

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

FELICITY M. TODD VEASEY and)	
SECOND AMENDMENT FOUNDATION,)	
INC.,)	
)	
Plaintiffs,)	
v.)	Case No. 5-14-CV-369-BO
)	
BRINDELL B. WILKINS, JR., in his official)	
Capacity as Sheriff of Granville County,)	
North Carolina,)	
)	
Defendant.)	

STATEMENT OF TIME AND EXPENSE

- 4/16/14 **(0.1)** E-mail from SAF re: initial inquiry.

- 5/1/14 **(0.2)** Initial review of relevant NC statutes.

- 5/1/14 **(0.5)** Telephone conference with Dario Ciccarone re: he and his wife being possible Plaintiffs to case (0.3); Draft e-mail to Dario Ciccarone re: information about case and documents needed from wife and him (0.2).

- 5/17/14 **(0.1)** Review e-mail from Miko at SAF re: Felicity Taylor as possible Plaintiff.

- 5/23/14 **(0.4)** Telephone conference with client Veasey.

- 6/4/14 **(0.3)** Telephone conference with client Veasey re: information about case, necessary documents.

- 6/5/14 **(0.2)** Telephone conference with local counsel re: details of case, division of tasks, strategy.

- 6/6/14 **(0.2)** Follow-up e-mail to client Veasey re: necessary documents for case.

- 6/9/14 **(0.1)** Review client documents.

- 6/18-19/14 **(1.7)** Review statute at issues for other requirements (1.5); Research as to identity and locations of proper Defendants (0.2).

6/19/14 **(2.3)** Draft Complaint.

6/20/14 **(0.3)** E-mails with co-counsel re: non-feasibility of including state constitutional claim into lawsuit.

6/24/14 **(0.2)** E-mails with client Veasey re: edits, comments to Complaint.

6/25/14 **(1.3)** Draft Civil Cover Sheet (0.3); E-mails with client re: comments to Complaint (0.2); Telephone conference with Clerk of Court re: filing of Complaint (0.1); Draft Summons (0.2); Draft SAF's Corporate Disclosure Statement (0.2); E-mails with co-counsel re: final procedural details in preparation for filing Complaint (0.2); E-mails with co-counsel re: Judge draw (0.1).

6/26/14 **(0.1)** Review e-mail from co-counsel re: Order selecting case for mediation.

6/27/14 **(0.3)** Draft Appearance (0.2); Complete ECF registration (0.1).

6/30/14 **(0.2)** Review e-mail from client Veasey re: Defendant's website not allowing her to purchase firearm for home possession due to alienage (0.1); E-mails with SAF re: adding this as issue (0.1).

7/1/14 **(0.3)** E-mails with co-counsel re: adding "local" home possession ban as claim and amending Complaint (0.1); Telephone conference with co-counsel re: strategy as to issue (0.2).

7/5/14 **(0.1)** Review e-mail from co-counsel re: communication with Defendant's attorney, request to set up conference to discuss case.

7/8/14 **(0.1)** E-mails with co-counsel re: conference with Defendant's attorney, strategy as to "local" home possession ban issue.

7/10/14 **(1.1)** Telephone conference with co-counsel re: preparation for conference with Defendant's attorney, discussion of State AG notification issue (0.2); Telephone conference with Defendant's attorney re: "local" home possession ban and Defendant's agreement to remove offending language from website with statement it is not actual law or policy and was erroneously included, Defendant's agreement to accept service of process, litigation plan for remainder of case and possible settlement (0.7); E-mail to Defendant's attorney re: injunction language from other States, possible settlement, agreement to Defendant's request for extension to respond to Complaint (0.2).

7/14/14 **(0.3)** Review e-mail and *Lefemine* decision re: 1988 attorney fees from co-counsel (0.2); Review e-mail from Defendant's attorney (0.1).

7/22/14 **(0.3)** Review Acceptance of Service of Defendant; Review Defendant's Appearance (0.1); E-mails to Defendant's attorney re: website issue (0.2).

