

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Case No. 5:14-cv-00369-BO

FELICITY M. TODD VEASEY and )  
SECOND AMENDMENT )  
FOUNDATION, INC., )  
) )  
Plaintiffs, )  
) )  
v. )  
) )  
BRINDELL B. WILKINS, JR., in his )  
official Capacity as Sheriff of Granville )  
County, North Carolina, PAT McCRORY, )  
in his Official Capacity as Governor of )  
North Carolina, ROY COOPER, in his )  
Official Capacity as Attorney General of )  
North Carolina, and FRANK L. PERRY, in )  
his Official Capacity as Secretary of the )  
North Carolina Department of Public )  
Safety, )

**DECLARATION OF CHRISTOPHER J.  
BLAKE IN SUPPORT OF PLAINTIFFS’  
MOTION FOR ATTORNEY’S FEES**

I, Christopher J. Blake, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18 and am competent to make this Declaration. I have personal knowledge of the statements contained in this Declaration.

2. I am a partner with the law firm of Nelson Mullins Riley and Scarborough, LLP in its Raleigh, North Carolina office. I received my undergraduate degree from Pace University in 1983, and I graduated from the Catholic University of America law school in 1986. After completing law school, I was employed as a litigation attorney at Jones Day in Washington, DC, and Moore & Van Allen in Raleigh, North Carolina. I am licensed to practice law in the District of Columbia and in North Carolina, and I have practiced in Raleigh since 1988. I have been admitted to practice before the Unites States District Court

for the Eastern District of North Carolina since that time. My practice focuses on civil litigation, primarily commercial and business litigation. I have litigated numerous cases in the Eastern District of North Carolina.

3. Based upon my experience and knowledge, I am familiar with the effort required for litigating a civil case in the Eastern District of North Carolina, specifically the amount of time that can be required to litigate such a matter. I also have knowledge of the prevailing billing rates for law firms in the Raleigh area whose attorneys represent clients in civil matters in the Eastern District of North Carolina.

4. I have reviewed the Declaration of Camden R. Webb and the Declaration of David G. Sigale setting forth the hourly billing rates for the lawyers representing the Plaintiffs in this matter and the time spent by members of their law firms.

5. In my opinion, the hourly rates charged by the attorneys who rendered legal services for the Plaintiffs were, at the time rendered and today, within the range of prevailing market billing rates that have been charged and that are being charged by lawyers with the skill and experience of Plaintiffs' counsel in the Eastern District of North Carolina. It is also my opinion that the time spent on the case is reasonable and reflects good billing judgment.

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury that the foregoing is true and correct

Executed on this the 27<sup>th</sup> day of August, 2015.

  
Christopher J. Blake

**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

James C. Wrenn, Jr. – jcw@hopperhickswrenn.com

Andrew H. Erteschik – aerteschik@poynerspruill.com

David G. Sigale – dsigale@sigalelaw.com

Hal F. Askins – haskins@ncdoj.gov

J. Joy Strickland – jstrickland@ncdoj.gov

WILLIAMS MULLEN

BY: /s/ Camden R. Webb  
Camden R. Webb  
N.C. State Bar No. 22374  
crwebb@williamsmullen.com  
P. O. Box 1000  
Raleigh, North Carolina 27602  
Telephone: (919) 981-4000  
Facsimile: (919) 981-4300  
*Local Civil Rule 83.1 Counsel for Plaintiffs*

LAW FIRM OF DAVID G. SIGALE, P.C.

BY: /s/ David G. Sigale  
IL Bar No. 6238103  
dsigale@sigalelaw.com  
799 Roosevelt Road, Suite 207  
Glen Ellyn, IL 60137  
Telephone: (630) 452-4547  
Facsimile: (630) 596-4445  
*Counsel for Plaintiffs*  
*Admitted Pro Hac Vice*