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14 Attorneys for Plaintiff Public.Resource.Org

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 16 IN THE UNITED STATES DISTRICT COURT
 17 THE NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

19 PUBLIC.RESOURCE.ORG, a California non-)	Case No. 13-cv-02789 WHO
20 profit organization,)	
21 Plaintiff,)	SUPPLEMENTAL DECLARATION OF
22 v.)	THOMAS R. BURKE IN SUPPORT OF
23 UNITED STATES INTERNAL REVENUE)	PLAINTIFF PUBLIC.RESOURCE.ORG'S
24 SERVICE,)	MOTION FOR ATTORNEYS' FEES AND
25 Defendant.)	COSTS

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1 I, Thomas R. Burke, state:

2 1. I am an attorney admitted to practice before all the courts in the State of California
3 and before this Court. I am a partner in the law firm of Davis Wright Tremaine LLP and am one
4 of the attorneys representing Plaintiff Public.Resource.Org (“Public.Resource.Org”) in this matter.
5 The matters stated herein are true of my own personal knowledge and could competently testify
6 them if called as a witness. I make this declaration in support of Public.Resource.Org Motion for
7 Attorney’s’ Fees and Costs.

8 2. I estimated in my original declaration, filed on July 29, 2015, that
9 Public.Resource.Org would incur between \$15,000 and \$25,000 in additional “fees on fees”
10 attorneys’ fees and I stated that I would supplement that information when Public.Resource.Org
11 filed its Reply. Attached as Exhibit C is a true and correct copy of the time entries billed by DWT
12 in connection with its Motion for Attorneys’ Fees and Reply for which Public.Resource.Org now
13 seeks reimbursement as “fees on fees.”

14 3. As reflected in Exhibit C, four DWT attorneys worked on the Motion for
15 Attorneys’ Fees and Reply: Thomas R. Burke, Ronald L. London, Daniel A. Laidman, and Diana
16 Palacios. They billed a total of 58.7 hours and incurred more than \$24,787.50 in fees. This total
17 also includes 5 hours which I am informed and believe will be necessary for Ms. Palacios to
18 prepare and attend the hearing on the Motion for Attorneys’ Fees. I have eliminated or reduced
19 time associated with various tasks, including time spent reviewing and revising briefs. I also
20 eliminated time spent by Ms. Palacios familiarizing herself with the case.

21 4. In my original declaration I described the relevant experience and background for
22 Mr. London, Mr. Laidman, and myself. Ms. Palacios joined the team to help draft the Motion for
23 Attorneys’ Fees and Reply. Ms. Palacios is an associate in the firm’s Los Angeles office. Ms.
24 Palacios is a 2012 graduate of the UCI School of Law and is involved in media and public records
25 litigation at DWT. Ms. Palacios’ biography is available at
26 <http://www.dwt.com/people/dianapalacios/>. Her billing rate is \$ 335 for 2015, which is
27 comfortably within the market rates charged by other law firms for associates.

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5. Accordingly, Public.Resource.Org has incurred \$244,322.50 in fees in connection with this action.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct and that this declaration was executed this 19th day of August, 2015, in Albany, California.

/s/ Thomas R. Burke
THOMAS R. BURKE