

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

THE COALITION FOR EQUITY AND)
EXCELLENCE IN MARYLAND HIGHER)
EDUCATION, INC., et al.,)
)
Plaintiffs,)
)
v.)
)
MARYLAND HIGHER EDUCATION)
COMMISSION, et al.,)
)
Defendants.)

Civil No. 06-2773-CCB

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES

Pursuant to Rule 54(d)(2) of the Federal Rules of Civil Procedure and Local Rule 109.2, Plaintiffs the Coalition for Equity and Excellence in Maryland Higher Education *et al.* respectfully move the Court to enter an order awarding Plaintiffs attorneys' fees on behalf of Kirkland & Ellis LLP ("Kirkland"), the Lawyers' Committee for Civil Rights under Law ("Lawyers' Committee"), and the Howard University Law School Civil Rights Clinic ("Howard Law School Clinic") in this long-running, historic case – the first of its kind ever to be prosecuted solely by private litigants. As the Court is aware, this case has spanned more than 10 years, featured two mediations, two lengthy trials, numerous motions and depositions, lengthy post-trial submissions, and lengthy expert reports from some of the nation's preeminent experts in school desegregation.

Specifically, Plaintiffs request attorneys' fees of \$12,320,010.99 and non-taxable litigation expenses of \$1,618,869.35 on behalf of Kirkland. Plaintiffs' request fees of \$6,803,324.81 and expenses of \$13,428.30 on behalf of the Lawyers' Committee. Plaintiffs also request fees of \$1,276,700 on behalf of the Howard Law School Clinic. The basis for these fees and

documentation supporting the same will be presented in memoranda, declarations, and exhibits to be filed with the Court in the time and manner provided for in Local Rule 109.2(a) and (b).

Plaintiffs respectfully request that the Court to enter an order awarding attorneys for Plaintiffs the amounts set forth above (or as the Court determines appropriate upon review of the parties' submissions) to Kirkland & Ellis LLP, the Lawyers' Committee for Civil Rights under Law, and to the Howard University School of Law Civil Rights Clinic.

Dated: November 21, 2017

Respectfully Submitted,

/s/ Michael D. Jones
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that today, November 21, 2017, *Plaintiff's Motion for Attorneys' Fees and Expenses* was filed electronically with the Clerk of the Court of the United States District Court for the District of Maryland by using the Court's CM/ECF System, which will send a notice of electronic filing to all counsel in this case, constituting proof of service in accordance with Local Rule 102.1.c.

/s/ Karen N. Walker

Counsel for Plaintiff