

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
TRINA REALMUTO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SANCTIONS**

I, Trina Realmuto, 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, as well as my colleague Kristin Macleod-Ball, was set forth in the Declaration of Trina Realmuto in Support of Plaintiffs' Motion for Class Certification (Dkt. 33) and Declaration of Trina Realmuto in Support of Plaintiffs' Motion for Sanctions (Dkt. 145).

3. Ms. Macleod-Ball and I have each recorded our time contemporaneously for this matter. Detailed time records for our work on preparing and filing Plaintiffs' Motion for Sanctions are attached as **Exhibit A**.

4. Based on the relevant market rates, my hourly rate was \$815.62 in 2018. Based on the relevant market rates, Ms. Macleod-Ball’s hourly rate was \$415.36 in 2018. See Declaration of Carol Sobel in Support of Plaintiffs’ Motion for Sanctions (Dkt. 138). These rates are within the range of reasonable and customary rates charged by lawyers with similar credentials, experience, expertise, and resources at comparable firms. See *id.*

5. Below is a chart summarizing our time and hourly rates. The total value of the work amounts to \$1,606.32.

	Trina Realmuto	Kristin Macleod-Ball
Plaintiffs’ Motion for Sanctions	0.9 hours x \$815.62 rate	2.1 hours x \$415.36 rate
	\$734.06	\$872.26

6. Based on my experience, I believe that these costs were reasonable and necessary for the litigation effort.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of March, 2019, at Brookline, Massachusetts.

s/Trina Realmuto
 Trina Realmuto
 American Immigration Council
 1318 Beacon Street, Suite 18
 Brookline, MA 03446
 Telephone: (857) 305-3600
 Email: treatmuto@immcouncil.org

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
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Seattle, WA 98101-3099
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EXHIBIT A

Wagafe Time at AIC

Date	Timekeeper	Task	Hours
3/23/2018	KMB	review mx for sanctions	0.9
3/26/2018	TR	review motions for sanctions	0.8
3/27/2018	KMB	work on declaration and records for mx for sanctions	1
3/27/2018	TR	review dec and records for motion for sanctions	0.1
4/13/2018	KMB	review reply ISO mx for sanctions	0.2