

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

FILED

May 17, 2022

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom, and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of
Minnesota,

Defendant.

**DECLARATION OF BEN STAFFORD IN SUPPORT OF
SACHS PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES**

I, Ben Stafford, declare as follows:

1. I am a partner at the firm of Elias Law Group LLP and am one of the attorneys representing the Sachs Plaintiffs in this matter. I hereby submit this affidavit in support of the Sachs Plaintiffs' Motion for Attorneys' Fees, Costs, and Disbursements.

2. The Sachs Plaintiffs were represented in this matter by attorneys from the firms of Elias Law Group LLP (all of whom practiced at Perkins Coie LLP before September 2021) and Lockridge Grindal Nauen P.L.L.P.

3. A true and correct copy of Elias Law Group LLP's billing detail for its work for the Sachs Plaintiffs in this matter is attached as Exhibit A. This billing detail contains "[a] description of each item of work performed, the date upon which it was performed, the amount of time spent on each item of work, the identity of the lawyer or legal assistant

performing the work, and the hourly rate sought for the work performed” as required by Minn. Gen. R. Prac. 119.02(1).

4. Each of the attorneys and other timekeepers at Elias Law Group LLP who performed work reflected in Exhibit A charged their usual rates. However, the Sachs Plaintiffs seek fees consistent with reasonable and customary rates charged in the Minneapolis and St. Paul legal community, as reflected by the fact that the requested rates are consistent with those sought by other counsel in this matter, and as is further discussed in the affidavit of Charles N. Nauen. The rates charged and sought for each timekeeper at Elias Law Group LLP are set forth as follows:

<u>Attorney/Timekeeper</u>	<u>Rate Charged (2021)</u>	<u>Rate Sought</u>
Marc Elias	\$1500	\$750
Abha Khanna	\$1200	\$600
Elisabeth Frost	\$1200	\$600
Ben Stafford	\$1100	\$600
Daniel Osher	\$850	\$425
Henry Brewster	\$850	\$425
Jonathan Hawley	\$775	\$400
Jyoti Jasrasaria	\$725	\$375
Joseph Posimato	\$725	\$375

5. Although the above-listed attorneys provided legal services to the Sachs Plaintiffs before the founding of Elias Law Group LLP in September 2021 (while they

were attorneys at the firm Perkins Coie LLP), Elias Law Group LLP seeks fees only for work performed since the firm’s founding. The Sachs Plaintiffs thus deducted more than 100 billed hours from the fees they are seeking.

6. I have reviewed the original time records for this case. I affirm that the work was actually performed for the benefit of the clients and was necessary for the proper representation of the clients and that charges for any unnecessary or duplicative work have been eliminated.

7. A summary calculation of the amounts reflected in Exhibit A is set forth below:

<u>Attorney</u>	<u>Rate Charged (2021)</u>	<u>Rate Sought</u>	<u>Hours Expended</u>	<u>Fees Charged</u>	<u>Fees Requested</u>
Marc Elias	\$1500	\$750	5.2	\$7,800.00	\$3,900.00
Abha Khanna	\$1200	\$600	20.7	\$24,840.00	\$12,420.00
Elisabeth Frost	\$1200	\$600	2.3	\$2,760.00	\$1,380.00
Ben Stafford	\$1100	\$600	54.9	\$60,390.00	\$32,940.00
Daniel Osher	\$850	\$425	5.3	\$4,505.00	\$2,252.50
Henry Brewster	\$850	\$425	6.7	\$5,695.00	\$2,847.50
Jonathan Hawley	\$775	\$400	189.9	\$147,172.50	\$75,960.00
Jyoti Jasrasaria	\$725	\$375	23.7	\$17,182.50	\$8,887.50
Joseph Posimato	\$725	\$375	2.0	\$1,450.00	\$750.00
Total – Elias Law Group LLP Subtotal			310.7	\$271,795.00	\$141,337.50

Consistent with Minnesota Statute § 358.116, I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: May 17, 2022

