

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

**FILED**

May 17, 2022

OFFICE OF  
APPELLATE COURTS

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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.

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**DECLARATION OF CHARLES N. NAUEN IN SUPPORT OF  
SACHS PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES**

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I, Charles N. Nauen, declare as follows:

1. I am an attorney with Lockridge Grindal Nauen P.L.L.P. and am counsel for Plaintiffs Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer (the "Sachs Plaintiffs") in the above-captioned matter. I hereby submit this declaration in support of Sachs Plaintiffs' Motion for an Award of Attorneys' Fees.

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. Attached as Exhibit A is a true and correct copy of Lockridge Grindal Nauen

P.L.L.P.’s billing detail for its work for the Sachs Plaintiffs on this matter. As required by Minn. Gen. R. Prac. 119.02(1), the billing detail in Exhibit A 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.

4. The normal hourly rate and hours charged by the Sachs Plaintiffs’ attorneys, Charles Nauen, David Zoll, Rachel Kitze Collins, and David Hahn are reasonable and consistent with reasonable and customary rates charged in the Minneapolis and St. Paul legal community for attorneys in complex, important litigation.

5. I have reviewed the time records of Lockridge Grindal Nauen P.L.L.P., and hereby verify that the work performed was for the benefit of the client and was necessary for the proper representation of the client and that there are no charges for unnecessary or duplicative work.

6. A summary of the amounts reflected in Exhibit A attached to this Declaration is here:

<u>Attorney</u>	<u>Rate</u>	<u>Hours Expended</u>	<u>Fees Requested</u>
Charles Nauen	\$700	106.00	\$73,940.00
David Zoll	\$575	169.00	\$97,175.00
Rachel Kitze Collins	\$375	165.10	\$61,912.50
David Hahn	\$300	29.80	\$8,940.00
<b>LGN Total</b>		469.90	<b>\$241,967.50</b>

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Executed this 17th day of May, 2022.

s/Charles N. Nauen  
Charles N. Nauen

**EXHIBIT A**  
**TO DECLARATION OF CHARLES N. NAUEN**

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEE REQUESTED</b>
2/3/2021	C. Nauen	Telephone conference with A. Khanna regarding redistricting process.	0.50	\$ 350.00
2/3/2021	D. Zoll	Review background materials related to 2012 redistricting process at state and local levels.	0.30	\$ 172.50
2/5/2021	D. Zoll	Strategies regarding timing of redistricting litigation.	0.60	\$ 345.00
2/5/2021	R. Kitze Collins	Discuss redistricting issues; review materials.	1.20	\$ 450.00
2/23/2021	C. Nauen	Review complaint; send to team.	0.30	\$ 210.00
2/25/2021	C. Nauen	Prepare for redistricting meeting.	0.50	\$ 350.00
2/25/2021	R. Kitze Collins	Review filed complaint; research regarding timing and effects of complaint.	0.70	\$ 262.50
2/26/2021	C. Nauen	Prepare for and participate in meeting; follow-up action items.	1.90	\$ 1,330.00
2/28/2021	C. Nauen	Organize redistricting issues; e-mail to team.	0.20	\$ 140.00
3/1/2021	D. Zoll	Review materials provided by P. Wattson; strategies regarding principles for redistricting.	1.70	\$ 977.50
3/3/2021	C. Nauen	E-mails with A. Khanna regarding strategies.	0.50	\$ 350.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
3/4/2021	D. Zoll	Review draft responses to constituents regarding legislative action related to redistricting.	0.20	\$ 115.00
3/16/2021	D. Zoll	Review analysis of committee actions during interim periods.	0.20	\$ 115.00
3/25/2021	C. Nauen	Review order and organizational issue.	0.40	\$ 280.00
4/1/2021	D. Zoll	Review dockets in pending impasse litigation; strategies regarding redistricting process.	1.90	\$ 1,092.50
4/9/2021	C. Nauen	Analyze previous orders and strategize on next steps.	1.00	\$ 700.00
4/10/2021	R. Kitze Collins	Review pleadings and timeline of redistricting proceedings from 2001 and 2011; prepare potential 2021 timeline.	1.00	\$ 375.00
4/11/2021	C. Nauen	Review license and comments regarding access.	0.40	\$ 280.00
4/11/2021	R. Kitze Collins	Review pleadings and timeline of redistricting proceedings from 2001 and 2011; prepare potential 2021 timeline.	0.60	\$ 225.00
4/12/2021	C. Nauen	Strategy call regarding timeline and complaint.	1.10	\$ 770.00
4/12/2021	D. Zoll	Review orders and pleadings from prior redistricting litigation; review timeline of key dates.	0.40	\$ 230.00
4/13/2021	C. Nauen	Review draft complaint.	1.10	\$ 770.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEE REQUESTED</b>
4/13/2021	D. Zoll	Review pleadings from prior rounds of litigation.	2.10	\$ 1,207.50
4/14/2021	R. Kitze Collins	Review and edit complaint.	0.70	\$ 262.50
4/15/2021	C. Nauen	Edit complaint.	0.80	\$ 560.00
4/15/2021	R. Kitze Collins	Review and edit complaint and petition.	0.90	\$ 337.50
4/16/2021	C. Nauen	Edit documents and conference with team regarding same; issues regarding contract.	1.20	\$ 840.00
4/16/2021	D. Zoll	Review congressional redistrict complaint and petition to Minnesota Supreme Court.	1.00	\$ 575.00
4/16/2021	R. Kitze Collins	Edit redistricting complaint.	0.50	\$ 187.50
4/20/2021	D. Zoll	Strategies regarding non-disclosure agreement and retainer agreements.	0.20	\$ 115.00
4/24/2021	C. Nauen	Various issues regarding logistics.	0.40	\$ 280.00
4/24/2021	D. Zoll	Review complaint; strategies with C. Nauen regarding litigation and legislative efforts.	0.90	\$ 517.50
4/24/2021	R. Kitze Collins	Review impasse complaint.	0.60	\$ 225.00
4/25/2021	C. Nauen	Telephone conference with A. Khanna regarding logistics for filings; work with team to get ready for upcoming filings; review and edit same.	1.40	\$ 980.00



