

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 04-814 (RCL)
	)	
CENTRAL INTELLIGENCE AGENCY,	)	
	)	
Defendant.	)	
_____	)	

DECLARATION OF JOHN H. CLARKE IN SUPPORT  
OF MOTION FOR AWARD OF ATTORNEY FES AND COSTS

I, John H. Clarke, declare and say as follows:

1. I graduated in from George Mason University School of Law in 1984 and was admitted to the Virginia Bar that same year. The following year, I was admitted to the District of Columbia and Maryland Bars, and, in 2005, to the New York Bar. I am also admitted to practice before federal courts in the District of Columbia, Virginia, and Maryland, the United States Court of Appeals for the District of Columbia Circuit, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court.

2. I have over 28 years of litigation experience. In addition to the instant decade-long case, I have litigated four FOIA cases in federal district court and in courts of appeals, two of which have been published in the official reports of the federal courts. *See Accuracy in Media, Inc. v. Nat'l Transp. Safety Bd.*, No. 03-00024, 2006 WL 826070 (D.D.C. Mar. 29, 2006); *Lahr v. National Transp. Safety Bd.*, 453 F. Supp. 2d 1153 (C.D. CA 2006), *sub. op.* 2006 WL 2854314 (C.D. Cal. Oct 4, 2006), *rev'd in part*, 569 F.3d 964 (9th Cir. 2009), *cert. denied*, 130 S.Ct. 3493, 177 L.Ed.2d 1057 (June 21, 2010).

3. I am a sole practitioner. I initially undertook this case in 2004, on behalf of Accuracy in Media, Inc. ("AIM"), and its then Chairman, Reed Irvine, on reduced fee basis. I was paid less than \$1,000, in 2004. Mr. Irvine passed away in November of 2004. After Mr. Irvine's passing, I agreed to continue on representing AIM on a complete contingency fee basis. This case is now in its 11th year of litigation.

4. I am compelled to move for interim fees because I am in dire financial straits. In the absence of an award of fees here, I will be forced to borrow funds in the short term, simply to meet my monthly obligations.

5. All time entries submitted herewith were made on the day the work was performed or within days of the rendering of services—when counsel's recollection of the time devoted was still fresh. Attached to this Declaration is an itemization of my time spent in this case. I have made a good faith effort to exclude from plaintiff's fee request hours that are excessive, redundant, relate to matters on which plaintiff did not prevail, or were otherwise unnecessary to the prosecution of the case:

- (a) I am not seeking any compensation for the period of May 19, 2004, when this action was first filed, through April 13, 2005, when Judge Kennedy denied AIM's motion to be treated as a "representative of the news media" under 5 U.S.C. 552 (a)(4)(A)(ii)(II);
- (b) I seek no compensation for time associated with any of plaintiffs' motions for enlargement of time;
- (c) I have already reduced the time charged preparing various pleadings in the case, where the amount of time spent was under-productive, or when the matter at hand seemed to take too long, in my view, to justify the total amount recorded;
- (d) I seek no compensation for keeping apprised of the litigation that Mr. Lesar undertook on behalf of his clients, including his various motions for discovery, as well as his matter that was referred to Magistrate Judge Facciola.

6. In this case, I seek hourly rates under the Laffey Matrix. The chart below gives the total amount of time and fees for which compensation is sought for each year in accordance with both the Salazar Laffey matrix rates, and the US Attorneys' Office Laffey matrix rates. The chart below indicates the amount of fees incurred for services that, in my view, are fully compensable.

