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Document Number	Document Description	Pages	Document Error
Document	Main document	11	DOCUMENT COULD NOT BE RETRIEVED! However, it may still be viewable individually.
Document 453 attachment	Attachment	6	DOCUMENT COULD NOT BE RETRIEVED! However, it may still be viewable individually.

1 William E. Lawler, III (admitted *pro hac vice*)
2 VINSON & ELKINS L.L.P.
3 2200 Pennsylvania Ave., NW
4 Suite 500 West
5 Washington, DC 20037
6 Telephone: (202) 639-6676
7 Facsimile: (202) 879-8876
8 wlawler@velaw.com

9 *Counsel for Non-Party Jesudoss Rowland*

10
11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **(SAN FRANCISCO DIVISION)**

15 IN RE: ROUNDUP PRODUCTS LIABILITY
16 LITIGATION

17 Case No. 3:16-md-02741-VC
18 MDL No. 2741

19 This document relates to:
20
21 ALL ACTIONS

22 **DECLARATION OF WILLIAM E.**
23 **LAWLER, III IN SUPPORT OF**
24 **NONPARTY JESUDOSS ROWLAND'S**
25 **MOTION FOR ATTORNEYS' FEES**

26 Date: Thursday, October 5, 2017
27 Time: 10:00 a.m. (Pacific Time)
28 Courtroom: Courtroom 4, 17th Floor
Judge: Honorable Vince Chhabria

1 I, William E. Lawler, III, hereby declare as follows based on my personal knowledge:

2 1. I am an active member in good standing of the bars of the District of Columbia
3 and the State of Maryland. I am admitted *pro hac vice* in this litigation pursuant to the Court's
4 Pretrial Order No. 1 (Oct. 6, 2016), ECF No. 2. I am an attorney with the law firm of Vinson &
5 Elkins LLP ("V&E"), counsel of record for non-party Jesudoss Rowland. Jon D. Jacobs, an
6 attorney with the Jacobs Law Firm PLLC of Washington, D.C., is co-counsel. Jon D. Jacobs is
7 submitting a separate declaration regarding his fees for work for Mr. Rowland.

8 2. I submit this Declaration in support of Nonparty Jesudoss Rowland's Motion for
9 Attorneys' Fees, filed on this day ("Motion for Fees"), as required by Civil Local Rule 37-4.

10 3. As required by Civil Local Rule 37-4(b)(2), from July 5 through July 7, 2017,
11 then again between July 30 and August 7, 2017, I conferred by email with Mr. Michael Miller,
12 Ms. Robin Greenwald, and Ms. Aimee Wagstaff, counsel for Plaintiffs, but was unsuccessful in
13 resolving this issue.

14 4. **V&E's Reasonable Attorneys' Fees.** V&E has extensive experienced in EPA
15 enforcement matters, government investigations, and class-action litigation. The work for Mr.
16 Rowland has been performed by attorneys in the Washington D.C. office, which is close to
17 where Mr. Rowland lives. This allowed us to meet and work with Mr. Rowland in person.

18 a) **William E. Lawler, III:** I am the co-head of V&E's White Collar practice group. I have
19 over thirty years' experience as an attorney. I served as an Assistant United States
20 Attorney in the U.S. Attorney's Office for the District of Columbia and have been in
21 private practice at V&E for over twenty years, representing corporations, organizations,
22 and individuals in a wide variety of difficult and sensitive matters. My standard rate is
23 \$945 per hour, but for this matter I charged a discounted rate of \$830 per hour.

24 b) **Jeremy Keeney:** Jeremy Keeney is a third-year associate at V&E who is admitted *pro*
25 *hac vice* in other class-action cases in N.D. California. Before joining V&E, Mr. Keeney
26 served as a law clerk for the Senior Judges of the D.C. Court of Appeals. Mr. Keeney's
27

1 standard rate is \$625 per hour, but for this matter he charged a discounted rate of \$550
 2 per hour. Other V&E clients with pending class-action cases in the Northern District of
 3 California pay equal or higher rates for his work.

4 5. Hourly rates similar to V&E's hourly rates have been approved as reasonable in
 5 other civil cases in the Northern District of California. These cases were decided several years
 6 ago and during those intervening years, market rates in San Francisco have risen. In addition,
 7 V&E's San Francisco office charges similar rates.