<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEEES REQUESTED</b>
4/26/2021	C. Nauen	Various issues regarding reallocation; finalize submissions; final review of complaint; communicate with partners; voice mail with A. Khanna regarding next steps.	3.20	\$ 2,240.00
4/26/2021	D. Zoll	Review complaint and petition to Minnesota Supreme Court; review information regarding congressional apportionment; communications relating to filing complaint.	2.30	\$ 1,322.50
4/26/2021	R. Kitze Collins	Edit and finalize redistricting complaint and other filings.	3.50	\$ 1,312.50
4/27/2021	C. Nauen	Finalize subsequent submission for Supreme Court; follow-up to filing.	1.70	\$ 1,190.00
4/27/2021	D. Zoll	Review Minnesota Supreme Court petition for filing; review issues related to legislative process.	1.10	\$ 632.50
4/27/2021	R. Kitze Collins	Edit and finalize petition to Minnesota Supreme Court and other filings and service papers.	1.20	\$ 450.00
4/28/2021	C. Nauen	Supreme Court follow-up; N. Hartshorn affidavit.	0.30	\$ 210.00
4/28/2021	D. Zoll	Review pleadings and correspondence regarding same.	0.20	\$ 115.00
4/28/2021	R. Kitze Collins	Review new filings; correspond with co-counsel.	0.20	\$ 75.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
4/29/2021	C. Nauen	Telephone conference with A. Khanna regarding engagement agreement.	0.40	\$ 280.00
5/5/2021	C. Nauen	Review N. Hartshorn e-mails and response.	0.30	\$ 210.00
5/5/2021	D. Zoll	Correspondence regarding litigation deadlines.	0.20	\$ 115.00
5/5/2021	R. Kitze Collins	Correspond with Perkins regarding litigation deadlines.	0.70	\$ 262.50
5/7/2021	C. Nauen	Update call with A. Khanna; review pleadings regarding D. Zoll motion.	0.90	\$ 630.00
5/7/2021	R. Kitze Collins	Correspond regarding litigation timeline.	0.60	\$ 225.00
5/9/2021	C. Nauen	Review N. Hartshorn filing.	0.10	\$ 70.00
5/10/2021	C. Nauen	Edit A. Khanna response and e-mail to N. Hartshorn regarding stipulation.	0.60	\$ 420.00
5/10/2021	D. Zoll	Review draft common interest agreements; strategies regarding coordination among interested parties.	0.70	\$ 402.50
5/10/2021	R. Kitze Collins	Review legislative redistricting bills.	2.20	\$ 825.00
5/11/2021	C. Nauen	Status update to Perkins team; issues regarding intervention.	0.50	\$ 350.00
5/11/2021	D. Zoll	Review S. Simon response to Supreme Court petition; strategies regarding request to lift stay.	0.30	\$ 172.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
5/12/2021	C. Nauen	Review materials from A. Khanna; e-mail regarding session; e-mail to N. Hartshorn regarding stipulation.	0.60	\$ 420.00
5/12/2021	D. Zoll	Review various issues relating to redistricting litigation and legislative activity.	0.40	\$ 230.00
5/20/2021	C. Nauen	Review Supreme Court order; e-mail to Secretary of State attorney.	0.40	\$ 280.00
5/23/2021	D. Zoll	Draft common interest agreement.	1.30	\$ 747.50
5/24/2021	C. Nauen	Review motion draft; review pro hac motions.	0.50	\$ 350.00
5/25/2021	C. Nauen	Finalize documents and e-mail regarding common interest agreement.	0.20	\$ 140.00
5/25/2021	D. Zoll	Revisions to draft common interest agreement; strategies relating to non-disclosure agreement.	0.30	\$ 172.50
5/26/2021	C. Nauen	Issues regarding common interest agreement; edit memo.	0.50	\$ 350.00
5/26/2021	D. Zoll	Analysis of common interest agreements; correspondence regarding same; litigation strategies; review draft motion to lift stay.	1.80	\$ 1,035.00
5/26/2021	R. Kitze Collins	Research regarding common interest privilege.	0.90	\$ 337.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEEs REQUESTED</b>
5/28/2021	C. Nauen	Review motion and forward in draft to N. Hartshorn; e-mail to A. Khanna regarding same.	0.50	\$ 350.00
6/1/2021	R. Kitze Collins	Draft memo comparing legislative proposals with prior court orders.	1.30	\$ 487.50
6/4/2021	C. Nauen	Strategy call with R. Kitze Collins and D. Zoll regarding review agenda; prepare for meeting.	1.30	\$ 910.00
6/4/2021	R. Kitze Collins	Draft memo regarding principles from court orders.	2.10	\$ 787.50
6/8/2021	D. Zoll	Follow-up issues relating to redistricting principles and timing of motion to lift stay.	0.80	\$ 460.00
6/8/2021	R. Kitze Collins	Discuss principles; draft memo.	0.50	\$ 187.50
6/16/2021	R. Kitze Collins	Draft principles memo.	1.50	\$ 562.50
6/22/2021	R. Kitze Collins	Draft principles memo.	2.30	\$ 862.50
6/23/2021	C. Nauen	Review new pleadings regarding League of Women Voters.	0.70	\$ 490.00
6/23/2021	R. Kitze Collins	Draft principles memo.	1.90	\$ 712.50
6/25/2021	D. Zoll	Review and edit memorandum regarding redistricting principles.	0.60	\$ 345.00