<u>Years</u>	<u>Salazar Rate</u>	<u>US Attorney Rate</u>	<u>Hours</u>	<u>Salazar Amount</u>	<u>US Attorney Rate Amount</u>
6/1/04-5/31/05	476	390	12	5,712	4,680
6/1/05-5/31/06	497	405	18.5	9,194.50	7,492.50
6/1/06-5/31/07	614	425	46.25	28,551.50	19,656.25
6/1/07-5/31/08	645	440	13	8,385	5,720
6/1/08-5/31/09	671	465	45.75	30,698.25	21,273.75
6/1/09-5/31/10	686	465	20.5	14,063	9,532.50
6/1/10-5/31/11	709	475	16.75	11,875.75	7,956.25
6/1/11-5/31/12	734	495	12.25	8,991.50	6,063.75
6/1/12-5/31/13	753	505	29.75	22,401.75	15,023.75
6/1/13-5/31/14	771	510	22.75	17,540.25	11,602.50
6/1/14-5/31/15	789	520	21.5	16,963.50	11,180
Totals:			259	<u>\$173,949.25</u>	<u>\$120,181.50</u>

7. A statement of time and services, applying the Salazar Laffey matrix rates, is attached hereto.

8. As the charts reflect, applying the Laffey matrix to the amount of compensable services rendered yields a total of \$173,949.25 under the Salazar Laffey matrix, and \$120,181.50, under the US Attorneys' Office Laffey matrix rates.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th of February, 2015.

\_\_\_\_\_/s/  
John H. Clarke

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**Invoice****Invoice Date:** Feb 9, 2015**Invoice Num:** 1184**Billing Through:** Feb 9, 2015**Accuracy in Media, Inc. (AIM v. Central Intelligence Agency:) - Managed by (John Clarke)****Professional Services**

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/22/2005	John Clarke	Revision of letter to CIA re fee waivers, telephone reviews with Mr. Lesar	1.50	\$470.00	\$705.00
4/26/2005	John Clarke	Assembly of waivers, drafting amended FOIA request	3.75	\$470.00	\$1,762.50
5/15/2005	John Clarke	Telephone reviews with Mr. Lesar	0.50	\$476.00	\$238.00
5/25/2005	John Clarke	Drafting amended complaint	1.00	\$476.00	\$476.00
5/26/2005	John Clarke	Review of administrative record, drafting amended complaint	2.50	\$476.00	\$1,190.00
5/27/2005	John Clarke	To US District Court, status hearing, conference with Messrs. Hall and Lesar	2.75	\$476.00	\$1,309.00
6/27/2005	John Clarke	Telephone reviews with AIM	0.50	\$497.00	\$248.50
6/28/2005	John Clarke	Review/assembly administrative record, administrative appeal	4.50	\$497.00	\$2,236.50
9/14/2005	John Clarke	Review of administrative record, drafting amended complaint	3.75	\$497.00	\$1,863.75
9/26/2005	John Clarke	Editing and refileing Amended Complaint	1.50	\$497.00	\$745.50
4/26/2006	John Clarke	To US District Court, status hearing, conference with Mr. Lesar and Ms. Momeni, memo to file	2.75	\$497.00	\$1,366.75
4/30/2006	John Clarke	Drafting memorandum to Ms. Momeni re parties' positions	2.50	\$497.00	\$1,242.50
5/1/2006	John Clarke	Further drafting memorandum to Ms. Momeni re parties positions	0.75	\$497.00	\$372.75
5/16/2006	John Clarke	Telephone conferences with Ms. Momeni and Mr. Lesar	0.75	\$497.00	\$372.75
5/22/2006	John Clarke	Drafting memo re CIA positions, email to Ms. Momeni	0.75	\$497.00	\$372.75
5/23/2006	John Clarke	Telephone conferences with Ms. Momeni and Mr. Lesar	0.75	\$497.00	\$372.75
11/8/2006	John Clarke	Review of CIA dispositive motions, Vaughn index, Judge Friedman order	2.75	\$614.00	\$1,688.50
11/16/2006	John Clarke	Drafting AIM dispositive motion points and authorities	2.50	\$614.00	\$1,535.00
11/21/2006	John Clarke	Legal research re news media status, assembly and review of administrative record	3.25	\$614.00	\$1,995.50
1/23/2007	John Clarke	Review of Hall Affidavit, drafting memorandum of points and authorities	3.50	\$614.00	\$2,149.00
3/12/2007	John Clarke	Drafting AIM dispositive motion points and authorities and statement of fact	2.75	\$614.00	\$1,688.50
3/13/2007	John Clarke	Drafting dispositive motions points and authorities	3.00	\$614.00	\$1,842.00
3/14/2007	John Clarke	Drafting dispositive motions points and authorities	1.25	\$614.00	\$767.50
3/20/2007	John Clarke	Review of administrative record, Vaughn index, drafting dispositive motions points and authorities	5.50	\$614.00	\$3,377.00
4/18/2007	John Clarke	Drafting AIM dispositive motion statement material facts	2.75	\$614.00	\$1,688.50
4/19/2007	John Clarke	Drafting AIM dispositive motion statement material facts	3.50	\$614.00	\$2,149.00
4/23/2007	John Clarke	Review of Hall Affidavit, drafting dispositive motion statement of fact	3.00	\$614.00	\$1,842.00
4/24/2007	John Clarke	Review of Hall Affidavit, drafting dispositive motion statement of fact	2.75	\$614.00	\$1,688.50

