

EXHIBIT B

FELICITY TODD VEASEY, ET AL. V. BRINDELL B. WILKINS, JR., ET AL.
EDNC CIVIL ACTION NO.: 5:14-cv-00369-BO

ITEMIZED SERVICES BILL

DATE	ATTY	DESCRIPTION	HOURS
06/20/14	CRW	Reviewed complaint, and email to/telephone call from D. Sigale regarding review of Complaint.	0.50
06/25/14	CRW	Review of all pleadings and attention to filing of same.	0.30
06/25/14	LMK	Analysis of initial case documents; prepare notice of appearance on behalf of C. Webb and financial disclosure statement on behalf of F. Veasey; open federal case and file initial case pleadings.	1.50
06/27/14	CRW	Follow up on filing of complaint and service of process issues.	0.20
06/30/14	LMK	Communicate with clerk regarding issuance of summons.	0.50
06/30/14	LMK	Correspondence to D. Sigale regarding summons and list of mediators.	0.20
07/01/14	CRW	Examined Granville County's stated policy of citizen-only pistol permit issuance in light of N.C.G.S. Section 14-404 and emailed D. Sigale regarding same;	0.30
07/01/14	CRW	Telephone call to County Attorney regarding service of process.	0.10
07/01/14	LMK	Analysis of service of process on defendant.	0.80
07/05/14	CRW	Received correspondence from J. Wrenn and followed up with D. Sigale.	0.20
07/08/14	CRW	Correspondence with D. Sigale and with J. Wrenn.	0.10
07/10/14	CRW	Preparation for and conduct telephone conference with J. Wrenn and analyzed issues raised in telephone conference.	1.00
07/14/14	CRW	Review correspondence from J. Wrenn and follow up with D. Sigale regarding same.	0.20
07/22/14	LMK	Docket management regarding upcoming deadlines.	0.10
07/30/14	CRW	Analyzed issues regarding Rule 5.1 notice.	0.40
07/30/14	LMK	Review federal rules; prepare letter to Attorney General enclosing summons and complaint.	1.00
07/31/14	LMK	Docket management regarding upcoming deadlines.	0.20
07/31/14	CRW	Additional work on Rule 5.1 service	0.10
08/06/14	CRW	Telephone conference with J. Wrenn and analyzed issues raised in telephone conference.	1.10
08/18/14	CRW	Reviewed emails from J. Wrenn and D. Sigale and followed up regarding the same.	0.30
08/22/14	CRW	Correspondence with opposing counsel regarding consent motion.	0.20
08/26/14	LMK	Docket management regarding upcoming deadlines.	0.10