/s/Ben Stafford
Ben Stafford

EXHIBIT A
TO DECLARATION OF BEN STAFFORD

Date	Timekeeper	Description	Hours	Fees Requested
9/2/2021	A. Khanna	Correspond with legal team regarding mapping strategy (0.3); confer and correspond with J. Hawley and local counsel regarding stipulation draft (0.2);	0.50	\$ 300.00
9/2/2021	J. Hawley	Email with case team regarding stipulation (0.2); email with local counsel regarding same (0.3); email with J. Jasrasaria regarding same (0.1); email with client regarding same (0.5); email with B. Stafford regarding case status (0.2);	1.30	\$ 520.00
9/2/2021	J. Jasrasaria	Email with case team regarding stipulation and case status (0.4);	0.40	\$ 150.00
9/3/2021	A. Khanna	Telephone conference with C. Nauen regarding upcoming deadlines (0.2); correspond and confer with legal team regarding same (0.2); correspond with legal team regarding criteria (0.3); review and revise draft stipulation and correspond with legal team regarding same (0.4);	1.10	\$ 660.00
9/3/2021	J. Hawley	Draft stipulation (4.3); conference with J. Jasrasaria regarding same (0.3); email with case team regarding same (0.2);	4.80	\$ 1,920.00
9/3/2021	J. Jasrasaria	Call with J. Hawley about next steps (0.3); correspond with case team regarding stipulation (0.2); correspond with local counsel about next steps (0.1); draft and review stipulation (0.4);	1.00	\$ 375.00
9/4/2021	A. Khanna	Review revised draft of stipulation and correspond with legal team regarding same (0.2);	0.20	\$ 120.00
9/4/2021	B. Stafford	Review draft stipulation and provide comments regarding same (0.1);	0.10	\$ 60.00
9/4/2021	J. Hawley	Review and revise stipulation (1.0); emails with client regarding same (0.2); email with local counsel regarding same (0.1);	1.30	\$ 520.00
9/6/2021	A. Khanna	Correspond with local counsel and legal team regarding preferred deviation for stipulation (0.1); review data scientist intervention papers and correspond with client regarding same (0.4);	0.50	\$ 300.00

9/6/2021	J. Hawley	Email with case team regarding stipulation (0.1); email with client regarding same (0.2);	0.30	\$	120.00
9/7/2021	A. Khanna	Attend portion of team meeting on stipulation, criteria, and mapping strategy (0.7); review Wattson congressional plan and data and correspond with legal team regarding same (0.4);	1.10	\$	660.00
9/7/2021	B. Stafford	Participate in team call to discuss case strategy and next steps (0.8); review case file from 2010 to familiarize with likely court procedures and process (0.3); review intervenor plan (0.5);	1.60	\$	960.00
9/7/2021	J. Hawley	Conference with case team regarding case status and briefing schedules (0.9);	0.90	\$	360.00
9/7/2021	J. Jasrasaria	Meet with A. Khanna, B. Stafford, and J. Hawley about case strategy and next steps (0.9); correspond with legal team about Wattson congressional plan and data (0.3);	1.20	\$	450.00
9/8/2021	A. Khanna	Video conference with legal team and local counsel regarding litigation strategy (0.8); review opposition to motion to intervene filed by Wattson plaintiffs and correspond with legal team regarding same (0.7); correspond with legal team and confer with client regarding data scientist intervention (0.2); review and revise draft stipulation and draft consent to intervention (0.3);	2.00	\$	1,200.00
9/8/2021	B. Stafford	Prepare for and participate in meeting with local counsel regarding to-dos, criteria, and recent filings (1.3); review case filings including intervention papers and draft map (0.9); review pro hac vice papers, revise, and get same notarized (0.3);	2.50	\$	1,500.00

9/8/2021	J. Hawley	Conference with case team and local counsel regarding case status and stipulation (0.8); email with client regarding Wattson Plaintiffs' proposed map (0.3); telephone conferences with A. Khanna regarding proposed intervention and stipulation (0.6); review filings from prior round of judicial redistricting (2.7); email with case team regarding same (0.2); draft intervention response (0.4); email with client regarding same (0.1); review and revise stipulation (0.2);	5.30	\$	2,120.00
9/8/2021	J. Jasrasaria	Email with case team regarding Wattson Plaintiffs' proposed map and filings from prior redistricting cycle (0.5); meeting with local counsel team about case status and next steps (0.8); research for stipulation (0.2);	1.50	\$	562.50
9/9/2021	A. Khanna	Review draft stipulation circulated by Wattson plaintiffs and correspond with legal team regarding same (0.6);	0.60	\$	360.00
9/9/2021	B. Stafford	Review draft stipulation from other intervenors and exchange correspondence with ELG team regarding response to stipulation issues (0.7);	0.70	\$	420.00
9/9/2021	J. Hawley	Review and revise proposed stipulation (0.7); emails with case team regarding same (0.3); email with client regarding same (0.3); email with local counsel regarding same (0.2); review case materials (0.8);	2.30	\$	920.00
9/9/2021	J. Jasrasaria	Email with case team regarding proposed stipulation (0.4); review stipulation from Wattson Plaintiffs (0.2);	0.60	\$	225.00
9/10/2021	A. Khanna	Telephone conference with Plaintiff W. Grimmer regarding public hearings (0.1); correspond with legal team regarding draft stipulation and preparation for call with all counsel (0.6); review order denying data scientists' motion to intervene (0.1);	0.80	\$	480.00
9/10/2021	B. Stafford	Review criteria stipulation draft in preparation for hearing and related meeting talking points in advance of call (0.5); conference call with other parties (0.5);	1.00	\$	600.00

