

CHRIST T. TROUPIS
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**Attorney for Plaintiff Idaho Republican Party
And Chairman Norm Semanko**

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF IDAHO**

IDAHO REPUBLICAN PARTY, and)
NORM SEMANKO, Chairman)
))
Plaintiffs,)
))
vs.)
))
BEN YSURSA, In his Official Capacity as)
Secretary of State of the State of Idaho,)
))
Defendant.)
))

Case No. 1:08-CV-00165-BLW

**AFFIDAVIT OF CHRIST TROUPIS
IN SUPPORT OF MOTION FOR
AWARD OF ATTORNEYS FEES
AND COSTS**

STATE OF IDAHO)
) **ss.**
COUNTY OF ADA)

Christ T. Troupis, Esq., being first duly sworn upon oath, deposes and states:

1. I am an attorney duly licensed to practice law in the States of Idaho, California, Illinois and Oregon, the U.S. District Court of Idaho, Central and Southern Districts of California, and the 7th and 9th Circuit Courts of Appeals. I am counsel for the Plaintiffs, Idaho Republican Party and Norm Semanko in this case.
2. I have practiced law for 35 years in state and federal courts, and for the past 19 years in the State of Idaho and the District Court for the District of Idaho. I am an experienced

civil litigator in state and federal cases involving questions of constitutional law and specifically within that subject area, Idaho election law.

3. I have been actively involved as counsel to the Idaho Republican Party and Chairman Norm Semanko in this case since July 1, 2008, although I did not formally appear in the lawsuit until after the general election in November, 2008 because I was a Republican candidate for the Idaho State Senate.
4. Prior to my involvement in this litigation, John E. Sutton represented the Plaintiffs, Idaho Republican Party and former Executive Director, Sid Smith. He billed the Plaintiffs for his services in this case for the period from March 29, 2008 through August 23, 2008. John Sutton's billing rate for his services was \$250.00/hour. Mr. Sutton utilized the services of a research Assistant and charged for his time at \$200.00/hour.
5. I reviewed the work performed by Mr. Sutton and his research assistant in this matter. John Sutton is an experienced and highly skilled litigator, with many years of experience in State and Federal Courts. His billing is reasonable and consistent with the amounts and prevailing hourly rates charged by other attorneys with the same knowledge, skill and experience in this local area. His invoices are summarized in Exhibit A hereto, and attached hereto as Exhibit A-3. I request that the Court award fees in the sum of \$17,828.92 to reimburse the Idaho Republican Party for fees paid to J.E. Sutton & Associates.
6. I have provided legal services as lead counsel for the Plaintiffs in this case since my retention in July, 2008. My fee agreement with the Idaho Republican Party and Chairman Norm Semanko was for a contingent fee, comprised of whatever sum was awarded by this Court in the event that the Plaintiffs were successful in prosecuting their claims in this action.

7. I agreed to maintain an accurate record of my actual time and work spent on this case, and to provide the clients with periodic statements reflecting that work. However, the clients were not obligated to pay any portion of my invoices except to reimburse costs incurred and therefore the hourly rate reflected in those statements was illustrative only and did not result in any legal obligation on the part of the Plaintiffs to my office for payment of fees.
8. Attached hereto as Exhibit A is a true and accurate summary of all of my time and work performed in this representation. My customary hourly rate for my services in litigated matters is \$250/hour. The time spent and amounts set out as chargeable fees for the services rendered were reasonable and necessary in relation to the complexity of the legal issues and nature of this dispute, and my duties as lead counsel under the Federal Rules. These charges are consistent with the prevailing rates and charges for such services by other attorneys with my experience, knowledge and skills, within the local legal community.
9. The Plaintiffs are the prevailing parties in this case, having obtained declaratory relief in the form of an order declaring Idaho's Open Elections law unconstitutional as applied to the Idaho Republican Party.
10. The issues raised in this lawsuit were complex and very significant. The outcome of this case will alter the conduct and results of Idaho elections for many years to come. The First Amendment rights of the Idaho Republican Party have been completely vindicated through this lawsuit.
11. In addition to the important and unresolved legal issues that were raised in this case, the Plaintiffs were required to assemble evidence to establish the existence, extent and effects of crossover voting within Idaho's primary elections. I undertook that obligation, and my

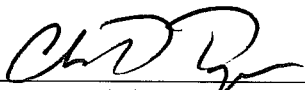
work included coordinating the formulation and conduct of a voter survey, analysis of the conduct and outcomes of various Idaho primary elections, interviews with a number of successful and unsuccessful Republican candidates, election consultants, and expert witnesses. In order to try this case, I was required to review and analyze the scholarly literature on this subject.

12. Because I agreed to undertake this case on a contingent fee basis, I assumed the risk that my client might not prevail in the lawsuit. I am a sole practitioner and the work required in this case was very time consuming and resulted in my inability to take on other legal work. Based upon the foregoing, I request an award of attorneys fees for my services in this case of \$92,910.28.
13. A significant amount of time was required to assemble testimony from Idaho Republican candidates providing anecdotal evidence of crossover voting in Idaho's primary elections. I created a list of more than 20 individuals to be interviewed for this purpose. I estimated that meeting and interviewing these individuals and reviewing draft affidavits with them would take more than 50 hours of my time, which would not have been productive or cost effective. Therefore, I retained Chad Houck to serve as my paralegal for this purpose. I paid him a flat fee of \$2,500 and covered his costs for binding and printing totaling \$179.16. These sums are reflected in Exhibit A hereto, and his invoices are attached as Exhibit A-2.
14. On my behalf, Mr. Houck met with each of these prospective witnesses, interviewed them and prepared summaries of their relevant information. I drafted affidavits based on that information, and together, Mr. Houck and I discussed the affidavit contents with each of these witnesses, and finalized them. Mr. Houck compiled signed copies of the

affidavits, together with the Moore Information results and the first portion of the Ripley analysis, which were bound and provided to Dr. Michael Munger for his expert review.

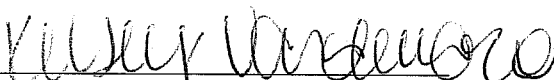
15. Chad Houck spent more than 50 hours completing these assigned tasks and his billing represents approximately \$50/hour charge for his services. That amount is 1/5th the amount that would have been incurred if I had been required to personally perform these tasks without assistance. Based on the foregoing, I request an award reimbursing my office for paralegal assistance of Chad Houck, in the sum of \$2,679.16.
16. Based upon the foregoing, I request that the Court award attorneys fees and costs as follows: total attorneys fees and and fees for paralegal assistance, \$113,418.36; total costs, \$30,461.42.

