

NORTH CAROLINA
WAKE COUNTY
COMMON CAUSE, et al.,

FILED
GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
2019 MAY 10 PM 3:33
18-CVS-14001
WAKE COUNTY, N.C.
BY _____

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS,
IN HIS OFFICIAL CAPACITY AS
SENIOR CHAIRMAN OF THE HOUSE
SELECT COMMITTEE ON
REDISTRICTING, et al.,

AFFIDAVIT OF ABHA KHANNA

Defendants.

I, Abha Khanna, upon my oath, declare and say as follows:

1. I am over the age of eighteen (18) and competent to testify as to the matters set forth herein.
2. I am a partner with the law firm of Perkins Coie LLP and one of the attorneys representing the plaintiffs in this case.
3. This Affidavit is being submitted pursuant to this Court's May 2, 2019 Order granting Plaintiffs' requested relief in their Supplemental Brief regarding Plaintiffs' First and Second Motions to Compel, specifically Plaintiffs' request for an award of fees and costs associated with Plaintiffs filing and arguing for the relief sought in their supplemental brief.
4. I am one of the Perkins Coie attorney with primary responsibility for this case. I have been practicing law since 2010 and have extensive experience litigating voting rights and redistricting cases. My regular and customary hourly rate, consistent with prevailing market rates of individuals with my skill and levels of experience, is \$720.00.

5. I have reviewed Perkins Coie's billing records associated with the supplemental brief, and they are consistent with my recollection of the work I performed. These billing records were recorded contemporaneously.

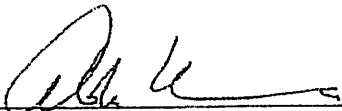
6. The detailed time entries associated with filing and arguing Plaintiffs' supplemental brief are as follows:

Date	Timekeeper Name	Hours	Amount	Narrative
4/12/2019	Khanna, Abha	0.1	\$72.00	Review and revise draft motion to compel;
4/26/2019	Khanna, Abha	0.4	\$288.00	Review and revise draft filing in support of motion to compel; email with legal team regarding same;
4/30/2019	Khanna, Abha	0.3	\$216.00	Telephone conference with legal team in preparation for court hearing; confer with D. Jacobson regarding summary of court hearing; [1/3 total time]
TOTAL:		0.8	\$576.00	

7. Plaintiffs respectfully request that the Court order Legislative Defendants to pay Perkins Coie \$576.00 for our work relating to Plaintiffs' supplemental brief regarding the Motions to Compel.

Further Affiant Sayeth Not.

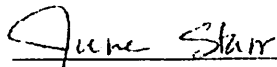
Respectfully submitted this the 10th day of May, 2019.

By: 
Abha Khanna

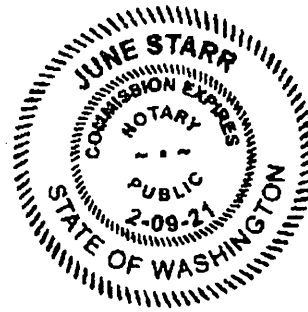
STATE OF WASHINGTON)

COUNTY OF KING)

Subscribed and sworn to before me as of this 10th
day of May, 2019


Notary Public

My commission expires: 2-9-2021



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing by email, addressed to the following persons at the following addresses which are the last addresses known to me:

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This the 10th day of May, 2019.


Caroline P. Mackie