DATE	ATTY	DESCRIPTION	HOURS
08/27/14	CRW	Telephone call/voicemail from J. Wrenn and telephone call to D. Sigale regarding potential resolution of case.	0.30
09/09/14	CRW	Reviewed draft of letter to J. Wrenn, reviewed underlying case law, and emailed D. Sigale regarding suggested changes.	0.40
09/09/14	LMK	Analysis of case law.	0.20
09/23/14	CRW	Reviewed letter from opposing counsel regarding fee and notice provisions, brief research on points raised in the letter, and follow up with D. Veasey regarding same.	0.60
09/24/14	CRW	Correspondence with D. Sigale regarding Motion to Dismiss.	0.10
09/24/14	CRW	Reviewed brief in support of motion to dismiss and followed up with co-counsel regarding same.	0.60
09/25/14	CRW	Revised affidavit of service and dictated letter to opposing counsel.	0.30
09/25/14	LMK	Docket management regarding upcoming response deadlines.	0.10
09/25/14	LMK	Prepare proof of service regarding notice to Attorney General and filed same.	1.30
09/26/14	CRW	Analyzed issues raised in Defendant's motion to dismiss and telephone conference with D. Sigale regarding same.	0.80
09/30/14	CRW	Correspondence/voicemail exchange with opposing counsel and worked on issues regarding 5.1 notice.	0.30
10/02/14	CRW	Analyzed Sheriff's defenses raised in Motion to Dismiss.	1.00
10/08/14	CRW	Worked on potential summary judgment approach/strategy and telephone call to D. Sigale.	0.20
10/11/14	CRW	Reviewed draft of Motion for Preliminary Injunction and noted issues for discussion with D. Sigale.	0.30
10/13/14	CRW	Correspondence to D. Sigale regarding case L120 strategy and follow up regarding same.	0.20
10/16/14	CRW	Reviewed brief in support of Motion for Preliminary Injunction, made suggested revisions, and sent correspondence to D. Sigale.	1.10
10/17/14	CRW	Telephone conference with D. Sigale to discuss motions.	0.20
10/20/14	CRW	Correspondence with opposing counsel and secured extension of time for response to Motion to Dismiss.	0.20
10/20/14	LMK	Prepare motion for extension of time to respond to Motion to Dismiss.	0.50
10/20/14	LMK	File and docket motion for extension of time to respond to Motion to Dismiss.	0.10
10/22/14	CRW	Correspondence with D. Sigale and follow up call to F. Veasey.	0.20
10/22/14	CRW	Analyzed Rule 5.1 issue and followed up regarding contact with AG's office	0.20
10/22/14	ECS	Complete analysis of Rule 5.1 requirements; communicate with C. Webb regarding the same.	1.10
10/23/14	CRW	Legal research and analysis regarding liability of municipality for enforcement of a state statute.	1.70
10/23/14	ECS	Draft Notice of Constitutional Challenge of a statute.	0.50
10/24/14	CRW	Continued research and analysis on theories in response to Motion to Dismiss.	0.60

DATE	ATTY	DESCRIPTION	HOURS
10/24/14	ECS	Revise Notice of Constitutional Challenge; communicate with C. Webb regarding the same.	0.40
10/27/14	CRW	Correspondence with/telephone conference with D. Sigale regarding Veasey Declaration and follow up with client.	0.50
10/27/14	ECS	Analyze authority relating to the status of the Sheriff as a local or state actor under application Section 1983 and 11th Amendment law; develop strategy for responding to the Sheriff's Motion to Dismiss; confer with C. Webb regarding the same.	3.70
10/28/14	CRW	Telephone conference with F. Veasey regarding declaration.	0.30
10/28/14	CRW	Worked on outline of argument for brief in opposition to Motion to Dismiss; discussed same with E. Stone.	0.90
10/28/14	CRW	Revised Veasey Declaration and follow up with D. Sigale.	0.30
10/28/14	CRW	Meeting with F. Veasey to discuss status of case and declaration; travel to/from meeting.	2.00
10/28/14	ECS	Review and analysis of legal authority relating to Section 1983 claims against a County agent; confer with C. Webb regarding the same.	1.80
10/29/14	CRW	Researched the Bockes line of cases as related to the Sheriff's position and worked on counter-arguments regarding same.	1.70
10/29/14	CRW	Telephone conference with D. Sigale to discuss preparation of briefs and follow up regarding same.	0.60
10/29/14	CRW	Reviewed all aspects of NC concealed handgun permit statutes and analyzed argument regarding "shall issue" regime.	1.70
10/29/14	ECS	Strategy conference with C. Webb regarding response to Motion to Dismiss; continued analysis of Vives opinion for use in response to Motion to Dismiss.	1.10
10/30/14	CRW	Drafted portions of brief regarding Monell, statutory interpretation, and other matters; drafted statement of the case and statement of facts; email with D. Sigale.	5.20
10/30/14	ECS	Continued analysis of authority relating to Official Policy requirement; draft language relating to the same for Response in Opposition to Motion to Dismiss; communicate with C. Webb regarding the same.	1.60
10/31/14	CRW	Continued legal research and writing for brief in opposition to Motion to Dismiss, and reviewed correspondence from D. Sigale regarding same.	2.60
10/31/14	LMK	Research regarding concealed carry permit application.	0.30
11/1/14	CRW	Worked on issues raised by D. Sigale regarding arguments on Motion to Dismiss; communicate with E. Stone regarding same.	0.40
11/1/14	ECS	Review and analyze potential benefits and drawbacks to statutory argument; communicate with C. Webb regarding the same.	0.30
11/2/14	CRW	Composed email to D. Sigale and other follow up communications regarding arguments on Motion to Dismiss.	0.90
11/3/14	CRW	Communications with A. Erteschik regarding motion for extension of time and reviewed and finalized same.	0.30
11/3/14	LMK	Prepare motion for extension of time to respond to Motion to Dismiss.	0.30