Firm	Partner Rates	Associate Rates
Saverti Law Firm ¹	\$960	\$465 – \$600
Prison Legal News ²	\$700 – \$875	\$325 – \$425
Class counsel ³	\$475 – \$950	\$300 – \$490
Rosen Bien & Galvan, LLP ⁴	\$560 – \$800	\$285 – \$510
V&E's San Francisco Office	\$750 – \$1,150	\$550 – \$845

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 13 6. **Staffing.** We staffed the case with an eye toward minimizing legal fees,
 14 delegating assignments to attorneys with lower billable rates when appropriate.

15 7. Mr. Rowland incurred attorney's fees and other expenses in responding to
 16 Plaintiffs' Motion to Compel and in preparing Mr. Rowland's Motion for Attorney's Fees. The
 17 fees sought in this Motion do not reflect the total amount of work actually done in relation to
 18 Plaintiff's denied Motion to Compel, but instead reflect what we believe is a reasonable claim for
 19 fees under all relevant circumstances.

20 8. In support of Mr. Rowland's fee request, we are submitting redacted invoices.
 21 V&E assisted Mr. Rowland on issues unrelated to the denied Motion to Compel. The time
 22

23
 24 ¹ *In re High-Tech Employee Antitrust Litigation*, No. 11-cv-02509, Docket Nos. 1073-3, 1112 at
 16 (N.D. Cal. May 7, 2015).

² *Prison Legal News v. Schwarzenegger*, 608 F.3d 446, 455 (9th Cir. 2010).

25 ³ *Gutierrez v. Wells Fargo Bank, N.A.*, No. C 07-05923, 2015 WL 2438274, at *5 (N.D. Cal.
 26 May 21, 2015), *appeal dismissed* (Oct. 30, 2015).

⁴ *Armstrong v. Brown*, 805 F. Supp. 2d 918, 920 (N.D. Cal. 2011).

1 entries that form the basis for the fee request are shown, but entries for other work has been
2 redacted.

3 9. A true and correct copy of V&E's redacted invoice for fees for services
4 performed in this matter is attached as Exhibit 1.⁵

5 10. **Opposition Brief and Related Documents.** In opposing Plaintiffs' Motion to
6 Compel, we drafted an opposition brief and related documents. Because our brief cited
7 information designated "Confidential" by Monsanto, it was accompanied by a motion to seal,
8 declaration in support of sealing, and proposed order.

9 11. The work performed included legal research, identifying relevant portions of the
10 factual record, drafting and revising the pleadings, communicating and coordinating amongst the
11 attorneys at V&E and the Jacobs Law Firm, and communicating with our client. Work was
12 performed by attorneys with lower billable rates where appropriate. V&E's work is described
13 below:

Name	Title	Rate	Hours	Total
William Lawler	Partner	\$830	6	\$4,980
Jeremy Keeney	Associate	\$550	14.8	\$8,140
				\$13,120

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17 12. I have reviewed the fees charged in this matter and I believe they are reasonable.
18 I note that a significant amount of work was required because Plaintiffs' counsel cited no cases
19 or court rules in support of their Motion to Compel. As a result, we had to develop and describe
20 all the relevant legal arguments without having the sort of legal reference points that would
21 normally be expected. Costs would have been lower if Plaintiffs' Counsel had cited cases and
22 court rules.

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25 ⁵ The redacted V&E and Jacobs Law Firm PLLC invoices (Exhibits 1 and 2, respectively) are
26 attached for the limited purpose of supporting Mr. Rowland's Motion for Fees. Aside from
27 presenting the text of certain time entries, Mr. Rowland does not waive any applicable rights,
28 privileges, or defenses.

