Matt Kenna, Attorney
Public Interest Environmental Law

679 E. 2nd Ave., Suite 11B
Durango, Colorado 81301
(970) 749-9149
matt@kenna.net

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CONFIDENTIAL SETTLEMENT DOCUMENT

Wyneva Johnson, USDOJ, wyneva.johnson@usdoj.gov
Joseph "Mark" Finnegan, USDOJ, Joseph.Finnigan@usdoj.gov
Michael Bogomolny, NOAA Counsel, Mbogomolny@doc.gov

RE: Litigation Costs, Including Attorney Fees, in *AquAlliance v. NOAA,* 1:17-cv-02108-CRC (D. D.C.)

Dear Counsel,

Now that the merits of this case have concluded in this matter, I am sending this letter in regards to settlement of our claim for litigations costs, including reasonable attorney fees.

As the attached time and expense sheets show, AquAlliance has incurred a total of $20,871.40 in reimbursable litigation costs, including reasonable attorney fees. All attorney hours claimed were recorded contemporaneously and spent on bona fide litigation tasks, and we have exercised billing judgment and have not included in the claim time spent on potentially duplicative work, work that could have been performed by secretaries, etc. The rates are USDOJ Laffey matrix rates, and resumes for co-counsel Rachel Doughty and myself are attached (Carla Barraez is a legal assistant for Ms. Doughty).

I believe the claim is reasonable, and hope that the government will agree to pay it so as to avoid any further litigation. Of course, if we are required to spend further time on the fee claim, we will seek compensation for that time as well.

Sincerely,

/s/Matt Kenna
Matt Kenna

Co-Counsel for AquAlliance