DATE	ATTY	DESCRIPTION	HOURS
11/5/14	CRW	Telephone conference with D. Sigale regarding response brief and follow up regarding issues for brief.	0.40
11/6/14	LMK	Docket management regarding upcoming deadlines.	0.10
11/7/14	CRW	Reviewed email from D. Sigale and worked on points for response brief to Motion to Dismiss.	1.10
11/8/14	CRW	Drafted portions of response brief to Motion to Dismiss.	0.50
11/9/14	CRW	Drafted additional portions of brief in opposition to Motion to Dismiss.	0.60
11/10/14	CRW	Continued revisions to brief, discussed same with D. Sigale, completed briefing and exhibits, and filed same.	3.40
11/10/14	ECS	Review and analyze authority relating to constitutional protections afforded resident legal aliens; communicate with C. Webb regarding the same.	0.60
11/10/14	LMK	Revise and gather exhibits to notice and file.	0.60
11/11/14	CRW	Correspondence to client regarding response brief.	0.20
11/13/14	LMK	Review federal rules and prepare affidavit of service on behalf of C. Webb.	0.70
11/14/14	CRW	Reviewed the Sheriff's reply brief and follow up regarding same.	0.40
11/14/14	LMK	Revise and file affidavit of service regarding notice to AG.	0.50
11/16/14	CRW	Correspondence with D. Sigale regarding Motion for Preliminary Injunction.	0.10
12/01/14	CRW	Correspondence with D. Sigale regarding Motion for Preliminary Injunction.	0.10
12/02/14	CRW	Reviewed Reply Brief and provided comments on same.	0.50
12/10/14	CRW	Correspondence with D. Sigale and follow up with court.	0.20
12/17/14	CRW	Correspondence with D. Sigale and with client.	0.20
01/05/15	CRW	Received notice of hearing and discussed hearing prep with D. Sigale.	0.40
01/06/15	CRW	Telephone conference with F. Veasey and follow up with D. Sigale.	0.30
01/07/15	LMK	Docket management regarding upcoming hearing.	0.70
01/19/15	CRW	Worked on preparation for motions hearing.	0.20
01/21/15	CRW	Prepared for hearing on Motion for Preliminary Injunction.	1.50
01/22/15	CRW	Final prep for hearing, meeting with clients, attended/argued hearing, and follow up regarding same.	2.50
01/23/15	CRW	Reviewed court's order regarding amendment and follow up regarding same.	0.40
01/23/15	LMK	Review and docket court order.	0.10
01/26/15	CRW	Analyzed issue of proper state actor to add in amendment to complaint.	0.50
01/26/15	ECS	Confer with C. Webb regarding Order to name a State representative as a defendant.	0.20