Dated: March 7, 2011


Christ T. Troupis, Esq.

SUBSCRIBED AND SWORN TO before me this 7th day of March, 2011.

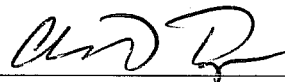



Notary Public of the State of Idaho
Residing at: Ada County
Commission expires: 10/2011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of March, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following persons:

Gary G Allen GaryAllen@givenspursley.com
Harry Kresky harrykres@aol.com
Michael S Gilmore mike.gilmore@ag.idaho.gov
Clay Smith clay.smith@ag.idaho.gov



Christ T. Troupis

EXHIBIT "A"
ATTORNEYS FEES
AND EXPENSES

Christ Troupis Attorneys' Fees (Invoices Attached – Exh. A-1)

Date	Invoice	Amount
9/28/09	337	\$ 2,925.00
11/2/09	360	\$ 200.00
01/06/10	400	\$ 850.00
02/18/10	424	\$27,200.00
03/18/10	436	\$ 8,569.60
06/16/10	476	\$ 2,175.00
03/02/11	586	\$48,915.68
03/07/11		\$ 2,075.00
	Total	\$92,910.28

Chad Houck (Paralegal Services) (Invoice Attached, Exh. A-2)

01/13/10	----	\$ 2,679.16
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John E. Sutton & Associates Attorneys' Fees (Invoices Attached, Exh. A-3)

07/11/08	100	\$ 9,428.92
	101	\$ 6,000.00
08/25/08	102	<u>\$ 2,400.00</u>
	Total	\$17,828.92

Total Attorneys' Fees and Paralegal Costs \$113,418.36

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INVOICE #	DATE	DUE DATE	BALANCE DUE
337	9/28/2009	9/28/2009	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
9/8/2009	1.3	Arrange for telephonic status conference; e-mail other counsel and confer with clients re scheduling	250.00	325.00
9/9/2009	1.5	Status conference with Judge winmill re litigation plan and scheduling for evidentiary hearing; confer with clients	250.00	375.00
9/11/2009	0.6	Telephonic conference with attorneys re scheduling and litigation plan; telephone conference John E. Sutton re litigation plan	250.00	150.00
9/17/2009	0.3	Telephone conference counsel and Jeff Severson re scheduling	250.00	75.00
9/17/2009	1.1	Meet with Norm Semanko re expert testimony, affidavits, and other evidence for hearing; and other issues	250.00	275.00
9/21/2009	0.7	Review memo re expert witnesses and election information; draft e-mail to clients	250.00	175.00
9/21/2009	1.2	Telephone conference client and e-mail client re expert witness information; telephone conference Attorney Sara Troupis re referral of expert witness; review expert witness CV's	250.00	300.00
9/22/2009	0.5	Telephone conference Dave Ripley re survey work and expert analysis	250.00	125.00
9/23/2009	0.8	Draft e-mail to expert witnesses re case issues and proposed retention	250.00	200.00
9/23/2009	0.3	Telephone conference Rod Beck re resolution of executive committee an other evidence for hearing	250.00	75.00
9/24/2009	0.5	Telephone conference Michael C. Munger re expert testimony and report	250.00	125.00
9/25/2009	0.6	Prepare for and attend status conference (telephonic): Telephone conference counsel re discovery progress and scheduling	250.00	150.00
9/25/2009	0.3	Draft retention letter to Professor Munger	250.00	75.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	
			BALANCE DUE	

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337	9/28/2009	9/28/2009	\$2,925.00

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
9/25/2009	0.3	Draft e-mail to client re resolution by Executive Committee on implementation of Closed Primary Rule	250.00	75.00
9/4/2009	1.7	Telephone conference N. Semanko re decision by Judge winmill and ramifications; review decision; e-mail to interested parties; telephone conference Gary allen office re setting up telephone status conference call	250.00	425.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$2,925.00

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INVOICE #	DATE	DUE DATE	BALANCE DUE
360	11/2/2009	11/2/2009	\$295.88

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
10/20/2009	0.5	Telephone conference Lou Esposito re polling data on elections;	250.00	125.00
		telephone conference client re meeting to discuss funding expense		
		of experts		
10/20/2009	0.3	Review e-mail from expert and draft e-mail to expert re elections	250.00	75.00
		data		
9/17/2009		reimbursed costs: AT conference call	95.88	95.88
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$-95.88
			BALANCE DUE	\$200.00

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INVOICE #	DATE	DUE DATE	BALANCE DUE
388	12/22/2009	12/22/2009	\$32.20

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
12/22/2009		AT Conference Call IRP v. Ysursa	14.70	14.70
12/22/2009		express mail re Idaho Republican Party vs. Ysursa	17.50	17.50
		Total Reimbursable Expenses		32.20
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$-32.20
			BALANCE DUE	\$0.00

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INVOICE #	DATE	DUE DATE	BALANCE DUE
400	1/6/2010	1/6/2010	\$850.00

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
11/16/2009	0.3	Telephone conference Rod Beck re expert witness testimony and affidavits	250.00	75.00
11/23/2009	0.4	Telephone conference L.C. re county races and cross over voting research	250.00	100.00
11/30/2009	0.3	Conference call with J. Severson and other counsel re scheduling	250.00	75.00
11/30/2009	0.5	Telephone conference S. Thayn re expert witness report; telephone conference R. Beck re expert witness evidence	250.00	125.00
12/8/2009	0.2	Review funding letters and e-mail client	250.00	50.00
12/29/2009	0.5	Telephone conference R. Gardiner re funds for expert witness expense; telephone conference Dave Ripley re polling information	250.00	125.00
12/30/2009	0.2	Receipt and review e-mails re funding for experts; draft e-mail to David Ripley re check issuance	250.00	50.00
1/4/2010	1	Telephone conference clients re expert costs; meet with R. Beck re affidavit testimony and expert costs; draft letter to Bob Moore re funding polling survey	250.00	250.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$850.00

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INVOICE #	DATE	DUE DATE	BALANCE DUE
402	1/6/2010	1/6/2010	\$118.30

