

EXHIBIT I

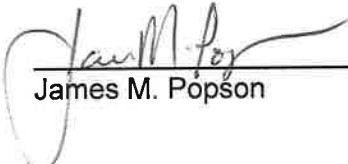
STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

AFFIDAVIT

I, James M. Popson, having been duly sworn, and having personal knowledge of the facts and statements contained herein, testify as follows:

- 1) I am greater than 18 years of age and have personal knowledge of the facts set forth herein.
- 2) I am counsel of record for defendants Alberto Nestico, Robert Redick, and Kisling Nestico & Redick, LLC in the above captioned matter.
- 3) I caused the retrieval of the following documents from the Clerk of Courts for Cuyahoga County, which are attached to this affidavit as:
Exh 1: case expense invoice for *J.G. and D.J. v. Jones*, et al., Case No. 1:17-cv-0177.
Exh. 2: case expense invoices for *John Pope, et al. v. Cliffs Natural Resources, Inc., et al.*, Case No. 1:14-CV-01234;
Exh. 3: case expense invoice for *Northeast Ohio Coalition v. Husted, et al.*, Case No. 2:06-CV-00896;
Exh. 4: case expense invoice for *Arthur Lavin, M.D., et al. v. Jon Husted*, Case No. 1:10-CV-01986;
Exh. 5: case expense invoice for *Christina Cruz, et al. v. English Nanny & Governess School, et al.*, Case No. CV-11-768767; and
Exh. 6: case expense invoice for *Sandy Cross v. Georgiou Studio, Inc.*, Case No. 1:07-CV-03790.
- 4) The attached exhibits are true and accurate copies to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.


James M. Popson

SWORN TO BEFORE ME and subscribed in my presence this 14th day of June, 2019.




Notary Public

**T H E
CHANDRA
L A W F I R M L L C**

1265 West 6th Street, Suite 400
Cleveland, Ohio 44113-1326
United States

INVOICE

Invoice # 1169
Date: 08/16/2018
Due Upon Receipt

Sabrina Robinson

J.G. and D.J. v. Jones, et al.

Date	Notes	Rate/ Price	Total
12/20/2016	MetroHealth medical records (Nov 1 to present)	\$41.84	\$41.84
12/31/2016	Lexis legal-research for December	\$31.65	\$31.65
01/10/2017	Empire Investigations, Inc. Travel and view scene with clients.	\$144.50	\$144.50
01/31/2017	Lexis legal-research for January	\$8.34	\$8.34
03/31/2017	Lexis legal-research for March	\$13.38	\$13.38
05/31/2017	Lexis legal-research for May	\$34.07	\$34.07
06/05/2017	Filing fee for Complaint in Northern District.	\$400.00	\$400.00
06/30/2017	Lexis legal-research for June	\$32.01	\$32.01
06/30/2017	Postage expense for June	\$19.68	\$19.68
10/30/2017	Fee for MetroHealth medical records for D'onte James and supplemental records for Jade Greenwood.	\$13.00	\$13.00
11/30/2017	Westlaw legal-research expense for November.	\$448.10	\$448.10
12/31/2017	Copy expense for December.	\$104.00	\$104.00
12/31/2017	Westlaw legal-research for December.	\$399.19	\$399.19
01/31/2018	Westlaw legal-research for January 2018.	\$124.82	\$124.82
03/05/2018	Greenwood mediation with Michael Ungar, Ulmer & Berne LLP.	\$4,463.49	\$4,463.49
		Subtotal	\$6,278.07
		Total	\$6,278.07

Exhibit 1

1



Case: 1:14-cv-01234-DCN Doc #: 34-2 Filed: 07/01/14 6 of 7. PageID #: 697

10. Plaintiff's counsel has incurred \$4,295.56 in out-of-pocket costs and expenses in litigating this action. The expenses incurred by Plaintiff's counsel are described by type and amount in the following table:

<i>Expense</i>	<i>Amount</i>
<i>Experts</i>	\$0
<i>Court reporter</i>	\$0
<i>Process server</i>	\$0
<i>Photocopies</i>	\$272.09
<i>Telephone (Long Distance and Conference Calls)</i>	\$22
<i>Postage, Overnight, and Messenger Delivery</i>	\$91.32
<i>Travel and Meals</i>	\$2,744.40
<i>Filing Fees and Notices</i>	\$840
<i>Computer Research</i>	\$325.75
<i>Total</i>	\$4,295.56

11. The categories of expenses for which Plaintiff's counsel seeks reimbursement are the types of expenses routinely charged to hourly clients and, therefore, should be reimbursed. All of these charges were reasonable and necessary to successfully prosecute this action.

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Invoice for
Northeast Ohio Coalition for the Homeless, SEIU
Local 1199, et al.

invoice

In reference to
Northeast Ohio Coalition v. Husted, et al.

professional services

		Hrs/Rate	Subtotal
Subodh Chandra	2013.01.22 Subodh Chandra Attention to McTigue communication and C. Gentry communication; communication to Brian Davis with NEOCH re upcoming consent-decree expiration.	00:06 \$435.00	\$43.50
Subodh Chandra	2013.01.23 Subodh Chandra Discussion with Prof. Norman Robbins of voter coalition regarding potential outstanding concerns regarding Secretary of State to be incorporated into motion to extend consent decree. Prepare for conference call among counsel. Conference call among counsel. Tel. call to C. Gentry. Tel. discussion with D. McTigue re need to extend consent decree. Further consideration of same.	01:36 \$435.00	\$696.00
Subodh Chandra	2013.01.24 Subodh Chandra Draft and synthesize "wish list" for Sixth Circuit mediation in effort to avoid need to move to extend consent decree. Discuss same with Brian Davis of NEOCH. Circulate to co-counsel.	01:12 \$435.00	\$522.00
Subodh Chandra	2013.01.28 Subodh Chandra Analysis of draft confidential mediation communication regarding issues to be addressed for mediator. Revise and edit same. Communications with Brian Davis at NEOCH regarding same and tel. discussion with B. Davis. Various communications with co-counsel. Tel. call to C. Gentry.	01:24 \$435.00	\$609.00

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		Hrs/Rate	Subtotal
Subodh Chandra	2013.01.29 Subodh Chandra Message to C. Gentry. Attention to comments from Brian Davis of NEOCH re draft communication to Sixth Circuit mediator to try to reach agreement with Secretary making motion to extend/modify consent decree unnecessary. Make further revision to same accordingly and transmit with comments to co-counsel. Discussion with D. Leonard regarding revisions and engage in correspondence with co-counsel regarding changed elements and approval to transmit to mediator.	00:48 \$435.00	\$348.00
Subodh Chandra	2013.02.13 Subodh Chandra Attention to comments from co-counsel and mediator.	00:06 \$435.00	\$43.50
Subodh Chandra	2013.02.15 Subodh Chandra Tel. discussion with D. McTigue re need to move to extend consent decree and strategy re same (and efforts to potentially amicably resolve outstanding issues with Secretary of State thus making motion unnecessary).	00:18 \$435.00	\$130.50
Subodh Chandra	2013.02.25 Subodh Chandra Consideration of outstanding issues in relation to motion to extend consent decree and draft communication to co-counsel re same.	00:12 \$435.00	\$87.00
Sandhya Gupta	2013.03.05 Sandhya Gupta Confer with co-counsel re motion to extend; review consent decree and complaint and injunction motions to begin drafting motion to extend.	01:06 \$300.00	\$330.00
Subodh Chandra	2013.03.05 Subodh Chandra Brief and plot strategy with S. Gupta re motion to extend; delegate assignments related to same.	00:42 \$435.00	\$304.50
Sandhya Gupta	2013.03.06 Sandhya Gupta Review cases and pleadings related to motion to extend.	00:48 \$300.00	\$240.00
Sandhya Gupta	2013.03.07 Sandhya Gupta Review cases and pleadings for motion to extend consent decree.	06:06 \$300.00	\$1,830.00

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		Hrs/Rate	Subtotal
Sandhya Gupta	2013.03.08 Sandhya Gupta Speak with D. McTigue re arguments for motion to extend; confer with S. Chandra re motion to extend.	00:48 \$300.00	\$240.00
Subodh Chandra	2013.03.08 Subodh Chandra Additional strategy discussion with S. Gupta re motion to extend consent decree. Provide guidance regarding same.	00:18 \$435.00	\$130.50
Sandhya Gupta	2013.03.11 Sandhya Gupta Review Judge Marbley decision from July 9, 2012. Draft motion to extend.	03:42 \$300.00	\$1,110.00
Sandhya Gupta	2013.03.12 Sandhya Gupta Continue to review prior motions and orders; draft motion to extend consent decree.	06:00 \$300.00	\$1,800.00
Sandhya Gupta	2013.03.12 Sandhya Gupta Review NEOCH and SEIU litigation, motions, consent decree, and draft motion to extend consent decree.	04:24 \$300.00	\$1,320.00
Sandhya Gupta	2013.03.14 Sandhya Gupta Confer with S. Chandra re additional evidence needed to support argument re extension; consider argument re Ohio law continuing to invite litigation without the decree.	04:54 \$300.00	\$1,470.00
Subodh Chandra	2013.03.14 Subodh Chandra Work with S. Gupta re motion to extend. Further consideration of arguments and case-law analysis regarding same.	01:00 \$435.00	\$435.00
Sandhya Gupta	2013.03.19 Sandhya Gupta Confer with S. Chandra re getting declaration from Brunner et al. to support what the parties had in mind for "good cause" and other potential evidence.	00:06 \$300.00	\$30.00
Subodh Chandra	2013.03.19 Subodh Chandra Communication with S. Gupta re obtaining additional evidence in support of motion to extend. Pursue avenues and communications regarding obtaining such additional evidence.	00:12 \$435.00	\$87.00