6/25/2021	R. Kitze Collins	Finalize principles memo; finalize notice of consent.	0.70	\$ 262.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
6/29/2021	C. Nauen	Update call with A. Khanna regarding timing of next steps; review motion to intervene.	0.70	\$ 490.00
6/30/2021	C. Nauen	Review panel order; follow-up regarding panel members; review intervention submission.	1.10	\$ 770.00
6/30/2021	D. Zoll	Receive and review order lifting stay and appointing panel; correspondence and strategies regarding same.	0.80	\$ 460.00
6/30/2021	R. Kitze Collins	Review Order from Court appointing panel; research regarding judges.	0.70	\$ 262.50
7/1/2021	C. Nauen	Analyze panel; follow-up regarding next steps.	0.80	\$ 560.00
7/1/2021	D. Zoll	Strategies regarding appointment of panel; coordinate filing of pro hac vice motions.	0.80	\$ 460.00
7/1/2021	R. Kitze Collins	Research regarding judges appointed to redistricting panel.	2.50	\$ 937.50
7/7/2021	C. Nauen	Review state submission regarding intervention.	0.20	\$ 140.00
7/8/2021	R. Kitze Collins	Research regarding redistricting panel.	2.00	\$ 750.00
7/13/2021	D. Zoll	Review filings in redistricting litigation; correspondence regarding same.	0.20	\$ 115.00
7/15/2021	D. Zoll	Strategies and correspondence regarding	1.20	\$ 690.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
		various motions to intervene or add parties.		
7/15/2021	R. Kitze Collins	Review new pleadings; research regarding intervenors and attorneys.	0.70	\$ 262.50
7/22/2021	D. Zoll	Receive and review orders granting motions for admission pro hac vice and scheduling order; correspondence regarding same.	0.70	\$ 402.50
7/26/2021	C. Nauen	Review amended complaint and service.	0.20	\$ 140.00
7/26/2021	D. Zoll	Review recent court filings.	0.20	\$ 115.00
7/27/2021	C. Nauen	Senate scheduling matter.	0.20	\$ 140.00
8/2/2021	R. Kitze Collins	Correspond regarding drafting response to intervenor's motions.	0.30	\$ 112.50
8/9/2021	C. Nauen	Review hearing report and order.	0.20	\$ 140.00
8/10/2021	D. Zoll	Review filings; strategies regarding responses to motions to intervene.	0.20	\$ 115.00
8/10/2021	R. Kitze Collins	Draft notice of non-opposition to intervention motions.	0.40	\$ 150.00
8/12/2021	C. Nauen	Edits to pleading; review demographic information on Minnesota.	0.50	\$ 350.00
8/12/2021	D. Zoll	Correspondence regarding responses to petitions to intervene.	0.30	\$ 172.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEE REQUESTED</b>
8/16/2021	D. Zoll	Strategies regarding litigation and redistricting principles.	0.80	\$ 460.00
8/18/2021	D. Zoll	Observe Minnesota House hearing on redistricting; strategies regarding revisions to complaint following release of population data.	0.60	\$ 345.00
8/22/2021	C. Nauen	Update status with A. Khanna; follow-up with team.	0.50	\$ 350.00
8/23/2021	D. Zoll	Strategies regarding redistricting principles and other preliminary issues.	0.50	\$ 287.50
8/24/2021	C. Nauen	Review new Order; follow-up regarding submissions.	0.50	\$ 350.00
8/24/2021	D. Zoll	Receive and review scheduling order from redistricting panel; correspondence regarding the same.	0.60	\$ 345.00
8/31/2021	R. Kitze Collins	Discuss redistricting litigation updates and next steps.	0.20	\$ 75.00
9/3/2021	R. Kitze Collins	Discuss updates; draft principles; edit stipulation.	1.40	\$ 525.00
9/4/2021	C. Nauen	E-mails regarding next steps; review materials.	0.50	\$ 350.00
9/6/2021	C. Nauen	Edit stipulation and e-mail to J. Hawley regarding same; e-mails regarding proposed intervention.	0.40	\$ 280.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
9/6/2021	D. Zoll	Review draft stipulation regarding preliminary issues; correspondence regarding same.	0.30	\$ 172.50
9/7/2021	C. Nauen	Various matters regarding data scientists efforts to intervene; review Wattson plaintiffs' submission.	0.50	\$ 350.00
9/7/2021	D. Zoll	Review data scientists' petition to intervene; strategies regarding response; prepare notices of appearance and motion for admission pro hac vice.	2.00	\$ 1,150.00
9/7/2021	R. Kitze Collins	Review pleadings.	0.60	\$ 225.00
9/8/2021	C. Nauen	Team call with Elias Law Group team and strategies regarding stipulation, schedule, and other pending issues; review intervention motion.	1.40	\$ 980.00
9/8/2021	D. Zoll	Conference with litigation team; review court orders and strategize for litigation.	2.80	\$ 1,610.00
9/8/2021	R. Kitze Collins	Conference call with ELG team to discuss updates and next steps.	1.20	\$ 450.00
9/9/2021	C. Nauen	Review draft stipulation; review and comment regarding same.	1.20	\$ 840.00
9/9/2021	D. Zoll	Review proposed stipulation on preliminary issues; correspondence with litigation team regarding same; revisions to draft stipulation.	1.20	\$ 690.00