1 13. **Prepare for and Attend Hearing on Motion to Compel.** I prepared for and
 2 attended by telephone a hearing on May 11, 2017 regarding the Motion to Compel. Mr. Jacobs
 3 helped me prepare for the hearing. Preparation included reviewing and analyzing Plaintiffs'
 4 Reply Brief and outlining possible legal and factual issues for the hearing. I then attended the
 5 hearing itself by telephone. My time for work related to the hearing was:

Name	Title	Rate	Hours	Total
William Lawler	Partner	\$830	8	\$6,640

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 8 14. I appreciate that the Court allowed me to attend the hearing by telephone in an
 9 effort to reduce costs. I have reviewed the fees charged in this matter and I believe that they are
 10 reasonable

11 15. **Motion for Fees and Related Documents.** Given that Plaintiffs' counsels'
 12 baseless Motion to Compel was denied, we have filed Mr. Rowland's Motion for Fees, a
 13 supporting declaration, and a proposed order to help him recoup a portion of the financial burden
 14 on him in this case.

15 16. The work performed included legal research, identifying relevant portions of the
 16 factual record, drafting and revising the pleadings, communicating and coordinating amongst the
 17 attorneys at V&E and the Jacobs Law Firm PLLC, and communicating with our client. Work
 18 was performed by attorneys with lower billable rates where appropriate.

19 17. As required by Civil Local Rule 37-4(b)(2), I had a number of email exchanges
 20 with Plaintiffs' counsel to try to resolve this fee request before bringing the motion to the Court's
 21 attention. These efforts were unsuccessful. We did, however, agree to a proposed hearing date.
 22 V&E's work related to the Motion for Fees was:

Name	Title	Rate	Hours	Total
William Lawler	Partner	\$830	3.8	\$3,154
Jeremy Keeney	Associate	\$550	5.5	\$3,025
				\$6,179

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 24
 25
 26 18. I have reviewed the fees charged in this matter and I believe they are reasonable.

Vinson & Elkins

Invoice

July 19, 2017

Rowland, Jesudoss
[REDACTED]

Client/Matter Number ROW736 64000
Invoice Number 25562126
Billing Attorney Andrew R. Stewart

Re: Rowland, Jesudoss Defense/Monsanto Multi District Litigation

Fees for services posted through July 17, 2017:

Date	Initials	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

I.R.S. NO. [REDACTED]

Please reference client/matter and invoice numbers when making payment.
PLEASE REMIT TO:
VINSON & ELKINS LLP, PO BOX 301019, DALLAS, TX 75303-1019

Tel +1.713.758.2222 Fax +1.713.758.2346 www.velaw.com

V&E Invoice

Rowland, Jesudoss July 19, 2017

Page 11

Client/Matter Number ROW736 64000
 Invoice Number 25562126
 Billing Attorney Andrew R. Stewart

Re: Rowland, Jesudoss Defense/Monsanto Multi District Litigation

Date	Initials	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/01/17	WEL	Telephone conferences, correspondence and work regarding Motion to Compel and response to same.	1.00	945.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

I.R.S. NO. [REDACTED]

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V&E Invoice

Rowland, Jesudoss July 19, 2017 Page 12

Client/Matter Number ROW736 64000
 Invoice Number 25562126
 Billing Attorney Andrew R. Stewart

Re: Rowland, Jesudoss Defense/Monsanto Multi District Litigation

Date	Initials	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/04/17	WEL	Work, telephone conferences and correspondence regarding Response to Motion to Compel and possible factual support for same.	2.50	2,362.50
05/04/17	JCKE	Draft opposition brief.	6.00	3,750.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/05/17	JCKE	Draft opposition brief.	8.80	5,500.00

I.R.S. NO. [REDACTED]

Please reference client/matter and invoice numbers when making payment.
 PLEASE REMIT TO:
 VINSON & ELKINS LLP, PO BOX 301019, DALLAS, TX 75303-1019

Tel +1.713.758.2222 Fax +1.713.758.2346 www.velaw.com

V&E Invoice

Rowland, Jesudoss July 19, 2017 Page 13

Client/Matter Number ROW736 64000
 Invoice Number 25562126
 Billing Attorney Andrew R. Stewart

Re: Rowland, Jesudoss Defense/Monsanto Multi District Litigation

Date	Initials	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/08/17	WEL	Work, telephone conferences and correspondence regarding opposition to Motion to Compel.	2.50	2,362.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

I.R.S. NO. [REDACTED]

V&E Invoice

Rowland, Jesudoss July 19, 2017 Page 14

Client/Matter Number ROW736 64000
 Invoice Number 25562126
 Billing Attorney Andrew R. Stewart