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5/4/2007	John Clarke	Drafting AIM statement of material facts and points and authorities	2.25	\$614.00	\$1,381.50
5/5/2007	John Clarke	Drafting AIM statement of material facts and points and authorities	2.75	\$614.00	\$1,688.50
5/7/2007	John Clarke	Review of CIA Vaughn index, drafting dispositive motion points and authorities	3.00	\$614.00	\$1,842.00
5/8/2007	John Clarke	Editing and revisions to dispositive motions	1.25	\$614.00	\$767.50
5/10/2007	John Clarke	Filing AIM dispositive motions	0.50	\$614.00	\$307.00
6/13/2007	John Clarke	Telephone reviews with Mr. Lesar, letter to AUSA re narrowing request	0.75	\$645.00	\$483.75
2/27/2008	John Clarke	Review and editing plaintiffs joint motion for stay, telephone reviews with Mr. Lesar	1.50	\$645.00	\$967.50
4/3/2008	John Clarke	To Mr. Hendon's office with Mr. Hall, drafting Hendon Affidavit	5.50	\$645.00	\$3,547.50
4/17/2008	John Clarke	Assembly and review of Hendon affidavit exhibits, drafting Hendon Affidavit	3.50	\$645.00	\$2,257.50
4/18/2008	John Clarke	Drafting Hendon Affidavit	1.75	\$645.00	\$1,128.75
9/5/2008	John Clarke	Telephone review with Mr. Lesar re dispositive motions and meet and confer statement	0.50	\$671.00	\$335.50
9/10/2008	John Clarke	Telephone review with Mr. Lesar	0.50	\$671.00	\$335.50
9/12/2008	John Clarke	Preparation and filing of meet and confer statement	1.25	\$671.00	\$838.75
11/7/2008	John Clarke	Review CIA dispositive motion and Vaughn materials, drafting dispositive motion points authorities	2.50	\$671.00	\$1,677.50
11/8/2008	John Clarke	Review CIA dispositive motion and Vaughn materials, drafting dispositive motion points authorities	2.00	\$671.00	\$1,342.00
11/10/2008	John Clarke	Assembly and review of administrative record, drafting memorandum points and authorities	5.00	\$671.00	\$3,355.00
11/19/2008	John Clarke	Drafting cross dispositive motions statement of material fact	2.00	\$671.00	\$1,342.00
11/24/2008	John Clarke	Drafting cross dispositive motions statement of material fact	1.50	\$671.00	\$1,006.50
11/25/2008	John Clarke	Drafting dispositive motions memorandum points and authorities, Statement of Material Fact	1.50	\$671.00	\$1,006.50
11/26/2008	John Clarke	Drafting dispositive motions memorandum points and authorities, Statement of Material Fact	1.50	\$671.00	\$1,006.50
11/27/2008	John Clarke	Drafting cross dispositive motions statement of material fact	3.00	\$671.00	\$2,013.00
11/28/2008	John Clarke	Legal research re news media status, drafting dispositive motions memorandum points and authorities	3.00	\$671.00	\$2,013.00
11/29/2008	John Clarke	Drafting dispositive motions memorandum points and authorities, Statement of Material Fact	4.25	\$671.00	\$2,851.75
12/2/2008	John Clarke	Review of PNOK releases, drafting of Hall Affidavit	1.50	\$671.00	\$1,006.50
12/3/2008	John Clarke	Drafting Hall Affidavit re PNOK releases, telephone review with Mr. Hall, email to Mr. Lesar	1.00	\$671.00	\$671.00
12/8/2008	John Clarke	Drafting dispositive motions memorandum points and authorities	3.25	\$671.00	\$2,180.75

