

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SHELBY COUNTY, ALABAMA

Plaintiff,

v.

ERIC H. HOLDER, JR.,
in his official capacity as
ATTORNEY GENERAL OF THE
UNITED STATES, et al.,

Defendants.

Civil Action No. 1:10-cv-00651-JDB

PLAINTIFF’S MOTION FOR ATTORNEY’S FEES

Pursuant to Federal Rule of Civil Procedure 54(d)(2) and 42 U.S.C. § 1973l(e), Plaintiff Shelby County, Alabama (“Shelby County” or “Plaintiff”) hereby requests that the Court award it attorney’s fees in the amount of \$2 million and litigation expenses in the amount of \$10,000.00. As set forth in more detail in the accompanying memorandum in support and accompanying exhibits, a fee award is warranted in this case because: this is an “action or proceeding to enforce the voting guarantees of the fourteenth [and] fifteenth amendment[s]”; Shelby County is the “prevailing party” in this action; no special circumstances warrant a denial; and the results obtained were exceptional. The United States and Defendant-Intervenors have indicated that they will oppose Shelby County’s fee petition.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting Plaintiff’s request for an award of attorney’s fees of \$2 million and costs of \$10,000.

Dated: October 25, 2013

Respectfully submitted,

/s/ Bert W. Rein

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