9/10/2021	J. Hawley	Draft talking points for call with opposing parties (0.5); emails with client regarding same (0.1); emails with local counsel regarding same (0.2); conference with opposing parties regarding stipulation (0.5); review filings (0.2); email with client regarding case status (0.2);	1.70	\$	680.00
9/10/2021	J. Jasrasaria	Meeting with counsel for all parties about stipulation (0.5); email with team regarding conference and stipulations (0.4); research differential privacy framework in 2020 Census (0.3);	1.20	\$	450.00
9/13/2021	A. Khanna	Review court order on public hearings and correspond with client and legal team regarding same (0.2);	0.20	\$	120.00
9/13/2021	J. Hawley	Review filing (0.3); email with client regarding same (0.5); update case calendar (0.3);	1.10	\$	440.00
9/14/2021	J. Hawley	Email with client regarding public hearings (0.1);	0.10	\$	40.00
9/14/2021	J. Jasrasaria	Email with team regarding public hearings and engagement letters (0.1);	0.10	\$	37.50
9/16/2021	A. Khanna	Correspond and confer with client and legal team regarding draft stipulation redlines (0.7);	0.70	\$	420.00
9/16/2021	J. Hawley	Review and revise proposed stipulation (0.8); emails with local counsel regarding same (0.3);	1.10	\$	440.00
9/16/2021	J. Jasrasaria	Read and respond to emails from team (0.4);	0.40	\$	150.00
9/17/2021	A. Khanna	Review draft stipulation redlines and summaries from all parties and correspond with legal team regarding same (0.4);	0.40	\$	240.00
9/17/2021	B. Stafford	Review other parties' draft stipulations on initial issues (0.2);	0.20	\$	120.00
9/17/2021	J. Hawley	Email with case team regarding plaintiff updates (0.1); emails with local counsel regarding proposed stipulation (0.2); email with B. Stafford regarding same (0.5); telephone conference with opposing parties regarding same (0.4); email with client regarding proposed stipulation and case updates (0.5); review and revise proposed stipulation (0.8);	2.50	\$	1,000.00

9/17/2021	J. Jasrasaria	Email with team and client regarding case updates (0.2);	0.20	\$	75.00
9/18/2021	A. Khanna	Review and revise draft stipulation (0.1);	0.10	\$	60.00
9/18/2021	B. Stafford	Review and revise stipulation on preliminary issues (0.3);	0.30	\$	180.00
9/18/2021	J. Hawley	Review and revise proposed stipulation (0.2); email with case team regarding same (0.1);	0.30	\$	120.00
9/20/2021	A. Khanna	Correspond with client and legal team regarding draft stipulation and DFL public testimony (0.3);	0.30	\$	180.00
9/20/2021	J. Hawley	Review and revise proposed stipulation (0.5); emails with client regarding same (0.2); emails with local counsel regarding same (0.2);	0.90	\$	360.00
9/20/2021	J. Jasrasaria	Email with team regarding proposed stipulation (0.2);	0.20	\$	75.00
9/21/2021	A. Khanna	Review draft stipulation and redistricting principles and correspond with legal team regarding same and upcoming mapping meeting (0.3);	0.30	\$	180.00
9/21/2021	B. Stafford	Review Wattson plaintiff revisions to stipulation on preliminary issues and provide comments on same to team (0.1); review draft redistricting criteria stipulation (0.1);	0.20	\$	120.00
9/21/2021	J. Hawley	Email with client regarding proposed maps (0.2); review proposed stipulations (0.5); email with case team regarding same (0.2); draft statement of unresolved preliminary issues (1.1); email with case team regarding same (0.1);	2.10	\$	840.00
9/22/2021	B. Stafford	Review draft statement on unresolved issues (0.1);	0.10	\$	60.00
9/22/2021	J. Hawley	Review and revise proposed stipulation (1.8); email with case team regarding same (0.1); email with local counsel regarding same (0.2); conference with B. Stafford regarding potential map (0.3);	2.40	\$	960.00
9/23/2021	J. Hawley	Revise and revise proposed stipulation (0.7); email with local counsel regarding same (0.1);	0.80	\$	320.00

