reference herein, Plaintiffs are the prevailing party with respect to the First-Time Voter claim, the amounts requested are reasonable and justified by established law, and substantially understate the fees actually incurred.

Plaintiffs reserve the right to seek additional fees and expenses and/or to forego the voluntary reductions already applied in their fee petition in the event a reply brief, preparation for a hearing, or other compensable work becomes necessary in order to obtain a reasonable fee award for the work performed in this matter.

Dated: August 9, 2021

Respectfully submitted,

Danielle Lang*
Molly Danahy*
Jonathan Diaz*
Caleb Jackson*
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Tel.: (202) 736-2200
dlang@campaignlegalcenter.org
rdoshi@campaignlegalcenter.org
mdanahy@campaignlegalcenter.org
jdiaz@campaignlegalcenter.org
cjackson@campaignlegalcenter.org

Ezra Rosenberg*
Pooja Chaudhuri*
Lawyers' Committee for Civil Rights Under Law
1500 K Street NW Suite 900
Washington, DC 20005
Tel.: (202) 662-8600
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org

*Admitted Pro Hac Vice

Attorneys for Plaintiffs

/s/ Christina R.B. López

William L. Harbison (No. 7012)
Lisa K. Helton (No. 23684)
Christopher C. Sabis (No. 30032)
Christina R.B. López (No. 37282)
Sherrard, Roe, Voigt & Harbison, PLC
150 3rd Avenue South, Suite 1100
Nashville, TN 37201
Tel.: (615) 742-4200
Fax: (615) 742-4539
bharbison@srvhlaw.com
lhelton@srvhlaw.com
csabis@srvhlaw.com
clopez@srvhlaw.com

RULE 7.01 CERTIFICATE

I hereby certify, pursuant to Local Rule 7.01(a)(1), that Plaintiffs informed Defendants on August 6, 2021 that they intended to seek fees and sought Defendants' position on this motion. As of the filing of this motion, Plaintiffs have yet to receive any response from Defendants and thus do not know Defendants' position.

/s/ Christina R.B. López

Christina R.B. López

CERTIFICATE OF SERVICE

I hereby certify, pursuant to Local Rule 5.01, that on this 9th day of August, 2021, the foregoing Motion was served via the Court's CM/ECF filing system on the following:

Janet Kleinfelter
Andrew B. Campbell
Alexander Rieger
Matthew D. Cloutier
Office of the Tennessee Attorney General
301 6th Ave. N.
Nashville, Tennessee 37243
Janet.kleinfelter@ag.tn.gov
Andrew.campbell@ag.tn.gov
Alex.rieger@ag.tn.gov
Matt.cloutier@ag.tn.gov
Counsel for Defendants

/s/ Christina R.B. López
Christina R.B. López

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