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
1/4/2010		ID Republican Party vs. Ysursa - polling survey balance	100.00	100.00
1/4/2010		express mail to Moore Information	18.30	18.30
		Total Reimbursable Expenses		118.30
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$-118.30
			BALANCE DUE	\$0.00

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INVOICE #	DATE	DUE DATE	BALANCE DUE
424	2/18/2010	2/18/2010	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
7/1/2008	2.2	Review motion to intervene by independent voters; confer with client re response	250.00	550.00
8/8/2008	1.1	Confer with client re intervention; response to motion	250.00	275.00
9/20/2008	0.8	Review intervenor pleadings with client	250.00	200.00
9/22/2008	1.5	Meet with Norm Semanko; advise client re preparation for deposition; draft sample questions and review with client; discuss issues	250.00	375.00
9/23/2008	0.8	Review Gerber Morton study and discuss polling information with client; discuss obtaining expert testimony	250.00	200.00
9/24/2008	4.5	Review discovery requests; draft responses to discovery requests, interrogatories and requests for production of documents; confer with client and Attorney Sutton	250.00	1,125.00
9/24/2008	0.3	Review litigation plan with client	250.00	75.00
10/7/2008	3.4	Research re motion for summary judgment	250.00	850.00
10/8/2008	2.5	Continued research re motion for summary judgment	250.00	625.00
10/13/2008	3	Work on draft of motion for summary judgment	250.00	750.00
10/15/2008	1.3	Continued work on draft of motion for summary judgment	250.00	325.00
10/21/2008	3.8	Revise memorandum re summary judgment	250.00	950.00
10/22/2008	2.5	Draft Affidavit of Norm Semanko; draft Statement of Material Facts	250.00	625.00
10/23/2008	2.8	Review and revise Motion for Summary Judgment	250.00	700.00
10/24/2008	1.5	Receipt and review Motion for Summary Judgment by intervenors	250.00	375.00
10/24/2008	1	Receipt and review Motion for Summary Judgment by Ysursa	250.00	250.00
10/27/2008	0.4	Confer with client re Motions for Summary Judgment by intervenor and Ysursa	250.00	100.00
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INVOICE #	DATE	DUE DATE	BALANCE DUE
424	2/18/2010	2/18/2010	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
10/29/2008	1.3	Outline response to Motions for Summary Judgment by state and intervenors	250.00	325.00
11/7/2008	3.5	legal research re Response to Motions for Summary Judgment	250.00	875.00
11/8/2008	2.2	Continued legal research re Response to Motions for Summary judgment	250.00	550.00
11/10/2008	3.5	Continued legal research re Summary Judgment Motions; work on draft response to State motion	250.00	875.00
11/11/2008	4	Work on response Memorandum in Opposition to State Motion for Summary Judgment	250.00	1,000.00
11/12/2008	3.2	Work on response Memorandum to State and Intervenor Motions for Summary Judgment	250.00	800.00
11/12/2008	0.3	Prepare and file Notice of Appearance	250.00	75.00
11/13/2008	0.5	File memorandum in Opposition to State and Intervenor Motions for Summary Judgment	250.00	125.00
11/13/2008	0.5	Draft Supplement to Memorandum	250.00	125.00
11/13/2008	0.3	File Supplement to Memorandum	250.00	75.00
11/17/2008	1.4	Receipt and review Memorandum in Opposition to IRP Motion for Summary Judgment by State	250.00	350.00
11/17/2008	1.2	Receipt and review Memorandum in Opposition to IRP Motion for Summary Judgment by Intervenor	250.00	300.00
11/20/2008	1.8	Work on Reply to Opposition to IRP Motion for Summary Judgment	250.00	450.00
11/21/2008	2.6	Work on Reply to Opposition to IRP Motion for Summary Judgment	250.00	650.00
12/4/2008	1.1	Review and revise Reply to Opposition to IRP Motion for Summary Judgment	250.00	275.00
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INVOICE #	DATE	DUE DATE	BALANCE DUE
424	2/18/2010	2/18/2010	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
12/5/2008	0.3	Review and file Reply to Opposition to IRP Motion for Summary Judgment	250.00	75.00
2/13/2009	3.5	Review motions and case law; outline argument	250.00	875.00
2/16/2009	1.5	Meet with J. Sutton; discuss preparation for hearing and issues, responses; review case law and argument	250.00	375.00
2/17/2009	1.3	Review case law and motions; finalize argument preparation	250.00	325.00
2/18/2009	3	Confer with clients re argument; attend hearing and argue motions	250.00	750.00
9/4/2009	1.8	Receipt and review Memorandum Decision and Order Denying Summary Judgment Motions; confer with clients	250.00	450.00
1/6/2010	1.3	Review data from elections analysis; telephone conference D. Ripley re affidavits and polling research; review polling questions	250.00	325.00
1/7/2010	1.2	Work on evidence compilation	250.00	300.00
1/7/2010	1.3	Meet with Research Assistant re affidavit evidence	250.00	325.00
1/8/2010	0.8	Review information re affidavits; e-mail Chad Houck and D. Ripley	250.00	200.00
1/11/2010	1.2	Work on Ripley Affidavit; work on subpoena for production of documents to D. Ripley	250.00	300.00
1/11/2010	2.5	Work on 2nd Ripley Affidavit; meet with Dave Ripley and Lou Esposito and review polling data; conference call with Bob Moore to discuss research findings and report	250.00	625.00
1/12/2010	0.3	Review Ripley background information for Affidavit; review cover memo on research	250.00	75.00
1/12/2010	8.5	Work on affidavits and other evidence	250.00	2,125.00
1/13/2010	3.8	Work on evidence submission	250.00	950.00
1/19/2010	1.3	Review affidavits and poll; scan and e-mail to opposing counsel	250.00	325.00
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424	2/18/2010	2/18/2010	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
1/19/2010	0.8	Telephone conference R. Beck re meeting to discuss evidence; review article on cross-over voting from Dr. Munger	250.00	200.00
1/19/2010	1.3	Review affidavits and poll; scan and e-mail to opposing counsel	250.00	325.00
1/20/2010	0.3	Telephone conference R. Beck re meeting with clients to review evidence and strategy	250.00	75.00
1/20/2010	0.5	Draft e-mail to Dr. Munger re information needed for his expert report; draft e-mail to D. Ripley re meeting	250.00	125.00
1/20/2010	0.4	Telephone conference Dr. Munger re expert report	250.00	100.00
1/20/2010	0.2	Receipt and review e-mail from Dr. Munger re expert report	250.00	50.00
1/20/2010	2	Meet with clients to discuss evidence and strategy	250.00	500.00
1/21/2010	2.2	Receipt and review Expert Report; telephone conference client and discuss report; scan and e-mail to opposing counsel and client	250.00	550.00
1/21/2010	0.8	Telephone conference J. Parker re disclosure of evidence and telephone conference D. Ripley re strategy	250.00	200.00
1/26/2010	1	Prepare for and attend status conference; advise clients of outcome and prospects	250.00	250.00
1/26/2010	0.4	Telephone conference D. Ripley and J. Parker re scheduling order and impact on primary election; discuss course of action	250.00	100.00
1/27/2010	0.5	Telephone conference R. Beck re response to scheduling order	250.00	125.00
2/4/2010	0.5	Draft case management statement and e-mail to opposing counsel	250.00	125.00
2/4/2010	0.5	Telephone conference R. Beck re closed primary legislation; respond to opposing counsel re proposal for closed primary	250.00	125.00
2/5/2010	0.5	Telephone conference Brian Kane and Karin Jones re Case Management Order, proposed legislation, and expert witness deadlines	250.00	125.00
2/5/2010	0.3	Telephone conference clients re deadlines and proposed legislation	250.00	75.00
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424	2/18/2010	2/18/2010	\$27,200.00

