UNITED STATES DISTRICT COURT

DISTRICT OF COLORADO

ADOLFO TREJO HERRERA Petitioner v. **ROBERT HAGAN,** *et. al.* Respondents.	Case No. 1:26-cv-1366 **MOTION FOR ATTORNEY'S FEES PURSUANT TO EAJA**

MOTION FOR ATTORNEY'S FEES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT

COMES NOW, Miriam Miller, on behalf of Petitioner, Adolfo Trejo Herrera, and respectfully requests an award of attorney's fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412.

In compliance with D.C.COLO.L Civ. R. 54.3, Petitioner submits the accompanying Affidavit of Counsel and detailed billing records, which set forth counsel's qualifications, the services rendered, the time expended, hourly rates, and the total fees requested.

Petitioner seeks fees in the total amount of $400, representing the two hours of work at a rate of $200 per hour.

Petitioner further asserts that, upon prevailing in this action, the position of the United States was not substantially justified and that no special circumstances would make an award of fees unjust.

WHEREFORE, Petitioner respectfully requests that the Court award attorney's fees and costs pursuant to EAJA.

Respectfully Submitted this 2nd day of April, 2026

/s/ Miriam Rose Miller

Counsel for Petitioner

Bull & Davies, P.C.
P.O. Box 33059
Northglenn, CO 80233
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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2026, I sent a copy of the **MOTION FOR ATTORNEY'S FEES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT** to the following parties in the way described below each party's name:

Party Name: **ROBERT HAGAN,** *et. al.*

How Served: **CM/ECF and Overnight Mail**

Party Attorney's Name: **Peter McNeilly**

Address: **1801 California Street, Suite 1600**
Denver, CO 80202

Telephone Number: (303) 454-0100

Email Address: Kevin.Traskos@usdoj.gov

/s/ Miriam Miller

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