DATE	ATTY	DESCRIPTION	HOURS
01/27/15	ECS	Review Order regarding joinder of State; analyze legal authority and other materials relating to the same.	0.80
01/29/15	CRW	Telephone conference with F. Veasey regarding amendment.	0.20
01/29/15	CRW	Researched potential state officials as proper parties for amendment, drafted proposed allegations, and emailed D. Sigale regarding same.	1.10
02/11/15	CRW	Reviewed proposed amendment and follow up with D. Sigale regarding same.	0.30
02/12/15	CRW	Telephone call from F. Veasey and worked on summons/service of process issue.	0.30
02/12/15	LMK	Prepare summons on additional defendants.	0.70
02/16/15	LMK	Prepare and file summonses.	0.80
02/18/15	CRW	Follow up on service of process on state agents.	0.20
02/18/15	LMK	Prepare and serve summons and complaint on defendants.	0.40
02/19/15	CRW	Reviewed case authority regarding award of fees.	0.20
02/20/15	LMK	Review and docket motion to dismiss.	0.10
02/27/15	CRW	Reviewed information regarding service of process and follow up with co-counsel and client regarding same.	0.20
02/27/15	LMK	Review and docket response deadlines to amended complaint.	0.10
03/02/15	CRW	Worked on Affidavit of Service, renewed Motion for Preliminary Injunction and Response to renewed Motion to Dismiss.	0.80
03/02/15	LMK	Prepare affidavit of service; prepare Motion for Preliminary Injunction.	1.20
03/03/15	LMK	Prepare response in opposition to Motion to Dismiss.	0.40
03/06/15	CRW	Telephone call from and telephone call to paralegal with NC DOJ regarding extension of time; follow up with D. Sigale regarding same.	0.30
03/09/15	CRW	Communications with client and with counsel for State defendants.	0.20
03/10/15	CRW	Correspondence with S. Gerger regarding State defendants' response to Complaint and follow up with client regarding same.	0.30
03/11/15	CRW	Telephone call to H. Askins regarding response to Motion for Preliminary Injunction	0.10
03/13/15	CRW	Telephone conference with H. Askins regarding Motion for Preliminary Injunction and follow up with client regarding same.	0.30
03/13/15	CRW	Correspondence to D. Sigale regarding Motion for Preliminary Injunction.	0.20
03/13/15	CRW	Reviewed response to Motion to Dismiss and prepared same for filing.	0.20
03/13/15	LMK	Review and file response to Motion to Dismiss; prepare and file amended certificate of service.	0.70
03/24/15	CRW	Correspondence with H. Askins and follow up regarding briefing on Motion for Preliminary Injunction.	0.20

DATE	ATTY	DESCRIPTION	HOURS
03/25/15	CRW	Received notice of hearing, communications to co-counsel and client regarding same, and worked on planning for hearing.	0.50
03/25/15	LMK	Docket court hearing.	0.10
03/26/15	CRW	Correspondence with D. Sigale regarding upcoming hearing.	0.20
03/26/15	LMK	Strategy session with C. Webb regarding upcoming hearing.	0.10
03/27/15	CRW	Correspondence with D. Sigale.	0.20
04/03/15	LMK	Review and docket regarding upcoming deadlines.	0.10
04/07/15	CRW	Worked on preparation for upcoming hearing.	0.50
04/07/15	LMK	Analysis of briefs in preparation for upcoming hearing.	0.60
04/08/15	CRW	Continued work on preparation for hearing; researched Equal Protection cases.	1.60
04/10/15	CRW	Analyzed 1983 issues for upcoming hearing.	0.40
04/13/15	CRW	Reviewed Eleventh Amendment case law.	0.90
04/13/15	JRP	Research and analyze cases regarding constitutional scrutiny of classifications based on alienage and review Second Amendment cases raising similar issues.	1.00
04/14/15	CRW	Continued preparation for hearing on Motion for Preliminary Injunction.	0.40
04/15/15	CRW	Continued preparation for hearing.	0.30
04/16/15	CRW	Completed preparation for hearing; attended hearing/argued motion.	3.00
04/16/15	CRW	Telephone conference with client as follow up from hearing.	0.20
04/17/15	CRW	Worked on legal theory for Sheriff being a "person" under 1983 based upon enforcement "person" under 1983 based upon enforcement of CHP statute.	0.80
04/20/15	CRW	Correspondence to D. Sigale regarding motion hearing follow up.	0.20
04/20/15	CRW	Telephone conference with client.	0.20
04/24/15	CRW	Reviewed proposed legislation in light of State's argument on Motion for Preliminary Injunction.	0.40
04/24/15	CRW	Read Order on Preliminary Injunction.	0.30
04/24/15	CRW	Telephone call to opposing counsel and follow up regarding same.	0.20
04/27/15	CRW	Worked on follow-up items to ruling on Motion for Preliminary Injunction.	0.60
04/27/15	CRW	Attention to extension of time.	0.20
04/28/15	CRW	Telephone call from F. Veasey regarding permit.	0.20
05/01/15	CRW	Email from and telephone call to client regarding permit application process.	0.20

