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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
 THIRD JUDICIAL DISTRICT AT ANCHORAGE

DANIEL J. SULLIVAN, JR.,

Appellant,

v.

STATE OF ALASKA, DIVISION OF
 ELECTIONS,

Appellee.

Case No. 3AN–26–07485 CI

**DANIEL J. SULLIVAN, JR.’S
 MOTION FOR ATTORNEY FEES**

I. INTRODUCTION

Pursuant to Appellate Rules 508(e) and 508(f)(2) and Alaska Statute 09.60.010(c), Appellant Daniel J. Sullivan, Jr. (“Mr. Sullivan”) requests an award of his attorney fees and costs as the prevailing party in this appeal of an administrative agency decision issued by the State of Alaska, Division of Elections (“Division”).

This appeal arises out of a June 15, 2026 final order by the Division, by and through its director, Carol Beecher (“Director Beecher”) de-certifying Mr. Sullivan’s candidacy for the office of United States Senate. The appeal was prepared and litigated on an extremely expedited timeline which necessarily included a motion for injunctive relief, merits briefing, and oral argument within the span of several days. The parties addressed numerous complex issues, and the stakes were significant – addressing the legality of an

unprecedented decision by the Division to strip Mr. Sullivan, a candidate who met all qualifications imposed by state and federal law to run for the office of United States Senate, from his right to appear on the ballot based on the Division's subjective determination that Mr. Sullivan was not a "good faith" candidate.

On June 26, 2026, this Court reversed the Division's decision, adopting each argument that Mr. Sullivan raised on appeal. Mr. Sullivan is thus the prevailing party and, under the appellate rules and Alaska Statute 09.60.010(c), is entitled to an award of his full reasonable attorney fees as a constitutional litigant. Those fees, as reflected in the concurrently-filed Affidavit of Counsel, total \$100,680.00. Aff. of Counsel in Supp. of Mot. for Attorney Fees at ¶ 11. In the alternative, if the Court finds that Mr. Sullivan is *not* properly characterized as a constitutional litigant, the Court should either award Mr. Sullivan his full or heightened fees "in the interest of justice," or award 20 percent of his full reasonable attorney fees.

II. DISCUSSION

Ordinarily, attorney fees are not awarded in appeals. However, Alaska Rule of Appellate Procedure 508 lists a number of exceptions to that rule, three of which are applicable here. First, subsection (e)(1) allows for an award of fees where fees "are provided by statute, caselaw, or contract." Here, there is a statute directly on point, Alaska Statute 09.60.010(c), which allows for such fees. Second, subsection (e)(3) includes a catch-all, allowing an award of attorney fees in an amount within the discretion of the court where "an award of fees is necessary in the interest of justice." Third, subsection (e)(4) allows for a prevailing party in administrative appeals like the instant matter to be awarded 20 percent of his actual attorney fees that were necessarily incurred, except in cases where the other subsections of Rule 508(e) apply.

A. Mr. Sullivan Is a Constitutional Litigant Entitled to a Full Award of His Reasonable Attorney Fees

Mr. Sullivan is the prevailing party in this action, having secured vacatur of the Division's decision in this Court for all of the reasons Mr. Sullivan argued. *See*

Progressive Corp. v. Peter, 195 P.3d 1083, 1092 (Alaska 2008) (“The prevailing party is the one who successfully prosecuted or defended against the action, the one who is successful on the ‘main issue’ of the action and in whose favor the decision or verdict is rendered and the judgment entered.” (internal quotation omitted)); *see also* June 26, 2026 Or. on Admin. Appeal at 31 (“The Final Decision of the Division of Elections is VACATED. Mr. Dan J. Sullivan is declared to be an eligible candidate for the office of United States Senator.”).

