UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Riky Alexis Morales Lopez, Petitioner, v. Todd Blanche, *et al.*, Respondents.	Case No.0:26-cv-01429-JRT-JFD

DECLARATION OF JOSHUA J. RISSMAN IN SUPPORT OF THE REPLY IN PETITIONER'S APPLICATION FOR FEES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT

I, Joshua J. Rissman, declare and state as follows:

1. I am a partner at Gustafson Gluek PLLC and make this declaration on its behalf.

2. I submit this declaration in support of the Reply in Petitioner's Application for Fees Pursuant to the Equal Access to Justice Act. I have personal knowledge of the matters set forth in this declaration, and, if called as a witness, I could testify to the matters set forth in this declaration.

3. Below is a detailed chart of the time and expenses spent on this case with an hourly rate of $267.36 pursuant to the Equal Access to Justice Act. 28 U.S.C. § 2412. Attorneys, paralegals and a law clerk worked as efficiently as possible to perform the work necessary to free the Petitioner from unlawful detention, obtain his seized property and prepare this fee petition and supporting papers.

4. Associates and I spent a significant amount of time researching and verifying the factual basis for the FTCA claim and completing and submitting this form. The multi-step process for completing the FTCA form was excessively onerous; Petitioner was required to register on SAM.gov as an entity and register for and receive a "Unique Entity Identifier" and "Commercial and Government Entity Code," despite the fact that Petitioner is not an entity. Respondents then scrapped the FTCA process in favor of yet a third and different form.

5. Petitioner was also compelled to spend a great amount of time writing a Reply to address 1) Respondents' novel (and incorrect) argument that the EAJA does not allow attorneys' fees in a habeas action; 2) Respondents' position that they were substantially justified in failing to address all but one of Petitioner's grounds for release as well as failing to follow this Court's orders; and 3) their mischaracterization of Petitioner's fee petition.

6. Since the initial fee petition, *see* Decl. of Joshua J. Rissman in Supp. of Mot. for Fees Pursuant to the Equal Access to Justice Act, ECF No. 35, at 2-7, attorneys, paralegals and a law clerk have spent the following time largely researching and drafting the reply brief:

Date	Timekeeper	Narrative	Hours	Rate	Lodestar
5/22/26	Joshua J. Rissman	E-mails with US Attorneys, internally re: FTCA claim award	0.25	$267.36	$66.84
5/26/26	Joshua J. Rissman	Follow up on FTCA claim	0.25	$267.36	$66.84
5/28/26	Joshua J. Rissman	Edit status report; e-mails with D. Fuller re: same and payment of FTCA claim.	0.50	$267.36	$133.68

5/29/26	Joshua J. Rissman	E-mails with DOJ re: hearing; analyze status report re: same; organize check sending to client;	0.75	$267.36	$200.52
6/01/26	Joshua J. Rissman	E-mails with D. Fuller re: EAJA meet and confer	0.50	$267.36	$133.68
6/02/26	Joshua J. Rissman	Analyze response to EAJA fee brief; research reply	0.75	$267.36	$200.52
6/03/26	Joshua J. Rissman	Conference with M. Nikolai re: reply brief and fee petition strategy	0.25	$267.36	$66.84
6/05/26	Joshua J. Rissman	Analyze Respondents' response to EAJA brief, including sovereign immunity arguments; e-mail N. Ford re: same	1.00	$267.36	$267.36
6/08/26	Nicholas D. Ford	Researching responses to Respondent's response to EAJA brief	5.25	$267.36	$1,403.64
6/09/26	Nicholas D. Ford	Drafting memo re: arguments against Respondents' EAJA brief; e-mailing J. Rissman re: same	1.50	$267.36	$401.04
6/09/26	Joshua J. Rissman	E-mail D. Hackworthy re: leave to file reply brief; analyze order on contempt and dismissal	0.50	$267.36	$133.68
6/10/26	Chelsea M. Noble	Draft Mtn for leave to file reply brief, meet and confer statement and proposed order; e-mails with J. Rissman re same.	2.50	$267.36	$668.40
6/10/26	Joshua J. Rissman	Editing motion for leave to file reply	0.50	$267.36	$133.68
6/10/26	Chelsea M. Noble	E-mails with T. Grill re: status of client check	0.25	$267.36	$66.84
6/14/26	Joshua J. Rissman	Analyzing and editing leave to file reply motion and supporting papers	0.25	$267.36	$66.84
6/15/26	Chelsea M. Noble	Edit, finalize and file mtn to file reply brief, meet and confer and proposed order; e-mails with J. Rissman re same.	0.50	$267.36	$133.68
6/15/26	Joshua J. Rissman	E-mail with N. Ford re: reply brief in support of EAJA motion	0.25	$267.36	$66.84
6/17/26	Nicholas D. Ford	Drafting brief in reply to Respondent's response brief	3.25	$267.36	$868.92
6/17/26	Joshua J. Rissman	E-mail with N. Ford re: reply brief in support of EAJA motion	0.25	$267.36	$66.84

6/18/26	Nicholas D. Ford	Drafting brief in reply to Respondent's response brief	5.50	$267.36	$1,470.48
6/19/26	Nicholas D. Ford	Drafting brief in reply to Respondent's response brief	2.50	$267.36	$668.40
6/22/26	Nicholas D. Ford	Revising brief in reply to Respondent's reply to Petitioner's motion for attorney fees; drafting declaration re: same	1.25	$267.36	$334.20
6/22/26	Joshua J. Rissman	Edit and draft reply brief; conference with N. Ford re: same	1.50	$267.36	$401.04
6/23/26	Nicholas D. Ford	Revising brief in reply to Respondent's reply to Petitioner's motion for attorney fees; revising declaration re: same	4.25	$267.36	$1,136.28
6/23/26	Joshua J. Rissman	Analyze and edit reply brief, declaration.	2.00	$267.36	534.72
6/23/26	Chelsea M. Noble	Edit, finalize and file reply brief and J. Rissman declaration; e-mails with N. Ford and J. Rissman re: same.	1.00	$267.36	$267.36
Total:	X		37.25		$9,959.16
		Work Listed in First Declaration:	66.50		$17,779.44
		Cost:			$5.00
		Grand Total:	103.75 Hours		$27,743.60

7. Attorneys, paralegals, and a law clerk collectively spent 103.75 hours on this matter, for a total of $27,743.60 in fees and costs.

8. I certify that the hours and expenses set forth above are all related to the prosecution of this matter, are reasonable and should be approved as part of the case.

9. I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: June 23, 2026

Respectfully submitted,

/s/ Joshua J. Rissman
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