

**Defendants' Opposition to Plaintiffs' Motion for Attorney Fees**

*Al-Haramain Islamic Found. Oregon et al. v. Obama et al.*  
(07-cv-109-VRW) (3:06-md-1791-VRW)

**Appendix 1**

INITIAL LODESTAR SUMMARY CHARTS

Appendix 1 - Initial Lodestar Summary Charts

I. Initial Lodestar Calculation for All Counsel (Pre-Judgment)

**I. Reasonable Hour Calculation - ALL COUNSEL COMBINED**

	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>Total</b>
Hours Claimed	1974.4	1097.76	1022.19	907.23	417.4	5418.98
Block Billing Reduction	449.8	215.5	174	145.8	77	1062.1
Consultation Reduction	375.5	209	203	184.58	84.04	1056.36
Duplication Reduction	228.3	129.8	130.4	83.9		572.4
Other Unproductive, Unreasonable Hours	493.3	366.7	201.45	199.2	26.1	1286.75
Punitive Damages Research 2010					102.95	102.95
Total Reduction	1547.1	936.2	709	613.45	290	4095.65
Total Hours	425.1	160.2	319	293.8	127.35	1325.54

**II. Initial Lodestar Calculation – ALL COUNSEL AND TOTAL**

Counsel	2006	2007	2008	2009	2010	TOTALS
<b><u>Eisenberg</u></b>	567.9	564.2	606.1	570.1	189.3	2497.6
Hours Claimed	141.3	83.6	225.8	222.2	58.95	731.85
Hours Award	465	480	505	505	505	
Hourly Rate	65,704	40,128	114,029	112,211	29,770	\$361,843
Total Initial Fee:						
<b><u>Goldberg</u></b>	204.2	109	168	112.9	88.1	682.2
Hours Claimed	40	12.2	11.94	27.2	28.2	119.54
Hours Award	425	440	455	450	450	
Hourly Rate	17,000	5,368	5,433	12,227	12,690	\$52,717
Total Initial Fee:						
<b><u>Nelson</u></b>	561	200.8	34	85	28	908.8
Hours Claimed	167.6	34.5	7	7.8	5.6	222.5
Hours Award	425	440	455	450	450	
Hourly Rate	71,230	15,188	3,185	3,549	2,520	\$96,645
Total Initial Fee:						
<b><u>Albies</u></b>	308.5	37.2	45.7	54.7	21.4	467.5
Hours Claimed	14.65	6.1	11.2	12.2	6	50.15
Hours Award	205	215	220	265	265	
Hourly Rate	3,003	1,312	2,464	3,233	1,590	\$11,602
Total Initial Fee:						
<b><u>Hassan</u></b>	159.5	80.86	52.79	10.73	39.2	343.5
Hours Claimed	20.1	8.5	12.7	1.9	10.6	53.8
Hours Award	305	315	405	405	400	
Hourly Rate	6,134	2,681	5,140	782	4,240	\$18,976
Total Initial Fee:						
<b><u>Jaskol</u></b>	162	29	56.1	25.4	12.2	284.7
Hours Claimed	40.5	3.3	25.4	11.5	10.8	190.3
Hours Award	395	415	420	420	420	
Hourly Rate	15,994	1,370	10,685	4,809	4,536	\$37,393
Total Initial Fee:						
<b><u>Hancock</u></b>	11.3	76.7	59.5	48.4	39.2	235.1
Hours Claimed	1	12	25	11	7.2	56.2
Hours Award	465	480	505	505	505	
Hourly Rate	465	5,650	12,605	5,555	3,636	\$27,910
Total Initial Fee:						
<b>TOTAL:</b>	1974.4	1097.7	1022.1	907.23	417.4	5419.40
Hours Claimed	425.15	160.2	319.04	293.8	127.3	1325.54
Hours Award	\$179,530	\$71,697	\$153,541	\$142,366	\$58,982	\$606,116
Total Initial Fee:						

### III. Initial Lodestar Calculation By Counsel

ATTORNEY: Jon Eisenberg

HOURS CLAIMED: 2497.6

<b>Jon Eisenberg</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	567.9	564.2	606.1	570.1	189.3	2497.6
Block Billing Reduction	70.8	55.4	62.7	50.7	12.1	251.7
Consultation Reduction	127.2	102.3	115	97.2	43.2	485
Duplication Reduction	65.7	91.9	85.3	47.7		290.6
Other Unproductive, Unreasonable Hours	162.9	231	117.3	152.3	12.1	675.6
Punitive Damages Research 2010					63	63
Total Reduction	426.6	480	380.3	347.9	130.4	1766
Total Hours	141.3	83.6	225.8	222.2	58.95	731.85
<i>Laffey</i> (San Fran.) Hourly Rate	465	480	505	505	505	
Maximum Initial Lodestar Fee	65,704	40,128	114,029	112,211	29,770	\$361,843