9/24/2021	A. Khanna	Review separate statement of preliminary issues (0.1); correspond with legal team regarding same (0.1);	0.20	\$	120.00
9/24/2021	B. Stafford	Prepare for and meet with team regarding mapdrawing issues and potential remedies (1.0); conference with J. Hawley regarding approach to criteria and map issues (0.6);	1.60	\$	960.00
9/24/2021	J. Hawley	Review and revise proposed stipulation (1.2); email with local counsel regarding same (0.3); email with client regarding same (0.2); conference with client regarding redistricting map (0.7); conference with B. Stafford and J. Jasrasaria regarding same (0.3); draft proposed stipulation of redistricting principles (0.5);	3.20	\$	1,280.00
9/27/2021	B. Stafford	Review and revise draft stipulation on criteria (0.9);	0.90	\$	540.00
9/27/2021	J. Hawley	Email with local counsel regarding filings (0.1); email with client regarding same (0.1); draft stipulation regarding redistricting principles (2.1); email with case team regarding same (0.2);	2.50	\$	1,000.00
9/27/2021	J. Jasrasaria	Review proposed filing and respond to email from team about same (0.1);	0.10	\$	37.50
9/27/2021	M. Elias	Review court stipulations and case status (0.5);	0.50	\$	375.00
9/28/2021	A. Khanna	Correspond with legal team regarding draft redistricting principles (0.2);	0.20	\$	120.00
9/28/2021	J. Hawley	Review and revise stipulation regarding redistricting principles (1.8); email with case team regarding same (0.1); email with client regarding same (0.2); update case calendar (0.3);	2.40	\$	960.00
9/29/2021	A. Khanna	Review and revise draft redistricting principles and correspond with client and legal team regarding same (0.3);	0.30	\$	180.00
9/29/2021	J. Hawley	Email with local counsel regarding stipulation call (0.2); review and revise stipulation regarding redistricting principles (0.4); email with client regarding same (0.2);	0.80	\$	320.00

9/30/2021	B. Stafford	Participate in conference of counsel regarding criteria (0.3); review set of draft criteria in advance of call (0.3); review and revise draft criteria (0.1);	0.70	\$	420.00
9/30/2021	J. Hawley	Review proposed stipulation regarding redistricting principles (0.6); telephone conference with other parties regarding same (0.3); telephone conference with B. Stafford regarding same (0.2); email with client regarding same (0.2); review and revise stipulation regarding redistricting principles (4.3);	5.60	\$	2,240.00
9/30/2021	J. Jasrasaria	Email with case team regarding redistricting principles and conference (0.2);	0.20	\$	75.00
10/4/2021	A. Khanna	Review client redlines on redistricting criteria (0.1);	0.10	\$	60.00
10/4/2021	B. Stafford	Review and provide thoughts on draft stipulation (0.1);	0.10	\$	60.00
10/4/2021	J. Hawley	Review and revise stipulation regarding redistricting principles (1.8); email with client regarding same (0.5); telephone conference with client regarding public hearings (0.3); email with local counsel regarding stipulation (0.4); draft separate statement of redistricting principles (1.0);	4.00	\$	1,600.00
10/5/2021	B. Stafford	Review various parties' proposed stipulations of redistricting criteria and revise same (0.5);	0.50	\$	300.00
10/5/2021	J. Hawley	Draft separate statement of redistricting principles (5.0); review and compile opposing parties' stipulation redlines (1.0); email with case team regarding same (0.2); prepare summary chart of parties' positions on redistricting principles (1.0);	7.20	\$	2,880.00
10/5/2021	J. Jasrasaria	Email with case team regarding stipulation and redistricting principles (0.2);	0.20	\$	75.00
10/6/2021	B. Stafford	Prepare for and conference with all counsel regarding criteria (0.7); prepare for and conference with client regarding criteria and map (0.8); prepare for and participate in call with local counsel regarding criteria and case strategy (1.1);	2.60	\$	1,560.00

10/6/2021	J. Hawley	Conference with parties regarding stipulation on redistricting principles (0.3); telephone conference with B. Stafford regarding same (0.3); email with client regarding same (0.3); conference with client regarding redistricting principles and public hearings (0.9); review and revise stipulation regarding redistricting principles (2.2); email with case team regarding same (0.1); email with client regarding same (0.2); draft separate statement of redistricting principles (3.2); telephone conference with J. Jasrasaria regarding same (0.5); email with J. Jasrasaria regarding same (0.2);	8.20	\$	3,280.00
10/6/2021	J. Jasrasaria	Conference with parties regarding stipulation on redistricting principles (0.3);	0.30	\$	112.50
10/7/2021	B. Stafford	Review draft plan submission requirements (0.1);	0.10	\$	60.00
10/7/2021	J. Jasrasaria	Update and circulate draft stipulations on principles and plan submission requirements (0.8); correspond with team for approvals (0.1);	0.90	\$	337.50
10/8/2021	B. Stafford	Review and revise draft principles brief (1.0);	1.00	\$	600.00
10/8/2021	E. Frost	Review draft joint stipulations (0.2);	0.20	\$	120.00
10/8/2021	J. Jasrasaria	Review stipulation proposals from other parties (0.4); draft and revise proposed redistricting principles brief (3.2); correspond with team about next steps for filing (0.2);	3.80	\$	1,425.00
10/8/2021	M. Elias	Review proposed stipulation (0.5);	0.50	\$	375.00
10/9/2021	J. Jasrasaria	Update draft of proposed redistricting principles brief (1.4); correspond with team about edits and next steps for filing (0.2);	1.60	\$	600.00
10/11/2021	B. Stafford	Review Wattson plaintiff email on criteria (0.1); prepare email to team on recommended approach in light of same to stipulation and criteria brief (0.2); review and revise draft brief on redistricting principles (0.7);	1.00	\$	600.00

