

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

MICHAEL MOORE, CHARLES HOOKS,)	Case No. 3:11-CV-3134
PEGGY FECHTER, JON MAIER, SECOND)	
AMENDMENT FOUNDATION, INC., and)	
ILLINOIS CARRY,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LISA MADIGAN, in her official capacity as)	
Attorney General of the State of Illinois, and)	
HIRAM GRAU, in his official capacity as)	
Director of the Illinois State Police,)	
)	
Defendants.)	
_____)	

MOTION FOR ATTORNEY FEES AND EXPENSES

Come now Plaintiffs, Michael Moore, Charles Hooks, Peggy Fechter, Jon Maier, Second Amendment Foundation, Inc. and Illinois Carry, 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:

Alan Gura:	88.1 hours X \$640/hr	= \$ 56,384.00
	5.4 hours X \$320/hr	= \$ 1,728.00
David G. Sigale:	101.8 hours X \$500/hr	= \$ 50,900.00
	17.3 hours X \$250/hr	= \$ 4,325.00
David D. Jensen	236.6 hours X \$450/hr	= \$106,470.00

Costs: \$3,193.29

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: December 16, 2013

Respectfully submitted,

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/s/ David G. Sigale
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Attorneys for Plaintiffs

CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On December 16, 2013, 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
One of the Attorneys for Plaintiffs