7/31/14 **(0.1)** Review letter by co-counsel to Attorney General re: required notice of challenge to statute's constitutionality.

8/6/14 **(0.2)** Telephone conference with Defendant's attorney re: possibility of settlement.

8/8/14 **(0.2)** Review Defendant's Motion for Extension of Time (Answer to Complaint) (0.1); Review Order of Court granting Motion for Extension of Time (Answer to Complaint) (0.1).

8/15/14 **(0.2)** Review e-mail from Defendant's attorney re: settlement, fee issue (0.1); Draft e-mail to co-counsel re: response to Defendant's e-mail (0.1).

8/18/14 **(0.3)** Review e-mail from co-counsel re: fee issue (0.1); Telephone conference with co-counsel re: litigation strategy (0.2).

8/19-20/14 **(0.2)** E-mails with Defendant's attorney re: their request for extension of time.

8/25/14 **(0.2)** Review Defendant's Second Motion for Extension of Time (Answer to Complaint) (0.1); Review Order of Court granting Second Motion for Extension of Time (Answer to Complaint) (0.1).

8/27/14 **(0.3)** E-mail and telephone conference with co-counsel re: litigation strategy, attorney's fees.

8/27-28/14 **(0.8)** Legal research to respond to Defendant's argument re: attorney fees.

9/9/14 **(1.4)** Draft correspondence to Defendant's counsel re: possible settlement, fee demand (1.0); E-mails with co-counsel re: edits and comments to response letter (0.4).

9/23/14 **(0.3)** Review correspondence from Defendant's attorney re: settlement, fee issue (0.1); Emails with co-counsel re: Defendant's attorney's correspondence (0.2).

9/24/14 **(0.8)** Review Defendant's Motion to Dismiss and Memorandum in Support (0.6); Telephone conference with client Veasey re: status (0.2).

9/25/14 **(0.3)** Review Affidavit and Proof of Service of Rule 5.1 (constitutionality challenge) Notice on Attorney General (0.1); Review correspondence from co-counsel to Defendant's attorney (0.1); Review correspondence from Defendant's attorney (0.1).

9/26/14 **(0.2)** Telephone conference with co-counsel re: litigation strategy.

10/8/14 **(0.1)** Telephone conference with co-counsel re: litigation strategy re: injunction, summary judgment.

10/9/14 **(0.3)** Draft Motion for Preliminary Injunction.

10/13/14 **(0.8)** Telephone conference with co-counsel re: Motion for Preliminary Injunction (0.2); Draft Declaration of Felicity Veasey (0.5); E-mail to client SAF re: Declaration for Motion for Preliminary Injunction (0.1).

10/14/14 **(0.2)** Draft Declaration of Julianne Versnel.

10/14-16/14 **(1.5)** Legal research for Memorandum for Preliminary Injunction.

10/16/14 **(7.0)** Draft Memorandum in Support of Motion for Preliminary injunction (6.7); E-mails with co-counsel re: edits and comments for Memorandum (0.3).

10/17/14 **(0.2)** Telephone conference with co-counsel re: Memorandum, litigation strategy.

10/20/14 **(0.1)** Review Motion for Extension of Time (Response to Motion to Dismiss) drafted by co-counsel.

10/21/14 **(0.1)** Review Order of Court granting Motion for Extension of Time (Response to Motion to Dismiss).

10/22/14 **(0.1)** E-mails with co-counsel re: client Veasey's Declaration for P.I. Motion.

10/24/14 **(0.1)** Draft e-mail to client Veasey re: Declaration for Preliminary Injunction Motion.

10/27/14 **(0.4)** E-mails with co-counsel re: Veasey Declaration (0.2); Telephone conference with co-counsel re: litigation strategy (0.2).

10/28/14 **(0.3)** Review e-mail from client Veasey re: Declaration for Preliminary Injunction Motion (0.1); E-mails with co-counsel re: Motion for Preliminary Injunction, litigation strategy (0.2).

10/29/14 **(0.4)** Telephone conference with co-counsel re: Response to Motion to Dismiss.