10/11/2021	J. Jasrasaria	Revise stipulation on redistricting principles and proposed redistricting principles brief (2.0); correspond with team about edits (0.3);	2.30	\$	862.50
10/11/2021	M. Elias	Review criteria stipulation (0.2);	0.20	\$	150.00
10/12/2021	A. Khanna	Correspond with legal team regarding preferred maps and stipulation (0.3);	0.30	\$	180.00
10/12/2021	J. Hawley	Review and revise stipulation regarding redistricting principles (0.3); email with local counsel regarding same (0.2); review and revise separate statement of redistricting principles (4.2); email with local counsel regarding same (0.3); review filings (0.3); email with client regarding proposed maps (0.1);	5.40	\$	2,160.00
10/12/2021	J. Jasrasaria	Correspond with local counsel about filing (0.2); finalize brief and stipulation for filing (0.8);	1.00	\$	375.00
10/13/2021	A. Khanna	Correspond with legal team regarding redistricting principles and draft maps (0.2);	0.20	\$	120.00
10/13/2021	J. Hawley	Email with case team regarding proposed maps (0.1); email with local counsel regarding same (0.2); review, compile, and summarize parties' proposed redistricting principles (2.4); email with case team regarding same (0.3); email with client regarding same (0.8);	3.80	\$	1,520.00
10/15/2021	J. Hawley	Draft response to parties' redistricting principles (3.9);	3.90	\$	1,560.00
10/16/2021	J. Hawley	Draft response to parties' redistricting principles (3.4);	3.40	\$	1,360.00
10/17/2021	A. Khanna	Review and revise draft response re redistricting principles (0.8); review case law and correspond with J. Hawley regarding same (0.2);	1.00	\$	600.00
10/17/2021	B. Stafford	Review and revise criteria brief (1.1);	1.10	\$	660.00
10/17/2021	J. Hawley	Draft response to parties' redistricting principles (2.5); review and revise response to parties' redistricting principles (1.3); email with client regarding same (0.2);	4.00	\$	1,600.00
10/17/2021	J. Jasrasaria	Correspond with case team regarding redistricting principles (0.1);	0.10	\$	37.50

10/18/2021	A. Khanna	Correspond with legal team regarding draft response brief on principles (0.2);	0.20	\$	120.00
10/18/2021	J. Hawley	Email with case team regarding response to parties' redistricting principles (0.5); email with M. Elias and E. Frost regarding same (0.1); review and revise response to parties' redistricting principles (0.1); email with client regarding same (0.2);	0.90	\$	360.00
10/18/2021	J. Jasrasaria	Correspond with team about redistricting principles (0.1);	0.10	\$	37.50
10/19/2021	E. Frost	Review response to parties' redistricting principles (0.4);	0.40	\$	240.00
10/19/2021	J. Hawley	Email with legal team regarding filing (0.3); email with client regarding same (0.1); email with local counsel regarding same (0.1);	0.50	\$	200.00
10/20/2021	J. Hawley	Review and revise response to parties' redistricting principles (0.9); review filings (0.1);	1.00	\$	400.00
10/20/2021	J. Jasrasaria	Correspond with case team about filing (0.1);	0.10	\$	37.50
10/20/2021	J. Posimato	Prepare and file response to parties' redistricting principles brief (2.0);	2.00	\$	750.00
10/20/2021	M. Elias	Review draft principles and standards brief; review past redistricting processes (1.0);	1.00	\$	750.00
10/21/2021	J. Hawley	Review filings (0.2);	0.20	\$	80.00
10/26/2021	J. Hawley	Review filing (0.5); prepare for oral argument (0.5);	1.00	\$	400.00
10/27/2021	J. Hawley	Email with client regarding scheduling order (0.2);	0.20	\$	80.00
10/30/2021	J. Hawley	Draft oral argument outline (1.0);	1.00	\$	400.00
10/31/2021	J. Hawley	Draft oral argument outline (2.1);	2.10	\$	840.00
11/1/2021	B. Stafford	Conference call with team to discuss oral argument preparation and plan submission (0.7);	0.70	\$	420.00
11/1/2021	J. Hawley	Draft oral argument outline (2.2); email with client regarding mapping meeting (0.2); confer with case team and local counsel regarding oral argument (0.6);	3.00	\$	1,200.00
11/1/2021	J. Jasrasaria	Confer with B. Stafford, J. Hawley, and local counsel team about upcoming oral argument on redistricting principles (0.7);	0.70	\$	262.50