Alaska Statute 09.60.010 entitles Mr. Sullivan, as prevailing party, to an award of his full reasonable attorney fees. The statute provides, in pertinent part, as follows:

(c) In a civil action or appeal concerning the establishment, protection, or enforcement of a right under the United States Constitution or the Constitution of the State of Alaska, the court

(1) shall award, subject to (d) and (e) of this section, full reasonable attorney fees and costs to a claimant, who, as plaintiff, counterclaimant, cross claimant, or third-party plaintiff in the action or on appeal, has prevailed in asserting the right . . .

(d) In calculating an award of attorney fees and costs under (c)(1) of this section,

(1) the court shall include in the award only that portion of the services of claimant's attorney fees and associated costs that were devoted to claims concerning rights under the United States Constitution or the Constitution of the State of Alaska upon which the claimant ultimately prevailed; and

(2) the court shall make an award only if the claimant did not have sufficient economic incentive to bring the suit, regardless of the constitutional claims involved.

AS 09.60.010(c)-(d).

Here, Mr. Sullivan prevailed on all of his claims on appeal, each of which concerned rights under the United States Constitution. To determine whether a claim is constitutional, courts look “‘*not* at the source of the rule of law,’ but instead at the ‘source of the right asserted.’” *Pruitt v. State*, 526 P.3d 136, 142 (Alaska 2023) (quoting *Lake &*

Peninsula Borough Assembly v. Oberlatz, 329 P.3d 214, 226 (Alaska 2014)) (emphasis added). In the *Pruitt* case, the Court provided a helpful example: “while voter residency requirements are defined by statute, the right to vote itself is a constitutional right. Thus, in a case where voters asserted that a voter residency statute deprived them of the right to vote . . . the claims were properly classified as constitutional claims.” *Pruitt*, 526 P.3d at 142 (citing *Oberlatz*, 526 P.3d at 227). By way of contrasting example, the right to legislate by municipal initiative derives from Alaska Statute 29.26.100, not the Alaska Constitution or U.S. Constitution, and a non-prevailing plaintiff is therefore not protected from an attorney fee award under AS 09.60.010(c)(2) after losing a case seeking to vindicate that right. *Alliance of Concerned Taxpayers, Inc. v. Kenai Peninsula Borough*, 273 P.3d 1128, 1138-39 (Alaska 2012).

This case is like *Pruitt* and *Oberlatz* and unlike *Alliance of Concerned Taxpayers*. Mr. Sullivan’s overarching argument on appeal was that the Division had no right to exclude him from the ballot; within this main point, he alleged that the Division’s decision was inconsistent not only with the Qualifications Clause, but also with the Division’s enabling statutes and agency regulations. All of these arguments sought to protect and enforce constitutional rights. Restrictions on ballot access implicate “at least two fundamental rights”: “the right to vote and the right to associate freely in pursuit of political beliefs.” *State, Division of Elections v. Metcalfe*, 110 P.3d 976, 979 (Alaska 2005). Mr. Sullivan thus appealed the Division’s final decision in an effort to vindicate these two rights. Indeed, the Court noted that “[r]estrictions on ballot access impinge not only on the rights of potential candidates, but on those of voters as well.” Super. Ct. Or. 21-22 (citing *Sonneman v. State*, 969 P.2d 632, 638 (Alaska 1998)). While Mr. Sullivan argued both that the Division’s decision to exclude him from the ballot was violative of the U.S. Constitution, as well as State law and regulation, his overarching argument was that the State’s restriction of his ballot access was violative of his own fundamental rights and the rights of Alaska voters, and he unquestionably prevailed on those issues. Mr. Sullivan is therefore entitled to an award of full fees and costs.