<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
9/10/2021	C. Nauen	Review and edit proposed stipulation; various e-mails with Elias Law Group regarding strategies; participate in parties' conference call; review order denying Saxe intervention.	1.20	\$ 840.00
9/10/2021	D. Zoll	Strategies regarding litigation; review order denying intervention; review draft stipulation; participate in conference with counsel regarding stipulation.	2.00	\$ 1,150.00
9/10/2021	R. Kitze Collins	Call with all parties regarding stipulation.	1.10	\$ 412.50
9/13/2021	C. Nauen	Review Panel Order regarding public hearings; strategies regarding same.	0.60	\$ 420.00
9/13/2021	D. Zoll	Receive and review order establishing schedule for public hearings; correspondence regarding same.	0.70	\$ 402.50
9/14/2021	C. Nauen	Work on hearing preparation.	0.50	\$ 350.00
9/14/2021	D. Zoll	Plan for public hearings.	0.70	\$ 402.50
9/15/2021	D. Zoll	Coordinate public hearing recruitment.	0.40	\$ 230.00
9/16/2021	C. Nauen	Prepare for Friday conference call; review stipulation drafts.	0.20	\$ 140.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEE REQUESTED</b>
9/16/2021	D. Zoll	Strategies regarding preliminary issues including acceptable deviation; edits to proposed stipulation; circulate proposed stipulation to parties.	1.80	\$ 1,035.00
9/17/2021	C. Nauen	Review competing stipulations; issues regarding parties call.	0.80	\$ 560.00
9/17/2021	R. Kitze Collins	Discuss updates, stipulation, next steps, call regarding stipulation.	0.80	\$ 300.00
9/19/2021	R. Kitze Collins	Draft principles stipulation.	0.50	\$ 187.50
9/20/2021	D. Zoll	Revise and edit draft stipulation regarding redistricting principles; research issues related to principles.	3.40	\$ 1,955.00
9/20/2021	R. Kitze Collins	Draft principles stipulation.	1.10	\$ 412.50
9/21/2021	C. Nauen	Edit principles and issues regarding stipulation.	0.30	\$ 210.00
9/21/2021	D. Zoll	Strategies with R. Kitze Collins regarding principles stipulation.	0.20	\$ 115.00
9/21/2021	D. Zoll	Strategies regarding principles stipulation; review edits to preliminary issues draft; correspondence with Elias Law Group.	0.40	\$ 230.00
9/22/2021	D. Zoll	Correspondence regarding stipulation on preliminary issues.	1.20	\$ 690.00
9/23/2021	R. Kitze Collins	Review preliminary issues stipulation.	0.30	\$ 112.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
9/24/2021	C. Nauen	Finalize stipulation and statement.	0.20	\$ 140.00
9/24/2021	D. Zoll	Finalize stipulation on preliminary issues; submit separate statement; review filings by other parties.	1.70	\$ 977.50
9/28/2021	C. Nauen	Prepare for hearing.	0.30	\$ 210.00
9/30/2021	D. Zoll	Conference with parties regarding principles stipulation; strategies regarding public hearings.	1.70	\$ 977.50
10/4/2021	R. Kitze Collins	Review draft of principles stipulation.	0.30	\$ 112.50
10/5/2021	C. Nauen	Review principles submissions with Court.	0.40	\$ 280.00
10/5/2021	D. Zoll	Circulate proposed principles; strategies and update with R. Kitze Collins.	0.40	\$ 230.00
10/5/2021	R. Kitze Collins	Discuss updates with D. Zoll.	0.30	\$ 112.50
10/6/2021	D. Zoll	Participate in conference call with parties regarding principles stipulation; research regarding legislative district numbering.	2.10	\$ 1,207.50
10/7/2021	D. Zoll	Review draft stipulation redlines regarding principles and plan submissions.	1.00	\$ 575.00
10/11/2021	C. Nauen	Attend redistricting public hearing via zoom.	1.20	\$ 840.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
10/12/2021	C. Nauen	Review and edit principles for filing; communicate with A. Khanna regarding maps; strategies regarding public hearings.	1.10	\$ 770.00
10/12/2021	D. Zoll	Follow-up regarding public hearings; review submissions on principles.	2.10	\$ 1,207.50
10/12/2021	R. Kitze Collins	Discuss updates; review brief in support of redistricting principles proposal.	1.00	\$ 375.00
10/13/2021	C. Nauen	Updates with A. Khanna; review maps.	0.40	\$ 280.00
10/13/2021	D. Zoll	Follow-up on filing of position statements on redistricting principles; review draft maps.	0.50	\$ 287.50
10/19/2021	C. Nauen	Review principles reply brief.	0.30	\$ 210.00
10/19/2021	D. Zoll	Coordinate for filing of response brief to redistricting principles.	0.30	\$ 172.50
10/19/2021	R. Kitze Collins	Discuss updates and next steps with D. Zoll.	0.20	\$ 75.00
10/20/2021	C. Nauen	Review final principles memo and various e-mails regarding filing.	0.20	\$ 140.00
10/20/2021	D. Zoll	Review and edit response brief regarding redistricting principles.	1.20	\$ 690.00
10/20/2021	R. Kitze Collins	Edit response to redistricting principles.	0.60	\$ 225.00
