

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

HORNBECK OFFSHORE SERVICES, L.L.C.,	*	CIVIL ACTION NO. 10-1663(F)(2)
Plaintiff	*	
VERSUS	*	SECTION F
	*	
KENNETH LEE “KEN” SALAZAR, IN HIS OFFICIAL CAPACITY AS SECRETARY, UNITED STATES DEPARTMENT OF THE INTERIOR; UNITED STATES DEPARTMENT OF THE INTERIOR; ROBERT “BOB” ABBEY, IN HIS OFFICIAL CAPACITY AS ACTING DIRECTOR, MINERALS MANAGEMENT SERVICE; AND MINERALS MANAGEMENT SERVICE,	*	JUDGE FELDMAN
	*	
	*	MAGISTRATE 2 MAGISTRATE WILKINSON
	*	
Defendants	*	
* * * * * *	*	

**MEMORANDUM IN SUPPORT OF
PLAINTIFFS’ MOTION FOR EXPEDITED CONSIDERATION**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Hornbeck Offshore Services, L.L.C., the Chouest Entities and the Bollinger Entities, which respectfully submit this memorandum in support of their Motion for expedited consideration of Plaintiffs’ Ex Parte Motion to File Appendix Under Seal. For the reasons set forth more fully below, the Court should consider the Motion to File Appendix Under Seal on an expedited basis because it is the only way Plaintiffs’ request will be considered prior to the February 18, 2011, filing deadline for

Plaintiffs' Motion to Set the Amount of Attorneys' Fees and Costs they seek as a civil contempt sanction against Defendants.

On December 3, 2010, Plaintiffs moved the Court to enter an Order entitling Plaintiffs to recover their attorneys' fees and costs from Defendants. *See* Rec. Doc. 213. On February 2, 2011, the Court entered an Order holding Defendants in civil contempt. *See* Rec. Doc. 226. The Court subsequently referred "the issue of quantum" to Magistrate Judge Wilkinson. *See* Rec. Doc. 227. On February 4, 2011, Magistrate Judge Wilkinson ordered Plaintiffs to file their Motion to Set the Amount of Attorneys' Fees and Costs they seek as a civil contempt sanction against Defendants no later than February 18, 2011. *See* Rec. Doc. 228.

In their Motion to File Appendix Under Seal, filed contemporaneously with their Motion for Expedited Consideration, Plaintiffs ask the Court to the authorize the filing under seal of the billings of Jones Walker and Venable as an appendix to Plaintiffs' Motion to Set the Amount of Attorneys' Fees and Costs owed by Defendants. Because February 18, 2011, is the deadline for Plaintiffs to file their Motion to Set the Amount of Attorneys' Fees and Costs, there is good cause for the Court to consider Plaintiffs' Motion to File Appendix Under Seal on the earliest available date (but not later than February 17, 2011). Plaintiffs' ability to present the Court with the evidence necessary to fully and fairly determine the attorneys' fees and costs owed by Defendants will be severely prejudiced if the Court does not consider Plaintiffs' Motion to File Appendix Under Seal on an expedited basis and before February 18, 2011.

For the foregoing reasons, and with the utmost respect, Plaintiffs' Motion to File Appendix Under Seal should be considered on an expedited basis.

Respectfully submitted,

s/ Carl D. Rosenblum

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**Attorneys for Plaintiffs,
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The Chouest Entities and The Bollinger Entities**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served upon all parties by email or by using the CM/ECF system which will send a Notice of Electronic filing to all counsel of record, this 9th day of February, 2011.

s/ Carl D. Rosenblum