Nor did Mr. Sullivan have a “sufficient economic incentive” to bring this action that would strip him of his status as a constitutional litigant. “A litigant has sufficient economic incentive to bring a claim when it is brought primarily to advance the litigant’s direct economic interest, regardless of the nature of the claim.” *Alaska Conservation Found. v. Pebble Ltd. P’ship*, 350 P.3d 273, 281-82 (Alaska 2015). The Court determines “the claim’s primary purpose by looking to the facts of the case and by examining ‘the nature of the claim and relief sought and the direct economic interest at stake.’” *Id.* at 282. An “[e]conomic interest need not take the form of damages,” but “courts must ‘look to the facts of the case to determine the litigant’s primary motivation for filing the suit.’” *Id.* (quoting *O’Callaghan v. State*, 920 P.2d 1387, 1390 (Alaska 1996)). The Alaska Supreme Court has “‘reiterate[d] and emphasize[d] the necessity of direct economic benefit from constitutional litigation for ‘sufficient economic incentive’” and cautioned that “[f]ocusing on the funding of constitutional litigation rather than on the litigation itself to determine primary purpose . . . can lead easily to the wrong result.” *Id.* at 285. Likewise, “it [i]s error for the superior court to look at future possibilities and contingencies well outside the contours of the litigation.” *Id.* at 284. In short, the Alaska Supreme Court has “never required that parties seeking constitutional claimant status . . . be completely disinterested in the case.” *Alaska Miners Ass’n v. Holman*, 397 P.3d 312, 317 (Alaska 2017).

Applying this precedent, the Alaska Supreme Court found in *Alaska Miners Association v. Holman* that a mining industry group was properly considered a constitutional litigant where it commenced litigation pertaining to a constitutional question relating to a ballot initiative for the Pebble Mine Project, despite the fact that members of the group had direct economic interests in the advancement of the Pebble Project. *Id.* Likewise, although candidates for public office may receive a salary if elected and appointed, the Court has repeatedly held that “the strong public interest in fair and honest elections justifies according public interest litigant status to officeholders or candidates pursuing a claim of error in an election.” *Pruitt*, 526 P.3d at 140 (citing *Mun.*

of *Anchorage v. Citizens for Representative Governance*, 880 P.2d 1058, 1062-63 (Alaska 1994) (citing strong public interest in fair and honest elections when concluding that normal compensation of elected office is not sufficient economic incentive to defeat political candidate's status as public interest litigant)). Mr. Sullivan did not seek an award of damages in this action – he was seeking to regain the ballot access that was wrongfully taken from him. Even if there is some possibility that Mr. Sullivan could be elected to the United States Senate and receive compensation associated with such office, that future possibility or contingency is well outside the contours of this action, which was filed in furtherance of the constitutional rights of Mr. Sullivan and Alaska voters. As a matter of law, the normal compensation of a United States Senator is not a sufficient economic incentive to defeat Mr. Sullivan's status as a public interest litigant.

B. Even if Not a Constitutional Litigant, the Court Should Award Mr. Sullivan His Full Fees or Heightened Fees in the Interest of Justice.

If the Court finds that Mr. Sullivan was *not* a constitutional litigant, a heightened fee award “in the interest of justice” pursuant to Rule 508(e)(3) would remain appropriate. The Alaska Supreme Court has suggested that the factors laid out in Rule 82(b)(3) – among them the complexity of the litigation, the reasonableness of the attorneys’ hourly rates and the number of hours expended, the reasonableness of the number of attorneys used, the attorneys’ efforts to minimize fees, the reasonableness of the claims and defenses pursued by each side, and any vexatious or bad faith conduct – are relevant to determining whether the “interest of justice” supports an appellate fee award. *Stalnaker v. Williams*, 960 P.2d 590, 598 n.14 (Alaska 1998) (“The author of this opinion believes that Appellate Rule 508(e) contemplates partial fees . . . Although Civil Rule 82 does not govern such awards, recent amendments to that rule suggest an analytical structure that appears equally applicable to fees incurred on appeal.”).