11/2/2021	A. Khanna	Participate in oral argument moot regarding redistricting principles (1);	1.00	\$	600.00
11/2/2021	B. Stafford	Prepare for moot of oral argument on criteria by reviewing party submissions on criteria (0.6); participate in moot argument concerning criteria submissions (1.0);	1.60	\$	960.00
11/2/2021	J. Hawley	Prepare for oral argument (0.9); confer with case team regarding same (1.3);	2.20	\$	880.00
11/2/2021	J. Jasrasaria	Confer with case team to prepare for J. Hawley's oral argument on redistricting principles (1.0); correspond with team about oral argument (0.1);	1.10	\$	412.50
11/3/2021	A. Khanna	Attend virtually MN oral argument on redistricting principles (1.8);	1.80	\$	1,080.00
11/3/2021	B. Stafford	Watch portions of redistricting criteria argument to monitor panel questions in preparation for subsequent briefing (0.8);	0.80	\$	480.00
11/3/2021	J. Hawley	Prepare for oral argument (2.1); attend oral argument (2.5);	4.60	\$	1,840.00
11/3/2021	J. Jasrasaria	Watch oral argument on redistricting principles to prepare for substantive briefing (1.5);	1.50	\$	562.50
11/5/2021	A. Khanna	Attend meeting with legal team and client in preparation for map submission and briefing in support (0.4);	0.40	\$	240.00
11/5/2021	B. Stafford	Conference call with client regarding plan submission details (0.4);	0.40	\$	240.00
11/5/2021	J. Hawley	Confer with case team and client regarding plan submission (0.4); review prior redistricting filings (0.6); email with client regarding same (0.2); email with local counsel regarding plan submission (0.1);	1.30	\$	520.00
11/5/2021	J. Jasrasaria	Confer with client team about next steps for map submission (0.4);	0.40	\$	150.00
11/8/2021	J. Hawley	Confer with J. Jasrasaria on next steps for plan submissions and accompanying briefing (0.3);	0.30	\$	120.00
11/8/2021	J. Jasrasaria	Confer with J. Hawley on next steps for plan submissions and accompanying briefing (0.3);	0.30	\$	112.50
11/9/2021	J. Hawley	Email with case team regarding public map submissions (0.2);	0.20	\$	80.00

11/11/2021	A. Khanna	Attend call with legal team and local counsel regarding map submissions and supporting brief (0.5);	0.50	\$	300.00
11/11/2021	B. Stafford	Prepare for and participate in conference call regarding plan submissions (0.9);	0.90	\$	540.00
11/11/2021	J. Hawley	Confer with case team and local counsel regarding plan submission (0.5); email with client regarding same (0.2);	0.70	\$	280.00
11/15/2021	A. Khanna	Correspond with client and legal team regarding proposed legislative maps and briefing regarding same (0.1);	0.10	\$	60.00
11/15/2021	J. Hawley	Email with client regarding mapping meeting with local counsel (0.2);	0.20	\$	80.00
11/16/2021	A. Khanna	Correspond and confer with J. Hawley regarding DFL maps (0.2);	0.20	\$	120.00
11/16/2021	J. Hawley	Confer with client regarding plan submissions (0.1); confer with A. Khanna regarding same (0.1);	0.20	\$	80.00
11/17/2021	J. Hawley	Confer with client regarding plan submissions (0.2); draft congressional map memorandum (2.0);	2.20	\$	880.00
11/18/2021	A. Khanna	Review court order on redistricting principles and correspond with legal team regarding same (0.3);	0.30	\$	180.00
11/18/2021	J. Hawley	Review order on redistricting principles (0.6); email with client and case team regarding same (0.5);	1.10	\$	440.00
11/19/2021	J. Hawley	Email with local counsel regarding legislative mapping materials (0.2); draft congressional map memorandum (0.6); confer with client and local counsel regarding legislative maps (0.8);	1.60	\$	640.00
11/23/2021	J. Hawley	Email with local counsel regarding Maptitude reports (0.1); draft congressional map memorandum (1.5);	1.60	\$	640.00
11/24/2021	J. Hawley	Draft congressional map memorandum (1.5);	1.50	\$	600.00
11/29/2021	J. Hawley	Draft congressional map memorandum (2.5); email with case team regarding same (0.2); email with client and local counsel regarding revisions to legislative maps (0.3); email with client regarding Data Scientist map submissions (0.2);	3.20	\$	1,280.00