10/30/14 **(0.3)** E-mails with Defendant's counsel re: Amended Motion for Preliminary Injunction, briefing schedule (0.2); E-mail with co-counsel re: Response to Motion to Dismiss (0.1).

10/31/14 **(0.4)** Review North Carolina firearms law reference published by Attorney General for Response to Motion to Dismiss (0.2); E-mail to co-counsel re: Response to Motion to Dismiss (0.2).

11/3/14 **(0.5)** Review, analyze and edit Response to Motion to Dismiss.

11/5/14 **(0.4)** Draft Amended Motion for Preliminary Injunction (0.2); Telephone conference with co-counsel re: Response to Motion to Dismiss, litigation strategy (0.2).

11/6/14 **(0.1)** Review Order of court granting Motion for Extension of Time.

11/7/14 **(0.2)** Draft e-mail to co-counsel re: Response to Motion to Dismiss.

11/10/14 **(1.1)** Review Notice of Challenge to Constitutionality of State Statute (0.1); Additional legal research for Response to Motion to Dismiss (0.4); Review and edit latest draft of Response to Motion to Dismiss and e-mails with co-counsel re: same (0.6).

11/14/14 **(0.7)** Review required Affidavit of Notice of Challenge to Constitutionality of State Statute (0.1); Review Defendant's Response to Motion for Preliminary Injunction (0.1); Review and analyze Defendant's Reply in support of Motion to Dismiss (0.3); E-mails with co-counsel re: planned Reply brief for Preliminary Injunction, strategy re: oral arguments (0.2).

12/1/14 **(6.8)** Draft Reply in support of Motion for Preliminary Injunction.

12/2/14 **(0.2)** E-mails with co-counsel re: P.I. Reply brief.

12/3/14 **(0.8)** Draft Motion for Leave to File (0.6); Draft proposed Order on Motion for Leave to File (0.2).

12/5/14 **(0.1)** E-mails with co-counsel re: Motion for Leave to File (P.I. Reply brief).

12/11/14 **(0.1)** Review Defendant's Response to Motion for Leave to File Reply Brief.

12/16-17/14 **(0.1)** E-mails with co-counsel re: pending Motion for Leave to File, litigation strategy.

1/5/15 **(0.2)** Review Order of Court setting hearing date for Motion for Preliminary Injunction (0.1); E-mails with co-counsel re: scope of oral argument (0.1).

1/7/15 **(0.2)** Review Order of Court changing hearing date for Motion for Preliminary Injunction (0.1); Telephone conference with co-counsel re: hearing date change (0.1).

1/19/15 **(0.7)** Telephone conference with co-counsel re: litigation strategy for oral argument.

1/21/15 **(1.9)** Additional review of file materials to prepare for hearing (0.6); conferences with co-counsel and client to prepare for hearing (1.3).

1/22/15 **(1.7 + 7.4 Tr)** Review e-mail from client Veasey re: local crime statistics (0.2); Appear in Court for Motion for Preliminary Injunction (1.0 + 7.4 Tr); Conference with co-counsel re: court appearance, upcoming litigation strategy (0.5).

1/23/15 **(0.3)** Review Order of Court (0.1); Telephone conference with co-counsel re: litigation strategy (0.2).

1/29/14 **(0.7)** Draft Amended Complaint (0.5); Review e-mail and attachment from co-counsel re: revisions to draft of Amended Complaint (0.2).

2/10/15 **(0.1)** E-mail to co-counsel re: Amended Complaint.

2/11/15 **(1.1)** Research of North Carolina statutes in order to revise amended Complaint (0.5); E-mails with co-counsel re: Amended Complaint (0.1); Edit and file Amended Complaint (0.5).

2/11/15 **(0.2)** Draft e-mail status to clients.

2/17/15 **(0.2)** E-mails with Defendant's (Wilkins) attorney re: responsive pleadings to Amended Complaint.

2/18/15 **(0.1)** Review Defendant's (Wilkins) Motion to Dismiss.