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<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/15/2008	John Clarke	AIM Opposition and Cross dispositive motions, drafting Memorandum of Points and Authorities	2.25	\$671.00	\$1,509.75
12/16/2008	John Clarke	Drafting Statement of Genuine Issues	2.25	\$671.00	\$1,509.75
12/17/2008	John Clarke	Further editing and assembly and filing of AIM Opposition and Cross dispositive motions	2.75	\$671.00	\$1,845.25
2/24/2009	John Clarke	Telephone reviews with Mr. Lesar	0.50	\$671.00	\$335.50
2/26/2009	John Clarke	Telephone reviews with Mr. Lesar	0.50	\$671.00	\$335.50
2/27/2009	John Clarke	Review and editing plaintiffs joint motion re referrals and stay, telephone reviews with Mr. Lesar	2.25	\$671.00	\$1,509.75
3/2/2009	John Clarke	Editing filing Motion for Stay	0.50	\$671.00	\$335.50
3/18/2009	John Clarke	Review of plaintiffs reply re referral motion, telephone review with Mr. Lesar	0.50	\$671.00	\$335.50
8/24/2009	John Clarke	Drafting exhibit re CIA responses to AIM statement material fact	4.25	\$686.00	\$2,915.50
8/25/2009	John Clarke	Drafting exhibit re CIA responses to AIM statement material fact	1.25	\$686.00	\$857.50
8/31/2009	John Clarke	Drafting reply memorandum to CIA opposition to dispositive motions	2.50	\$686.00	\$1,715.00
9/5/2009	John Clarke	Drafting exhibit re CIA responses to AIM statement material fact	1.25	\$686.00	\$857.50
9/16/2009	John Clarke	Drafting reply memorandum, assembly and filing	1.25	\$686.00	\$857.50
12/15/2009	John Clarke	Review of J Kennedy Order, drafting of memorandum to Mr. Lesar re case management plan	3.25	\$686.00	\$2,229.50
12/16/2009	John Clarke	Further drafting of memorandum to Mr. Lesar re case management	1.25	\$686.00	\$857.50
12/17/2009	John Clarke	Telephone review with Mr. Lesar	0.50	\$686.00	\$343.00
1/6/2010	John Clarke	Memorandum to Mr. Lesar re proposed order under J. Kennedy opinion, emails and telephone w Mr. Lesar	1.75	\$686.00	\$1,200.50
1/8/2010	John Clarke	Drafting of plaintiffs' report to court re case plan	2.00	\$686.00	\$1,372.00
2/1/2010	John Clarke	Review of Mr. Lesars proposed order under memo opinion, emails and telephone with Mr. Lesar	1.25	\$686.00	\$857.50
9/1/2010	John Clarke	Telephone review with Mr. Lesar	0.50	\$709.00	\$354.50
9/16/2010	John Clarke	Telephone reviews with Mr. Lesar, email to Mr. Lesar	0.50	\$709.00	\$354.50
2/28/2011	John Clarke	Review of Cole Declaration and other Vaughn materials	2.00	\$709.00	\$1,418.00
3/1/2011	John Clarke	Review of Cole Declaration and other Vaughn materials	2.50	\$709.00	\$1,772.50
3/2/2011	John Clarke	Further review Cole Declaration, memorandum to file	1.25	\$709.00	\$886.25
3/9/2011	John Clarke	Review of Vaughn and memorandum order, drafting of response to CIA supplemental response under order	3.50	\$709.00	\$2,481.50
3/10/2011	John Clarke	Telephone review with Mr. Lesar	0.50	\$709.00	\$354.50
3/17/2011	John Clarke	Drafting response to CIA supplemental response under memorandum order	2.00	\$709.00	\$1,418.00
3/22/2011	John Clarke	Telephone review with Mr. Lesar, email to Mr. Lesar	0.50	\$709.00	\$354.50
3/28/2011	John Clarke	Telephone review with Mr. Lesar, email to Mr. Lesar	0.50	\$709.00	\$354.50