10/26/2021	C. Nauen	Review order on hearing.	0.20	\$ 140.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEE REQUESTED</b>
10/26/2021	D. Zoll	Receive and review order regarding oral argument and plan submissions.	0.50	\$ 287.50
10/26/2021	R. Kitze Collins	Review redistricting principles submissions; discuss next steps with D. Zoll.	0.90	\$ 337.50
10/27/2021	C. Nauen	Review order regarding argument; scheduling issues.	0.30	\$ 210.00
10/27/2021	R. Kitze Collins	Review redistricting principles submissions.	1.50	\$ 562.50
10/28/2021	C. Nauen	Edit principles memo.	0.30	\$ 210.00
10/28/2021	D. Zoll	Strategies regarding hearing on redistricting principles; review briefs; review draft chart summarizing parties' proposed principles.	2.20	\$ 1,265.00
10/28/2021	R. Kitze Collins	Review redistricting principles submissions; prepare comparison chart.	2.00	\$ 750.00
11/1/2021	C. Nauen	Meet with D. Zoll regarding hearing; prepare for call with Elias counsel regarding Wednesday's hearing.	0.80	\$ 560.00
11/1/2021	D. Zoll	Strategies and conference with Elias Law Group team regarding hearing on redistricting principles.	1.70	\$ 977.50
11/3/2021	C. Nauen	Observe hearing and follow-up matters.	1.50	\$ 1,050.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
11/3/2021	D. Zoll	Prepare for and attend oral argument regarding redistricting principles; follow-up strategies with J. Hawley; update to C. Nauen.	2.80	\$ 1,610.00
11/5/2021	C. Nauen	Update status regarding plans and briefing.	0.20	\$ 140.00
11/8/2021	C. Nauen	Issues regarding submissions.	0.60	\$ 420.00
11/9/2021	D. Zoll	Strategies regarding plan submissions; correspondence with J. Hawley regarding same.	1.10	\$ 632.50
11/11/2021	C. Nauen	Telephone conference with Elias co-counsel regarding next steps for plan; strategy call with D. Zoll and R. Kitze Collins regarding work on maps and submission.	1.10	\$ 770.00
11/11/2021	D. Zoll	Strategies with Elias Law Group team regarding plan submissions.	1.80	\$ 1,035.00
11/11/2021	D. Hahn	Review and analyze 2010 redistricting order and parties' opening briefs on redistricting principles in preparation for drafting brief in support of proposed maps.	1.70	\$ 510.00
11/11/2021	R. Kitze Collins	Telephone call with ELG.	0.60	\$ 225.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
11/12/2021	D. Hahn	Review parties' response briefs on redistricting principles and draft maps in preparation for briefing in support of proposed district maps; e-mail correspondence with R. Kitze Collins regarding same.	1.00	\$ 300.00
11/12/2021	R. Kitze Collins	Outline legislative brief.	1.40	\$ 525.00
11/13/2021	D. Hahn	Review 2010 DFL brief in support of proposed district maps to prepare to brief current proposed maps.	0.70	\$ 210.00
11/15/2021	C. Nauen	Work on court submission.	0.30	\$ 210.00
11/15/2021	D. Zoll	Strategies regarding plan submissions.	0.50	\$ 287.50
11/15/2021	R. Kitze Collins	Review maps and outline legislative plan brief.	2.80	\$ 1,050.00
11/16/2021	C. Nauen	Issues regarding legislative map.	0.60	\$ 420.00
11/16/2021	R. Kitze Collins	Review public comments and testimony; discuss next steps with D. Zoll and C. Nauen.	1.20	\$ 450.00
11/17/2021	C. Nauen	Issues regarding maps and House submission.	0.30	\$ 210.00
11/17/2021	D. Hahn	Analyze written comments submitted to redistricting panel in preparation for brief in support of proposed maps.	1.50	\$ 450.00
11/17/2021	R. Kitze Collins	Outline legislative plan brief; review public comments and testimony.	2.40	\$ 900.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEEs REQUESTED</b>
11/18/2021	C. Nauen	Discuss mapping issues; review principles order.	1.20	\$ 840.00
11/18/2021	D. Zoll	Strategies with C. Nauen regarding plan submissions; receive and review order on redistricting principles; coordination between legislative and litigation procedures.	1.60	\$ 920.00
11/19/2021	C. Nauen	Review legislative materials from J. Hawley.	1.10	\$ 770.00
11/19/2021	D. Hahn	Complete review of written comments to redistricting panel; review summary of in-person testimony for comments on state legislative boundaries for use in brief supporting proposed maps; attend meeting with R. Kitze Collins, and Elias Law Group to review and discuss map proposals.	2.50	\$ 750.00
11/19/2021	R. Kitze Collins	Review maps and reports; discuss legislative map with ELG.	3.20	\$ 1,200.00
11/22/2021	C. Nauen	Issues regarding redistricting maps and House map.	1.60	\$ 1,120.00
11/22/2021	D. Zoll	Review proposed redistricting plan for legislative offices; strategies and correspondence regarding same.	1.90	\$ 1,092.50
11/22/2021	R. Kitze Collins	Draft legislative plan brief; discuss same with C. Nauen and D. Zoll.	3.10	\$ 1,162.50