DATE	ATTY	DESCRIPTION	HOURS
05/01/15	CRW	Analyzed/researched issues for response briefs.	1.00
05/04/15	CRW	Correspondence with client regarding permit.	0.20
05/04/15	CRW	Review correspondence with D. Erteschik and follow up regarding same; telephone call with D. Sigale.	0.60
05/06/15	CRW	Correspondence with opposing counsel regarding motion responses.	0.10
05/06/15	CRW	Revised/finalized motions to extend time.	0.20
05/07/15	CRW	Review correspondence from opposing counsel regarding proposed motion, and follow up regarding the same.	0.20
05/08/15	CRW	Reviewed correspondence from opposing counsel and follow up with D. Sigale.	0.40
05/11/15	CRW	Worked on structure of argument for response to State's brief.	0.30
05/11/15	LMK	Analysis of motion to amend order.	0.10
05/14/15	CRW	Reviewed amended order and follow up with client regarding same.	0.30
05/18/15	CRW	Reviewed case authority cited in State defendants' brief and worked on Second Amendment argument.	2.20
05/18/15	LMK	Prepare draft response in opposition to Motion to Dismiss.	1.70
05/19/15	CRW	Revised Second Amendment/Equal Protection argument for response brief; reviewed and incorporated Eleventh Amendment argument; finalized brief; correspondence to client.	2.30
05/19/15	JRP	Continue research on 11th Amendment issue and read relevant case law to develop argument for response to Motion to Dismiss and draft argument for brief.	1.00
05/19/15	ECS	Revise Response in Opposition to State Defendants' Motion to Dismiss.	0.70
05/19/15	LMK	Review and file response in opposition to Motion to Dismiss.	0.30
05/20/15	CRW	Telephone call from client regarding permit.	0.20
05/22/15	CRW	Worked on filings and correspondence with opposing counsel.	0.50
05/22/15	LMK	Prepare and file amended response in opposition to Motion to Dismiss.	0.70
05/27/15	CRW	Reviewed Order regarding bond and followed up regarding same.	0.20
05/27/15	LMK	Prepare letter to clerk regarding security bond.	0.30
06/09/15	CRW	Telephone call to client and follow up with opposing counsel.	0.50
06/10/15	CRW	Telephone conference with D. Sigale.	0.20
06/10/15	CRW	Worked on follow up items from call with opposing counsel, and emailed D. Sigale regarding same.	0.30
06/11/15	CRW	Analyzed potential avenues for streamlining case / reaching a decision as a matter of law.	0.60
06/19/15	CRW	Correspondence with client regarding issuance of permit.	0.20
06/25/15	CRW	Correspondence with client regarding status of motions.	0.30