Each of these factors supports an award of heightened attorney fees to Mr. Sullivan. As noted above, this matter was litigated on an extraordinarily compressed timeline, which required Mr. Sullivan's three-attorney counsel to devote nearly all of their

attention to this matter around the clock for several days. Aff. of Counsel in Supp. of Mot. for Attorney Fees at ¶ 9. The rates that were charged in connection with this matter were reasonable, commensurate with counsel's experience, and a substantial reduction from the rates charged in other matters. ¶ 8. Further, the Division's Final Decision was unprecedented and completely unsupported by any law, which required undersigned counsel to carefully research the issues which Mr. Sullivan advanced on appeal. *Id.* at ¶ 10 It also appeared motivated in large part by partisan objectives which are unusual for a public entity. Indeed, the Court noted that the Division's decision to exclude Mr. Sullivan from the ballot was "contrary to the Alaska Supreme Court's well-established presumption in favor of candidate eligibility." Or. at 31. It would be unfair and contrary to the interests of justice for the Court to allow candidates who have been the subject of unlawful conduct by the Division of Elections to be forced to bear the economic brunt of resulting litigation.

C. If the Court finds Mr. Sullivan to Neither be a Constitutional Litigant Nor Entitled to Full or Heightened Fees in the Interest of Justice, It Should Enter an Award of 20% of his Fees

In the alternative, Mr. Sullivan requests that the Court pursuant to Appellate Rule 508(e)(4) award him 20 percent of the attorney fees necessarily incurred in this proceeding. These fees were reasonable and necessary to pursue this appeal, particularly given the novelty and significance of the issues being litigated. Never before had the Division taken the position that it may exclude candidates it does not like from a ballot simply because it determines that a candidate had not declared candidacy in "good faith." In commencing this appeal, Mr. Sullivan sought to advance not only his constitutional right to run for office, but also the public's interest in participating in elections in which the Division complies with the laws it is tasked with administering, and in which voters may choose from among all qualified candidates.

III. CONCLUSION

Mr. Sullivan respectfully requests that the Court enter an award of attorney fees as set forth herein.

DATED: July 6, 2026

BALLARD SPAHR LLP
Attorneys for Appellant Daniel J. Sullivan,
Jr.

By /s/ Jeffrey W. Robinson
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I hereby certify that on July 6, 2026,
a true and correct copy of the foregoing was served via
TrueFiling / First Class Mail on:

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**AFFIDAVIT OF COUNSEL IN
SUPPORT OF DANIEL J.
SULLIVAN, JR.'S MOTION FOR
ATTORNEY FEES**

STATE OF ALASKA

THIRD JUDICIAL DISTRICT

ss.

1. I, Jeffrey W. Robinson, being first duly sworn, state as follows:
2. I am a partner with Ballard Spahr LLP, counsel for Appellant Daniel J. Sullivan, Jr. ("Mr. Sullivan").
3. Ballard Spahr LLP is a highly-regarded national law firm with lawyers across 18 U.S. offices. I am the managing partner of our firm's Anchorage office.
4. I make this Affidavit in support of Mr. Sullivan's Motion for Attorney Fees. I have personal knowledge of the facts set forth herein and am competent to testify to the same.

5. I am a shareholder in the Commercial Litigation and Dispute Resolution group of Ballard Spahr. In my career, I have tried over 50 cases to verdict, and I regularly handle complex civil matters, including high-profile matters, matters of public interest, and cases involving constitutional questions and issues of first impression. I am routinely ranked by Chambers USA, The Best Lawyers in America, and other top-tier legal publications regarding my skills and expertise as a litigator. I served as lead counsel in this matter.

6. My billable rate is generally set between approximately \$600 and \$1,000 per hour depending on the complexity of the matter and the case needs. For this matter, my rate was \$700 per hour, which is well within the market range for an attorney of like skills, competence, and experience.

7. Attorneys Bryn R. Pallesen and Zoe A. Eisberg, both accomplished commercial litigators, also worked extensively on this case. Attorney Douglas Plume also worked on this case in a more limited capacity.