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
2/5/2010	0.3	Telephone conference R. Beck re proposed legislation - 30 day registration and logistical problems with implementation	250.00	75.00
2/5/2010	0.3	Telephone conference N. Semanko re proposed legislation and scheduling order	250.00	75.00
2/9/2010	0.7	Telephone conference Norm Semanko and K. Jones re proposed legislation provisions; effective date and other issues; draft e-mail to Brian Kane	250.00	175.00
2/9/2010	0.4	Telephone conference D. Ripley re agreement to postpone effective date of closed primary in exchange for agreement on other issues	250.00	100.00
2/16/2010	0.2	Review e-mails and respond re trial date	250.00	50.00
2/17/2010	0.3	Telephone conference N. Semanko re status of case; review e-mails re scheduling trial and advise client	250.00	75.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$27,200.00

TROUPIS LAW OFFICE, PA
Christ T. Troupis
Office: 208-938-5584 Fax: 208-938-5482

TROUPIS LAW OFFICE, PA
1299 East Iron Eagle - Suite #130
PO Box 2408
Eagle, ID 83616

Invoice

Idaho Republican Party
P.O. Box 2267
Boise, ID 83701

INVOICE #	DATE	DUE DATE	BALANCE DUE
436	3/18/2010	3/18/2010	\$8,569.60

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
2/18/2010	0.3	Review and respond to e-mails re scheduling order and jury vs. court trial	250.00	75.00
2/23/2010	0.8	Telephone conference Rod Beck re expert testimony and e-mail Dr. Munger re scheduling deposition and meeting	250.00	200.00
3/3/2010	0.4	Review deposition notice for Dr. Munger; draft e-mail to client re deposition	250.00	100.00
3/3/2010	0.2	Draft e-mail to Dr. Munger re deposition preparation	250.00	50.00
3/4/2010	0.2	Reply to e-mail from client re travel expenses	250.00	50.00
3/4/2010	0.5	Telephone conference D. Ripley re underlying data for expert report re election analysis	250.00	125.00
3/9/2010	1.1	Review Exhibits designated for Dr. Munger deposition; organize and prepare copies for deposition use	250.00	275.00
3/9/2010	0.4	Review e-mail from opposing counsel re Moore Info study data; draft e-mail to consultant re study information	250.00	100.00
3/10/2010	10	Prepare for and travel to deposition of expert witness Dr. Michael Munger	250.00	2,500.00
3/11/2010	10	Meet with Dr. Munger; confer re deposition; attend deposition; summarize notes	250.00	2,500.00
3/12/2010	10	Travel from deposition of Dr. Munger in Raleigh, NC	250.00	2,500.00
3/16/2010	0.3	Review e-mail from client re depositions; reply and advise client of developments in case	250.00	75.00
3/9/2010		Printing and Copying: 196 pages of documents for Mundy deposition @.10/pg.	19.60	19.60
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$8,569.60

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INVOICE #	DATE	DUE DATE	BALANCE DUE
476	6/16/2010	6/16/2010	\$2,175.00

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
3/18/2010	0.4	Review evidence disclosure and forward to client	250.00	100.00
3/22/2010	1.6	Review Munger deposition transcript; scan and e-mail to expert; draft e-mail re additional information needed, changes, and supplemental report	250.00	400.00
3/23/2010	0.5	Telephone conference Dave Ripley re Moore survey information and supplementation of report to respond to defense request	250.00	125.00
4/5/2010	0.6	Receipt and review information from R. Moore Information for supplemental discovery response	250.00	150.00
4/9/2010	0.2	Review IPEA newsletter re cross-over voting	250.00	50.00
4/12/2010	0.7	Review data from Moore and Ripley to respond to State's request for sample information	250.00	175.00
4/13/2010	0.4	Review e-mail from K. Jones re sample for survey, receipt and review e-mail from Dave Ripley re sample, copy and send to K. Jones	250.00	100.00
4/14/2010	0.3	Receipt and review e-mail questions from AG; forward to D. Ripley for response	250.00	75.00
4/22/2010	0.5	Receipt, review and respond to e-mail re expert discovery on survey	250.00	125.00
4/23/2010	0.3	Review e-mail from S. Bair re evidence on closed primary case	250.00	75.00
5/12/2010	0.3	Telephone conference Rod Beck re evidence disclosures and response	250.00	75.00
5/19/2010	1	Meet with Rod Beck to review and discuss state's expert report	250.00	250.00
5/25/2010	0.4	Telephone conference R. Beck re expert disclosures of State of Idaho	250.00	100.00
6/9/2010	1.5	Review documents re expert report for state	250.00	375.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$2,175.00

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INVOICE #	DATE	DUE DATE	BALANCE DUE
560	11/29/2010	11/29/2010	\$417.90

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
11/29/2010		Hilton Garden Inn - Dr. Munger re IRP - October trial	417.90	417.90
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$-389.12
			BALANCE DUE	\$28.78

