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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

JAMES M. CLEAVENGER,

Plaintiff,

vs.

CAROLYN McDERMED, BRANDON
LEBRECHT, and SCOTT CAMERON,

Defendants.

Case No. 6:13-cv-01908-DOC

**PLAINTIFF'S PETITION FOR
SUPPLEMENTAL ATTORNEY FEES
AND NON-TAXABLE COSTS**

I. CONFERRAL

Plaintiff's counsel attempted to confer with defense counsel as to this motion for supplemental attorney fees and non-taxable costs on March 14, 2016, and defense counsel opposes the motion and supplemental fees and costs.

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II. PETITION AND ARGUMENT

Pursuant to FRCP 54, plaintiff hereby moves the Court for a supplemental award of attorney fees for work done on the post-trial motions in this case, after plaintiff's initial attorney fee petition was filed. Plaintiff is entitled to these additional fees pursuant to 42 USC Sec. 1988. The amount of additional fees sought is set forward in the table below:

NAME	POSITION	HOURS	RATE	TOTAL
Gregory Kafoury	Attorney	7.5	\$500	\$3,750
Mark McDougal	Attorney	25.4	\$450	\$11,430
Jason Kafoury	Attorney	54.7	\$350	\$19,145
Adam Kiel	Attorney	56.1	\$250	\$14,025
David Hess	Trial Tech	6.35	\$185	\$1,174.75
Dustin Hawkins	Law Clerk	6.9	\$175	\$1,207.50
TOTAL:				\$50,732.25

This motion for supplemental attorney fees incorporates by reference the arguments and authorities raised in plaintiff's Motion for Attorney Fees dated October 13, 2015 (docket number 173) and the declarations and exhibits attached thereto. This motion is further supported by the March 14, 2016 declarations of Gregory Kafoury, Mark McDougal, Jason Kafoury, Adam Kiel, Dustin Hawkins, and David Hess.

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III. CONCLUSION

The Court should make an award of supplemental attorney fees and costs for all time reasonably expended on post-trial matters. Plaintiff requests that the Court grant this motion for attorney fees and award \$50,732.25 for Kafoury & McDougal's post-trial fees and \$4,469.35 in non-taxable costs (official transcript).

DATED: March 14, 2016.

/s/ Jason Kafoury

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CERTIFICATE OF SERVICE

I certify that on March 14, 2016, I served or caused to be served a true and complete copy of the foregoing **PLAINTIFF'S PETITION FOR SUPPLEMENTAL ATTORNEY FEES AND NON-TAXABLE COSTS; DECLARATION OF JASON KAFOURY; DECLARATION OF MARK McDOUGAL; DECLARATION OF GREGORY KAFOURY; DECLARATION OF ADAM KIEL; DECLARATION OF DAVID HESS; and DECLARATION OF DUSTIN HAWKINS** on the party or parties listed below as follows:

Andrea Coit
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360 E 10th Ave, Ste 300
Eugene OR 97401-3273

Via CM / ECF Filing

Dated: March 14, 2016.

/s/ Jason Kafoury

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