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		Hrs/Rate	Subtotal
Subodh Chandra	2013.03.21 Subodh Chandra Tel. conference with all co-counsel to discuss pending issues including motion to extend consent decree; tel. discussion with ODP's counsel Don McTigue re motion to extend and evidence gathering.	00:48 \$435.00	\$348.00
Subodh Chandra	2013.03.22 Subodh Chandra Participate in Sixth Circuit mediation call with particular focus on trying to exhort a timely answer from Defendants regarding conditions required to avoid need to file motion to extend . Separate call with Sixth Circuit mediator on NEOCH's behalf. Attention to communication from D. Leonard.	01:54 \$435.00	\$826.50
Sandhya Gupta	2013.03.25 Sandhya Gupta Research and draft motion to extend consent decree; review additional evidence.	04:54 \$300.00	\$1,470.00
Suzanne Zaranko	2013.03.25 Suzanne Zaranko Preparation of exhibit regarding purposes of decree for Motion to Extend Consent Decree.	01:00 \$120.00	\$120.00
Sandhya Gupta	2013.03.26 Sandhya Gupta Review NEOCH complaint; research and draft motion to extend consent decree.	08:36 \$300.00	\$2,580.00
Suzanne Zaranko	2013.03.26 Suzanne Zaranko Preparation of exhibit of complaint provisions for motion to extend consent decree.	01:00 \$120.00	\$120.00
Sandhya Gupta	2013.03.27 Sandhya Gupta Research, draft motion to extend consent decree.	06:36 \$300.00	\$1,980.00
Sandhya Gupta	2013.03.28 Sandhya Gupta Research and draft motion to extend consent decree.	13:36 \$300.00	\$4,080.00
Sandhya Gupta	2013.04.01 Sandhya Gupta Review deposition transcripts re evidence to support motion to extend.	04:06 \$300.00	\$1,230.00

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		Hrs/Rate	Subtotal
Sandhya Gupta	2013.04.04 Sandhya Gupta Draft Brian Davis declaration in support of motion to extend consent decree. Speak with D. McTigue re substance of draft of motion to extend consent decree; communications with S. Chandra re conference call.	02:48 \$300.00	\$840.00
Subodh Chandra	2013.04.04 Subodh Chandra Work on strategy with S. Gupta re motion to extend.	00:18 \$435.00	\$130.50
Sandhya Gupta	2013.04.05 Sandhya Gupta Conference with D. McTigue and S. Chandra re motion to extend. Further discussion with S. Chandra re same.	02:54 \$300.00	\$870.00
Subodh Chandra	2013.04.05 Subodh Chandra Tel. discussion with D. McTigue and S. Gupta re evidence gathering on motion to extend and strategic considerations. Strategy discussions with S. Gupta re motion to extend and research results, as well as additional evidence gathering needed.	01:00 \$435.00	\$435.00
Sandhya Gupta	2013.04.08 Sandhya Gupta Review earlier motion for fees and response and order to see arguments re how the consent decree changed the legal position of the parties; send email to S. Chandra re results; attention to email correspondence re new fee for birth certificate.	01:00 \$300.00	\$300.00
Subodh Chandra	2013.04.08 Subodh Chandra Attention to communications from S. Gupta re analysis related to motion to extend.	00:06 \$435.00	\$43.50
Suzanne Zaranko	2013.04.08 Suzanne Zaranko Computer research to obtain from City of Cleveland cost of copy of birth certificate—relates to supporting motion to extend consent decree.	00:06 \$120.00	\$12.00
Sandhya Gupta	2013.04.09 Sandhya Gupta Revise motion to extend consent decree, in particular flesh out section re statute and its failure to contemplate voters with SSN and without ID.	06:36 \$300.00	\$1,980.00

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Subodh Chandra	2013.04.16 Subodh Chandra Analysis and revision of second draft of motion to extend Consent Decree. Communications with S. Gupta re same.	01:06 \$435.00	\$478.50
Sandhya Gupta	2013.04.23 Sandhya Gupta Finish reviewing extensive deposition transcripts for evidence to support motion to extend.	04:48 \$300.00	\$1,440.00
Sandhya Gupta	2013.04.24 Sandhya Gupta Edit motion to extend; discuss comments with S. Chandra.	01:30 \$300.00	\$450.00
Subodh Chandra	2013.04.24 Subodh Chandra Further editing and revision of motion to extend; transmit draft to co-counsel. Communications regarding same.	01:36 \$435.00	\$696.00
Subodh Chandra	2013.04.25 Subodh Chandra Attention to and consideration of mediation-related messages from co-counsel and opposing counsel; continued effort to received timely response from opposing counsel/ Secretary to avoid need to file motion to extend that we are drafting.	00:12 \$435.00	\$87.00
Sandhya Gupta	2013.04.30 Sandhya Gupta Review D. Leonard's reactions re draft motion to extend consent decree; consider various criticisms; draft email to S. Chandra with my initial reactions.	02:18 \$300.00	\$690.00
Subodh Chandra	2013.04.30 Subodh Chandra Absorb D. Leonard (SEIU counsel) comments regarding motion-to-extend draft and engage S. Gupta re same.	00:42 \$435.00	\$304.50
Sandhya Gupta	2013.05.06 Sandhya Gupta Prepare for conference call with D. McTigue, S. Chandra, and C. Gentry; discuss with S. Chandra; draft email response to D. Leonard's comments.	02:12 \$300.00	\$660.00

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		Hrs/Rate	Subtotal
Subodh Chandra	2013.05.06 Subodh Chandra Analyze motion to extend consent decree, commentary back-and-forth, and generally prepare for conference discussion with D. McTigue (counsel for ODP), C. Gentry, and S. Gupta. Conf. call with same. Debriefing communications with S. Gupta re follow-up coordination with SEIU's counsel.	01:54 \$435.00	\$826.50
Sandhya Gupta	2013.05.07 Sandhya Gupta Review draft motion in preparation for all-plaintiffs'-counsel conference call (0.5); conference call (1.0); review 2012 motions to modify and district-court opinion sections re content of consent decree (1.5); draft email to group responding to this issue (0.5).	03:30 \$300.00	\$1,050.00
Subodh Chandra	2013.05.07 Subodh Chandra Prepare for tel. conference with all counsel. Tel. conference with all counsel. Further discussion with S. Gupta. Tel. discussion with D. McTigue.	01:48 \$435.00	\$783.00
Sandhya Gupta	2013.05.14 Sandhya Gupta Revise motion to extend consent decree, reviewing June 2012 motion to modify, as well as Secretary's official provisional-ballot count for 2012 general election, and district court and Sixth Circuit opinions.	04:00 \$300.00	\$1,200.00
Sandhya Gupta	2013.05.15 Sandhya Gupta Sixth Circuit mediation conference call. Debrief with S. Chandra including re non-answers from Secretary leaving motion to extend consent decree in limbo.	02:12 \$300.00	\$660.00
Subodh Chandra	2013.05.15 Subodh Chandra Prepare for and participate in Sixth Circuit mediation conference call (2.5 hrs); discussion with S. Gupta; communications with C. Gentry. Edit motion to extend consent decree in light of there still being no resolution from Secretary concerning issues that would obviate the need for the decree.	02:54 \$435.00	\$1,261.50
Sandhya Gupta	2013.05.16 Sandhya Gupta Conference call with all plaintiffs' counsel re case status and thoughts on motion to extend.	01:00 \$300.00	\$300.00

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Subodh Chandra	2013.05.16 Subodh Chandra Conference call with all plaintiffs' counsel re motion to extend. Further discussion with S. Gupta.	01:00 \$435.00	\$435.00
Sandhya Gupta	2013.05.21 Sandhya Gupta Review D. Leonard's email and edits. Email S. Chandra re edits. Incorporate changes into new drafts and email S. Chandra. Attention to email correspondence.	00:18 \$300.00	\$90.00
Subodh Chandra	2013.05.21 Subodh Chandra Communications to co-counsel re motion to extend.	00:06 \$435.00	\$43.50
Subodh Chandra	2013.05.23 Subodh Chandra Discussion with P. Calico, Sixth Circuit mediator, including tight timing that the Secretary's non-answers have left us with now for a motion to extend. Finalize and transmit documents to him for discussion with opposing counsel. Communications to co-counsel team.	00:24 \$435.00	\$174.00
Subodh Chandra	2013.05.24 Subodh Chandra Attention to message from Paul Calico and further consideration of same. Consideration of impact of delays presented by Defendants to avoid prejudice to client regarding motion to extend.	00:06 \$435.00	\$43.50
Subodh Chandra	2013.05.28 Subodh Chandra Discussion with Paul Calico, Sixth Circuit mediator in effort to obtain answers from Defendants regarding need to extend consent decree. Update S. Gupta re same.	00:12 \$435.00	\$87.00
Subodh Chandra	2013.06.03 Subodh Chandra Communications among counsel.	00:18 \$435.00	\$130.50
Subodh Chandra	2013.06.04 Subodh Chandra Communications among counsel.	00:06 \$435.00	\$43.50
Sandhya Gupta	2013.06.07 Sandhya Gupta Conference call with NEOCH/SEIU team; conference call with 6th Cir. mediator, confirming Defendants will not cooperate regarding conditions necessary to avoid motion to extend.	02:18 \$300.00	\$690.00

