

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
NO. 1:13-CV-00949**

DAVID HARRIS and CHRISTINE  
BOWSER,

Plaintiffs,

v.

PATRICK MCCRORY, in his capacity as  
Governor of North Carolina; NORTH  
CAROLINA STATE BOARD OF  
ELECTIONS; and JOSHUA HOWARD, in  
his capacity as the Chairman of the North  
Carolina State Board of Elections,

Defendants.

**PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEYS' FEES  
AND LITIGATION EXPENSES**

Plaintiffs David Harris and Christine Bowser, by and through undersigned counsel and pursuant to 42 U.S.C. § 1988, 52 U.S.C. § 10310(e) (formerly codified as 42 U.S.C. § 19731(e)), Fed. R. Civ. P. 54, and LR 54.2, respectfully request that this Court approve Plaintiffs' request for attorneys' fees in the amount of \$1,104,307.80, and reasonable litigation expenses in the amount of \$150,809.17.

In support of this motion, Plaintiffs rely on Plaintiffs' Memorandum in Support of Their Motion for Award of Attorneys' Fees and Litigation Expenses; the Declarations of William B. Stafford, Edwin M. Speas, and J. Gerald Hebert, and exhibits attached thereto; and the Court's Memorandum Opinion (ECF No. 142) and Final Judgment (ECF No. 143). These materials demonstrate that Plaintiffs are the prevailing parties in this

matter, are entitled to recovery of reasonable attorneys' fees and litigation expenses, and that the quantum of fees and expenses requested by Plaintiffs are reasonable.

WHEREFORE, Plaintiffs respectfully request that this Court award Plaintiffs attorneys' fees in the amount of \$1,104,307.80, and reasonable litigation expenses in the amount of \$150,809.17, grant Plaintiffs leave to file a supplemental fee petition within 14 days of this Court's final order on remedy and further order such other relief as this Court deems appropriate.

Respectfully submitted, this the 5th day of April, 2016.

By: /s/ Kevin J. Hamilton

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*Local Rule 83.1 Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

On April 5, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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