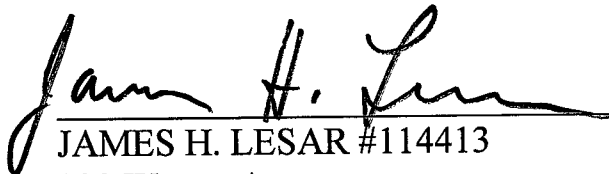


Referring to the Salazar Laffey matrix as the “Legal Services-adjusted Laffey matrix (“LSI Laffey matrix”), Judge Cooper writes that he is “persuaded by Judge Howell’s analysis of the issue in Ely [v. District of Columbia], 999 F.Supp.2d 137 (D.D.C. 2013) that the LSI-adjusted Laffay matrix, while imperfect, offers a better methodology for estimating prevailing market rates for complex federal litigation in Washington, D.C.” CREW v. DOJ, Feb. 11, 2015 Mem. Op. at 4. He further writes, “[c]onsidering that Washington, D.C. is the third most expensive legal market in the country, the Court agrees with Judge Howell that the LSI-adjusted Laffey matrix—even if it does not capture the precise types of litigation services involved in this case—likely offers a better approximation of D.C. rates for the relevant legal services than a matrix adjusted using a general inflation index.” Id.

Judge Cooper’s decision in CREW v. DOJ is relevant to Plaintiffs’ Motion for an Interim Award of Attorney’s Fees and Costs (“Mot.”) at 28, which cites other cases holding that the better standard to apply to attorney fee applications in the D.C. area is the Salazar hourly rate, not that prescribed by the U.S. Attorney’s Laffey matrix. This Court should follow the Salazar line of cases in determining what is a reasonable hourly rate for the services rendered in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James H. Lesar". The signature is fluid and cursive, with a long horizontal stroke at the end.

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Dated February 12, 2015