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4/18/2011	John Clarke	Editing and filing response to CIA supplemental response under memorandum order	3.00	\$709.00	\$2,127.00
2/15/2012	John Clarke	Telephone conference with Ms. Momeni and Mr. Lesar, review with Mr. Lesar	0.50	\$734.00	\$367.00
3/2/2012	John Clarke	Review February 2012 NSA production correlation study	1.00	\$734.00	\$734.00
3/16/2012	John Clarke	Telephone review with Mr. Hall, review transcript Dec 19 Status	1.00	\$734.00	\$734.00
3/19/2012	John Clarke	To USDC, status hearing, meeting with Mr. Lesar and Mr. Hall	1.75	\$734.00	\$1,284.50
4/9/2012	John Clarke	Telephone conference with Mr. Lesar and Mr. Hall, email correspondence with Mr. Lesar	0.75	\$734.00	\$550.50
4/20/2012	John Clarke	To US District Court, status hearing, conference with Mr. Lesar	1.75	\$734.00	\$1,284.50
5/17/2012	John Clarke	Review of Vaughn materials	1.75	\$734.00	\$1,284.50
5/28/2012	John Clarke	To Mr. Lesar's office, meeting with Messrs. Lesar and Hall	3.75	\$734.00	\$2,752.50
6/7/2012	John Clarke	Review of memorandum Order, drafting of response to CIA response to order	3.50	\$753.00	\$2,635.50
6/11/2012	John Clarke	Telephone conference with Mr. Lesar, further drafting of response	1.75	\$753.00	\$1,317.75
6/17/2012	John Clarke	Further review of memorandum Order and drafting of response to CIA response	1.25	\$753.00	\$941.25
6/18/2012	John Clarke	Drafting of response to CIA response to order	3.00	\$753.00	\$2,259.00
6/19/2012	John Clarke	Further drafting of response to CIA response to order	3.00	\$753.00	\$2,259.00
6/20/2012	John Clarke	Revisions to response to CIA response to order, filing	1.75	\$753.00	\$1,317.75
8/11/2012	John Clarke	Review of memorandum Order	1.25	\$753.00	\$941.25
8/20/2012	John Clarke	Further review of J. Lambert opinion, telephone review with Mr. Lesar	2.25	\$753.00	\$1,694.25
8/21/2012	John Clarke	Telephone conference with Ms. Momeni and Mr. Lesar, telephone review with Mr. Lesar	1.00	\$753.00	\$753.00
8/23/2012	John Clarke	Telephone conference with Mr. Lesar	0.25	\$753.00	\$188.25
11/25/2012	John Clarke	Telephone conference with Mr. Lesar	0.25	\$753.00	\$188.25
12/4/2012	John Clarke	Review and revision plaintiffs' motion for scheduling order, telephone reviews with Mr. Lesar	1.50	\$753.00	\$1,129.50
12/5/2012	John Clarke	Filing plaintiffs motion for scheduling order	0.50	\$753.00	\$376.50
12/13/2012	John Clarke	Review of CIA summary judgment motion	0.50	\$753.00	\$376.50
12/14/2012	John Clarke	Drafting opposition to CIA summary judgment motion, telephone review with Mr. Lesar	1.25	\$753.00	\$941.25
12/16/2012	John Clarke	Further drafting opposition to CIA summary judgment motion, emails with Jim Lesar	2.25	\$753.00	\$1,694.25
3/18/2013	John Clarke	Telephone and emails to Mr. Hall and Mr. Lesar	1.50	\$753.00	\$1,129.50
3/19/2013	John Clarke	To USDC for Status Hearing, conference with Mr. Lesar, email correspondence	2.25	\$753.00	\$1,694.25