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INVOICE #	DATE	DUE DATE	BALANCE DUE
586	3/2/2011	3/2/2011	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
6/21/2010	0.3	Telephone conference R. Beck re proposal to change candidate selection process and effect on lawsuit	250.00	75.00
6/22/2010	0.3	Draft letter to client re trial strategy	250.00	75.00
6/30/2010	2.7	Review proposed stipulation re Daubert; review expert disclosures; confer with expert witness re rebuttal	250.00	675.00
6/30/2010	0.5	Telephone conference D. Ripley re supplemental report on specific legislative races and telephone conference J. parker re affidavit on Bisterfeldt campaign endorsement by Democrats	250.00	125.00
7/1/2010	0.9	Review proposed stipulation re Daubert issues; telephone conference M. Gilmore re stipulation, witnesses, and deposition of experts	250.00	225.00
7/1/2010	2.2	Draft Supplemental Discovery Response and disclosure of exhibits and witnesses; serve	250.00	550.00
7/1/2010	0.5	Confer with D. Ripley re expert witness depositions preparation	250.00	125.00
7/2/2010	1.2	Telephone conference Dr. Munger re expert report and rebuttal; deposition questions; review documents and questions	250.00	300.00
7/22/2010	0.5	Review, execute, and e-mail stipulation re Daubert issues	250.00	125.00
7/30/2010	0.3	Draft e-mail to counsel re available dates for depositions	250.00	75.00
8/5/2010	0.5	Telephone conference R. Beck re expert testimony and deposition schedules	250.00	125.00
8/12/2010	0.3	Confer with Attorney Sutton re deposition preparation	250.00	75.00
8/18/2010	1.6	Review expert reports and work on deposition preparation	250.00	400.00
8/18/2010	3.1	Review expert report; summarize issues and prepare for deposition of experts	250.00	775.00
8/18/2010	2.5	Continued work: review expert report and prepare for deposition	250.00	625.00
8/26/2010	0.1	Receipt and review e-mail re deposition scheduling; reply	250.00	25.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	
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INVOICE #	DATE	DUE DATE	BALANCE DUE
586	3/2/2011	3/2/2011	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
8/30/2010	0.4	Telephone conference K. Jones re trial date and completion of discovery depositions	250.00	100.00
8/31/2010	2.5	Prepare scheduling of deposition witnesses; confer with each witness re schedule and attendance	250.00	625.00
9/7/2010	1.2	Telephone conference M. Gilmore re scheduling and depositions; draft notice of expert depositions and serve; telephone conference court clerk re motion	250.00	300.00
9/7/2010	0.4	Telephone conference law clerk and M. Gilmore re continuance of hearing	250.00	100.00
9/8/2010	0.4	Telephone conference H. Kulczyk re deposition; scan and e-mail affidavit and notice of deposition	250.00	100.00
9/8/2010	0.8	Revise witness schedule for depositions; e-mail Bob Moore re deposition; draft e-mail to opposing counsel	250.00	200.00
9/9/2010	0.5	Work on rescheduling Bob Moore deposition	250.00	125.00
9/9/2010	2.4	Prepare for expert depositions; review expert report with Bob Moore and D. Ripley; telephone conference re deposition preparation	250.00	600.00
9/9/2010	0.3	Draft letter to L. Barrett re deposition scheduling	250.00	75.00
9/12/2010	3	Work on preparation for expert witness depositions of state's experts; review source material for state report	250.00	750.00
9/13/2010	3.5	Continued work on preparation for expert witness depositions	250.00	875.00
9/14/2010	3.5	Prepare for depositions of experts and other witnesses	250.00	875.00
9/14/2010	3.5	Take depositions of State's experts	250.00	875.00
9/14/2010	0.6	Telephone conference Henry Kulczyk and Laird Maxwell and Rod Beck re deposition testimony	250.00	150.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	
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INVOICE #	DATE	DUE DATE	BALANCE DUE
586	3/2/2011	3/2/2011	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
9/14/2010	4.5	Review Defendant's Trial Memorandum, Exhibit List; draft Witness List, Exhibit List, and Trial Memorandum	250.00	1,125.00
9/15/2010	8	Prepare for and attend depositions of Rod Beck, Lenore Barrett, Curtis Bowers, Gregg Vance, and David Ripley	250.00	2,000.00
9/16/2010	8	Prepare for and attend depositions of Darrel Deide, Henry Kulczyk, Laid Maxwell, and Dennis Mansfield; confer with client re damage proof issues	250.00	2,000.00
9/17/2010	3	Prepare for and attend deposition of Bob Moore	250.00	750.00
9/21/2010	0.5	Review e-mail from opposing counsel re submission of case on briefs; telephone conference M. Gilmore; telephone conference clients re proposal	200.00	100.00
9/21/2010	4.5	Attend depositions of Steve Adams and continued deposition of David Ripley	250.00	1,125.00
9/24/2010	0.2	Telephone conference Attorney Gilmore re status conference and evidentiary hearing	250.00	50.00
9/28/2010	0.5	Review e-mail from opposing counsel; telephone conference opposing counsel re alternative plan for witnesses; e-mail expert witness re trial testimony	250.00	125.00
9/28/2010	1.1	Prepare for and attend pre-trial conference; confer with expert witnesses	250.00	275.00
9/29/2010	0.5	File exhibits for trial	250.00	125.00
9/30/2010	0.4	E-mail expert Bob Moore re scheduling; telephone conference Attorney Gilmore re scheduling	200.00	80.00
9/30/2010	0.2	E-mail counsel re scheduling conference with court clerk	250.00	50.00
9/30/2010	0.5	Scheduling conference with court	250.00	125.00
9/30/2010	1	Start review of deposition transcripts	250.00	250.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	
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INVOICE #	DATE	DUE DATE	BALANCE DUE
586	3/2/2011	3/2/2011	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
10/1/2010	0.9	Review depositions of witnesses	250.00	225.00
10/1/2010	1.2	Review Semanko deposition; review stipulation on exhibits and respond to opposing counsel	250.00	300.00
10/4/2010	0.6	Review stipulation re Semanko testimony and objections; review expert witness information; confer with opposing counsel	250.00	150.00
10/5/2010	0.5	Telephone conference opposing counsel re stipulation; review stipulation and e-mail counsel	250.00	125.00
10/11/2010	0.5	E-mail expert witness re arrangements for trial; review e-mail from opposing counsel re exhibit use at trial	250.00	125.00
10/12/2010	8	Prepare for trial; review rulings on evidentiary objections; review deposition testimony; work on preparation for Moore testimony; confer with expert witnesses	250.00	2,000.00
10/13/2010	10.5	Attend evidentiary hearing; meet with expert witnesses and client; and prepare for second day of trial	250.00	2,625.00
10/14/2010	9	Attend evidentiary hearing; confer with clients following hearing; telephone conference with counsel re scheduling stipulation for briefing	250.00	2,250.00
10/15/2010	1.2	Attend telephonic hearing re post trial briefing schedule; confer with client	250.00	300.00
10/18/2010	0.2	Prepare and scan exhibit 1023 for filing	250.00	50.00
10/18/2010	0.2	File Exhibit 1023	250.00	50.00
10/18/2010	0.2	Review stipulation for briefing and reply	250.00	50.00
10/20/2010	2.3	Continued work on Findings of Fact	250.00	575.00
10/20/2010	2	Legal Secretary/Assistant: Work on draft Findings of Fact incorporating exhibits into the record	40.00	80.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	
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INVOICE #	DATE	DUE DATE	BALANCE DUE
586	3/2/2011	3/2/2011	