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Subodh Chandra	2013.06.07 Subodh Chandra Prepare for Sixth Circuit mediation call; tel. conference with various co-counsel in preparation; participate in Sixth Circuit mediation call—finally obtaining final word from Defendants that would obviate the need for the motion to extend; call with D. McTigue; debriefing call with plaintiff's team; delegate assignments to S. Gupta re expediting under great time constraints motion to extend finalizing and moving as fast as possible now given the June 30 extension of consent decree and avoiding prejudice associated with Defendants' unfair delay in responding; attention to emails re all of the above.	03:48 \$435.00	\$1,653.00
Sandhya Gupta	2013.06.08 Sandhya Gupta Review S. Chandra instructions re revisions to draft motion to extend consent decree; insert case information as required; further consideration of extension issues.	04:42 \$300.00	\$1,410.00
Subodh Chandra	2013.06.08 Subodh Chandra Further refinement, editing, and draft new sections for memorandum in support of motion to extend. Coordinate additional research and plug-in needs with co-counsel.	02:24 \$435.00	\$1,044.00
Sandhya Gupta	2013.06.09 Sandhya Gupta Additional review of pleadings to understand history and impact of Secretary of State's Directive 2008-80, how it got incorporated into consent decree, and the allegations of confusing application of voter-ID requirements.	03:00 \$300.00	\$900.00
Sandhya Gupta	2013.06.10 Sandhya Gupta Direct compilation of exhibits and TOA/TOC. Attention to emails re additions to motion to extend. Confer with S. Chandra re status and coordination, and substance.	05:30 \$300.00	\$1,650.00

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Subodh Chandra	2013.06.10 Subodh Chandra Further editing and refinement of motion to extend and memo in support; provide directions to paralegal S. Zaranko and S. Gupta about finalization; communications with Don Strasser with Columbus Coalition for the Homeless and Brian Davis with Northeast Ohio Coalition for the Homeless. Attention to Don McTigue inserts into the brief and delegate insertions. Edit Davis declaration draft and discussion with B. Davis. Attention to problem associated with ECF system's failure to permit filing of entire brief and exhibits and direct S. Gupta and S. Zaranko regarding handling of same.	02:54 \$435.00	\$1,261.50
Sandhya Gupta	2013.06.11 Sandhya Gupta Follow-up addressing exhibits related to motion to extend.	00:36 \$300.00	\$180.00
Subodh Chandra	2013.06.11 Subodh Chandra Monitor situation regarding problems with S.D. Ohio e-filing and advise S. Gupta and S. Zaranko accordingly.	00:06 \$435.00	\$43.50
Sandhya Gupta	2013.06.12 Sandhya Gupta Call court's chambers to follow up re motion to extend consent decree and court's planned briefing schedule. Convey info to S. Chandra. Attention to email from S. Chandra to all counsel.	00:24 \$300.00	\$120.00
Subodh Chandra	2013.06.12 Subodh Chandra Communications with counsel. Communications with S. Gupta re logistics/procedure and motion for fees re consent-decree extension. Attention to result of her communication with the Court re same.	00:12 \$435.00	\$87.00
Sandhya Gupta	2013.06.14 Sandhya Gupta Confer with D. McTigue and S. Chandra in advance of Judge Marbley's court telephonic status conference; telephonic status conference with court and counsel; debrief with D. McTigue, S. Chandra, and C. Gentry post-status-conference.	00:54 \$300.00	\$270.00

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Subodh Chandra	2013.06.14 Subodh Chandra Discussion with co-counsel in preparation for upcoming status conference re motion to extend. Telephone status conference with the court. Further consideration of strategy regarding securing timely extension of decree in light of Defendants' complete refusal to even negotiate agreement on at least maintaining the status quo until the Court makes a decision.	00:54 \$435.00	\$391.50
Subodh Chandra	2013.06.18 Subodh Chandra Attention to Court's order temporarily extending consent decree.	00:06 \$435.00	\$43.50
Sandhya Gupta	2013.06.24 Sandhya Gupta Review Defendant's opposition to motion to extend.	02:12 \$300.00	\$660.00
Subodh Chandra	2013.06.24 Subodh Chandra Attention to R. Coglianese's communications with the Court and eventual filing. Initial quick review of Defendants' opposition to motion to extend.	00:42 \$435.00	\$304.50
Sandhya Gupta	2013.06.25 Sandhya Gupta Attention to correspondence with C. Gentry and D. McTigue, responding to thoughts about Reply brief; send draft declaration to McTigue; review defendant's cases; consider and begin drafting arguments for Reply brief; confer with D. McTigue re Brunner declaration and Reply; review cases and consent decree.	09:42 \$300.00	\$2,910.00
Subodh Chandra	2013.06.25 Subodh Chandra More detailed analysis of Defendants' brief in opposition to extending consent decree and develop strategy regarding reply to same.	00:36 \$435.00	\$261.00
Sandhya Gupta	2013.06.26 Sandhya Gupta Prepare with questions for co-counsel in conference call. Continue to consider issues for reply and continue drafting. Confer with co-counsel. Conference with 6th circuit mediator. Draft reply brief. Review and make edits to proposed Brunner draft declaration based on D. McTigue's discussion with Brunner.	11:00 \$300.00	\$3,300.00

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Subodh Chandra	2013.06.26 Subodh Chandra Tel. conf. with C. Gentry, D. McTigue, and S. Gupta re substance and strategy for reply brief (on EXPEDITED SCHEDULE) and related evidence and law in support of motion to extend; further tel. discussion with C. Gentry, D. McTigue, S. Gupta; continues to provide guidance and direction to S. Gupta re strategy in brief; analyze research results and provide additional direction to S. Gupta.	03:48 \$435.00	\$1,653.00
Sandhya Gupta	2013.06.27 Sandhya Gupta Draft reply brief in support of consent decree.	12:18 \$300.00	\$3,690.00
Subodh Chandra	2013.06.27 Subodh Chandra Monitor and engage regarding progress on reply brief process (very tight time deadline) regarding motion to extend.	00:06 \$435.00	\$43.50
Sandhya Gupta	2013.06.28 Sandhya Gupta Review cases; revise brief; confer with co-counsel; finalize; file.	06:00 \$300.00	\$1,800.00
Subodh Chandra	2013.06.28 Subodh Chandra Edit various sections of reply brief in support of motion to extend consent decree on expedited schedule and engage in various discussions re same. Edit declarations in support.	02:54 \$435.00	\$1,261.50
Sandhya Gupta	2013.07.01 Sandhya Gupta Prepare for hearing by reviewing cases on termination/extension, exhibit from Reply to Mot. Pl, studying decree, reviewing arguments in motion; writing up questions that court may ask at hearing.	02:00 \$300.00	\$600.00
Subodh Chandra	2013.07.03 Subodh Chandra Attention to the Court's order re oral argument. Attention to oral-argument preparation and review of evidence.	00:30 \$435.00	\$217.50
Subodh Chandra	2013.07.05 Subodh Chandra Review and analyze past billings for work product in connection with upcoming fee petition for 2012 work.	04:18 \$435.00	\$1,870.50
Sandhya Gupta	2013.07.07 Sandhya Gupta Review cases and write up outline.	03:00 \$300.00	\$900.00

Oct 21, 2013

Invoice # 237

T H E
CHANDRA
L A W F I R M L L C

Chandra Law Firm, LLC
1265 West 6th St., Suite 400
Cleveland, OH 44113.1326
216.578.1700 www.ChandraLaw.com