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4/4/2013	John Clarke	Telephone conference amd email correspondence with Mr. Lesar	0.25	\$753.00	\$188.25
4/10/2013	John Clarke	Email correspondence with Mr. Lesar and Mr. Hall re CIA positions	0.50	\$753.00	\$376.50
5/20/2013	John Clarke	To Office of USA, conference with Ms. Momeni, CIA counsel, Mr. Lesar, and Mr. Hall.	2.75	\$753.00	\$2,070.75
6/12/2013	John Clarke	Email correspondence with Ms. Momeni and Mr. Lesar and Mr. Hall, review of 3/19 status	1.00	\$771.00	\$771.00
6/13/2013	John Clarke	Telephone review with Mr. Lesar, legal research re FOIA Electronic Records Amend, email Ms. Momeni	1.00	\$771.00	\$771.00
6/27/2013	John Clarke	Review of draft CIA status report, memorandum re CIA search statistics, email to Mr. Lesar	1.25	\$771.00	\$963.75
7/1/2013	John Clarke	Telephone review with Mr. Lesar, preparation for status hearing	1.25	\$771.00	\$963.75
7/2/2013	John Clarke	To US District Court, conference with Mr. Lesar, Mr. Hall, Hearing, review w/ Mr.Lesar and Mr. Hall	3.25	\$771.00	\$2,505.75
7/3/2013	John Clarke	Review of status conference transcript	0.50	\$771.00	\$385.50
7/10/2013	John Clarke	Telephone review with Mr. Lesar, review of CREW decision, memorandum to Mr. Lesar	1.25	\$771.00	\$963.75
7/11/2013	John Clarke	Review of memorandum orders, drafting of memo re prevailing party, email Mr. Lesar	3.25	\$771.00	\$2,505.75
7/12/2013	John Clarke	Review of memorandum orders, drafting of memo re prevailing party, email Mr. Lesar	1.75	\$771.00	\$1,349.25
7/14/2013	John Clarke	Review of memorandum orders, drafting of fee demand letter	3.50	\$771.00	\$2,698.50
1/19/2014	John Clarke	Email correspondence with Mr. Lesar	0.25	\$771.00	\$192.75
1/20/2014	John Clarke	Email correspondence with Mr. Lesar	0.50	\$771.00	\$385.50
2/14/2014	John Clarke	Telephone reviews with Mr. Lesar and Mr. Hall	0.50	\$771.00	\$385.50
2/25/2014	John Clarke	Telephone review and memo to Mr. Lesar re Report to Court	0.50	\$771.00	\$385.50
7/2/2014	John Clarke	Telephone reviews with Mr. Lesar, email correspondence with Mr. Lesar	0.50	\$789.00	\$394.50
7/6/2014	John Clarke	Review of CIA productions, memo to Mr. Lesar	2.25	\$789.00	\$1,775.25
7/7/2014	John Clarke	Review of CIA productions, memo to Mr. Lesar	0.50	\$789.00	\$394.50
7/17/2014	John Clarke	Review of CIA productions, memo to Jim Lesar	0.50	\$789.00	\$394.50
9/30/2014	John Clarke	Telephone reviews with Mr. Lesar and Ms. Momeni, review of proposed scheduling order	0.75	\$789.00	\$591.75
10/5/2014	John Clarke	Telephone conferences with Lynn O'Shea, drafting affidavit, emails Lynn and Doug Farnes	0.75	\$789.00	\$591.75
10/9/2014	John Clarke	Telephone review with Mr. Lesar	0.25	\$789.00	\$197.25
10/12/2014	John Clarke	Telephone reviews with Roger Hall	0.25	\$789.00	\$197.25
10/13/2014	John Clarke	Telephone review with Mr. Lesar	0.25	\$789.00	\$197.25



