

IN THE UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF VIRGINIA
 Newport News Division

| | | |
|------------------------------------|---|-----------------------------------|
| GAVIN GRIMM, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Civil Case No. 4:15-cv-54-AWA-DEM |
| |) | |
| GLOUCESTER COUNTY SCHOOL BOARD, |) | |
| |) | |
| Defendant. |) | |
| |) | |

STIPULATION FOR ENTRY OF ORDER

Plaintiff Gavin Grimm and Defendant Gloucester County School Board (the “Board”) hereby stipulate and agree that Plaintiff’s Motion for Attorney’s Fees and Costs (the “Fee Petition”) is unopposed, and there being nothing left to consider, a final Order granting the Fee Petition should be entered by the Court.

1. On July 26, 2021, pursuant to Federal Rule of Civil Procedure 54(d), the Plaintiff moved this Court for an award of attorneys’ fees and costs reasonably incurred in this matter (the “Fee Petition”). ECF 252.

2. In support of the Fee Petition, Plaintiff’s requested fee award was based on the following market rates, with a 50% discount for hours spent on travel:

| Name | Years of Experience | Rate |
|------------------|-----------------------------|---|
| Joshua Block | 10 (in 2015) – 16 (in 2021) | \$650 (before 6/1/16); \$750 (after 6/1/16) |
| Rebecca Glenberg | 18 (in 2015) | \$650 |
| Eden Heilman | 12 (in 2018) – 15 (in 2021) | \$650 |

| | | |
|-------------------|---------------------------|-------|
| Gail Deady | 4 (in 2015) – 7 in (2018) | \$450 |
| Shayna Medley | 1 (in 2018) – 2 (in 2019) | \$350 |
| Jennifer Safstrom | < 1 (in 2018- 2019) | \$300 |

3. The Board has satisfied the Fee Petition and has tendered payment to Plaintiff for attorneys’ fees in this case in the full amount of \$1,284,735.75 and costs in the amount of \$27,467.85.

4. The Parties agree that no further proceedings will remain pending before the Court upon entry of an order, and this case can be placed among the ended matters.

Respectfully submitted,

/s/ Eden B. Heilman

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* Admitted *pro hac vice*

Dated: August 26, 2021

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GLOUCESTER COUNTY SCHOOL BOARD

By Counsel

_____/s/

David P. Corrigan (VSB No. 26341)

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August 2021, a true and correct copy of the forgoing was filed electronically with the Clerk of the Court for the U.S. District Court for the Eastern District of Virginia by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Eden Heilman

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