		Hrs/Rate	Subtotal
Sandhya Gupta	2013.07.08 Sandhya Gupta Complete outline for consent-decree extension motion. Send to S. Chandra.	08:36 \$300.00	\$2,580.00
Subodh Chandra	2013.07.08 Subodh Chandra Prepare for oral argument re motion for extension of consent decree.	03:42 \$435.00	\$1,609.50
Sandhya Gupta	2013.07.09 Sandhya Gupta Add points to the outline for oral argument, consider additional arguments, flesh out case summaries, review original, supplemental, and ODP complaints to analyze what claims are still in the case; attention to correspondence from B. Davis and S. Chandra re additional evidence re social-security cards and identification; write up list of materials to have on hand at hearing.	05:54 \$300.00	\$1,770.00
Subodh Chandra	2013.07.09 Subodh Chandra Further prepare for oral argument on motion to extend: analyze outline draft prepared by Ms. Gupta and relevant case law and evidence. Refine arguments.	03:48 \$435.00	\$1,653.00
Sandhya Gupta	2013.07.10 Sandhya Gupta Draft notice of filing exhibits re additional evidence for hearing; review depositions to make chart; review cases citing Vanguard; review outline; read motion to dismiss.	05:30 \$300.00	\$1,650.00
Subodh Chandra	2013.07.10 Subodh Chandra Prepare for oral argument on motion to extend consent decree.	03:30 \$435.00	\$1,522.50
Suzanne Zaranko	2013.07.10 Suzanne Zaranko Preparation of documents needed for oral argument.	01:30 \$120.00	\$180.00
Sandhya Gupta	2013.07.11 Sandhya Gupta Review deposition transcripts of counties and tabulate into chart; prep co-counsel S. Chandra for tomorrow's oral argument; elaborate on case summaries of termination cases for S. Chandra review; prepare B. Davis declaration and confer with B. Davis re changes; prepare exhibits to declaration and notice of filing; review outline and other potential questions for oral argument.	14:00 \$300.00	\$4,200.00

Oct 21, 2013
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		Hrs/Rate	Subtotal
Subodh Chandra	2013.07.11 Subodh Chandra Field and return call from Rob in Judge Marbley's chambers. Attention to new court order rescheduling oral argument. Inform all parties and clients re same. Various coordination and instructions to expedite materials and exhibit preparation and delegation of same. Prepare for oral argument on motion to extend consent decree. Discussions with B. Davis, C. Gentry, and S. Gupta. Communications with D. McTigue. Communications with D. Strasser of Columbus Coalition for the Homeless.	04:42 \$435.00	\$2,044.50
Suzanne Zaranko	2013.07.11 Suzanne Zaranko Review deposition transcripts to obtain information needed for oral argument. Prepare exhibits for oral argument. File Notice of Filing Exhibits for Motion to Extend Consent Decree with court.	07:30 \$120.00	\$900.00
Sandhya Gupta	2013.07.12 Sandhya Gupta Review and complete chart of deposition testimonies on issue of SSN-4 ballots counted without return in 10 days (0.6); travel to and from Columbus, briefing and prepping S. Chandra; attend oral argument and prepare rebuttal points for S. Chandra to use in oral argument; debrief with co-counsel.	08:06 \$300.00	\$2,430.00
Subodh Chandra	2013.07.12 Subodh Chandra Travel to and from Columbus for oral argument with Judge Marbley including extensive preparation and debriefing conferences with client Brian Davis and co-counsel Sandhya Gupta (5.9); prepare for and attend oral argument on motion to extend and debrief with plaintiffs' counsel. Further discussion with B. Davis.	08:36 \$435.00	\$3,741.00
Sandhya Gupta	2013.07.18 Sandhya Gupta Review district-court and Sixth-Circuit opinions to determine outstanding issues and email to S. Chandra (0.8).	00:48 \$300.00	\$240.00

Oct 21, 2013
Invoice # 237

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		Hrs/Rate	Subtotal
Subodh Chandra	2013.07.19 Subodh Chandra Attention to docket calendar for this case and potential problems associated with today's scheduled expiration of consent decree per Doc. #368. Call to Rob in Judge Marbley's chambers for procedural guidance re same. Prepare motion for further temporary extension draft and consultations with D. McTigue, counsel for Ohio Democratic Party. Communications with S. Gupta re finalizing details in motion and filing it (overcoming problems with ECF system).	00:48 \$435.00	\$348.00
Subodh Chandra	2013.08.05 Subodh Chandra Analyze opinion from Judge Marbley extending consent decree; communication with S. Gupta; discussion with D. McTigue and C. Gentry. Communication to B. Davis at NEOCH.	01:00 \$435.00	\$435.00
Subodh Chandra	2013.08.06 Subodh Chandra Further communications with B. Davis at NEOCH re Judge Marbley's decision on motion to extend consent decree. Prepare for potential appellate response re same.	00:12 \$435.00	\$87.00
			\$95,712.00

additional charges

	Qty/Price	Subtotal
2013.01.31 Lexis legal-research expense	\$251.01	\$251.01
2013.02.28 Lexis legal-research expense	\$8.96	\$8.96
2013.03.31 Lexis legal-research expense	\$277.91	\$277.91
2013.03.31 PACER electronic legal-research expense 1st quarter	\$290.61	\$290.61
2013.04.30 Lexis legal-research expense	\$289.61	\$289.61

Oct 21, 2013
Invoice # 237

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216.578.1700 www.ChandraLaw.com

	Qty/Price	Subtotal
2013.05.06 Conference call expense	\$23.70	\$23.70
2013.05.23 Copy expense for May	\$18.20	\$18.20
2013.06.30 Copies for June 2013	\$15.60	\$15.60
2013.06.30 Lexis legal-research expense	\$53.01	\$53.01
2013.06.30 PACER electronic legal-research expense 2nd quarter	\$169.60	\$169.60
2013.07.12 Mileage to Columbus for oral arguments Mileage expense paid to Sandhya Gupta for travel expense to Columbus for Oral Argument on 7/12/2013 (with Subodh Chandra).	\$166.11	\$166.11
2013.07.31 Copies for July 2013	\$84.00	\$84.00
2013.07.31 Lexis legal-research expense	\$61.14	\$61.14
		\$1,709.46

Invoice Subtotal	\$97,421.46
Total due by Oct 21, 2013	\$97,421.46

staff time

	Hours	Rate	Subtotal
Sandhya Gupta	207:18	\$300.00	\$62,190.00
Subodh Chandra	74:00	\$435.00	\$32,190.00
Suzanne Zaranko	11:06	\$120.00	\$1,332.00

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 1 of 10. PageID #: 3519

Sep 21, 2012

Lavin, et al v Husted

Invoice #

THE
CHANDRA
LAW FIRM LLC

Chandra Law Firm, LLC

1265 West 6th St., Suite 400

Cleveland, OH 44113.1326

216.578.1700 www.ChandraLaw.com

Billed To

Arthur Lavin

18502 Lynton Road

Shaker Hts OH 44122

invoice

Billable Time	\$0.00
Expenses	\$7,992.93
	\$7,992.93
Taxes	\$0.00
	\$7,992.93
Retainer Applied	\$0.00
	\$7,992.93
Previous Balance	\$0.00
Total Owing (due by: Sep 21, 2012)	\$7,992.93

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 2 of 10. PageID #: 3520

invoice details

Item	Hrs./Qty	Rate/Price	Taxes	Subtotal
2010.07.27 Copy Charges for research Jul 27, 2010		\$1.80		\$1.80
9 pages at \$.20 per page				
2010.07.30 Copy charges for research Jul 30, 2010		\$0.20		\$0.20
1 page at \$.20 per page.				
2010.07.31 Westlaw online research Jul 31, 2010		\$604.13		\$604.13
2010.08.02 Copy charges for draft of complaint Aug 02, 2010		\$6.00		\$6.00
30 copies at \$.20 per page.				
2010.08.09 Copy charges for draft of complaint Aug 09, 2010		\$7.20		\$7.20
36 copies at \$.20 per page.				
2010.08.12 Copy charge for research Aug 12, 2010		\$41.50		\$41.50
415 pages at \$.20 per page.				
2010.08.12 Employee travel - Sandhya Gupta Aug 12, 2010		\$147.70		\$147.70
Mileage for travel to Columbus for research at Ohio Historical Society archives, at rate of \$.555 per mile.				

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Item	Hrs./Qty	Rate / Price	Fees	Subtotal
2010 08.16 Copy charges for draft of complaint Aug 16, 2010		\$7 50		\$7 50
37 copies at \$ 20 per page				
2010 08.31 Westlaw online research Aug 31, 2010		\$348.28		\$348.28
2010 09.03 Copy charges for service copies of complaint & PI Motion Sep 03, 2010		\$13 70		\$13 70
137 copies at \$ 20 per page				
2010.09.03 Court filing fees for Complaint Sep 03, 2010		\$350.00		\$350 00
2010.09.16 Postage charge for Complaint Sep 16, 2010		\$52 25		\$52.25
Postage charge for serving complaint:				
2010.09.30 Westlaw online research Sep 30, 2010		\$74.76		\$74.76
2010.09.30 Westlaw online research Sep 30, 2010		\$604.83		\$604.83
2010.10.04 Pacer online research Oct 04, 2010		\$1.12		\$1.12
2010.10.07 Copy charges for documents to prepare for hearing Oct 07, 2010		\$64 00		\$64.00
320 copies at \$ 20 per page.				

