

# EXHIBIT E

*Hadnott v. Kelly, et al.*  
07 C 6754

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>JONATHAN HADNOTT, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>07 C 6754</b>
	)	
<b>v.</b>	)	
	)	<b>Judge David H. Coar</b>
<b>CITY OF CHICAGO, et al.,</b>	)	
	)	<b>Magistrate Judge Schenkier</b>
<b>Defendants.</b>	)	

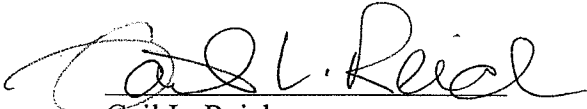
**DECLARATION OF GAIL L. REICH**

Pursuant to 28 U.S.C. § 1746, I, Gail L. Reich, declare as follows:

1. I graduated from The John Marshall Law School in June 2002.
2. Beginning in May 2001, I worked for two years as a law clerk and three years as an Assistant Corporation Counsel with the City of Chicago in the Building and Land Use Litigation Division. During that 5-year period, I prosecuted thousands of cases at the City of Chicago Department of Administrative Hearings and in the Circuit Court of Cook County.
3. I joined the Individual Defense Litigation Division in the City of Chicago Law Department in August 2006. Since that time, my sole practice has consisted of defending Chicago Police Officers and the City of Chicago in over 50 §1983 cases.
4. In 2008, I was trial counsel in Redmond v. City of Chicago, et., al. 06 CV 3611, a jury trial before Judge Der-Yeghiayan.
5. While I work for a government agency, and do not have a set billing rate, based on my research of relevant case law, the Laffey Matrix, and comparison with colleagues of similar experience and skill in the community in which I practice, I believe that a fair hourly rate is \$270/hr.
6. The attached billing records fairly state the time I spent working on the litigation required after the deposition of Michael Kelly on August 19, 2008 and Attorney Dymkar's refusal to engage in a telephone conference with Judge Soat Brown and are a reasonable in terms of time spent per task.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/19/10

  
Gail L. Reich

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>JONATHAN HADNOTT, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>07 C 6754</b>
	)	
<b>v.</b>	)	
	)	<b>Judge David H. Coar</b>
<b>CITY OF CHICAGO, et al.,</b>	)	
	)	<b>Magistrate Judge Schenkier</b>
<b>Defendants.</b>	)	

**DECLARATION OF ASHLEY C. KOSZTYA**

Pursuant to 28 U.S.C. § 1746, I, Ashley C. Kosztya, declare as follows:

1. I graduated from The John Marshall Law School in June 2001. For one year prior to graduation, I was employed as a full-time 711 prosecutor for the City of Chicago in its traffic division.
2. Beginning in September 2001, I worked for five years as an Assistant State's Attorney in Cook County in both its criminal and civil divisions. In the criminal division, I prosecuted hundreds of cases in the Circuit Court of Cook County. I then spent over four years in the Civil Division litigating federal civil rights cases as well as various state tort claims, and prevailed at trial in several cases – including civil rights lawsuits.
3. I left the Cook County State's Attorney's Office to enter private practice for approximately two years, concentrating in insurance defense.
4. In May of 2007 I accepted a position with the City of Chicago's Department of Law (directly prior to the birth of my eldest child). Since joining the City, I have once again concentrated my practice to civil rights defense. Most recently I was trial counsel in the 2009 jury trial of *Mason v. City of Chicago, et al.*, 07 C 4763 in the Northern District.
5. While I work for a government agency, and do not have a set billing rate, based on my research of relevant case law, the Laffey Matrix, and comparison with colleagues of similar experience and skill in the community in which I practice, I believe that a fair hourly rate is \$300.00/hr.
6. The attached billing records fairly state the time I spent working on the litigation required after the deposition of Michael Kelly on August 19, 2008 and Attorney

Dymkar's refusal to engage in a telephone conference with Judge Soat Brown and are a reasonable in terms of time spent per task.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1-19-10

