

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the
United States, *et al.*,

Defendants.

No. 17-cv-00094 RAJ

**SUPPLEMENTAL DECLARATION OF
HUGH HANDEYSIDE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SANCTIONS**

I, Hugh Handeyside, declare as follows.

1. I am an attorney admitted to practice in New York and Washington, and I am counsel for Plaintiffs in this case. I have personal knowledge of the facts set forth herein and am competent to testify thereto.

2. My background and experience as an attorney was set forth in the Declaration of Hugh Handeyside in Support of Plaintiffs' Motion for Sanctions (Dkt. 139) and the Declaration of Lee Gelernt in Support of Plaintiffs' Motion for Class Certification (Dkt. 30).

3. I have recorded my time contemporaneously for this matter using the Toggl timekeeping platform. Attached as **Exhibit A** to this declaration is a true and correct copy of my time records for the work performed to prepare and file Plaintiffs' Motion for Sanctions.

1 4. As supported by the Declaration of Carol Sobel, my hourly rate for the work
2 performed is \$676.85 for 2018, based on my year of graduation and the market rates for Seattle,
3 Washington. *See* Declaration of Carol Sobel in Support of Plaintiffs' Motion for Sanctions (Dkt.
4 138).

5 5. Below is a chart that details the attorneys' fees that I am seeking. The total value
6 of my work is \$3,993.42.

	Time and Rate
Plaintiffs' Motion for Sanctions	5.9 hours x \$676.85 rate
TOTAL	\$3,993.42

7
8
9
10 I declare under penalty of perjury that the foregoing is true and correct.

11 DATED this 13th day of March, 2019, at New York, New York.

12
13 *s/ Hugh Handeyside*
14 Hugh Handeyside

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I caused service of the foregoing document via the CM/ECF system, which will automatically send notice of such filing to all counsel of record.

DATED this 13th day of March, 2019, at Seattle, Washington.

s/ Cristina Sepe
Cristina Sepe, WSBA No. 53609
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: CSepe@perkinscoie.com

EXHIBIT A



Detailed report

2018-01-01 - 2018-12-31

Total 05 h 55 min

Date	Description	Duration	User
03-21	Confer regarding motion for sanctions CARRP - [AF]	0:36:00 14:31-15:07	Hugh Handeyside
03-26	Review and revise draft motion for sanctions CARRP - [AF]	0:40:58 19:50-20:31	Hugh Handeyside
03-26	Review and revise draft motion for sanctions CARRP - [AF]	0:49:07 23:57-00:46	Hugh Handeyside
03-28	Review and revise draft motion for sanctions; exchange correspondence on same CARRP - [AF]	0:27:22 10:54-11:21	Hugh Handeyside
04-10	Review opposition to motion for sanctions; exchange correspondence on same CARRP - [AF]	1:32:00 14:27-15:59	Hugh Handeyside
04-12	Review and revise draft reply in support of motion for sanctions CARRP - [AF]	1:49:52 22:46-00:36	Hugh Handeyside

Created with toggl.com