<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
11/23/2021	C. Nauen	Work on legislative maps; conference call regarding same.	2.50	\$ 1,750.00
11/23/2021	D. Hahn	E-mail correspondence with R. Kitze Collins regarding public testimony to redistricting panel; send R. Kitze Collins spreadsheet compiling relevant testimony.	0.20	\$ 60.00
11/23/2021	R. Kitze Collins	Draft legislative plan brief.	3.50	\$ 1,312.50
11/24/2021	C. Nauen	Work on state legislative map.	1.00	\$ 700.00
11/24/2021	D. Zoll	Strategies with C. Nauen and R. Kitze Collins regarding submission of redistricting plans.	0.30	\$ 172.50
11/26/2021	C. Nauen	Various redistricting map issues; e-mails with R. Kitze Collins and D. Zoll; monitor call.	1.30	\$ 910.00
11/26/2021	R. Kitze Collins	Draft legislative plan brief.	2.80	\$ 1,050.00
11/27/2021	C. Nauen	Strategy call with D. Zoll and R. Kitze Collins; edit A. Khanna e-mail.	0.80	\$ 300.00
11/27/2021	D. Zoll	Correspondence regarding legislative redistricting plans; conference with C. Nauen and R. Kitze Collins regarding same.	1.30	\$ 747.50
11/27/2021	R. Kitze Collins	Draft legislative plan brief.	2.10	\$ 787.50
11/29/2021	C. Nauen	Work on legislative maps; various e-mails regarding same; provide report regarding same.	2.00	\$ 1,400.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
11/29/2021	D. Zoll	Strategies with C. Nauen and R. Kitze Collins regarding submission of redistricting plans; provide revised maps to Elias Law Group team.	1.10	\$ 632.50
11/29/2021	D. Hahn	Analyze population summary reports for house and senate district; draft section of brief concerning principle of population-based representation.	1.00	\$ 300.00
11/29/2021	R. Kitze Collins	Draft legislative plan brief.	6.40	\$ 2,400.00
11/30/2021	C. Nauen	Work on submissions and details of 12-07; review filings.	1.70	\$ 1,190.00
11/30/2021	D. Zoll	Coordinating efforts relating to submission of redistricting plan in litigation; review public filing by proposed data scientist intervenors.	1.70	\$ 977.50
11/30/2021	D. Hahn	Research and analyze official 2020 census data showing racial and ethnic breakdown of Minnesota population; e-mail correspondence with R. Kitze Collins regarding same; draft brief sections containing tables showing minority representation in proposed legislative districts.	3.00	\$ 900.00
11/30/2021	R. Kitze Collins	Draft legislative plan brief.	4.70	\$ 1,762.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
12/1/2021	C. Nauen	Conference calls with Elias co-counsel regarding maps and briefing; work with team regarding legislative maps and briefing.	1.50	\$ 1,050.00
12/1/2021	D. Zoll	Review draft plan submission materials; conference calls regarding proposed legislative redistricting plan.	2.40	\$ 1,380.00
12/1/2021	D. Hahn	Analyze measure of compactness reports and compare to 2010 redistricting plan; draft section of legislative brief concerning compactness and send same to R. Kitze Collins; review public hearing transcripts to pull citations of public testimony for use in brief section on configuration of legislative districts.	4.50	\$ 1,350.00
12/1/2021	R. Kitze Collins	Strategy call with Elias Law Group; draft brief.	6.20	\$ 2,325.00
12/2/2021	C. Nauen	Edit briefs; various e-mails and conference calls regarding same.	3.60	\$ 2,520.00
12/2/2021	D. Zoll	Review and edit plan submission materials; draft sections relating to legislative districts.	4.20	\$ 2,415.00
12/2/2021	D. Hahn	Review and edit draft of legislative brief, incorporating citations of public testimony; e-mail correspondence with R. Kitze-Collins regarding same.	3.90	\$ 1,170.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
12/2/2021	R. Kitze Collins	Draft brief in support of legislative proposal.	8.00	\$ 3,000.00
12/3/2021	C. Nauen	Work on briefs; meet with team; follow-up logistics; issues regarding Data Scientists.	1.30	\$ 910.00
12/3/2021	D. Zoll	Review and edit draft plan submission materials.	1.90	\$ 1,092.50
12/3/2021	R. Kitze Collins	Discuss briefs; edit Congressional brief; edits legislative brief; discuss final reports and maps.	3.80	\$ 1,425.00
12/4/2021	D. Zoll	Review submissions by data scientists amici; correspondence with litigation team regarding same.	0.40	\$ 230.00
12/4/2021	D. Hahn	Analyze updated reports for compactness, minority representation, and population deviation and update numbers in brief supporting legislative map.	1.20	\$ 360.00
12/4/2021	R. Kitze Collins	Edit brief in support of legislative proposal.	1.00	\$ 375.00
12/5/2021	R. Kitze Collins	Edit brief in support of legislative proposal.	2.00	\$ 750.00
12/6/2021	C. Nauen	Work on redistricting briefs and materials; review amicus order.	2.00	\$ 1,400.00
12/6/2021	D. Zoll	Review and edit materials to file in support of legislative and congressional plans.	3.70	\$ 2,127.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEE REQUESTED</b>
12/6/2021	D. Hahn	Conduct close final review and cite check of brief in support of legislative redistricting plan; send edits on same to R. Kitze Collins.	2.60	\$ 780.00
12/6/2021	R. Kitze Collins	Edit brief in support of legislative proposal; finalize reports and maps.	6.50	\$ 2,437.50
12/7/2021	C. Nauen	Review for final submissions; review other parties' submissions.	3.50	\$ 2,450.00
12/7/2021	D. Zoll	Finalize materials in support of congressional and legislative plans and oversee filing with panel.	7.40	\$ 4,255.00
12/7/2021	R. Kitze Collins	Finalize and file briefs in support of congressional and legislative proposals.	5.50	\$ 2,062.50
12/8/2021	C. Nauen	Review submissions; discuss next steps with D. Zoll.	1.50	\$ 1,050.00
12/8/2021	D. Zoll	Review parties' submissions in support of congressional and legislative plans.	2.20	\$ 1,265.00
12/8/2021	D. Hahn	Analyze statistical reports submitted by other plaintiff groups and create draft document summarizing same.	1.30	\$ 390.00
12/8/2021	R. Kitze Collins	Review submissions from other parties.	1.40	\$ 525.00
12/9/2021	C. Nauen	Briefing strategies; analyze comparison materials.	1.10	\$ 770.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
12/9/2021	D. Zoll	Conference with Elias Law Group team regarding responses to party submissions; strategies regarding responses; review submissions.	3.20	\$ 1,840.00
12/9/2021	D. Hahn	Analyze amicus brief from Citizen Data Scientists and add data to existing summary document; revise summary document.	1.50	\$ 450.00
12/9/2021	R. Kitze Collins	Review submissions from other parties; call with ELG to discuss responses.	2.80	\$ 1,050.00
12/10/2021	C. Nauen	Various matters regarding plans.	0.50	\$ 350.00
12/10/2021	D. Zoll	Strategies regarding response to parties' submissions.	0.60	\$ 345.00
12/10/2021	D. Hahn	E-mail correspondence with R. Kitze Collins regarding summary of statistics in opposing parties' redistricting plan submissions.	0.10	\$ 30.00
12/10/2021	R. Kitze Collins	Draft response brief.	3.20	\$ 1,200.00
12/13/2021	D. Hahn	Create summaries of Anderson plaintiffs' minority opportunity districts for R. Kitze Collins to use in drafting response brief.	1.20	\$ 360.00
12/13/2021	R. Kitze Collins	Draft response brief.	4.20	\$ 1,575.00
12/14/2021	C. Nauen	Issues regarding reply memorandum.	0.80	\$ 560.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
12/14/2021	D. Zoll	Strategies regarding response to other parties' redistricting plans.	1.70	\$ 977.50
12/14/2021	R. Kitze Collins	Draft response brief.	7.10	\$ 2,662.50
12/15/2021	C. Nauen	Review and revise order; issues regarding briefing; edit brief.	1.30	\$ 910.00
12/15/2021	D. Zoll	Edits to response brief.	1.60	\$ 920.00
12/15/2021	D. Hahn	Complete final review and edits on response brief in support of redistricting plan; send same to R. Kitze Collins via email.	1.50	\$ 450.00
12/15/2021	R. Kitze Collins	Draft and edit response brief.	4.10	\$ 1,537.50
12/16/2021	C. Nauen	Review final briefs and argument strategy.	1.70	\$ 1,190.00
12/16/2021	D. Zoll	Draft and edit briefs opposing other parties' redistricting plans.	4.20	\$ 2,415.00
12/16/2021	R. Kitze Collins	Draft and edit response briefs.	2.40	\$ 900.00
12/17/2021	C. Nauen	Review and edit final briefs; review reply briefs.	1.50	\$ 1,050.00
12/17/2021	D. Zoll	Finalize and file briefs opposing other parties redistricting plans.	1.90	\$ 1,092.50
12/17/2021	R. Kitze Collins	Finalize and file response briefs.	2.50	\$ 937.50
12/20/2021	D. Zoll	Review materials prepare for oral argument on redistricting plans.	3.30	\$ 1,897.50