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10/14/2014	John Clarke	Review of email correspondence with Jim Lesar, memo re selection for Vaughn indexing	0.50	\$789.00	\$394.50
10/20/2014	John Clarke	Drafting attorney fee letter to Ms. Momeni	1.75	\$789.00	\$1,380.75
10/28/2014	John Clarke	Email to AIM re status of fee litigation, telephone review with Mr. Aronoff	0.50	\$789.00	\$394.50
11/5/2014	John Clarke	Telephone reviews with Mr. Lesar, AUSA Momeni, Taffe, re attorney fees, scheduling	0.75	\$789.00	\$591.75
11/17/2014	John Clarke	Two telephone reviews with Mr. Lesar, drafting of Joint Motion Stay	1.25	\$789.00	\$986.25
11/18/2014	John Clarke	Revision Joint Motion Stay, three telephone reviews with Mr. Lesar, email to Mr. Taaffe	0.75	\$789.00	\$591.75
11/19/2014	John Clarke	Two telephone reviews w Mr. Lesar, revisions Joint Motion Stay, emails with AUSA Mr. Taaffe	1.00	\$789.00	\$789.00
11/20/2014	John Clarke	Filing Joint Motion for Stay	0.25	\$789.00	\$197.25
1/22/2015	John Clarke	Telephone reviews with Mr. Lesar, Mr. Taaffe, re attorney fees, scheduling order	0.75	\$789.00	\$591.75
1/25/2015	John Clarke	Review draft Joint Motion Scheduling Order, telephone review w Mr. Lesar	0.50	\$789.00	\$394.50
1/26/2015	John Clarke	Telephone reviews with Mr. Lesar re attorney fee issue	0.25	\$789.00	\$197.25
2/3/2015	John Clarke	Email correspondence with Jim Lesar re draft of proposed response to attorney fee offer	0.75	\$789.00	\$591.75
2/4/2015	John Clarke	Legal research re Rule 68 admissibility, email to Jim Lesar	0.50	\$789.00	\$394.50
2/5/2015	John Clarke	Telephone review with Mr. Lesar re attorney fee petition	0.25	\$789.00	\$197.25
2/6/2015	John Clarke	Drafting affidavit support of attorney fees	0.75	\$789.00	\$591.75
2/8/2015	John Clarke	Revisions to affidavit, telephone review Jim Lesar	0.50	\$789.00	\$394.50
2/9/2015	John Clarke	Telephone and email Jim Lesar, revise affidavit, draft and file Motion Interim Attorney Fee Award	4.50	\$789.00	\$3,550.50

**Total Service Amount:** \$173,949.25**Amount Due This Invoice:** \$173,949.25*This invoice is due upon receipt***Account Summary**

<b>Services BTD</b>	<b>Expenses BTD</b>	<b>Last Inv Num</b>	<b>Last Inv Date</b>	<b>Last Inv Amt</b>	<b>Last Pay Amt</b>	<b>Prev Unpaid Amt</b>
\$173,949.25	\$0.00	--	--	\$0.00	\$0.00	\$0.00

**Total Amount Due Including This Invoice:** \$173,949.25