Page 3 of 10

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Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2010.10.13 Copy charges for MJ report and docs to prepare objections Sep 30, 2010 50 copies at \$.20 per page.		\$10.00		\$10.00
2010.10.19 Copy charges for Objections draft Sep 29, 2010 100 copies at \$.20 per page		\$20.00		\$20.00
2010.12.23 Postage for serving subpoenas Dec 23, 2010 Subpoenas served on Custodian of Records for the Ohio Dept of Job and Family Services, Custodian of Records for Ohio Atty General, and CVS Caremark Corp, in care of registered agent Pharmicare Mgt. Services		\$16.96		\$16.96
2010.12.31 Pacer online research Dec 31, 2010		\$27.84		\$27.84
2010.12.31 Westlaw online research Dec 31, 2010		\$1.21		\$1.21
2011.01.25 Federal Express charge for delivering subpoena to CVS Jan 25, 2011		\$21.15		\$21.15
2011.01.25 Federal Express charge for delivering subpoena to Prentice Hall Jan 25, 2011		\$14.19		\$14.19

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 5 of 10. PageID #: 3523

Item	Rate	Price	Taxes	Subtotal
2011.01.25 Federal Express charge for delivering subpoena to Rite Aid Jan 25, 2011		\$19.46		\$19.46
2011.01.25 Federal Express charge for delivering subpoena to Rite Aid HQ Jan 25, 2011		\$16.34		\$16.34
2011.01.25 Federal Express charge for delivering subpoena to Wal-Mart Jan 25, 2011		\$14.19		\$14.19
2011.01.28 Copy charges for various drafts and examples of Motion to extend Jan 28, 2011		\$17.20		\$17.20
86 copies at \$.20 per page				
2011.01.31 Westlaw online research Jan 31, 2011		\$61.84		\$61.84
2011.02.11 Accessline conference call charge Feb 11, 2011		\$21.51		\$21.51
Conference call between Subodh Chandra, the Court and Defendants' counsel to discuss the oral argument date.				
2011.03.01 Federal Express charge for delivering subpoenas to Rite Aid Mar 01, 2011		\$24.04		\$24.04

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 6 of 10. PageID #: 3524

Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2011.03.14 Mayhew Deposition Transcript and Court Reporter Attendance		\$759.60		\$759.60
Deposition of Curtiss Mayhew - Transcript and Court Reporter Attendance				
2011.03.31 Westlaw Research Mar 14, 2011		\$156.64		\$156.64
Westlaw research for month of March 2011				
2011.04.30 Copy expenses Apr 30, 2011		\$22 10		\$22 10
Copy expenses for month of April, 2011.				
2011.04.30 Westlaw Research Apr 26, 2011		\$100.56		\$100.56
Westlaw research for the month of April 2011.				
2011.05.18 Subpoena Expense May 18, 2011		\$127.03		\$127 03
Third Party Subpoena - Kroger Co.				
2011.05.31 Copy Expenses May 23, 2011		\$2.50		\$2.50
Copy expenses for month of May, 2011				
2011.05.31 Westlaw Research May 31, 2011		\$894.72		\$894.72
Research for month of May 2011 relating to motion to supplement record, including research on Secretary's argument that "an ownership interest" means "5% ownership interest."				

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 7 of 10. PageID #: 3525

Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2011.08.19 Court fee for filing Notice of Appeal		\$455.00		\$455.00
Court fee for filing Notice of Appeal in N.D.				
2011.08.31 Westlaw Expense		\$11.43		\$11.43
Westlaw research expense for the month of August 2011.				
2011.09.09 Transcript Expense Sep 09, 2011		\$87.30		\$87.30
Fee to court reporter for transcript taken at the 10/07/2010 hearing by U.S. District Court Reporter, Shirle Perkins to be filed with the 6th Circuit Court of Appeals				
2011.10.10 Research Expense		\$5.44		\$5.44
Pacer charges for July 1, 2011 through Sept. 30, 2011				
2011.10.26 Transcript Expense		\$102.20		\$102.20
Fee to court reporter for transcript of hearing on 5/18/2011 before Judge Nugent to be filed with the 6th Circuit Court of Appeals - court reporter Sue Tristan				
2011.11.30 Lexis Expense		\$60.27		\$60.27
Lexis research charge for November 2011.				
2011.12.31 Lexis Expense Dec 31, 2011		\$140.28		\$140.28
Lexis research expense for December 2011.				

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 8 of 10. PageID #: 3526

Item	Hrs/Qty	Rate/Price	Taxes	Subtotal
2011 12.31 Pacer research expense Dec 31, 2011		\$1.60		\$1 60
2012.01.31 Lexis Expense Lexis research for January 2012.		\$78.69		\$78.69
2012 02.28 Copy Expense Copy expense for month of February 2012		\$19.20		\$19.20
2012.02.29 Lexis legal-research expense		\$385.49		\$385.49
2012 03.31 Lexis legal-research expense Lexis March 1-31, 2012 billing period.		\$138 08		\$138.08
2012.03.31 Pacer Expense		\$1.52		\$1.52
2012 03 31 copy expense for March 2012 Copy charges fro month of March 2011		\$236 40		\$236.40
2012.04.30 Lexis legal-research expense Lexis April 1-30, 2012 billing period for 6th Circuit briefing.		\$494.30		\$494 30
2012.04.30 copy expense for April 2012		\$15 80		\$15.80
2012 06.30 Pacer electronic legal-research expense 2nd quarter		\$2.10		\$2 10

Case: 1:10-cv-01986-BYP Doc #: 97-4 Filed: 09/21/12 9 of 10. PageID #: 3527

Item	Hrs./Qty	Rate/Price	Taxes	Subtotal
2012.07.24 Lodging for Subodh Chandra in Cincinnati for Oral Argument		\$423.75		\$423.75
The Westin, downtown Cincinnati, one night stay for Oral Argument				
2012.07.25 Mileage for Oral Argument for Sandhya Gupta		\$280.83		\$280.83
Travel to and from Cincinnati for Oral Argument on July 25, 2012 - 506 miles at a rate of \$0.555 per mile				
2012.07.25 Mileage for Oral Argument for Subodh Chandra		\$283.05		\$283.05
510 miles round trip to Cincinnati for Oral Argument on July 25, 2012 to Chandra at rate of \$.555 per mile.				
2012.07.31 Copy expense for July 2012		\$9.00		\$9.00
2012.08.31 Lexis legal- research expense		\$4.95		\$4.95
2012.09.19 copy expense for September 2012		\$82.20		\$82.20
Subtotal				\$7,992.93
Total due by Sep 21, 2012				\$7,992.93
Previous Balance				\$0.00
Total Owning				\$7,992.93

Case: 1:10-cv-01986-BYP Doc #: 97-5 Filed: 09/21/12 1 of 107. PageID #: 3529

Sep 21, 2012
Kilroy v. Husted
Invoice #

THE
CHANDRA
LAW FIRM LLC

Chandra Law Firm, LLC
1265 West 6th St., Suite 400
Cleveland, OH 44113.1326
216.578.1700 www.ChandraLaw.com

Billed To
John Kilroy

invoice

Billable Time \$516,442.50

Expenses \$5,602.59

\$522,045.09

Taxes \$0.00

\$522,045.09

Retainer Applied \$0.00

\$522,045.09

Previous Balance \$0.00

Total Owing \$522,045.09
(due by: Sep 21, 2012)

Case: 1:10-cv-01986-BYP Doc #: 97-5 Filed: 09/21/12 2 of 107. PageID #: 3530

invoice details

Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2011.02.18 Postage for serving Complaint		\$6.32		\$6.32
2011.06.29 Copy Expense		\$5.00		\$5.00
Copy expenses for the month of June 2011.				
2011.06.29 Postage Expense		\$1.08		\$1.08
Postage expenses for month of June 2011.				
2011.06.30 Research		\$14.24		\$14.24
Pacer charges.				
2011.07.26 Copy Expense		\$46.80		\$46.80
Copy expense for month of July 2011.				
2011.07.31 Westlaw Expense		\$46.07		\$46.07
Westlaw Research charges for month of JULY 2011.				
2011.08.11 Research Expense		\$80.00		\$80.00
Fee to Ohio Historical to obtain financial disclosure statements for Ohio Attorney Generals.				
2011.08.16 Research Expense		\$65.00		\$65.00
Fee to Sears to cover cost for research/retrieval of information for public-record request.				
2011.08.31 Copy Expense		\$8.40		\$8.40
Copy expense for the month of August.				

Case: 1:10-cv-01986-BYP Doc #: 97-5 Filed: 09/21/12 3 of 107. PageID #: 3531

Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2011.08.31 Postage Expense		\$5.79		\$5.79
Postage expense for month of August, 2011.				
2011.08.31 Westlaw Expense		\$144.62		\$144.62
Westlaw research charges for the month of August 2011.				
2011.09.30 Copy Expense		\$77.90		\$77.90
Copy expense for month of September 2011.				
2011.09.30 Jim von der Heydt PACER		\$36.00		\$36.00
PACER and Dropbox charges for September.				
2011.09.30 Postage Expense		\$134.79		\$134.79
Postage expense for the month of September 2011.				
2011.10.04 Deposition Expense		\$16.85		\$16.85
Lunch for Kilroy deposition attendees.				
2011.10.10 Research Expense		\$43.12		\$43.12
Pacer charges for July 1, 2011 through Sept. 30, 2011.				
2011.10.11 Deposition Transcript		\$434.00		\$434.00
Rennillo invoice #OH56232 for transcript of John Kilroy's deposition on October 4, 2011.				
2011.10.20 Parking Expense		\$12.00		\$12.00
Parking fee for Defendant's 30 (b)(6) deposition.				