3/6/15 **(0.1)** Review proposed Response to Defendant Wilkins' renewed Motion to Dismiss.

3/10/15 **(0.1)** Review State Defendants' Motion for Extension of Time.

3/13/15 **(0.1)** Review e-mail about companion *Messmer* case.

3/24/15 **(0.1)** Review Order of Court.

3/25/15 **(0.1)** Review Order of Court setting hearing on renewed Motion for Preliminary Injunction.

3/25-26/15 **(0.2)** E-mails with co-counsel re: upcoming P.I. hearing.

4/2/15 **(0.5)** Review and analyze State Defendants' Motion to Dismiss (0.3); E-mails with co-counsel re: upcoming hearing, State Defendants' Motion to Dismiss (0.2).

4/16/15 **(1.7 + 7.0 Tr)** Appear in Court for Motion for Preliminary Injunction (1.0 + 7.0 Tr); Conference with co-counsel and client re: hearing, litigation strategy (0.7).

4/24/15 **(0.2)** Review Order granting Preliminary Injunction.

4/24/15 **(0.1)** Status e-mail to SAF clients.

4/29/15 **(0.1)** Review Order of Court.

5/4/15 (0.4) Review letter from Defendants re: "scope of P.I. Order" (0.1); E-mail and telephone conference with co-counsel re: Defendants' letter (0.3).

5/6/15 (0.1) Review e-mail re: scope of P.I. Order.

5/8/15 (0.3) E-mails and telephone conference with opposing counsel and co-counsel re: Motion to Amend Preliminary Injunction Order.

5/19/15 (0.3) Review Response to State Defendants' Motion to Dismiss.

5/27/15 (0.1) Review Order of Court re: posting of bond.

5/28/15 (0.4) Begin to draft Motion for Permanent Injunction.

6/10/15 (0.2) Review e-mail and telephone conference with co-counsel re: litigation strategy, Motion for Permanent Injunction.

7/31/15 (0.4) Review Order on Motion to Dismiss (0.1); Review Discovery Plan (0.1); E-mails with co-counsel re: Response to Motion to Dismiss (0.2).

8/4/15 (0.6) Telephone conference with co-counsel re: litigation strategy (0.2); E-mails with co-counsel re: Response to Motion to Dismiss (0.2); Review proposed law affecting challenged statute (0.2).

8/7/15 (0.3) Review Motion to Dismiss (Subject Matter Jurisdiction) with exhibit (0.2); E-mail to client re: status of litigation (0.1).

8/10/15 (0.1) E-mails with co-counsel re: Response to Motion to Dismiss.

8/11/15 (0.1) E-mails with co-counsel re: Response to Motion to Dismiss.

8/14/15 (0.4) Telephone conference with co-counsel re: litigation strategy.

8/18/15 (0.2) Review Motion to Stay Discovery Plan (0.1); E-mails with co-counsel re: Response to Motion to Dismiss (0.1).

8/20/15 (0.1) Review Order of Court.

TOTAL HOURS BILLED AT \$500.00/hour: 54.1 \$27,050.00

TOTAL TRAVEL HOURS BILLED AT \$250.00/hour: 14.4 \$ 3,600.00

COSTS: \$ 1,729.46

Southwest Airlines (4/15-16/15)	\$248.99
Hotel (Country Inn & Suites – Raleigh) (4/15/15)	\$115.97
Tobacco Road Cafe – (Conference w/ co-counsel)	\$ 52.21
Parking for Midway Airport (4/15-16/15)	\$ 30.00
American Airlines –	\$537.70
(1/15/15 - \$241.60 + \$25)	
(1/22/14 - \$246.10 + \$25)	
Hotel	\$346.53
Hyatt Place Raleigh-Durham - \$109.75	
Holiday Inn Downtown Raleigh - \$236.78	
Food	\$ 32.61
Budget Rent A Car	\$116.49
Brasa – (Conference w/ client and co-counsel 1/21/15)	\$119.96
American Coach (Transportation to/from Airport)	\$129.00

TOTAL FEES AND EXPENSES: \$32,379.46