8. Ms. Pallesen has worked for several national and international law firms and regularly handles commercial disputes in state and federal court. She has extensive administrative law experience. Ms. Pallesen's hourly rate is generally between \$500-\$750 per hour, typically set in a manner that depends on the complexity of the matter and the case needs. Her rate for this matter, \$500, was well within the market range for an attorney of like skills, competence, and experience.

9. Ms. Eisberg, a commercial litigator, has a notable track record in Alaska civil matters, including election matters, and she has argued and tried numerous cases. Her rate for this matter, \$500, was well within the market range for an attorney of like skills, competence, and experience.

10. Douglas Plume, a commercial litigator, has a broad array of experience. Prior to joining Ballard, Mr. Plume practiced as a litigator at another nationally recognized firm, where he represented individuals, large companies, and financial institutions in a variety of civil litigation, government investigations, and enforcement actions. His rate for

this matter, \$500, was well within the market range for an attorney of like skills, competence, and experience.

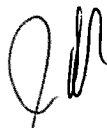
11. Our team's rates in this matter are heavily discounted from our standard rates, and were implemented based on the scope of the representation and public interest nature of this case. These rates are commensurate with our team's and our firm's experience and skills and are within the Anchorage-market rate for litigation cases of this nature undertaken by attorneys with similar levels of skill and experience.

12. This matter was litigated on an extraordinarily compressed time frame which required Ms. Pallesen, Ms. Eisberg, Mr. Plume and I to devote the bulk of our energy to this case and work nearly around-the-clock.

13. Moreover, because of the unprecedented nature of the Division's Final Decision, we were forced to devote additional time and energy to researching and briefing unexpected issues, many of which appear to have been issues of first impression.

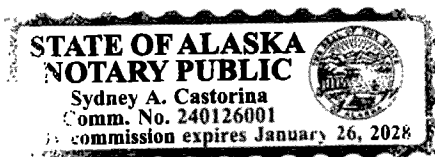
14. Appended hereto as **Exhibit A** is an itemized tabulation of the fees charged in connection with this matter for which our client is seeking reimbursement as prevailing party. These fees total \$100,680.00. All fees were reasonably and necessarily incurred. It would not have been possible to competently prepare, litigate, and successfully argue this matter without the participation of all members of our team and their collaborative efforts.

FURTHER AFFIANT SAYETH NAUGHT.



Jeffrey W. Robinson

SUBSCRIBED AND SWORN TO this 16 day of July, 2026.





Notary in and for the State of Alaska
My commission expires: 01/26/2028

I hereby certify that on July 6, 2026,
a true and correct copy of the foregoing was served via
TrueFiling / First Class Mail on:

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/s/ Sydney A. Castorina

EXHIBIT A

Timekeeper Name	Date	Hours	Rate	Amount	Narrative
Bryn R. Pallesen	6/12/2026	4.80	500.00	\$2,400.00	Factual and legal research re: arguments raised in Division's correspondence to client
Jeffrey W. Robinson	6/12/2026	6.00	700.00	\$4,200.00	Review material associated with eligibility
Zoe A. Eisberg	6/12/2026	3.20	500.00	\$1,600.00	Research procedure and timeline for administrative appeal from adverse decision of division of elections regarding candidate eligibility and prepare memo re: [REDACTED]
Bryn R. Pallesen	6/13/2026	4.20	500.00	\$2,100.00	Compile factual timeline (2.2); summarize key documents (2.0)
Bryn R. Pallesen	6/15/2026	2.30	500.00	\$1,150.00	Call with client (0.3); review final determination (1.5); internal strategy e-mails (0.5)
Jeffrey W. Robinson	6/15/2026	0.70	700.00	\$490.00	Confer with Z. Eisberg and B. Pallesen re: next steps.
Jeffrey W. Robinson	6/15/2026	0.30	700.00	\$210.00	Call with client
Zoe A. Eisberg	6/15/2026	4.00	500.00	\$2,000.00	Call with client (0.3); legal research re: basis for division decision denying candidacy (2.0); begin outlining potential arguments on appeal (1.7)
Bryn R. Pallesen	6/16/2026	5.80	500.00	\$2,900.00	Teleconference with client (0.3); review case law (3.5); factual research (2.0)
Jeffrey W. Robinson	6/16/2026	0.30	700.00	\$210.00	Call with client
Bryn R. Pallesen	6/17/2026	1.80	500.00	\$900.00	Strategy call (0.3); review case law (1.5)
Jeffrey W. Robinson	6/17/2026	1.80	700.00	\$1,260.00	.3 call with client; confer with Z. Eisberg and B. Pallesen (.5); review recent case precedent re: "good faith" candidates (.5); review legislative opinion (.5).
Zoe A. Eisberg	6/17/2026	2.40	500.00	\$1,200.00	Continue refining internal memo re: [REDACTED] (1.2); legal research re: analogous case precedent (0.4); confer with J. Robinson and B. Pallesen re: [REDACTED] (0.5); call with client re: [REDACTED] (0.3)
Bryn R. Pallesen	6/19/2026	6.10	500.00	\$3,050.00	Outline administrative appeal (1.0); draft fact section of administrative appeal (4.6); e-mails re: [REDACTED] (0.5)