Re: Rowland, Jesudoss Defense/Monsanto Multi District Litigation

Date	Initials	Description	Hours	Amount
		[REDACTED]		
05/10/17	WEL	Prepare for motion hearing; telephone conferences and correspondence with counsel; telephone conference with client regarding same [REDACTED]	3.50	3,307.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/11/17	WEL	Prepare for and attend hearing on Motion to Compel testimony; telephone conferences and correspondence with counsel regarding same; telephone conference with client regarding same.	5.00	4,725.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

I.R.S. NO. [REDACTED]

Please reference client/matter and invoice numbers when making payment.
 PLEASE REMIT TO:
 VINSON & ELKINS LLP, PO BOX 301019, DALLAS, TX 75303-1019

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V&E Invoice

Rowland, Jesudoss July 19, 2017 Page 19

Client/Matter Number ROW736 64000
 Invoice Number 25562126
 Billing Attorney Andrew R. Stewart

Re: Rowland, Jesudoss Defense/Monsanto Multi District Litigation

Date	Initials	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/05/17	WEL	Work regarding motion for fees; correspondence with plaintiffs' counsel regarding consultation about same; conference call with Jon Jacobs regarding same; correspondence regarding press inquiries.	1.50	1,417.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/06/17	JCKE	Draft response to Plaintiffs' counsel regarding Jess Rowland's motion for fees.	0.50	312.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

I.R.S. NO. [REDACTED]

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
	Client	Attorney	Description of Services	Day Start	Time Start	Day End	Time End	Elapsed Time	Elapsed Minutes	TOTAL BILLING MINUTES	FEE (\$) (rate = \$500/hr)	Jon's Expenses	TOTAL CHARGES	Billing Duration in Minutes	Billing Duration in Hours	Rate	Amount	Category 1. Opposition Related 2. Motion for Fees 3. Hearing on Motion to Compel
1	Jess Rowland	Jon Jacobs	[REDACTED]															
2	Jess Rowland	Jon Jacobs	[REDACTED]															
3	Jess Rowland	Jon Jacobs	[REDACTED]															
4	Jess Rowland	Jon Jacobs	[REDACTED]															
5	Jess Rowland	Jon Jacobs	[REDACTED]															
6	Jess Rowland	Jon Jacobs	conference calls with AStewart and client regarding next steps responding to Plaintiff's Motion to Compel Responses dated 4/28/2017	Mon 5/1/2017	1:00:00 PM	Mon 5/1/2017	2:00:00 PM	1:00	60	60	500	0	500	60	1	500	500	1
7	Jess Rowland	Jon Jacobs	[REDACTED]															
8	Jess Rowland	Jon Jacobs	[REDACTED]															
9	Jess Rowland	Jon Jacobs	[REDACTED]															
10	Jess Rowland	Jon Jacobs	[REDACTED]															
11	Jess Rowland	Jon Jacobs	[REDACTED]															
12	Jess Rowland	Jon Jacobs	[REDACTED]															
13	Jess Rowland	Jon Jacobs	[REDACTED]															
14	Jess Rowland	Jon Jacobs	[REDACTED]															
15	Jess Rowland	Jon Jacobs	review FRCP and local rules re: motions and responses; review draft declaration and redacted transcript; call with AStewart re: comments	Tue 5/2/2017	9:00:00 PM	Tue 5/2/2017	11:00:00 PM	2:00	120	120	1000	0	1000	120	2	500	1000	1
16	Jess Rowland	Jon Jacobs	[REDACTED]															
17	Jess Rowland	Jon Jacobs	[REDACTED]															
18	Jess Rowland	Jon Jacobs	[REDACTED]															
19	Jess Rowland	Jon Jacobs	[REDACTED]															
20	Jess Rowland	Jon Jacobs	[REDACTED]															
21	Jess Rowland	Jon Jacobs	review emails regarding opposition to motion to compel, letters to former employer, case management briefing	Fri 5/5/2017	9:50:00 AM	Fri 5/5/2017	10:30:00 AM	0:40	40	42	350	0	350	42	0.7	500	350	1
22	Jess Rowland	Jon Jacobs	call with AStewart re: notification letters, revise letters, email letters to companies,	Fri 5/5/2017	10:30:00 AM	Fri 5/5/2017	12:00:00 PM	1:30	90	90	750	0	750	90	1.5	500	750	1
23	Jess Rowland	Jon Jacobs	[REDACTED]															
24	Jess Rowland	Jon Jacobs	draft history section of Opposition; email to team for comments	Sun 5/7/2017	3:00:00 PM	Sun 5/7/2017	7:30:00 PM	4:30	270	270	2250	0	2250	270	4.5	500	2250	1
25	Jess Rowland	Jon Jacobs	further revise draft Opposition; email to team for review	Sun 5/7/2017	9:20:00 PM	Sun 5/7/2017	10:40:00 PM	1:20	80	84	700	0	700	84	1.4	500	700	1
26	Jess Rowland	Jon Jacobs	review Section 7 database for [REDACTED] draft and send email to [REDACTED] re: producer verification; draft section of Opposition following review of orders and transcript.	Mon 5/8/2017	10:00:00 AM	Mon 5/8/2017	11:30:00 AM	1:30	90	90	750	0	750	90	1.5	500	750	1

