

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

BOBBY SINGLETON, *et al.*,

Plaintiffs,

v.

WES ALLEN, *in his official capacity as
Alabama Secretary of State, et al.*,

Defendants.

Case No.: 2:21-cv-1291-AMM

THREE-JUDGE COURT

EVAN MILLIGAN, *et al.*,

Plaintiffs,

v.

WES ALLEN, *in his official capacity as
Alabama Secretary of State, et al.*,

Defendants.

Case No.: 2:21-cv-1530-AMM

THREE-JUDGE COURT

MARCUS CASTER, *et al.*,

Plaintiffs,

v.

WES ALLEN, *in his official capacity as
Secretary of State of Alabama, et al.*,

Defendants.

Case No.: 2:21-cv-1536-AMM

STATEMENT OF FEES AND EXPENSES
BY THE SPECIAL MASTER TEAM

BEFORE THE SPECIAL MASTER:

In the October 5, 2023 Injunction, Order, and Court-Ordered Remedial Map (“Order”), the Court reiterated its order that the fees and expenses of the Special Master Team be paid by the State of Alabama and ordered the Special Master Team to file a Fee Statement within 30 days of the date of the Order. Order, at 8. The Court instructed that the Fee Statement set forth expenses incurred (with supporting documentation), hours worked and work performed, hourly rate, and any additional information necessary for the Court to assess the reasonableness of the expenses and fees claims, for the Special Master, his counsel, and the cartographer. *Id.*

The Special Master Team respectfully files this Statement of Fees and Expenses in compliance with the Court’s Order. The fees and expenses incurred by each member of the Special Master Team are set forth below, along with the hours worked, hourly rates, and descriptions of the work performed by each member.

Fees Incurred by Members of the Special Master Team

Special Master Richard F. Allen

Richard F. Allen served as the Special Master in this matter, incurring fees from July 24, 2023 through October 5, 2023. His work during this period included the following: Providing overall coordination and guidance to attorneys and the cartographer in developing the Report & Recommendation; providing proposed congressional district maps for the State of Alabama that meet all legal and constitutional requirements; participating in telephone conferences and communicating with members of the Court and the Special Master Team; attending and monitoring Court hearings; reviewing U.S. Supreme Court cases and orders of the Court; reviewing and analyzing filings by parties and interested non-parties; reviewing maps and plans proposed by parties and interested non-parties; and providing review and input for the Report & Recommendation and other Court filings by the Special Master Team.

His hourly rate is \$380 and he worked for 236.6 hours. Thus, his total fees are \$89,908.

Cartographer David Ely

David Ely served as the cartographer in this matter. His work included the following: Reviewing and analyzing filings by parties and interested non-parties; reviewing maps and plans proposed by parties and interested non-parties; drawing proposed congressional district maps for the State of Alabama that meet all legal and constitutional requirements; participating in telephone conferences and communicating with members of the Court and the Special Master Team; attending and monitoring Court hearings; and providing review and input for the Report & Recommendation and other Court filings by the Special Master Team.

His hourly rate is \$400 and he worked for 264 hours. Thus, his total fees are \$105,600.

Counsel to the Special Master—Mayer Brown LLP

All rates for Mayer Brown LLP attorneys reflect a 10% discount from their standard hourly rates.

Michael A. Scodro

Michael Scodro is a partner at Mayer Brown LLP and served as an attorney on the Special Master Team. His work in this matter included the following: Providing overall coordination and guidance to attorneys in performing research for and drafting the Report & Recommendation; reviewing and editing drafts of the Report & Recommendation and other Court filings by the Special Master Team; reviewing and analyzing filings by parties and interested non-parties; reviewing maps and plans proposed by parties and interested non-parties; participating in telephone conferences and communicating with members of the Court and the Special Master Team; attending and monitoring Court hearings; and providing review and input for the Report & Recommendation and other Court filings by the Special Master Team.

His discounted hourly rate is \$1,161.00, and he worked for 98.90 hours. Thus, his total fees are \$144,822.90.

Mitchell D. Holzrichter

Mitchell Holzrichter is a partner at Mayer Brown LLP and served as an attorney on the Special Master Team. His work in this matter included the following: Working closely with the cartographer to draw proposed congressional district maps for the State of Alabama that meet all legal and constitutional requirements; drafting the Report & Recommendation; reviewing and editing drafts of the Report & Recommendation and other Court filings by the Special Master Team; reviewing and analyzing filings by parties and interested non-parties; reviewing maps and plans proposed by parties and interested non-parties; participating in telephone conferences and communicating with members of the Court and the Special Master Team; participating and monitoring Court hearings; and providing review and input for the Report & Recommendation and other Court filings by the Special Master Team.