Case: 1:10-cv-01986-BYP Doc #: 97-5 Filed: 09/21/12 4 of 107. PageID #: 3532

Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2011.10.20 Travel Expense		\$8.85		\$8.85
Travel meals for 30(b)(6) deposition of defendant.				
2011.10.31 Copy expense		\$80.30		\$80.30
Copy expense for October 2011.				
2011.11.21 Deposition Expense		\$1,377.80		\$1,377.80
Attendance of court reporter for deposition of J. Curtis Mayhew and the transcript of same.				
2011.11.30 Research Expense		\$156.93		\$156.93
Lexis research charge for November 2011.				
2011.12.25 Copy expense		\$9.99		\$9.99
Yousendit service for forwarding discovery documents to Attorney General.				
2011.12.31 Lexis Expense		\$431.35		\$431.35
Lexis research expense for December 2011.				
2012.01.07 Jim von der Heydt PACER		\$42.00		\$42.00
PACER charges for 4th quarter 2011.				
2012.01.31 Lexis Expense		\$719.15		\$719.15
Lexis research for January 2012.				
2012.02.29 Lexis legal- research expense		\$87.22		\$87.22
2012.03.31 PACER Expense		\$20.40		\$20.40

Case: 1:10-cv-01986-BYP Doc #: 97-5 Filed: 09/21/12 5 of 107. PageID #: 3533

Item	Hrs / Qty	Rate / Price	Taxes	Subtotal
2012.04.30 Lexis legal-research expense		\$107.07		\$107.07
Lexis April 1-30, 2012 billing period.				
2012.04.30 copy expense for April 2012		\$20.60		\$20.60
2012.05.15 Filing fee for Appeal		\$455.00		\$455.00
Filing fee for filing Notice of Appeal in Sixth Circuit.				
2012.05.31 Copy expense for May 2012		\$31.60		\$31.60
2012.05.31 Lexis legal-research expense		\$268.85		\$268.85
Lexis May 1-31, 2012 billing period.				
2012.06.30 Copy expense for June 2012		\$3.00		\$3.00
2012.06.30 PACER electronic legal-research expense 2nd quarter		\$1.30		\$1.30
2012.07.31 Copy expense for July 2012		\$61.40		\$61.40
2012.08.31 Lexis legal-research expense		\$506.40		\$506.40
2012.09.17 Copy expense for Sept., 2012		\$35.40		\$35.40

COHEN ROSENTHAL & KRAMER LLP

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TEL: (216) 781-7956 • FAX: (216) 781-8061
WWW.CRKLAW.COM

FEDERAL TAXPAYER I.D. No. 74-3069210

July 08, 2015

Christina Cruz / Heidi Kaiser

In Reference To: English Nanny & Governess School
English Nannies & Governesses

Invoice # 70401

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2013	EMK Communications with P. Pattakos re: subpoenas to West Chester, PA witnesses; prepare cover sheets; research re: new PA statute on foreign subpoenas	1.00 350.00/hr	350.00
2/15/2013	EMK Telephone call court reporting firm re: process server recommendation; telephone call process server re: service of subpoenas, witness fees; telephone call P. Pattakos re: status	0.50 350.00/hr	175.00
3/1/2013	EMK Telephone call T. Fredericks, Chester County Court, P. Pattakos re: foreign subpoena deficiencies	0.50 350.00/hr	175.00
3/4/2013	EMK Draft Petition for Issuance of Foreign Subpoenas; complete Chester County subpoena forms; Telephone call T. Fredericks re: status, service; Letter T. Fredericks re: same	0.90 350.00/hr	315.00
3/27/2013	EMK Prepare and send out pleadings and subpoena forms and related documents for service on Chester County, Pennsylvania witnesses	1.30 350.00/hr	455.00
12/3/2013	JF Created DVD exhibits for brief filing.	1.20 275.00/hr	330.00
12/5/2013	JF Researched proposed jury instructions.	4.00 275.00/hr	1,265.00
1/16/2014	JF Reviewed proposed jury instructions, analyzed, and researched possible arguments for and against.	8.30 275.00/hr	2,282.50
1/17/2014	JF Further reviewed jury instructions, began draft of findings.	5.00 275.00/hr	1,375.00
1/21/2014	JF Completed jury instruction analysis, finalized memorandum, discussed with PGP and distributed.	7.20 275.00/hr	1,980.00



Electronically Filed 08/31/2015 14:49 / MOTION / CV 11 768767 / Confirmation Nbr. 531037 / BATCH

Exhibit 5

Sandra Kurt, Summit County Clerk of Courts

Christina Cruz / Heidi Kaiser

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
1/13/2015 MD	Scanned in and Bates numbered documents from client	1.00 60.00/hr	60.00
1/16/2015 JF	Prepared transcripts for filing and walked to Court for filing under seal. Researched projector rentals. Called Court re: IT requirements.	3.20 275.00/hr	880.00
1/15/2015 JF	Prepared video DVDs for filing/service. Drafted Notice of filing transcripts. Prepare exhibits for filing.	2.00 275.00/hr	550.00
1/16/2015 MD	Create binder of exhibits	1.10 60.00/hr	66.00
1/20/2015 MD	Created binder of exhibits	2.10 60.00/hr	126.00
2/19/2015 MD	Created pleadings binder	0.80 60.00/hr	48.00
3/31/2015 JF	Prepared IT items and exhibits for trial, delivered and setup at the Court.	2.00 275.00/hr	550.00
4/1/2015 JF	Prepared IT items and exhibits for trial, delivered and setup at the Court.	1.80 275.00/hr	495.00
3/27/2015 MD	Pulled exhibits, labeled with exhibit sticker, made copies	0.70 60.00/hr	42.00
3/30/2015 MD	Pulled exhibits, labeled with exhibit sticker, made copies	5.50 60.00/hr	330.00
3/31/2015 MD	Made copies of exhibits for jury	1.00 60.00/hr	60.00
MD	Pulled exhibits, labeled with exhibit stickers, made copies	3.00 60.00/hr	180.00
1/5/2015 JBR	Attention to trial preparation	1.40 400.00/hr	560.00
JBR	Attention to trial preparation	1.40 400.00/hr	560.00
1/6/2015 JBR	Attention to trial preparation - review outline of proof, review depositions of Roth, Gaylord, Cruz, Kaiser and Nacson	5.60 400.00/hr	2,240.00
3/27/2015 JBR	Trial preparation - Kaiser direct examination; Nacson direct examination	4.20 400.00/hr	1,680.00
3/25/2015 JBR	Prepare for and attend pretrial	3.30 400.00/hr	1,320.00

Christina Cruz / Heidi Kaiser

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2015 JBR	Trial preparation - conference PPattakos re various issues; order of proof; evidentiary matters	5.50 400.00/hr	2,200.00
3/29/2015 JBR	Trial prep - attention to exhibits for Kaiser and Nacson	2.00 400.00/hr	800.00
3/30/2015 JBR	Prepare for and attend settlement conference; conference with clients re same and trial issues	6.00 400.00/hr	2,400.00
3/31/2015 JBR	Prepare for and attend trial - day 1	12.00 400.00/hr	4,800.00
4/1/2015 JBR	Prepare for and attend trial - day 2	11.70 400.00/hr	4,680.00
4/2/2015 JBR	Prepare for and attend trial - day 3	8.00 400.00/hr	3,200.00
1/21/2014 JBR	Review PPattakos draft brief	0.80 400.00/hr	320.00
	For professional services rendered	116.50	\$36,849.50
	Expenses :		
3/31/2012	In-house copies and prints for March 2012		2.52
4/30/2012	In-house copies and prints for April 2012		29.28
	Postage for April 2012		5.76
2/6/2012	Bonnie Speed Inv. 55672 - roundtrip delivery to Common Pleas Court		11.90
5/31/2012	In-house copies and prints for May 2012		68.76
	Postage for May 2012		10.80
6/30/2012	In-house copies and prints for June 2012		18.48
	Postage for June 2012		5.04
7/31/2012	In-house copies and prints for July 2012		52.08
9/30/2012	In-house copies and prints for September 2012		6.36
10/31/2012	In-house copies and prints for October 2012		5.76
12/7/2012	HealthPort Inv. 0119341379 - copy medical records		44.12

