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12 MEXICAN AMERICAN LEGAL DEFENSE
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20 **IN THE UNITED STATES DISTRICT COURT**
21 **DISTRICT OF ARIZONA**

22 MARIA M. GONZALEZ, et al.,

23 Plaintiffs,

24 v.

25 STATE OF ARIZONA, et al.

26 Defendants.

No. CV06-01268 PHX ROS
No. CV06-1362 PCT ROS (Cons)
No. CV06-1575 PCT ROS (Cons)

**GONZALEZ PLAINTIFFS' AND
STATE DEFENDANTS' JOINT
MOTION FOR ENTRY OF ORDER
RESOLVING GONZALEZ
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND
EXPENSES**

(Assigned to the Honorable
Roslyn O. Silver)

1 On September 11, 2013, this Court entered Final Judgment for the Gonzalez
2 Plaintiffs on their claim under the National Voter Registration Act (“NVRA”), 42 U.S.C.
3 § 1973gg *et seq.* (Dkt. 1123). Thereafter, Gonzalez Plaintiffs filed a timely Amended
4 Motion for Attorneys’ Fees and Non-Taxable Expenses (Dkt. 1129) requesting
5 attorneys’ fees and expenses pursuant to 42 U.S.C. § 1973gg-9(c) for work undertaken
6 in this litigation. Gonzalez Plaintiffs requested total fees and expenses in the amount of
7 \$667,133.57.

8 Under the NVRA, prevailing parties are permitted to recover “reasonable
9 attorneys’ fees, including litigation expenses, and costs.” 42 U.S.C. § 1973gg-9(c). *See*
10 *Hensley v. Eckerhart*, 461 U.S. 424, 429 (1983). Under 28 U.S.C. § 1961, the Court
11 must also award post-judgment interest from the date the Court enters judgment on the
12 fees application until the date that judgment is paid to Plaintiffs.

13 Gonzalez Plaintiffs and the State Defendants now agree that, in order to amicably
14 resolve Gonzalez Plaintiffs’ Amended Motion for Attorneys’ Fees and Expenses in its
15 entirety and to avoid further litigation of this matter, an award of attorneys’ fees, and
16 litigation expenses and costs, should be made to Gonzalez Plaintiffs in the amount of six
17 hundred forty thousand dollars (\$640,000.00). The parties, therefore, jointly request that
18 this Court enter an Order granting Plaintiffs’ Motion in that amount plus post-judgment
19 interest at the rate of 0.14% per annum, commencing on the date of entry of the Order.
20 See LRCiv 54.2(d)(1) (requiring parties to seek to resolve attorneys’ fee matters by
21 settlement). A proposed Order is attached.

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DATED this 28th day of March, 2014.

THOMAS C. HORNE
Arizona Attorney General

s/ Michele L. Forney
Michele L. Forney
Assistant Attorney General
Attorney for the State of Arizona and the
Arizona Secretary of State

MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND

s/ Nina Perales (with permission)
Nina Perales
Attorney for the Gonzalez Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of March, 2014, I caused the foregoing document to be electronically transmitted to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF Registrants in the above case.

s/ Maureen Riordan

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