

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
MATT ADAMS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SANCTIONS**

I, Matt Adams, hereby declare:

1. I am one of the attorneys for Plaintiffs in this case. I have personal knowledge of the facts set forth herein and am competent to testify thereto. I submit this supplemental declaration in support of Plaintiffs' Motion for Sanctions.

2. My background and experience as an attorney was set forth in the Declaration of Matt Adams in Support of Plaintiffs' Motion for Class Certification (Dkt. 31) and Declaration of Matt Adams in Support of Plaintiffs' Motion for Sanctions (Dkt. 141).

3. I have recorded my time contemporaneously for all matters in this case. Attached as **Exhibit A** to this declaration is a true and correct copy of my timesheet for the work performed on Plaintiffs' Motion for Sanctions.

1 4. As supported by the Declaration of Carol Sobel, the hourly market rate of work
 2 performed was \$815.62 in 2018. *See* Declaration of Carol Sobel in Support of Plaintiffs' Motion
 3 for Sanctions (Dkt. 138). These rates are within the range of reasonable and customary rates
 4 charged by lawyers with similar credentials, experience, expertise, and resources at comparable
 5 firms. *See id.*

6 5. Below is a chart that details the attorneys' fees that I am seeking for my work on
 7 Plaintiffs' Motion for Sanctions. The total value of my work is \$6,606.52.

	Time and Rate
Plaintiffs' Motion for Sanctions	8.1 hours x \$815.62 rate
TOTAL	\$6,606.52

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

12 7th day of March, 2019, at Seattle, Washington.

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 Matt Adams

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 18 Seattle, WA 98104
 19 Tel: (206) 957-8611
 20 Email: matt@nwirp.org
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EXHIBIT A

ID	Date of Service	Time Spent	Caseworker	Funding Code	Activity Type	Activity Details
#57304	04/12/2018	0.8	Matt Adams	23 NWIRP - general	Case Activity	reviewing & editing reply iso motion for sanctions
#56809	04/10/2018	1.8	Matt Adams	23 NWIRP - general	Case Activity	reviewing opp to mx for sanctions, and supporting declarations
#56801	04/10/2018	0.5	Matt Adams	23 NWIRP - general	Case Activity	pc re response to ex parte mx and mx for sanctions
#56779	04/10/2018	0.7	Matt Adams	23 NWIRP - general	Case Activity	reading defs' opp to sanctions mx + mx for ex parte in camera review
#54928	03/30/2018	1	Matt Adams	23 NWIRP - general	Case Activity	call with ACLU, re next steps
#54446	03/27/2018	0.5	Matt Adams	23 NWIRP - general	Case Activity	pc re docs needed for sanctions motion
#54331	03/22/2018	1	Matt Adams	23 NWIRP - general	Case Activity	finish editing sanctions mx
#53366	03/21/2018	1.8	Matt Adams	23 NWIRP - general	Case Activity	editing sanctions mx