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
10/21/2010	2.4	Work on Findings of Fact; summarizing deposition testimony for record	250.00	600.00
10/25/2010	4.5	Work on findings of fact and conclusions of law for post trial submission	250.00	1,125.00
10/26/2010	0.5	Start review of transcript of bench trial proceedings for preparation of findings of fact	250.00	125.00
11/2/2010	6.5	Work on Findings of Fact and Conclusions of Law	250.00	1,625.00
11/3/2010	6.3	Work on Findings of Fact and Conclusions of Law	250.00	1,575.00
11/4/2010	5.5	Work on Findings of Fact and Conclusions of Law	250.00	1,375.00
11/5/2010	6.5	Work on Findings of Fact and Conclusions of Law	250.00	1,625.00
11/8/2010	5.5	Work on Findings of Fact and Conclusions of Law; confer with expert witness re findings	250.00	1,375.00
11/8/2010	4.6	Work on Findings of Fact and Conclusions of Law; legal research and drafting of closing brief	250.00	1,150.00
11/8/2010	4.4	Work on revision to Findings of Fact and Conclusions of Law	250.00	1,100.00
11/16/2010	2.2	Review and revise closing initial trial brief and findings of fact; scan and file with court	250.00	550.00
11/17/2010	2.5	Start review of State's proposed Findings of Fact	250.00	625.00
11/29/2010	2.8	Work on legal research for reply memorandum	250.00	700.00
11/30/2010	5.4	Legal research on reply brief for closing	250.00	1,350.00
12/1/2010	6.5	Work on closing brief; legal research	250.00	1,625.00
12/2/2010	4.1	Work on closing brief	250.00	1,025.00
12/2/2010	5.8	Continue working on closing brief	250.00	1,450.00
12/3/2010	4.4	Revise closing brief; prepare for filing and file	250.00	1,100.00
12/6/2010	1.3	Draft statement to clarify remedy requested; e-mail to opposing counsel	250.00	325.00
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INVOICE #	DATE	DUE DATE	BALANCE DUE
586	3/2/2011	3/2/2011	\$48,915.68

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
12/30/2010	1.3	Meet with client to discuss alternative strategies after receipt of decision by the court	250.00	325.00
1/10/2011	0.2	Telephone conference client re status of case	250.00	50.00
1/17/2011	1.5	Review new authority submitted by State; review Arizona Lib Party v. Bayless; confer with clients re selection of PCO's on primary ballot	250.00	375.00
2/15/2011	1.5	Receipt and review order re judicial notice; receipt and review responses; confer with clients; draft response and file	250.00	375.00
10/28/2010		Bella Aquilla - meeting with Munger, Espositio & Ripley	155.68	155.68
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$48,915.68

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INVOICE #	DATE	DUE DATE	BALANCE DUE
587	3/7/2011	3/7/2011	\$2,075.00

SERVICE DATE	TIME	DESCRIPTION	RATE	AMOUNT
3/3/2011	2.2	Review court decision and judgment; advise clients; begin work on motion for fees and costs	250.00	550.00
3/4/2011	1.3	Work on motion for fees and costs	250.00	325.00
3/7/2011	4.8	Work on motion for fees and cost award; telephone conference J. parker re billing information; review invoices and expense information; draft motion, memorandum, and affidavit of Christ T. Troupis; review with client	250.00	1,200.00
WE APPRECIATE YOUR PROMPT PAYMENT!			LESS PAYMENTS/CREDITS	\$0.00
			BALANCE DUE	\$2,075.00

TROUPIS LAW OFFICE, PA
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Chad Houck
PO Box 191091
Boise, ID 83719

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1299 E. Iron Eagle, Ste. 130
PO Box 2408
Eagle, ID 83616
ctroupis@trouplaw.com

Invoice for Services

January 13, 2010

Qty	Item	Amount
1	Research	\$2500.00
		Total Due: \$2500.00
	Terms: 50% payable on receipt of invoice	
	with balance payable upon completion of	
	work	

Please make check payable to Chad Houck for pick up at your offices.

Thank you for the opportunity to serve you!

Chad Houck

Chad Houck
PO Box 191091
Boise, ID 83719

Invoice: 2010002

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Invoice for reimbursement for materials
Client: IRP
Project: Briefing Book

Qty	Item	Amount
10	Book binding - Office Max	\$ 45.47
10	Tab Divider sets - Office Depot	49.71
3	Paper Reams - Office Max	15.00
30	Pages, Cardstock for covers - Office Max	2.70
1262	Printed pages total @ .05 ea w/ tax	66.28
	TOTAL	\$ 179.16

Please make check payable to Chad Houck for pickup at your office. Thank you for the opportunity to serve you!

