

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JAMES L. ALEXANDER, <i>et al.</i> ,)	
)	
Plaintiffs,)	Civil Action No. 5:07-cv-00117-FJS-GHL
)	
v.)	
)	
THOMAS J. CAHILL, <i>et al.</i> ,)	
)	
Defendants.)	
)	

SECOND DECLARATION OF GREGORY A. BECK

I, Gregory A. Beck, declare as follows:

1. I am an attorney at Public Citizen Litigation Group (PCLG), a nonprofit public-interest law firm in Washington, DC. I am submitting this declaration in further support of plaintiffs' motion for attorneys' fees and costs to reflect additional time spent drafting plaintiffs' reply memorandum in support of their motion for fees and costs.

2. I spent a total of 11.7 hours researching and drafting the reply memorandum and this declaration. Mr. Wolfman spent a total of .9 hours reading and editing the memorandum and preparing his own affidavit. A detailed description of the hours claimed by plaintiffs' counsel is attached as Exhibit 1. All the entries on Exhibit 1 were contemporaneously recorded and copied from electronic time records kept by counsel.

3. The additional fees claimed by plaintiffs are summarized as follows:

<u>Attorney</u>	<u>Requested Hours</u>	<u>Requested Rate</u>	<u>Total Fee</u>
Gregory A. Beck	11.7	\$215/hour	\$2515.50
Brian Wolfman	.9	\$440/hour	\$396.00
Total:	12.6		\$2911.50

4. Plaintiffs previously requested \$59,255.50 in fees and \$1856.04 in costs.

Including the \$2911.50 in fees for time spent drafting the reply memorandum, plaintiffs request total fees of \$62,167 and total costs of \$1856.04.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Executed on: October 1, 2007

/s/Gregory A. Beck

Gregory A. Beck

Exhibit 1

Time Record Report - All Staff

<i>STAFF</i>	<i>DATE</i>	<i>CASENAME</i>	<i>TIME (hr)</i>	<i>DESCRIPTION</i>
Beck, Greg	9/25/2007	Alexander v. Cahill	0.2	Review response to fee application
Beck, Greg	9/26/2007	Alexander v. Cahill	3	Research issues for reply on fee application
Beck, Greg	9/28/2007	Alexander v. Cahill	6	Research/draft reply brief in support of fees
Beck, Greg	9/30/2007	Alexander v. Cahill	1.5	Research/draft reply brief on fees.
Beck, Greg	10/1/2007	Alexander v. Cahill	1	Edit/revise reply
<i>Summary for 'Staffer' = Beck, Greg (5 detail records)</i>			<i>11.7</i>	
Wolfman, Brian	10/1/2007	Alexander v. Cahill	0.7	Draft declaration in reply to defendants' fee opposition
Wolfman, Brian	10/1/2007	Alexander v. Cahill	0.2	Read and edit GB's reply regarding atty's fees
<i>Summary for 'Staffer' = Wolfman, Brian (2 detail records)</i>			<i>0.9</i>	

Grand total for all staff:	<i>12.6</i>
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