

NORTH CAROLINA

WAKE COUNTY

COMMON CAUSE, et al.,

FILED
2019 MAY 10 PM 3:32
WAKE COUNTY, N.C.

Plaintiffs,

v.

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

Defendants.

GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18-CVS-14001

AFFIDAVIT OF CAROLINE P. MACKIE

I, Caroline P. Mackie, 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 Poyner Spruill LLP ("Poyner") 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. Edwin M. Speas, Jr. and I are the Poyner attorneys with primary responsibility for this case. Mr. Speas has been practicing law since 1971 and has extensive experience litigating voting-rights cases. I have been practicing law since 2010 and also have extensive experience litigating voting-rights cases. Our regular and customary hourly rates, consistent with prevailing

market rates of individuals with our skill and levels of experience, are as follows: \$585 for Mr. Speas; \$350 for Ms. Mackie.

5. I have reviewed our billing records associated with the supplemental brief, and they are consistent with my recollection of the work performed by Mr. Speas and me. These billing records were recorded contemporaneously.

6. Since the supplemental brief was only one of three motions heard by the Court on April 30, I have limited our time preparing for that hearing and attending the hearing to one-third of the total time spent.

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

Date	Timekeeper Name	Hours	Amount	Narrative
4/4/2019	Mackie, Caroline P.	0.4	\$140.00	Review Legislative Defendants' privilege log.
4/4/2019	Speas, Edwin M.	0.3	\$175.50	Review privilege log.
4/12/2019	Mackie, Caroline P.	0.7	\$245.00	Review and comment on draft supplemental brief re: motion to compel.
4/26/2019	Mackie, Caroline P.	0.8	\$280.00	Review Legislative Defendants' response to Plaintiffs' supplemental brief re: motion to compel. Review draft reply re: the same.
4/26/2019	Speas, Edwin M.	0.5	\$292.50	Review reply brief.
4/30/2019	Mackie, Caroline P.	1.8	\$630.00	Review materials and discuss briefs and arguments in advance of hearing on three discovery motions. Attend hearing. Discussions with co-counsel and clients re: hearing. [1/3 total time]
4/30/2019	Speas, Edwin M.	0.9	\$526.60	Court hearing and preparation for same [1/3 total time]
TOTAL:		5.4	\$2,289.60	

8. Plaintiffs do not seek reimbursement of any expenses incurred by Poyner Spruill relating to the supplemental brief.

9. Plaintiffs respectfully request that the Court order Legislative Defendants to pay Poyner Spruill \$2,289.60 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.

STATE OF NORTH CAROLINA
COUNTY OF WAKE

I certify that Caroline P. Mackie personally appeared before me this day, acknowledging to me that she voluntarily signed the foregoing Affidavit for the purpose therein stated.

Caroline P. Mackie
Caroline P. Mackie

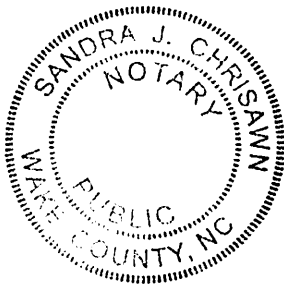
Sworn to and subscribed before me this 10th day of May, 2019.

Official Signature of Notary: _____

Sandra J. Chrisman

Notary's Printed or Typed Name: Sandra J. Chrisman
_____, Notary Public

My Commission Expires: 12-4-2020



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