Chad Houck

STATEMENT

J. E. Sutton & Associates

STATEMENT # 100
DATE: JULY 11, 2008200 N. 3rd Street, Suite # 2
Boise, ID 83701
Phone (208) 336-4444
Fax (208) 336-4494BILL Idaho Republican Party
TO
Customer ID JE5-1432

DATE	INT.*	DESCRIPTION	RATE/HR	HOURS	AMOUNT
3-29-08	GLQ	Legal Research-Reviewed decision in <i>Beck v. Ysursa</i> , and reviewed authority cited in <i>Beck decision</i> , Reviewed election cases pending before U.S. Sup.Ct; Review Beck Amended complaint.	\$200.00	6	\$1200.00
4-2-08	GLQ	Legal Research-Idaho Legislative Bills pending, drafted revised list of issues for review by JES.	\$200.00	2.2	\$440.00
4-8-08	GLQ	Revised draft complaint, deleted matters unnecessary to establish Party's standing; reordered allegations, T/C with JES re: litigation plan and filing issues	\$200.00	2.6	\$520.00
4-8-08	JES	Research and Review class action avoidance, T/C with GLQ: Strategy and filing issues.	\$250.00	1.8	\$450.00
4-10-08	GLQ	Revised complaint, T/C w/ JES re: allegations regarding 2008 primary; lack of remedy in 2008 and request for relief, Revisions and corrections to draft of complaint, e-mailed final draft to JES, T/C w/ JES re: final filing issues.	\$200.00	3.4	\$680.00
4-10-08	JES	Reviewed of draft revisions, T/C w/ GLQ re: allegations regarding 2008 primary; lack of remedy in 2008 and request for relief, T/C w/ GLQ re: final filing issues, prepare documents for filing-pursuant to local rule 5.1 et al.	\$250.00	1.8	\$450.00
4-11-08	GLQ	Further revision, Conference w/ JES regarding such revisions, T/C w/ JES re: Third party prayer for relief, T/C w/ JES re: federal filing and format issues.	\$200.00	2.5	\$500.00
4-11-08	JES	Review of draft revisions, Conference w/ GLQ re: Third party prayer for relief, Research supporting case authority, Review complaint w/ Syd Smith, Notarize verification, Prep complaint for filing.	\$250.00	2.9	\$725.00
4-14-08	GLQ	Conference with JES re: litigation plan and motions.	\$200.00	1.8	\$360.00
4-14-08	JES	Research and review file, Conference with GLQ re: litigation plan and motions.	\$250.00	1.8	\$450.00
4-15-08	JES	Research file-case authority, e-mail materials to GLQ, Confirm filing procedure.	\$250.00	0.8	\$200.00

4-15-08	GLQ	Review e-mailed materials from JES, retrieve and copy cited case materials.	\$200.00	0.9	\$180.00
4-17-08	JES	Request draft of Summons on Complaint from GLQ, T/C w/ GLQ re: draft of Summons on Complaint, T/C w/ GLQ re: service and waiver of summons, T/C w/ Secretary of State's office, T/C w/ District Court Clerk.	\$250.00	.9	\$225.00
4-17-08	GLQ	Drafting of Summons on Complaint, T/C w/ JES re: draft of Summons on Complaint, T/C w/ JES re: service and waiver of summons.	\$200.00	0.5	\$100.00
4-19-08	GLQ	Miscellaneous research charges-Copy charges	N/A	N/A	\$48.92
5-15-08	JES	Service of Complaint upon Secretary of State	\$250.00	1	N/C
5-16-08	JES	Research and review file, litigation plan, research summary judgment procedure, T/C w/ Syd Smith's Office	\$250.00	0.8	\$200.00
5-23-08	JES	Research and review file, T/C w/ Idaho Republican Party re: Central Committee Conference	\$250.00	0.2	\$50.00
6-12-08	JES	Travel-To and from Sandpoint, ID-Conference with Republican Central Committee, Mr. Sullivan, Mr. Smith--(No charge-7 hours)	\$250.00	9	\$2250.00 N/C
6-26-08	JES	Conference GOP Chairman Jason Risch and Syd Smith	\$250.00	.5	N/C
7-9-08	JES	Amend Motion Pro Hoc Vice Appearance; Motion to Intervene as Defendants-Intervenors pursuant to FRCP Rule 24; Memorandum in Support of Motion to Intervene as Defendants-Intervenors	\$250.00	1.6	\$400.00
7-9-08	JES	Correspondence to Chairman Semanko	\$250.00	1	N/C

*JES-John E. Sutton	Total Charges-JES	Total Charges-GLQ	Total Payments	AMOUNT DUE
*GLQ-Gary L. Quigley	\$5,400.00	\$4,028.92		\$9,428.92

THANK YOU FOR YOUR BUSINESS!

STATEMENT

J. E. Sutton & Associates

STATEMENT # 102
DATE: AUGUST 25, 2008

200 North 3rd Street
Boise, ID 83701
Phone (208) 336-4444
Fax (208) 336-4494

BILL Idaho Republican Party
TO C/O Norm Semanko
802 West Bannock
Boise, Idaho 83702
Customer ID- JES-1432

DATE	INITIALS	DESCRIPTION	RATE/HR	HOURS	AMOUNT
8-12-08	JES	Research and shepardize OPC Case Law and argument; draft Sur-reply brief	\$250.00	6	\$1500.00
8-13-08	JES	Finish draft and file Sur-reply brief	\$250.00	1	\$250.00
8-18-08	MH	Emailed Client re: hearing	\$50.00	.10	N/C
8-19-08	JES	Review of all briefs; Prepare for Hearing; T/Cf Attorney General's Office	\$250.00	1.5	\$375.00
8-20-08	JES	Travel to U.S. District Court; Prepare for hearing; Argument at hearing; Conference w/ OPC Intervenors; Attorney General's Office; Conference w/ Executive Director Syd Smith	\$250.00	3.5	\$875.00
8-23-08		Discount- 20%			-\$600.00
		BALANCE FORWARD	CURRENT CHARGES	TOTAL PAYMENTS	AMOUNT DUE
		\$15,428.92	\$2,400.00	\$0.00	\$17,828.92

8/27/08 < 8,914.46 >

8,914.46

10/7/08 CR 22602

THANK YOU FOR YOUR BUSINESS!