11/30/2021	J. Hawley	Draft congressional map memorandum (6.6); email with client regarding legislative map (0.2);	6.80	\$	2,720.00
12/1/2021	A. Khanna	Confer with local counsel regarding plan submissions (0.4); confer with client and local counsel regarding legislative maps and plan submissions (0.5); telephone conference with J. Hawley regarding congressional map arguments (0.6);	1.50	\$	900.00
12/1/2021	B. Stafford	Call with local counsel regarding plan submission filing and related logistics (0.5);	0.50	\$	300.00
12/1/2021	J. Hawley	Draft congressional map memorandum (8.1); confer with local counsel regarding plan submissions (0.4); confer with client and local counsel regarding legislative maps and plan submissions (0.5);	9.00	\$	3,600.00
12/2/2021	A. Khanna	Correspond with legal team regarding substance and logistics of map and brief submissions (0.2);	0.20	\$	120.00
12/2/2021	B. Stafford	Review and revise congressional memo (2.3);	2.30	\$	1,380.00
12/2/2021	J. Hawley	Review and revise congressional map memorandum (5.4); email with client and local counsel regarding same (0.3); email with client and local counsel regarding communities of interest (0.3);	6.00	\$	2,400.00
12/3/2021	J. Hawley	Review and revise congressional map memorandum (1.5); email with client and local counsel regarding same (0.4); review and revise legislative map memorandum (1.5);	3.40	\$	1,360.00
12/3/2021	M. Elias	Review brief in support of congressional plan (1);	1.00	\$	750.00
12/4/2021	A. Khanna	Review and revise draft brief in support of congressional plan and correspond with legal team regarding same (1.3);	1.30	\$	780.00
12/5/2021	A. Khanna	Correspond with legal team regarding COI overlay on maps and description of same in text (0.2);	0.20	\$	120.00
12/5/2021	E. Frost	Review motion to adopt proposed congressional plan (0.7);	0.70	\$	420.00
12/5/2021	J. Hawley	Review and revise congressional map memorandum (1.0);	1.00	\$	400.00

12/6/2021	J. Hawley	Review and revise legislative map memorandum (7.9); email with client and local counsel regarding Maptitude reports (0.3); review and revise congressional map memorandum (0.2);	8.40	\$	3,360.00
12/6/2021	M. Elias	Review brief in support of map (1.0);	1.00	\$	750.00
12/7/2021	J. Hawley	Review and revise congressional map memorandum (2.5); review and revise legislative map memorandum (0.3); email with client regarding Maptitude report (0.1); prepare filings (0.6); review plan submissions (1.2);	4.70	\$	1,880.00
12/7/2021	J. Jasrasaria	Correspond with team about map submissions and briefing (0.1);	0.10	\$	37.50
12/8/2021	J. Hawley	Email with client regarding plan submissions (0.1);	0.10	\$	40.00
12/9/2021	A. Khanna	Attend meeting with legal team and local counsel regarding analysis of plaintiffs' proposed maps (0.4);	0.40	\$	240.00
12/9/2021	B. Stafford	Conference with local counsel regarding reply briefs on congressional and legislative plans (0.6);	0.60	\$	360.00
12/9/2021	D. Osher	Confer with litigation team and local counsel regarding comparison of proposed maps (0.6);	0.60	\$	255.00
12/9/2021	J. Hawley	Email with client regarding response to parties' plan submissions (0.2); confer with local counsel regarding plan submissions (1.5);	1.70	\$	680.00
12/10/2021	J. Hawley	Confer with local counsel regarding plan submissions (0.7); review plan submissions (1.2);	1.90	\$	760.00
12/13/2021	J. Hawley	Review plan submissions (3.2); draft response to parties' congressional plan submissions (3.1);	6.30	\$	2,520.00
12/13/2021	J. Jasrasaria	Correspond with team about filing (0.1);	0.10	\$	37.50
12/14/2021	J. Hawley	Draft response to parties' plan submissions (5.4); email with client, local counsel, and case team regarding same (0.3);	5.70	\$	2,280.00
12/15/2021	B. Stafford	Review draft congressional brief in opposition to other parties' plans (1.5); conference with J. Hawley regarding presentation (0.5);	2.00	\$	1,200.00