ATTORNEY: Steve Goldberg

HOURS CLAIMED: 682.2

<b>Steve Goldberg</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	204.2	109	168	112.9	88.1	682.2
Block Billing Reduction	42.2	32.7	50.4	33.9	26.4	185.6
Consultation Reduction	40.4	24.85	40.4	28.2	22	155.9
Duplication Reduction	28.7	11	20.6	9.7		70
Other Unproductive, Unreasonable Hours	52.95	28.3	44.6	13.9		139.75
Punitive Damages Research 2010					11.5	11.5
Total Reduction	164.2	96.8	156	85.7	59.9	562.7
Total Hours	40	12.2	11.94	27.2	28.2	119.54
<i>Laffey</i> Portland Or. Hourly Rate	425	440	455	450	450	
Maximum Initial Lodestar Fee	17,000	5,368	5,433	12,227	12690	\$52,717

ATTORNEY: Thomas Nelson

HOURS CLAIMED: 912.7

<b>Thomas Nelson</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	561	200.8	34	85	28	908.8
Block Billing Reduction	168.6	60.2	10.2	25.5	8.4	273
Consultation Reduction	62.7	50.2	8.5	28.25		149.65
Duplication Reduction	65.2	12.5	4.8	12.8		95.3
Other Unproductive, Unreasonable Hours	96.9	43.4	3.5	10.6	14	168.4
Punitive Damages Research 2010						
Total Reduction	393.4	166.3	27	77.15	22.4	686.2
Total Hours	167.6	34.5	7	7.8	5.6	222.5
<i>Laffey</i> Portland Or. Hourly Rate	425	440	455	450	450	
Maximum Initial Lodestar Fee	71,230	15,188	3185	3549	2520	\$96,645

ATTORNEY: Zaha Hassan

HOURS CLAIMED: 343.5

<b>Zaha Hassan</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	159.5	80.86	52.79	10.73	39.2	343.5
Block Billing Reduction	44.1	24.3	15.8	3.2	11.9	99.3
Consultation Reduction	39.1	22.3	11	4.3	9.1	85.8
Duplication Reduction	15.6	7.1	5.1	1.3		29.1
Other Unproductive, Unreasonable Hours	40.6	17.65	8.2			66.45
Punitive Damages Research 2010					7.6	7.6
Total Reduction	139.4	71.35	40.1	8.8	28.6	288.25
Total Hours	20.1	8.5	12.7	1.9	10.6	53.8
<i>Laffey</i> Portland Or. Hourly Rate	305	315	405	405	400	
Maximum Initial Lodestar Fee	6,134	2,681	5,140	782	4,240	18,976

ATTORNEY: Ashlee Albies

HOURS CLAIMED: 467.2

<b>Ashlee Albies</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	308.5	37.2	45.7	54.7	21.4	467.5
Block Billing Reduction	86.8	11.2	13.7	16.4	6.4	134.5
Consultation Reduction	76	9.3	11.4	13.7	3	113.4
Duplication Reduction	35.4		4.8	4.1		44.3
Other Unproductive, Unreasonable Hours	95.65	10.6	9.4	8.3		123.95
Punitive Damages Research 2010					5.95	5.95
Total Reduction	293.85	31.1	39.3	42.5	15.35	422.1
Total Hours	14.65	6.1	11.2	12.2	6	50.15
<i>Laffey</i> Portland Or. Hourly Rate	205	215	220	265	265	
Maximum Initial Lodestar Fee	3,003	1,312	2,464	3,233	1,590	11,602

ATTORNEY: Lisa Jaskol

HOURS CLAIMED: 284.6

<b>Lisa Jaskol</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	162	29	56.1	25.4	12.2	284.6
Block Billing Reduction	34.8	8.7	3.4	1.6		48.5
Consultation Reduction	30.1		12.4	5.2		47.7
Duplication Reduction	17.7	7.3	5.2	3.5		33.7
Other Unproductive, Unreasonable Hours	38.9	9.75	9.75	3.7		59
Punitive Damages Research 2010					1.4	1.4
Total Reduction	118.4	25.75	30.75	14	1.4	190.3
Total Hours	40.5	3.3	25.4	11.5	10.8	91.5
<i>Laffey</i> Los Angeles Hourly Rate	395	415	420	420	420	
Maximum Initial Lodestar Fee	15,994	1,370	10,685	4,809	4,536	37,393

ATTORNEY: William Hancock

HOURS CLAIMED: 235.1

<b>William Hancock</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b><u>Total</u></b>
Hours Claimed	11.3	76.7	59.5	48.4	39.2	235.1
Block Billing Reduction	2.5	23	17.8	14.5	11.8	69.6
Consultation Reduction			4.4	7.7	6.7	18.8
Duplication Reduction	.3	15.9	4.6	4.8		25.6
Other Unproductive, Excessive, Vague Hours/Activities	8.5	26	7.7	10.4		53.6
Punitive Damages Research 2010					13.5	13.5
Total Reduction	11.3	64.9	35.5	37.4	32	181.1
Total Hours	1	12	25	11	7.2	56.2
<i>Laffey</i> (San Fran.) Hourly Rate	465	480	505	505	505	
Maximum Lodestar Reasonable Fee	465	5,650	12,605	5,555	3,636	27,910