DATE	ATTY	DESCRIPTION	HOURS
06/26/15	CRW	Telephone conference with D. Erteschik and follow up regarding same.	0.40
07/31/15	CRW	Read order on Motion to Dismiss, and follow up correspondence to D. Sigale and to client.	0.60
08/03/15	CRW	Correspondence with D. Sigale.	0.20
08/03/15	CRW	Review text of and status of amendment to statutes regarding citizenship.	0.70
08/04/15	CRW	Telephone conference with D. Sigale and follow up regarding same; worked on issues regarding potential final judgment.	0.80
08/07/15	CRW	Follow up analysis of effect of amendment to NCGS 14-415.12.	0.60
08/07/15	CRW	Reviewed Motion to Dismiss (mootness) filings and planned response.	0.70
08/10/15	LMK	Prepare declaration of C. Webb in support of motion for attorneys fees; analysis of firearm laws.	1.50
08/10/15	CRW	Reviewed matters to be submitted to the court for fee motion and planned out filings.	1.10
08/10/15	CRW	Telephone conference with R. Zechini regarding legislative history of change in CHP statute, and follow up research regarding same.	0.30
08/10/15	CRW	Detailed review of time entries and expenses, and revisions to same, for exhibit to fee declaration.	0.90
08/10/15	CRW	Received voicemail from and email reply to A. Erteschik regarding scheduling order.	0.10
08/11/15	LMK	Prepare motion for attorneys fees.	0.80
08/11/15	CRW	Outlined brief in support of Motion for Attorney Fees and drafted portion of legal standard section of brief.	0.60
08/11/15	CRW	Developed facts to present to the court in support of Motion for Attorneys Fees.	0.50
08/12/15	CRW	Analyzed potential responses to Motion to Dismiss (Mootness).	0.60
08/14/15	CRW	Received email from C. Blake regarding fee affidavit, worked on issues regarding affidavit, and composed/sent email to C. Blake.	0.20
08/14/15	CRW	Telephone conference with D. Sigale regarding strategy for resolution of case.	0.30
08/17/15	CRW	Worked on potential affidavit from A. Gura.	0.20
08/18/15	LMK	Strategy session with C. Webb regarding brief for attorneys fees.	0.10
08/18/15	CRW	Worked on potential affidavit from A. Gura.	0.90
08/18/15	CRW	Correspondence to client regarding status of case and upcoming motion/motion response.	0.10
08/18/15	CRW	Reviewed proposed consent motion, and correspondence with opposing counsel regarding suggested modification	0.20
08/18/15	CRW	Conducted legal research and drafted response to Motion to Dismiss.	0.70
08/20/15	LMK	Analysis of attorneys fees.	0.30
08/20/15	CRW	Revised motion, brief, and declarations for motion for attorney fees.	0.60

DATE	ATTY	DESCRIPTION	HOURS
08/20/15	CRW	Finalized Response to Motion to Dismiss.	0.10
08/21/15	LMK	Analysis of attorneys fees.	0.70
08/21/15	CRW	Reviewed correspondence from D. Sigale and follow up with L. Katz regarding same.	0.20
08/24/15	LMK	Analysis of time entries.	2.50
08/24/15	CRW	Reviewed information for inclusion in Sigale declaration.	0.70
08/24/15	CRW	Revised brief and supporting declarations for Motion for Attorney's Fees, and conducted additional research regarding lodestar factors.	1.10
08/25/15	ECS	Analyze authority relating to awardable costs under 1988; communicate with C. Webb regarding the same; draft Memorandum of Law in Support of Motion for Attorney Fees.	2.10
08/25/15	LMK	Email communication with F. Veasey; draft declaration; analysis of time entries.	2.70
		<u>TOTAL HOURS:</u>	129.40
		<u>TOTAL:</u>	<u>\$49,347.50</u>

COSTS

DESCRIPTION	AMOUNT
Filing Fee Clerk, U.S. District Court, Veasey et al. v. Wilkins, Jr.	\$400.00
Filing Fee Clerk, U.S. District Court: Security Bond	\$1.00
Westlaw	\$940.50
Pacer	\$2.50
TOTAL COSTS	\$1,344.00
TOTAL THIS STATEMENT	<u>\$50,691.50</u>