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
12/21/2021	C. Nauen	Prepare for call regarding argument.	1.10	\$ 770.00
12/21/2021	D. Zoll	Review response briefs and plan for oral arguments.	1.70	\$ 977.50
12/22/2021	C. Nauen	Strategies regarding oral proceedings; review brief.	1.00	\$ 700.00
12/22/2021	D. Zoll	Conference with B. Stafford, J. Hawley, and R. Kitze Collins regarding oral argument; review materials and prepare for argument.	1.60	\$ 920.00
12/22/2021	R. Kitze Collins	Review other response briefs; call with ELG to discuss oral argument.	1.70	\$ 637.50
12/23/2021	D. Zoll	Review briefs and prepare for oral argument.	2.20	\$ 1,265.00
12/27/2021	D. Zoll	Review briefs; prepare for oral arguments.	5.60	\$ 3,220.00
12/27/2021	R. Kitze Collins	Review response briefs; plan presentation.	1.60	\$ 600.00
12/28/2021	C. Nauen	Prepare for argument; issues regarding slides.	0.80	\$ 560.00
12/28/2021	D. Zoll	Review briefs and plan submissions; strategies regarding oral argument; prepare plan presentation.	4.20	\$ 2,415.00
12/28/2021	R. Kitze Collins	Prepare presentation.	1.50	\$ 562.50
12/29/2021	C. Nauen	Review Amicus motion; continued assistance regarding hearing preparation.	1.60	\$ 1,120.00