Christina Cruz / Heidi Kaiser

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	<u>Amount</u>
1/7/2013 Cady Reporting Services, Inc. Inv. 983518 -	1,584.58
Cady Reporting Services, Inc. Inv. 983520 -	1,665.95
Cady Reporting Services, Inc. Inv. 983522 -	1,510.22
1/29/2013 Cady Reporting Services, Inc. Inv. 983664 - deposition of Shari Nacson	1,109.46
2/27/2013 Chester County Pa, subpoenas - Prothonotary of Chester County	43.00
2/15/2013 Chester County Pa, subpoenas - Fredericks and Palmer, service and filing of subpoenas	255.00
Chester County Pa, subpoenas - Chester County Dept. of Children Youth and Families	44.00
1/31/2013 In-house copies and prints for January 2013	91.44
11/30/2012 Westlaw usage for November 2012	5.69
In-house copies and prints for November 2012	3.36
Postage for November 2012	2.25
12/31/2012 In-house copies and prints for December 2012	173.16
*2/11/2013 Cady Reporting Inv. 983794 - Cruz transcript vol. 1	960.00
Cady Reporting Inv. 983795 - Cruz transcript vol.2	915.30
2/28/2013 Westlaw usage for February 2013	103.96
In-house copies and prints for February 2013	64.44
2/27/2013 FedEx Inv. 2-197-97402 - delivery to Fredericks and Palmer	19.93
3/7/2013 Mosback Legal Delivery Service Inv. 24233 - service on Angel Chapin, Cheryl McNulty	115.00
3/13/2013 FedEx Inv. 2-205-48940 - delivery to Fredericks and Palmer, Phila	20.11
3/17/2013 Bonnie Speed Inv. 5907 - deliveries to Common Pleas Court	25.00
3/21/2013 Mosback Legal Delivery Service Inv. 24261 - service on Margaret Smedley, Morris Levinson, Heather Goldberg, attempt on Barbara Bryndall	175.00
3/27/2013 Dr. Resnick - psychiatric expert	1,200.00
C. McNulty - Cruz deposition	51.17
3/31/2013 Westlaw usage March 2013	8.39
In-house copies and prints for March 2013	71.64

Christina Cruz / Heidi Kaiser

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	<u>Amount</u>
3/31/2013 Postage for March 2013	0.46
4/4/2013 Cady Reporting Services, Inc. Inv. 984235 - depositions of Lynne Behrman and Erika Theirfelder	905.90
3/31/2013 Cady Reporting Inv. 984331 - deposition of Cheryl McNulty and Starr Angel Chapin	1,037.25
4/29/2013 Cady Reporting Services Inv. 98445 - attendance at deposition of Heather Goldberg	217.75
4/30/2013 Westlaw usage for April 2013	58.44
In-house copies and prints for April 2013	55.92
Postage for April 2013	0.46
5/14/2013 Cady Reporting Inv. 874 - transcript of Heidi Kaiser	592.35
5/24/2013 Clicks Inv. 7011979 - 917 copies	99.60
5/15/2013 Phillip J. Resnick M.D./Monifa Seawell	2,883.00
5/31/2013 Westlaw usage for May 2013	8.71
Postage for May 2013	18.11
In-house copies and prints for May 2013	27.96
4/16/2013 Travel to Cleveland for Cruz	932.88
6/11/2013 Clicks Inv. 7012066 - 1636 lit copies, tabs and binding	221.84
6/5/2013 Clicks Inv. 7012034 - 1204 lit copies, tabs and binding	183.36
4/26/2013 New Virtual Medicine LLC Inv. 6041301 - Fabio Urresta MD	500.00
6/9/2013 Bonnie Speed Inv. 12407 - deliveries	12.50
6/30/2013 Westlaw usage for June 2013	58.76
Postage for June 2013	11.44
In-house copies and prints for June 2013	76.56
7/31/2013 Westlaw usage for July 2013	34.16
In-house copies and prints for July 2013	110.64
8/31/2013 In-house copies and prints for August 2013	12.36
In-house copies and prints for August 2013	12.36

932.88 = reduced travel expense

Christina Cruz / Heidi Kaiser

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	<u>Amount</u>
8/31/2013 Westlaw usage for August 2013	1.62
9/30/2013 Postage for September 2013	0.92
In-house copies and prints for September 2013	3.36
10/17/2013 Airfare and hotel for Dr. Monifa Seawell travel to Cleveland for Deposition	729.03
11/19/2013 Witness fee for Cheryl McNulty (\$13.70) and S. Angel Chapin (\$13.00)	26.70
Mosback Legal Delivery Inv. 24681 - service on McNulty and Chapin	120.00
11/30/2013 In-house copies and prints for Oct.-Nov. 2013	303.84
10/31/2013 Postage for October 2013	2.24
11/30/2013 Postage for November 2013	3.04
10/31/2013 Westlaw usage for October 2013	1.52
11/30/2013 Westlaw usage for November 2013	32.46
12/14/2013 Mosback Legal Delivery Service Inv. 24698 subpoena to Margaret Smedley	40.00
Mosback Legal Delivery Service Inv. 24704 subpoena to Shari Nacson	52.50
12/26/2014 Mosback Legal Delivery Service Inv. 24749 - service on Margaret Smedley, Cheryl McNulty, Shari Nacson, Angel Chapin	180.00
12/31/2013 Hotel for Pattakos In NY 128.52; Hotel for Cruz In Cleveland \$256.95; Airfare for Jerry Davis (697.60)	1,083.07
Westlaw usage for December 2013	148.42
In-house copies and prints for December 2013	339.48
12/23/2013 Cady Reporting Inv. 3146 - deposition of Lynne Behrman	1,861.60
Cady Reporting Services Inc. Inv. 3146 - deposition of Lynne Behrman	1,889.52
1/31/2014 Westlaw usage January 2014	95.75
Postage for January 2014	12.22
In-house copies and prints for January 2014	74.64
2/28/2014 In-house copies and prints for February 2014	3.48
4/30/2014 In-house copies and prints for April 2014	0.84

○ = reduced
travel
expenses

Christina Cruz / Heidi Kaiser

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	<u>Amount</u>
5/31/2014 In-house copies and prints for May 2014	41.76
6/30/2014 Westlaw usage for June 2014	10.80
In-house copies and prints June 2014	3.48
7/31/2014 In-house copies and prints for July 2014	2.16
8/31/2014 Westlaw usage for August 2014	2.44
In-house copies and prints for August 2014	1.68
9/30/2014 In-house copies and prints for September 2014	4.20
10/31/2014 Westlaw usage for October 2014	9.47
In-house copies and prints for October 2014	2.16
11/30/2014 In-house copies and prints for November 2014	91.92
Westlaw usage for November 2014	7.45
12/31/2014 Westlaw usage for December 2014	53.18
In-house copies and prints for December 2014	4.56
Postage for December 2014	7.56
1/7/2015 The Institute for Mind Wellness, LLC (Monifa Sewell, M.D.)	1,695.00
11/11/2014 Mirror Image Video Productions Inc. video of Urresta deposition	487.45
11/17/2014 Veritext Inv. OH2188149 - deposition of expert	152.25
1/15/2015 Tara M. Drake Court Reporter - Saratoga Springs NY Inv. 11938 - depositions of Astruc and Urresta	500.00
Veritext Inv. OH2224871 deposition of Joel Steinberg	387.20
1/31/2015 Postage for January 2015	0.48
In-house copies and prints for January 2015	267.72
Westlaw usage for January 2015	53.18
2/28/2015 Postage for February 2015	6.70
In house copies and prints for February 2015	73.56
3/10/2015 Subpoena fees for Shari Nacson (\$16.50) and Margaret Smedley (\$6.50)	23.00

Christina Cruz / Heidi Kaiser

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	<u>Amount</u>
3/17/2015 Mosback Legal Delivery Service Inv. 25431 - service on McNulty, Chaplin	150.00
3/31/2015 In-house copies and prints for March 2015	680.52
Westlaw usage for March 2015	8.29
1/31/2014 Heidi Kaiser flight to trial (\$381.70); Christina Cruz flight to trial (\$398.70), Monifa Seawell flight to trial (\$433.20)	* 27.96
4/14/2015 Aloft Hotel lodging for plaintiffs for March 30 trial	* 3,206.38
5/1/2015 In-house copies and prints for April 2015	145.20
Total additional charges	<u>\$33,754.61</u>
Total amount of this bill	<u>\$70,604.11</u>
Balance due	<u>\$70,604.11</u>

* = reduced travel expenses not included in motion for fees b/c incurred in connection w/ mistrial

STATE OF OHIO)
) SS: AFFIDAVIT
COUNTY OF CUYAHOGA)

The undersigned, Jason R. Bristol, first being duly sworn according to law,
deposes and states:

1. I am a partner with the law firm of Cohen Rosenthal & Kramer LLP, which firm is a counsel of record for Plaintiff Sandy Cross.

2. I have reviewed the time records that are attached to Plaintiff's Motion for an Award of Attorneys' Fees together with supporting data with respect to the time expended by me in this matter.

3. The \$250.00 hourly fee for my services is the normal rate charged by Cohen Rosenthal & Kramer LLP for my services and for this type of work.

4. The \$250.00 hourly fee is commensurate with my broad experience in the prosecution of collective and class actions in various state and federal courts throughout the United States. My entire practice has been devoted to class litigation and other complex civil litigation, and I have represented hundreds of thousands of individuals in cases ranging from wage and hour disputes to suits to recover losses associated with mass disasters. I serve as an Adjunct Professor of Law at Cleveland State University's Cleveland-Marshall College of Law, where I teach Advanced Brief Writing and an administrative law course on the Fair Labor Standards Act. I also serve as Plaintiff's Complex Litigation and Class Action Counsel to the State of Ohio. I am a Life Member of the Eight District Judicial Conference and I am a member of numerous professional organizations including the Cleveland Employment Inn of Court.