12/15/2021	J. Hawley	Review order (0.1); confer with B. Stafford regarding oral argument (0.4); review and revise response to parties' congressional plan submissions (1.2); review and revise response to parties' legislative plan submissions (0.4); email with D. Osher regarding same (0.2);	2.30	\$	920.00
12/16/2021	B. Stafford	Review legislative and congressional briefs responding to other party submissions (0.9);	0.90	\$	540.00
12/16/2021	D. Osher	Review prior filings in preparation for finalizing briefing (0.5); Review and revise draft of brief responding to other parties' proposed congressional plans (1.5); Review and revise draft of brief responding to other parties' proposed legislative plans (1.6);	3.60	\$	1,530.00
12/16/2021	E. Frost	Review draft oppositions to other parties' plans and emails with team regarding same (1.0);	1.00	\$	600.00
12/16/2021	J. Hawley	Confer with D. Zoll regarding oral argument (0.4);	0.40	\$	160.00
12/17/2021	D. Osher	Incorporate client edits to congressional and legislative response briefs and finalize the same for filing (1.1);	1.10	\$	467.50
12/21/2021	J. Hawley	Review parties' response briefs (0.4);	0.40	\$	160.00
12/22/2021	B. Stafford	Conference with local counsel regarding argument preparation (0.6);	0.60	\$	360.00
12/22/2021	H. Brewster	Confer with A. Khanna and J. Hawley about PowerPoint presentation for oral argument (0.3);	0.30	\$	127.50
12/22/2021	J. Hawley	Confer with B. Stafford and local counsel regarding oral argument (0.7); email with client regarding plan submissions (0.2);	0.90	\$	360.00
12/23/2021	H. Brewster	Design power point for oral argument (1.3);	1.30	\$	552.50
12/27/2021	J. Hawley	Review parties' plan submission response briefs (1.9); email with client regarding same (0.2); draft oral argument outline and prepare PowerPoint presentation (5.1);	7.20	\$	2,880.00
12/28/2021	H. Brewster	Design presentation for oral argument (3.3);	3.30	\$	1,402.50
12/28/2021	J. Hawley	Confer with H. Brewster regarding PowerPoint presentation (0.3);	0.30	\$	120.00

12/29/2021	B. Stafford	Review and revise oral argument outline (0.6); review and revise powerpoint (0.6); review party briefing to prepare for oral argument (2.8);	4.00	\$	2,400.00
12/29/2021	H. Brewster	Work on revisions to oral argument presentation (1.2);	1.20	\$	510.00
12/29/2021	J. Hawley	Email with local counsel regarding congressional member residence (0.1); email with B. Stafford regarding same (0.3); review and revise oral argument outline and PowerPoint presentation (1.9);	2.30	\$	920.00
12/30/2021	A. Khanna	Attend oral argument prep session with legal team (1);	1.00	\$	600.00
12/30/2021	B. Stafford	Conference call with local counsel to discuss oral argument (1.0); prepare for oral argument by revising outline, powerpoint, and reviewing party briefing (3.2);	4.20	\$	2,520.00
12/30/2021	J. Hawley	Confer with case team and local counsel regarding oral argument (1.3); review and revise oral argument outline and PowerPoint presentation (0.4);	1.70	\$	680.00
12/31/2021	B. Stafford	Oral argument prep (2.2);	2.20	\$	1,320.00
1/2/2022	B. Stafford	Prepare for oral argument by outlining argument, and reviewing other parties' maps and briefing (2.5);	2.50	\$	1,500.00
1/3/2022	B. Stafford	Prepare for oral argument by outlining argument, and reviewing other parties' maps and briefing, and our own maps and submissions (6.0);	6.00	\$	3,600.00
1/3/2022	H. Brewster	Review final presentations for oral argument (0.6);	0.60	\$	255.00
1/3/2022	J. Hawley	Email with client regarding oral argument (0.2);	0.20	\$	80.00
1/4/2022	B. Stafford	Prepare for oral argument on maps; attend morning and afternoon sessions of argument and prepare during sessions with local counsel (7.0);	7.00	\$	4,200.00
1/4/2022	J. Hawley	Watch oral argument (2.7);	2.70	\$	1,080.00
1/4/2022	J. Jasrasaria	Watch oral argument on proposed plans (1.5);	1.50	\$	562.50
2/14/2022	J. Jasrasaria	Correspond with plaintiffs about upcoming maps (0.2);	0.20	\$	75.00

2/15/2022	A. Khanna	Review maps and correspond with legal team regarding same (0.5);	0.50	\$	300.00
2/15/2022	B. Stafford	Review court orders and maps and correspond with legal team regarding same (0.4);	0.40	\$	240.00
2/15/2022	J. Hawley	Review adopted congressional and legislative plans (0.7); email with client regarding same (0.2); email with local counsel regarding same (0.1); confer with case team and client regarding new congressional map (0.4);	1.40	\$	560.00
2/15/2022	M. Elias	Review court orders and maps (1);	1.00	\$	750.00
2/16/2022	B. Stafford	Confer with J. Hawley and local counsel regarding adopted maps (0.4); review court order and maps in advance of same (0.6);	1.00	\$	600.00
2/16/2022	J. Hawley	Confer with B. Stafford and local counsel regarding adopted maps (0.4);	0.40	\$	160.00
2/17/2022	J. Hawley	Confer with client regarding adopted maps (0.3);	0.30	\$	120.00
2/17/2022	J. Jasrasaria	Correspond with plaintiffs about court decision and maps (0.3);	0.30	\$	112.50
			310.70	\$	141,337.50