<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEEES REQUESTED</b>
12/29/2021	D. Zoll	Review briefs; strategies regarding oral argument; prepare PowerPoint presentation regarding legislative plan.	7.40	\$ 4,255.00
12/29/2021	R. Kitze Collins	Prepare presentation; review response briefs.	5.00	\$ 1,875.00
12/30/2021	C. Nauen	Prepare for and strategy call regarding argument; follow-up and review order.	1.50	\$ 1,050.00
12/30/2021	D. Zoll	Prepare for oral arguments; conference with A. Khana, B. Stafford, J. Hawley, C. Nauen, and R. Kitze Collins regarding oral arguments.	6.70	\$ 3,852.50
12/30/2021	R. Kitze Collins	Call with ELG to discuss PowerPoint presentations; prepare and edit presentation.	5.20	\$ 1,950.00
12/31/2021	C. Nauen	Hearing preparation matters.	0.50	\$ 350.00
12/31/2021	D. Zoll	Revise and edit PowerPoint presentations; strategies regarding oral argument.	0.90	\$ 517.50
12/31/2021	R. Kitze Collins	Review and edit presentations.	2.80	\$ 1,050.00
1/1/2022	C. Nauen	Review draft of talking points.	0.60	\$ 420.00
1/2/2022	C. Nauen	Review and edit slides; hearing issues.	1.00	\$ 700.00
1/2/2022	D. Zoll	Prepare for oral arguments regarding redistricting plans.	2.20	\$ 1,265.00
1/3/2022	C. Nauen	Review slides and materials; help prepare for arguments.	2.70	\$ 1,890.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEEES REQUESTED</b>
1/3/2022	D. Zoll	Finalize presentations for oral argument; prepare for oral argument.	7.70	\$ 4,427.50
1/4/2022	C. Nauen	Assist in preparation and attend redistricting hearings; debrief and communicate with team.	6.00	\$ 4,200.00
1/4/2022	D. Zoll	Prepare for and participate in oral arguments before Special Redistricting Panel; follow-up matters.	8.40	\$ 4,830.00
1/4/2022	R. Kitze Collins	Attend redistricting hearing.	4.00	\$ 1,500.00
1/5/2022	D. Zoll	Debrief regarding oral arguments.	0.40	\$ 230.00
1/5/2022	R. Kitze Collins	Debrief redistricting hearing.	0.30	\$ 112.50
1/7/2022	C. Nauen	Review Senate plan and analyze deficiencies.	0.80	\$ 560.00
1/7/2022	D. Zoll	Review senate Republicans proposed redistricting plans.	0.40	\$ 230.00
1/10/2022	C. Nauen	Review order and late submissions; review Senate Republicans plan.	0.60	\$ 420.00
1/10/2022	D. Zoll	Review Senate Republicans' redistricting proposal; review court order regarding late or incomplete plan submissions and public comments.	0.30	\$ 172.50
1/11/2022	D. Hahn	E-mail correspondence with R. Kitze Collins following up on oral arguments regarding redistricting plans.	0.20	\$ 60.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEES REQUESTED</b>
1/18/2022	D. Zoll	Strategies regarding timing of court panel order and format of maps.	0.40	\$ 230.00
1/28/2022	D. Zoll	Strategies regarding litigation and potential follow-up matters after court maps are released.	0.60	\$ 345.00
2/2/2022	R. Kitze Collins	Research appeal options and discuss talking points following release of maps.	1.20	\$ 450.00
2/4/2022	D. Zoll	Strategies regarding responses to judicial panel redistricting plans; research and strategies regarding potential appeal of order.	1.30	\$ 747.50
2/14/2022	C. Nauen	Prepare for maps release; review statements regarding same.	1.30	\$ 910.00
2/14/2022	D. Zoll	Receive and review notification of scheduled release of redistricting plans; correspondence and strategies regarding same.	0.90	\$ 517.50
2/14/2022	R. Kitze Collins	Correspond regarding anticipated release of maps.	0.50	\$ 187.50
2/15/2022	C. Nauen	Review maps; various e-mails and calls regarding same.	3.10	\$ 2,170.00
2/15/2022	D. Zoll	Receive and review redistricting plans and court orders; correspondence and strategies regarding same.	3.80	\$ 2,185.00
2/16/2022	C. Nauen	Analyze maps; various e-mails; update call with ELG team.	1.40	\$ 980.00

<b>DATE</b>	<b>TIMEKEEPER</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>FEEs REQUESTED</b>
2/16/2022	D. Zoll	Debrief with litigation team.	0.60	\$ 345.00
2/16/2022	D. Hahn	Analyze initial memo addressing enacted congressional and legislative maps.	0.20	\$ 60.00
2/17/2022	C. Nauen	Follow-up matter regarding new maps; various e-mails regarding same.	1.00	\$ 700.00
3/2/2022	C. Nauen	Issues regarding Court submission.	0.30	\$ 210.00
<b>TOTALS</b>			<b>469.90</b>	<b>\$ 241,967.50</b>