Jeffrey W. Robinson	6/19/2026	0.30	700.00	\$210.00	Correspond with B. Pallesen and Z. Eisberg re: [REDACTED].
Zoe A. Eisberg	6/19/2026	2.50	500.00	\$1,250.00	Begin drafting and outlining appellate brief (2.0); confer with B. Pallesen re: [REDACTED] (0.5)
Bryn R. Pallesen	6/20/2026	6.50	500.00	\$3,250.00	Draft and revise facts section and qualifications section of administration appeal (4.5); compile appendix to same (2.0)
Jeffrey W. Robinson	6/20/2026	0.30	700.00	\$210.00	Call with Z. Eisberg re: [REDACTED].
Zoe A. Eisberg	6/20/2026	12.10	500.00	\$6,050.00	Legal research re: standard of review (2.1) and ability of states to impose additional qualification on candidates for senate (6.0); continue drafting argument sections re: Division's lack of authority to exceed constitutional requirements for senate qualification and need to comply with its own regulations (4.0)
Bryn R. Pallesen	6/21/2026	10.90	500.00	\$5,450.00	Revise facts section of appellate brief (4.0); review and revise notice of appeal (1.0); review and revise points of authority (0.5); draft rider to motion for temporary restraining order (5.4)
Douglas Plume	6/21/2026	3.50	500.00	\$1,750.00	Revise and conduct cite check of brief of Appellant in appeal from decision of Division of Elections re eligibility for primary election ballot
Douglas Plume	6/21/2026	0.80	500.00	\$400.00	Draft notice of appeal and notice of points on appeal
Jeffrey W. Robinson	6/21/2026	8.00	700.00	\$5,600.00	Review appellate pleadings and strategize [REDACTED].
Zoe A. Eisberg	6/21/2026	4.60	500.00	\$2,300.00	Revise draft appellate brief (2.0); outline motion for stay or, in the alternative, for temporary restraining order (2.0); confer with J. Robinson and B. Pallesen re: [REDACTED] (0.6)
Bryn R. Pallesen	6/22/2026	3.40	500.00	\$1,700.00	Teleconference with opposing counsel (0.3); review motion for stay (0.3); draft and revise proposed orders (0.8); review motion for expedited consideration and supporting affidavit (1.0); finalize appendix (1.0)
Douglas Plume	6/22/2026	5.50	500.00	\$2,750.00	Revise, cite-check, and finalize Brief of Appellant, Appendix to Brief, Motion for Expedited Consideration, Affidavit of Counsel in support of same, Proposed Order Granting Same, Motion