5. Numerous other courts within this judicial district have approved attorney's fee requests at the \$250.00 hourly fee for my services.

FURTHER AFFIANT SAYETH NAUGHT.

Jason R. Bristol

SWORN TO BEFORE ME and subscribed in my presence at
Cleveland, Ohio, this 30th day of December, 2008.

~~Notary Public~~

James B. Rosenthal
Notary Public
State of Ohio
My Commission Has No Expiration

Exhibit 6

Sandra Kurt, Summit County Clerk of Courts

COHEN ROSENTHAL & KRAMER LLP

ATTORNEYS AT LAW

700 WEST ST. CLAIR AVENUE, SUITE 400

CLEVELAND, OHIO 44113

TEL: (216) 781-7956 • FAX: (216) 781-8061

WWW.CRKLAW.COM

Statement of Legal Services and Expenses

Matter: *Cross v. GeorgiouStudio, Inc.*

U.S. District Court, Northern District of Ohio, Case No. 1:07-cv-3790

Attorneys: Jason R. Bristol, Esq.

Invoice date: 12/30/2008

Invoice amount: \$9,620.78

Date	Description of Legal Services Performed	Time	Rate	Amount
11/30/2007	Conversation with AJL Re: possible FACTA case	0.50	250.00/hr	125.00
11/30/2007	Discuss possible FACTA case with RWC and AJL	1.00	250.00/hr	250.00
12/3/2007	Review Cross receipt of 7/30/07	0.25	250.00/hr	62.50
12/4/2007	Meeting with RWC and AJL to discuss FACTA case	1.50	250.00/hr	375.00
12/4/2007	Conference call with RWC and AJL regarding FACTA case	0.50	250.00/hr	125.00
12/5/2007	Internet research Re: Georgiou Studio and various store locations	1.00	250.00/hr	250.00
12/5/2007	Research statutory agent and review other pending and past litigation	1.50	250.00/hr	375.00
12/6/2007	Teleconference with AJL Re: FACTA settlement issues	0.50	250.00/hr	125.00
12/7/2007	Legal research Re: class certification issues in FACTA litigation	2.00	250.00/hr	500.00
12/10/2007	Review Cross receipt for 12/10/07 purchase	0.25	250.00/hr	62.50
12/10/2007	Teleconference with AJL and RWC Re: 12/10/07 receipt	0.25	250.00/hr	62.50
12/10/2007	Review and revise draft complaint on class cert. allegations	1.00	250.00/hr	250.00
12/10/2007	Review AJL revisions to draft complaint	0.25	250.00/hr	62.50
12/10/2007	Discuss draft complaint with RWC and AJL	0.50	250.00/hr	125.00
12/10/2007	Review and execute class action fee agreement	0.25	250.00/hr	62.50
12/10/2007	Meeting with AJL to discuss case and class representative duties	1.00	250.00/hr	250.00
12/11/2007	Execute revised class action fee agreement	0.25	250.00/hr	62.50
12/12/2007	File class action complaint	0.50	250.00/hr	125.00

12/12/2007	Review summons	0.25	250.00/hr	62.50
12/12/2007	Preparation of notice of waiver of service	0.25	250.00/hr	62.50
1/8/2008	Discuss waiver of service with AJL	0.25	250.00/hr	62.50
1/17/2008	Receipt and review of CMC order	0.25	250.00/hr	62.50
2/12/2008	Phone conference call with RWC and AJL re: CMC	0.50	250.00/hr	125.00
2/20/2008	Conference w/ NAH Re: mailing of complaint to defendant	0.25	250.00/hr	62.50
2/26/2008	Phone conference call with RWC and AJL re: CMC	0.25	250.00/hr	62.50
3/31/2008	Conference with NAH Re: mailing of CMC order to defendant	0.25	250.00/hr	62.50
3/31/2008	Review and edit motion for leave for additional time	0.50	250.00/hr	125.00
4/1/2001	Call to defendant Re: status of case- left message for president	0.25	250.00/hr	62.50
4/16/2008	Call to defendant Re: status of case- left message for president	0.25	250.00/hr	62.50
4/29/2008	Prepare for and attend Case Management Conference with J. Oliver	1.50	250.00/hr	375.00
4/29/2008	Research former counsel for defendant; Calls to former counsel w/ messages	0.50	250.00/hr	125.00
4/29/2008	Call to defendant Re: status of case- left message for president	0.25	250.00/hr	62.50
4/29/2008	Preparation of draft affidavit detailing efforts to contact defendant	1.00	250.00/hr	250.00
4/29/2008	Review AJL amendments to affidavit	0.25	250.00/hr	62.50
5/22/2008	Legal research Re: amendment to FCRA; Call to AJL Re: same	0.50	250.00/hr	125.00
5/23/2008	Legal research Re: default prior to class certification	1.50	250.00/hr	375.00
5/23/2008	Draft letter to defendant Re: efforts to receive answer/response	0.50	250.00/hr	125.00
5/30/2008	Phone call with RWC and AJL Re: amendment to FCRA	0.50	250.00/hr	125.00
5/30/2008	Status Conference with J. Oliver	0.50	250.00/hr	125.00
6/4/2008	Phone call with RWC and AJL Re: Status Conference with Court	0.75	250.00/hr	187.50
6/5/2008	Receipt and review of court order Re: default	0.50	250.00/hr	125.00
11/25/2008	Status Conference with J. Oliver Re: status of default	0.25	250.00/hr	62.50
11/26/2008	Review of email from RWC Re: draft Motion for Default Judgment and Motion	0.50	250.00/hr	125.00
11/27/2008	Phone call with AJL Re: Motion for Default Judgment	0.25	250.00/hr	62.50
12/16/2008	Legal research Re: standard for willful violation	0.75	250.00/hr	187.50
12/17/2008	Revisions to Motion for Default Judgment	8.00	250.00/hr	2,000.00
12/17/2008	Review and revise Affidavit of Sandy Cross; Conf. w/ RWC Re: same	0.25	250.00/hr	62.50
12/17/2008	Phone call with AJL Re: revisions of Affidavit of Sandy Cross	0.50	250.00/hr	125.00
12/17/2008	Filing of Motion for Default Judgment	0.25	250.00/hr	62.50
12/18/2008	Conversation with J. Oliver Re: atty. fees submission	0.25	250.00/hr	62.50
12/22/2008	Teleconference with J. Oliver's chambers Re: atty. fee filing	0.25	250.00/hr	62.50
12/29/2008	Teleconference w/ RWC and AJL Re: fee submission	0.25	250.00/hr	62.50
12/30/2008	Review and edit motion for award of attorneys' fees; Prepare affidavit in support of fee request	0.50	250.00/hr	125.00
12/30/2008	Final revisions to atty. fee motion and filing of motion	0.50	250.00/hr	125.00

Total Cost of Legal Services

\$9,250.00

Total Cost of Expenses Incurred	\$370.78
Total Cost of Legal Services and Expenses	\$9,620.78

12/30/2008
3:08 PMCohen Rosenthal & Kramer LLP
Pre-bill Worksheet

Page 1

Selection Criteria

Client (hand select) Include: CROSS, SANDY

Nickname CROSS, SANDY | GEORGIU STUDIO
 Full Name Sandy Cross
 Address 2144 Lyndway Road
 Beachwood OH 44122
 Phone 1
 Phone 3
 In Ref To
 Phone 2
 Phone 4
 Fees Arrg. By billing value on each slip
 Expense Arrg. By billing value on each slip
 Tax Profile Exempt
 Last bill
 Last charge 12/18/2008
 Last payment Amount \$0.00

Total of billable time slips \$0.00

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
12/12/2007 8841	EKRAMER E112 Court filing fee	350.00	1.000	350.00	Billable
2/24/2008 8980	EKRAMER E107 Reliable Runners Invoice No. 276647 for Feb. 20, 2008 District Court delivery	3.75	1.000	3.75	Billable
2/29/2008 8958	JCOHEN E101 In-house copies and prints for February 2008	0.12	18.000	2.16	Billable
3/31/2008 9031	JCOHEN E101 In-house copies and prints for March 2008	0.12	4.000	0.48	Billable
5/31/2008 9237	JCOHEN E108 Postage for May 2008	5.32	1.000	5.32	Billable
12/17/2008 9575	JBRISTOL E108 Postage - certified mail delivery to Georgiou Studio	5.32	1.000	5.32	Billable
12/18/2008 9574	JBRISTOL E107 Reliable Runners delivery to District Court	3.75	1.000	3.75	Billable

12/30/2008
3:08 PM

Cohen Rosenthal & Kramer LLP
Pre-bill Worksheet

Page 2

CROSS, SANDY:Sandy Cross (continued)

	Amount	Total
TOTAL Billable Costs		\$370.78

Calculation of Fees and Costs

	Amount	Total
Total of Fees (Time Charges)		\$0.00
Costs Bill Arrangement: Slips By billing value on each slip.		
Total of billable expense slips	\$370.78	
Total of Costs (Expense Charges)		\$370.78
Total new charges		\$370.78
Total New Balance		\$370.78