A. C. Koszya  
Ashley C. Koszya

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>JONATHAN HADNOTT, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>07 C 6754</b>
	)	
<b>v.</b>	)	
	)	<b>Judge David H. Coar</b>
<b>CITY OF CHICAGO, et al.,</b>	)	
	)	<b>Magistrate Judge Schenkier</b>
<b>Defendants.</b>	)	

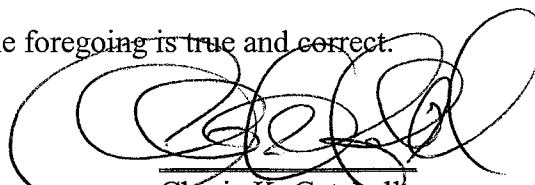
**DECLARATION OF CHERIE K. GETCHELL**

Pursuant to 28 U.S.C. § 1746, I, Cherie K. Getchell, declare as follows:

1. I graduated from The John Marshall Law School in June 2009.
2. Beginning in September 2007 and continuing through the present, I have served as a law clerk with the City of Chicago Law Department in the Federal Civil Rights Litigation Division. From September 2007 - January 1, 2009, my sole responsibility as a law clerk consisted of defending Chicago Police Officers and the City of Chicago in § 1983 cases.
3. In January 2009 and continuing through the present, I joined the City of Chicago - Municipal Prosecutions, Traffic Division, where, in addition to clerking for the Federal Civil Rights Litigation Division, I also act as a City Prosecutor.
4. While I work for a government agency, and do not have a set billing rate, based on my research of relevant case law, the Laffey Matrix, and comparison with colleagues of similar experience and skill in the community in which I practice, I believe that a fair hourly rate is \$125/hr.
5. The attached billing records fairly state the time I spent working on the litigation required after the deposition of Michael Kelly on August 19, 2008 and Attorney Dymkar's refusal to engage in a telephone conference with Judge Soat Brown and are reasonable in terms of time spent per task.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 15, 2010

  
Cherie K. Getchell

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>JONATHAN HADNOTT, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>07 C 6754</b>
	)	
<b>v.</b>	)	
	)	<b>Judge David H. Coar</b>
<b>CITY OF CHICAGO, et al.,</b>	)	
	)	<b>Magistrate Judge Schenkier</b>
<b>Defendants.</b>	)	

**DECLARATION OF MEGAN K. McGRATH**

Pursuant to 28 U.S.C. § 1746, I, Megan K. McGrath, declare as follows:

1. I graduated from The Loyola University Chicago School of Law in June 2006.
2. Beginning in June 2004, I worked for two years as a law clerk in with the City of Chicago in the Municipal Prosecutions and Revenue Litigation Divisions. During those two years I assisted with hundreds of prosecutions in the City's Department of Administrative Hearings, prosecuted hundreds of cases in the Traffic Section of the Circuit Court of Cook County, and wrote a successful motion for summary judgment in the Law Division of the Circuit Court of Cook County.
3. I joined the Police Policy Litigation Division in the City of Chicago Law Department in July 2006 as an Assistant Corporation Counsel. In 2009, this group which merged with the Individual Defense Litigation Section to become the Federal Civil Rights Litigation Division. Since that time, my sole practice has consisted of defending both the City of Chicago and Chicago Police Officers in close to 100 § 1983 cases.
4. In 2008, I was trial counsel in *Amarin v. City of Chicago, et., al.* 07cv1354, a jury trial before Judge Kendall; *Duran v. City of Chicago, et., al.* 06cv6469, a jury trial before Chief Judge Holderman; and *Williams v. City of Chicago, et al.*, 07cv2977, a jury trial before Judge Castillo.
5. While I work for a government agency, and do not have a set billing rate, based on my research of relevant case law, the Laffey Matrix, and comparison with colleagues of similar experience and skill in the community in which I practice, I believe that a fair hourly rate is \$225/hr.
6. The attached billing records fairly state the time I spent working on the litigation,

as required to help my colleagues in this matter prepare a motion for an extension of time to complete Plaintiff's depositions.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on JUN. 26, 2010

  
Megan K. McGrath