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10 Attorneys for Defendants Council on American-Islamic  
Relations, Inc., Council on American Islamic Relations  
11 Action Network, Inc., and Council on American Islamic  
Relations of Santa Clara, Inc.

DAVIS WRIGHT TREMAINE LLP

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 THE NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 MICHAEL SAVAGE,  
17 Plaintiff,

18 v.

19 COUNCIL ON AMERICAN-ISLAMIC  
20 RELATIONS, INC., COUNCIL ON  
AMERICAN ISLAMIC RELATIONS ACTION )  
21 NETWORK, INC., COUNCIL ON AMERICAN )  
ISLAMIC RELATIONS OF SANTA CLARA, )  
22 INC., and DOES 3-100, )  
23 Defendants. )

) Case No. CV07-06076 SI

) **DECLARATION OF NADHIRA AL-**  
) **KHALILI IN SUPPORT OF MOTION**  
) **FOR AWARD OF ATTORNEYS' FEES**  
) **AND COSTS**

) Date: October 3, 2008

) Time: 9:00 a.m.

) Honorable Susan Illston

DAVIS WRIGHT TREMAINE LLP

1           1.       I am an attorney for the Defendants in this matter and a member in good standing  
2 of the Virginia Bar. I have personal knowledge of the matters stated in this declaration. If called  
3 upon to do so, I am competent to testify to all matters set forth herein.

4           2.       I am National Legal Counsel for the Council on American-Islamic Relations  
5 (“CAIR”), which is a nonprofit, grassroots civil rights and advocacy with its principal place of  
6 business in Washington, D.C. I have been National Legal Counsel at CAIR since December 3,  
7 2007.

8           3.       For 2008, my rate is \$300 per hour.

9           4.       My rates are well within the prevailing hourly rates for lawyers of comparable  
10 education, expertise, and experience who handle matters of the type involved in this litigation.

11          5.       In 2000, I received my Juris Doctor degree from the Dickinson School of Law of  
12 the Pennsylvania State University. I am admitted to practice before the Virginia Supreme Court  
13 and the Eastern and Western U.S. District Courts.

14          6.       After a careful review of my time records on the case which were recorded  
15 contemporaneously as the work was performed, I estimate the minimum number of hours I spent  
16 on the answer, motion for judgment on the pleadings, reply in support of the motion for judgment  
17 on the pleadings, motion for judicial notice, and the motion for fees as follows:

<u>Date</u>	<u>Task</u>	<u>Hours</u>
21-Dec-07	Begin draft of Answer to Complaint.	2.6
22-Dec-07	Continue drafting Answer.	0.8
23-Dec-07	Continue drafting Answer.	1.1
24-Dec-08	Continue drafting Answer.	0.9
26-Dec-07	Continue drafting Answer, editing as an Answer for solely on behalf of Santa Clara. Research on CAIR-National's location of incorporation and registered agent.	1.1
27-Dec-08	Continue drafting Answer to Complaint. Corresponded with T. Burke regarding [redacted]. Coordinated with chapters regarding registered agent and answering factual allegations in the Complaint.	3.4
28-Dec-07	Continue drafting answer to amended complaint: coordinating with Staff, Board, other chapters, former CAIR attorneys to address	3.6

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	factual allegations in Complaint.	
30-Dec-07	Continue drafting Answer. Coordinating with CAIR staff, past and present to answer complaint. Research re: CAIR's place and form of incorporation.	2.4
2-Jan-08	Continue drafting Answer.	0.7
3-Jan-08	Confirming issues on service of process. Contact Court regarding service of process. Continue drafting Answer to Amended Complaint.	1.7
4-Jan-08	Continue drafting Answer.	2.1
8-Jan-08	Continue drafting Answer.	1
10-Jan-08	Continue draft of Answer.	1.4
11-Jan-08	Correspondence with CAIR-Santa Clara and T. Burke [redacted]. Continue draft of Answer.	1.7
17-Jan-08	Securing audio files to submit with Motion for Judgment.	0.4
18-Jan-08	Continue work on Answer: collecting information from CAIR: NY.	3.7
22-Jan-08	Further research and edits to Answer.	0.8
23-Jan-08	Correspondence from T. Burke [redacted]. Begin drafting Answer on behalf of CAIR-TX.	2.8
24-Jan-08	Continue drafting Answer on behalf of Texas.	1.1
28-Jan-08	Performing edits per attorneys to Answer.	3
29-Jan-08	Final edits to Answer.	1.5
30-Jan-08	Coordinating drafting and signing of Declarations.	1.2
1-Feb-08	Preparing Answer for CAIR-TX. Coordinating with CAIR-TX to answer specific allegations relating to that chapter from Complaint. Correspondence with attorneys regarding CAIR-TX's Answer.	3
3-Mar-08	Coordinating recording of radio show at issue for submission to court at hearing.	1.1

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Total 2007 hours: 43.1

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11. In total, I spent no fewer than 43.1 hours on this litigation. At my hourly rates, my total fees are \$12,930.00.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on August 28, 2008.

/s/ Nadhira Al-Khalili  
Nadhira Al-Khalili

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