

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

AMERICAN BOOKSELLERS FOUNDATION FOR
FREE EXPRESSION, et al.

Plaintiffs,

v.

JOHN BURNS, in his official capacity as ATTORNEY
GENERAL OF THE STATE OF ALASKA,

Defendant.

Civil No. 3:10-cv-00193-RRB

JOINT MOTION TO GRANT FEES AND EXPENSES UNDER 42 U.S.C. § 1988

WHEREAS, plaintiffs are the prevailing parties in this action; and

WHEREAS, plaintiffs filed an application for attorneys' fees and expenses under 42 U.S.C. § 1988 on July 25, 2011 (Doc. #87); and

WHEREAS, defendant responded thereto on September 16, 2011 (Doc. #100); and

WHEREAS, the parties hereto have entered into a stipulation to settle the fees and expenses to be paid by defendant to plaintiffs, a copy of which is attached hereto as Exhibit A.

THEREFORE, the parties jointly respectfully request this Court grant plaintiffs an aggregate amount of \$135,000 for attorneys fees and expenses under 42 U.S.C. § 1988.

Dated: October 20, 2011

Respectfully submitted,

Counsel for Plaintiffs:

s/ Michael A. Bamberger

Michael A. Bamberger (*pro hac vice*)

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Counsel for Defendant:

s/ Marika R. Athens
Marika R. Athens
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The undersigned certifies that a true and correct copy of the foregoing Joint Motion to Grant Fees and Expenses Under 42 U.S.C. § 1988 was served via electronic filing this 20th day of October, 2011, upon counsel for Defendants.

s/ Michael A. Bamberger
Michael A. Bamberger

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

AMERICAN BOOKSELLERS FOUNDATION FOR
FREE EXPRESSION, et al.

Plaintiffs,

Civil No. 3:10-cv-00193-RRB

v.

JOHN BURNS, in his official capacity as ATTORNEY
GENERAL OF THE STATE OF ALASKA,

Defendant.

STIPULATION

WHEREAS, plaintiffs are the prevailing parties in this action; and

WHEREAS, plaintiffs filed an application for attorneys' fees and expenses under 42 U.S.C.
§ 1988 on July 25, 2011 (Doc. #87); and

WHEREAS, defendant responded thereto on September 16, 2011 (Doc. #100); and

THEREFORE, the parties hereto stipulate and agree that plaintiffs, as prevailing parties,
shall receive an aggregate amount of \$135,000 for attorneys' fees and expenses under 42 U.S.C.
§ 1988 with respect to this action.

Dated: October 17, 2011

Respectfully submitted,

Counsel for Plaintiffs:

s/ Michael A. Bamberger

Michael A. Bamberger (*pro hac vice*)

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s/ Marika R. Athens
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The undersigned certifies that a true and correct copy of the foregoing Stipulation was served via electronic filing this 20th day of October, 2011, upon counsel for Defendants.

s/ Michael A. Bamberger
Michael A. Bamberger

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

AMERICAN BOOKSELLERS FOUNDATION FOR
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Plaintiffs,

v.

JOHN BURNS, in his official capacity as ATTORNEY
GENERAL OF THE STATE OF ALASKA,

Defendant.

Civil No. 3:10-cv-00193-RRB

**[PROPOSED] ORDER AND JUDGMENT
GRANTING ATTORNEYS' FEES AND EXPENSES**

This matter is before the Court on a joint motion to grant fees and expenses under 42 U.S.C. § 1988. The Court grants the Motion and awards plaintiffs the stipulated amount of \$135,000.

IT IS SO ADJUDGED, ORDERED AND DECREED.

DATED at Anchorage, Alaska this ____ day of _____, 2011.

Hon. Ralph R. Beistline
United States District Court Judge