

## **Prevailing Parties Only Entitled to Fees Reasonably Incurred: Beware the Duplication of Efforts**

Posted on March 6, 2009 by [Gary A. Bresee](#)

Last fall I served as an expert in a case which analyzed the lodestar claimed by the prevailing parties in *City of Los Angeles v. County of Kern*, Case No. CV 06-5094 GAF (VBKx) (September 3, 2008). The written opinion by U.S. District Judge Gary Allen Fees has been cited as "must reading" on the methodology that can be used by a federal district judge to reduce the lodestar in civil rights cases. See [California Attorneys' Fees](#) website. The decision illustrates more than a few pitfalls which should be avoided by litigation counsel, particularly when there are multiple lawfirms billing to the file and the duplication of efforts that can result therefrom. The decision also outlines an approach which can be utilized by anyone interested in how best to evaluate the reasonableness of attorney invoices before paying. To read the full decision, click [here](#).