					for Stay, Proposed Order Granting Same (2.8); travel to court to file same with Clerk of Court (0.7); virtually attend legislative hearing on authority of Division of Elections to de-certify qualified candidates for office (2.0)
Jeffrey W. Robinson	6/22/2026	0.60	700.00	\$420.00	Review motion to stay/TRO.
Zoe A. Eisberg	6/22/2026	6.50	500.00	\$3,250.00	Continue drafting TRO motion and motion for expedited consideration (4.7); call with Division's counsel re: briefing timeline (0.3); attend portion of legislative hearing (1.5)
Bryn R. Pallesen	6/23/2026	8.30	500.00	\$4,150.00	Attend status hearing (0.7); draft opposition to motion to intervene (4.0); draft proposed order denying same (0.5); review case law (3.1)
Douglas Plume	6/23/2026	2.10	500.00	\$1,050.00	Develop strategy [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Jeffrey W. Robinson	6/23/2026	4.50	700.00	\$3,150.00	Attend status hearing (0.7); email S. Stone (0.5); review intervention and associated legal issues (1); email B. Pallesen and Z. Eisberg re: [REDACTED] (.3); consider appellate issues for briefing (2.0)
Zoe A. Eisberg	6/23/2026	11.30	500.00	\$5,650.00	Legal research re: jurisdictions in which a "good faith" requirement is imposed on candidates for local office (4.0); begin drafting Qualifications Clause arguments for reply memorandum (4.1); attend status hearing (0.7); confer with J. Robinson re: [REDACTED] (0.5); legal research re: [REDACTED] (2.0)
Bryn R. Pallesen	6/24/2026	8.30	500.00	\$4,150.00	Draft and revise opposition to motion to intervene (4.0); draft sections of reply brief (2.0); review cases cited in Division's brief (1.8); review agency record (0.5)
Douglas Plume	6/24/2026	1.50	500.00	\$750.00	Cite-check and finalize reply brief of Appellant in appeal of administrative agency decision to Superior Court
Jeffrey W. Robinson	6/24/2026	10.00	700.00	\$7,000.00	Prepare for oral argument
Zoe A. Eisberg	6/24/2026	4.80	500.00	\$2,400.00	Continued revisions to reply brief (3.0); confer with J. Robinson and B. Pallesen re: [REDACTED] (0.4); begin preparation for oral argument, to

					include creating [REDACTED] [REDACTED] (1.4)
Zoe A. Eisberg	6/24/2026	6.60	500.00	\$3,300.00	Continue drafting reply brief (3.0); legal research re: common-law duty of Division to administer elections in a non-confusing way (3.0); confer with J. Robinson and B. Pallesen re: [REDACTED] [REDACTED] (0.6)
Bryn R. Pallesen	6/25/2026	3.10	500.00	\$1,550.00	Prepare for and attend oral argument on administrative appeal (1.9); call with Division regarding record on appeal (0.2); revise citations in and coordinate filing of amended opening brief (1.0)
Bryn R. Pallesen	6/25/2026	0.40	500.00	\$200.00	Call with R. Witty re motion for expedited review and excerpt of record (0.2); review excerpt of record (0.2)
Douglas Plume	6/25/2026	0.40	500.00	\$200.00	Revise and finalize amended brief of Appellant
Jeffrey W. Robinson	6/25/2026	0.10	700.00	\$70.00	Call with client.
Jeffrey W. Robinson	6/25/2026	7.00	700.00	\$4,900.00	Prepare for oral argument (3); argue case (1); strategize appeal (3).
Zoe A. Eisberg	6/25/2026	2.70	500.00	\$1,350.00	Continued preparation for oral argument (1.3); attend oral argument (1.4)
Zoe A. Eisberg	6/25/2026	1.50	500.00	\$750.00	Create condensed timeline of agency record (1.2); continued preparations for oral argument (0.3)
Zoe A. Eisberg	6/30/2026	3.60	500.00	\$1,800.00	Research entitlement to fees as prevailing constitutional litigant; draft memo re: [REDACTED]
TOTAL		185.4		\$100,680.00	