	A	B	C	D	E	F	G	H	I	J	K
20	Rowland	RG	[REDACTED]								
21	Rowland	RG	Emails re: fee petition	6/2/2017	11:15	11:18	0.1	Hours	0.1	385	38.5
22	Rowland	RG	Work on draft petition for fees/sanctions — additional research; summarize arguments sections; intro/background; related emails	6/4/2017	11:30	3:38	4.1	Hours	4.1	385	1578.5
23	Rowland	RG	[REDACTED]								
24	Rowland	RG	[REDACTED]								
25			[REDACTED]								

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: ROUNDUP PRODUCTS LIABILITY
LITIGATION

Case No. 3:16-md-02741-VC
MDL No. 2741

**[PROPOSED] ORDER GRANTING
NONPARTY JESUDOSS ROWLAND'S
MOTION FOR ATTORNEYS' FEES**

This document relates to:

ALL ACTIONS

Date: Thursday, October 5, 2017
Time: 10:00 a.m. (Pacific Time)
Courtroom: Courtroom 4, 17th Floor
Judge: Honorable Vince Chhabria

1 Nonparty Jesudoss Rowland’s Motion for Attorneys’ Fees requests that this Court order
2 Plaintiffs’ counsel to reimburse Mr. Rowland for expenses he incurred, including attorney’s fees,
3 in responding to Plaintiffs’ Motion to Compel Responses from Deponent Jesudoss Rowland,
4 ECF No. 261-1 (“Motion to Compel”).

5 The Court’s Pretrial Order No. 23, ECF No. 297, denied Plaintiffs’ Motion to Compel. In
6 addition, the Court finds that Plaintiffs’ counsel have not met their burden of proving the Motion
7 to Compel was substantially justified or that the award of the fees to Mr. Rowland would be
8 unjust. The Court also finds that Vinson & Elkins LLP and Jacobs Law Firm PLLC’s attorneys
9 fees—both the hourly rate and the hours worked—are reasonable in light of Plaintiffs’ counsels’
10 conduct.

11 **THEREFORE IT IS ORDERED:**

- 12 1. Pursuant to Rule 37(a)(5)(B), Mr. Rowland’s motion is GRANTED; and
- 13 2. Attorneys Robin Greenwald, Michael Miller, and Aimee Wagstaff (signors of the Motion
14 to Compel) and their respective law firms, jointly and severally, are ORDERED TO PAY
15 Vinson & Elkins LLP in the amount of \$45,995.
- 16 3. The check must be mailed to Vinson & Elkins LLP, c/o William E. Lawler, III, 2200
17 Pennsylvania Avenue NW, Suite 500 West, Washington, DC 20037-1701.
- 18 4. The check must be received within thirty calendar days of the entry of this Order.
- 19 5. Vinson & Elkins LLP will then remit \$20,056 to Jacobs Law Firm PLLC.

20
21 **IT IS SO ORDERED.**

22
23 Dated: _____

24 HONORABLE VINCE CHHABRIA
25 UNITED STATES DISTRICT JUDGE
26
27
28