

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
NORTHERN DIVISION AT ASHLAND

APRIL MILLER, *et al.*,

Plaintiffs,

v.

KIM DAVIS, *et al.*,

Defendants.

Case No. 0:15-cv-00044-DLB

***Electronically filed***

**PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEYS' FEES AND COSTS**

Pursuant to 42 U.S.C. § 1988, Plaintiffs, by counsel, move for an award of attorneys' fees and costs in the amount of \$233,058.08. This amount includes \$231,050.00 for the attorneys' fees generated from July 1, 2015 through September 14, 2016, and \$2,008.08 for the costs incurred during that time.

In support of their request, Plaintiffs tender the accompanying memorandum of law, supporting exhibits, and proposed order.

Respectfully submitted,

s/ William E. Sharp

Daniel J. Canon  
Laura E. Landenwich  
L. Joe Dunman  
CLAY DANIEL WALTON & ADAMS, PLC  
462 South Fourth Street  
Suite 101  
Louisville, KY 40202  
(502) 561-2005  
ACLU OF KENTUCKY Cooperating  
Attorneys  
dan@justiceky.com  
laura@justiceky.com  
joe@justiceky.com

Daniel Mach\*  
Heather L. Weaver\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 15th Street NW  
Washington, DC 20005  
(202) 675-2330  
dmach@aclu.org

\* Admitted *pro hac vice*

William E. Sharp  
Legal Director  
ACLU OF KENTUCKY  
315 Guthrie Street, Suite 300  
Louisville, KY 40202  
(502) 581-9746  
sharp@aclu-ky.org

Ria Tabacco Mar\*  
James D. Esseks\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street  
New York, NY 1004  
(212) 549-2627  
rmar@aclu.org  
jesseks@aclu.org

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on September 19, 2016, I filed this motion and accompanying proposed order with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Jeffrey C. Mando  
Claire E. Parsons  
Cecil Watkins  
jmando@aswdlaw.com  
cparsons@aswdlaw.com  
cwatkins@prosecutors.ky.gov

*Counsel for Rowan County*

Anthony C. Donahue  
Roger Gannam  
acdonahue@donahuelawgroup.com  
rgannam@lc.org

*Counsel for Kim Davis*

s/ Heather L. Weaver  
*Counsel for Plaintiffs*