EXHIBIT "B"
COSTS INCURRED

Date	Payee	Description	Amount
9/17/09	AT Conference	Conference Call to Court	95.88
12/4/09	M&M Court Reporting	Semanko Depo Transcript	421.93
12/22/09	AT Conference	Conference Call to Court	14.70
12/22/09	US Postal Service	Express Mail/Munger	17.50
1/4/10	Moore Information	Voter Survey Costs	8,000.00
1/4/10	US Postal Service	Express Mail/Moore	18.30
1/6/10	Moore Information	Voter Survey Costs	4,000.00
1/12/10	David Ripley	Expert Witness Fee (Statement Attached B-2)	2,000.00
3/17/10	Michael Munger, Ph.D.	Expert Witness Fee (itemized Statement Attached B-2)	4,050.00
3/24/10	M&M Court Reporting	Munger Depo Transcript	372.65
3/30/10	Capital One Bank Visa	Reimburse Troupis Travel Exp. For Munger Deposition in Raleigh-Durham, NC (Itemized B-1, attached)	885.39
3/30/10	Capital One Bank Visa	Reimburse AT Conf. Call 1/26/10 Status Conference	35.45
4/23/10	David Ripley	Expert Witness Fee	2,000.00
9/28/10	QnA Court Reporting	Saunders/Martin Depo Trans.	399.85
9/30/10	M&M Court Reporting	Moore Depo Trans.	127.12
9/30/10	M&M Court Reporting	Maxwell/Deide/Vance Ripley/Bowers/Barrett Beck/Kulczyk/Mansfield Depo Transcripts	898.59
10/4/10	AT Conference	9/14/10 and 9/30/10 Depositions phone conference	232.07
10/4/10	M&M Court Reporting	Ripley, Vol.2/Adams	

		Depo Transcripts	344.89
11/2/10	Tamara Hohenleitner, CSR	Transcript of Court Hearings	788.12
11/2/10	AT Conference	Conference Call re: Briefing	4.28
11/29/10	Hilton Garden Inn	Hotel Cost for Hearing/Munger	417.90
11/29/10	Michael Munger, Ph.D.	Expert Witness Fees (Itemized Statement Attached B-2)	2,912.50
11/29/10	Michael Munger, Ph.D.	Travel Expenses (Itemized B-1, attached)	689.96
10/22/10	Robert Moore	Expert Witness Fees (Statement Attached, B-2)	1,500.00
10/22/10	Robert Moore	Expert Witness Costs – Travel (Itemized B-1, attached)	234.34
		Total	\$30,461.42

EXHIBIT "B-1"
TRAVEL COSTS INCURRED

Troupis – Travel Expenses for Munger Deposition

3/30/10	Airfare – Boise – Raleigh-Durham, NC	435.80
3/30/10	Hotel – Comfort Suites	236.60
3/30/10	Meals	119.88
3/30/10	Dollar Car Rental	67.61
3/30/10	Airport Parking	<u>25.50</u>
	Total	885.39

Munger – Travel Expenses for Evidentiary Hearing

10/12/10	Airfare – Raleigh-Durham, NC – Boise	655.80
10/12/10	Airport Parking	16.00
10/12/10	Meals in Transit	<u>18.16</u>
	Total	689.96

Moore – Travel Expenses for Evidentiary Hearing

10/22/10	Airfare – Portland – Boise	226.70
10/22/10	Meals in transit	11.64
10/22/10	Airport Parking	<u>16.00</u>
	Total	254.34
	Total Travel Costs	1,829.69

David D. Ripley

January 13, 2010

TO: CHRIST TROUPIS

FM: DAVID RIPLEY

Invoice for Professional Services Re: Election Research for Closed Primary Case

1/12/10 Research on election results in Districts 10, 14, 15, 28, and Latah County
Work on Polling Survey

\$2,000.00

EXHIBIT B-2

Michael Munger, PhD

10020 Bushveld Lane
Raleigh, NC 27613
munger@duke.edu

Cell (919) 369 6453
Fax (919) 844 0954
<http://www.duke.edu/~munger>

March 12, 2010

Christ Troupis
Troupis Law Office, P.A.
1299 E. Iron Eagle, Ste 130
P.O. Box 2408
Eagle, Idaho 83616

Dear Mr. Troupis:

I have added up my hours, and have come up with a bill for my services as an expert in the case of IRP v Yursa.

The hours, including work on reviewing the data, the affidavits, and the survey, preparing the report, and preparing for the deposition, sum to:

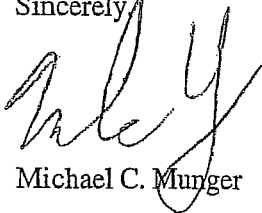
27 hours
\$150 / hour
Total Fee: \$4,050

My address is above.

My Social Security number, [REDACTED]

Thanks!

Sincerely,



Michael C. Munger

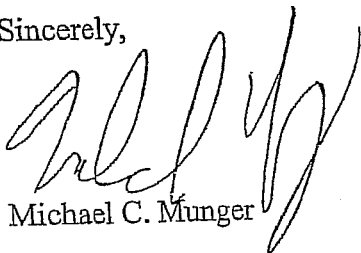
Christ Troupis
Troupis Law Office, P.A.
1299 E. Iron Eagle, Ste 130
P.O. Box 2408
Eagle, Idaho 83616

Dear Mr. Troupis:

Please find below the itemized listing of my final bill for services and travel in the matter of Idaho Republican Party v. Isursa.

It was a pleasure working with you!

Sincerely,



Michael C. Munger

Itemized Costs:

1. *Services:*

12 hours preparation @ \$175/hour:	\$2,100
3.25 hours on stand as expert witness @ \$250/hour:	812.50

2. *Travel:*

Airfare on Delta (receipt attached)	655.80
Parking in Raleigh (receipt attached)	16.00
Meals (while in transit, receipts attached)	18.16

Grand Total: \$3,602.46

This is my final and total request for payment in this matter.

mcm



MOORE INFORMATION

OPINION RESEARCH • STRATEGIC ANALYSIS

2130 SW Jefferson, Suite 200, Portland, OR 97201

DATE	INVOICE NO.
10/14/2010	100102-2

BILL TO
Troupis Law Office, PA 1299 East Iron Eagle, Suite 130 PO Box 2408 Eagle, Idaho 83616

REMIT TO
Moore Information, Inc. 2130 SW Jefferson Street Suite 200 Portland, OR 97201

ITEM	DESCRIPTION	AMOUNT
3010	Expert Witness Testimony	1,500.00
3010	Travel Expenses	254.34
Due upon receipt of invoice		
Total		\$1,754.34
Federal Tax I.D. [REDACTED]		
Phone: (800) 498-5154		
Phone: (503) 221-3100		
Payments/Credits		\$0.00
Balance Due		\$1,754.34