His discounted hourly rate is \$963.00 and he worked for 65.6 hours. Thus, his total fees are \$63,172.80.

Christopher S. Comstock

Christopher Comstock is a partner at Mayer Brown LLP and served as an attorney on the Special Master Team. His work in this matter included the following: Researching legal topics and authorities and drafting the Report & Recommendation; reviewing and editing drafts of the Report & Recommendation and other Court filings by the Special Master Team; reviewing and analyzing filings by parties and interested non-parties; communicating with members of the Court and the Special Master Team; monitoring Court hearings; and drafting other Court filings by the Special Master Team.

His discounted hourly rate is \$1,008.00 and he worked for 86.30 hours. Thus, his total fees are \$86,990.40.

Rachel J. Lamorte

Rachel Lamorte is an associate at Mayer Brown LLP and served as an attorney on the Special Master Team. Her work in this matter included the following: Researching legal topics and authorities and drafting sections of the Report & Recommendation; reviewing and editing drafts of the Report & Recommendation and other Court filings by the Special Master Team; reviewing and analyzing filings by parties and interested non-parties; communicating with members of the Court and the Special Master Team; and providing review and input for the Report & Recommendation and other Court filings by the Special Master Team.

Her discounted hourly rate is \$945.00 and she worked for 23.8 hours. Thus, her total fees are \$22,491.00.

Clare E. Myers

Clare Myers is an associate at Mayer Brown LLP and served as an attorney on the Special Master Team. Her work in this matter included the following: Researching legal topics and authorities and drafting sections of the Report & Recommendation; cite-checking and reviewing the Report & Recommendation; communicating with members of the Court and the Special Master Team; reviewing and analyzing filings by parties and interested non-parties; and providing review and input for the Report & Recommendation and other Court filings by the Special Master Team.

Her discounted hourly rate is \$711.00 and she worked for 40.90 hours. Thus, her total fees are \$29,079.90.

Total Fees

The total fees incurred by the Special Master Team are reflected in the table below:

Name	Discounted Rate	Hours	Total Fees
Richard F. Allen	\$380	236.60	\$89,908.00
David Ely	\$400	264.00	\$105,600.00
Michael A. Scodro	\$1,161	98.90	\$114,822.90
Mitchell D. Holzrichter	\$963	65.60	\$63,172.80
Christopher S. Comstock	\$1,008	86.30	\$86,990.40

Name	Discounted Rate	Hours	Total Fees
Rachel J. Lamorte	\$945	23.80	\$22,491.00
Clare E. Myers	\$711	40.90	\$29,079.90
Total Fees			\$512,065.00

Expenses Incurred by Members of the Special Master Team

The members of the Special Master Team incurred the following expenses in connection with this matter.

Name	Explanation	Total Expenses
Richard F. Allen	Travel to and from Birmingham, Alabama for October 3, 2023 Hearing (private vehicle mileage)	\$106.11 (152 miles)
David Ely	Travel to and from Birmingham, Alabama for October 3, 2023 Hearing (flight and hotel)	\$1,980.44 ¹
Michael A. Scodro	Travel to and from Birmingham, Alabama for October 3, 2023 Hearing (flight and hotel)	\$713.06 ²
Mitchell Holzrichter	Travel to and from Birmingham, Alabama for October 3, 2023 Hearing (flight and hotel)	\$713.06 ³
Total Expenses		\$3,512.67

WHEREFORE, the Special Master Team hereby requests that the Court enter an order awarding the fees and expenses set forth above, totaling \$512,065.00 in fees and \$3,512.67 in expenses. Following an order from the Court specifying fees and costs, the Special Master Team will provide information needed to effect payment.

SUBMITTED this 3rd day of November, 2023.

/s/ Richard F. Allen
RICHARD F. ALLEN
SPECIAL MASTER

¹ See Ex. A hereto (highlighted receipts of Mr. Ely) showing total flight expenses of \$1,231.62 (\$1,101.27 + \$30 + \$30 + \$70.35) and total hotel expenses of \$748.82 for a total of \$1,980.44.

² See Ex. B hereto (highlighted receipts of Mr. Scodro) showing total flight expenses of \$519.81 and total hotel expenses of \$193.25 for a total of \$713.06.

³ See Ex. C hereto (highlighted receipts of Mr. Holzrichter) showing total flight expenses of \$519.81 and total hotel expenses of \$193.25 (\$161.92 + \$6.48 + \$11.33 + \$10.52 + \$3.00) for a total of \$713.06.