

1 UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE

4 BRUCE CORKER d/b/a RANCHO ALOHA;
5 COLEHOUR BONDERA and MELANIE
6 BONDERA, husband and wife d/b/a
7 KANALANI OHANA FARM; ROBERT
8 SMITH and CECELIA SMITH, husband and
9 wife d/b/a SMITHFARMS; and SMITHFARMS,
10 LLC, a Hawaii limited liability company, on
11 behalf of themselves and others similarly
12 situated,

13 Plaintiffs,

14 v.

15 COSTCO WHOLESALE CORPORATION, a
16 Washington corporation; AMAZON.COM,
17 INC., a Delaware corporation; HAWAIIAN
18 ISLES KONA COFFEE, LTD., LLC, a
19 Hawaiian limited liability company; COST
20 PLUS/WORLD MARKET, a subsidiary of BED
21 BATH & BEYOND, a New York corporation;
22 BCC ASSETS, LLC d/b/a BOYER'S COFFEE
23 COMPANY, INC., a Colorado corporation;
24 L&K COFFEE CO. LLC, a Michigan limited
25 liability company; MULVADI
26 CORPORATION, a Hawaii corporation;
COPPER MOON COFFEE, LLC, an Indiana
limited liability company; GOLD COFFEE
ROASTERS, INC., a Delaware corporation;
CAMERON'S COFFEE AND DISTRIBUTION
COMPANY, a Minnesota corporation; PACIFIC
COFFEE, INC., a Hawaii corporation; THE
KROGER CO., an Ohio corporation;
WALMART INC., a Delaware corporation; BED
BATH & BEYOND INC., a New York
corporation; ALBERTSONS COMPANIES
INC., a Delaware Corporation; SAFEWAY
INC., a Delaware Corporation; MNS LTD., a
Hawaii Corporation; THE TJX COMPANIES
d/b/a T.J. MAXX, a Delaware Corporation;
MARSHALLS OF MA, INC. d/b/a
MARSHALLS, a Massachusetts corporation;
SPROUTS FARMERS MARKET, INC. a
Delaware corporation; COSTA RICAN GOLD;
COFFEE CO., INC., a Florida Corporation; and

Case No. 2:19-CV-00290-RSL

**DECLARATION OF JASON L.
LICHTMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS**

The Honorable Robert S. Lasnik

1 KEVIN KIHNKE, an individual,
2 Defendants.

3
4 I, Jason L. Lichtman, declare as follows:

5 1. I am a partner in the law firm of Lief Cabraser Heimann & Bernstein, LLP
6 (“LCHB”). I am Plaintiffs’ counsel of record in this litigation, along with Karr Tuttle Campbell. I
7 am a member in good standing of the bars of Illinois, New York, and the District of Columbia. I
8 respectfully submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees,
9 Reimbursement of Expenses, and Service Awards. Except as otherwise noted, I have personal
10 knowledge of the facts set forth in this declaration and could testify competently to them if called
11 upon to do so.

12 2. I have been involved in all aspects of this litigation since March 2019.

13 **I. LCHB’s Work in this Matter**

14 3. LCHB is an international law firm with offices in San Francisco, New York,
15 Nashville, and Munich. LCHB’s practice focuses on complex and class action litigation
16 involving product liability, consumer, employment, financial, securities, antitrust, environmental,
17 and personal injury matters. A copy of the firm’s resume was filed with my declaration in
18 support of preliminary approval, at Dkt. 394-8.

19 4. LCHB joined Karr Tuttle Campbell as co-counsel in this matter shortly after the
20 initial complaint was filed in early 2019. Our value to the case was primarily our expertise in the
21 litigation and certification of complex class actions, including cases requiring the modelling of
22 economic damages on a class-wide basis. We have extensive experience in litigating issues
23 involving class-wide damages in complex consumer class actions, including in *In re Gen.*
24 *Motors, LLC Ignition Switch Litig.*, MDL No. 2543 (S.D.N.Y.) (\$121 million settlement
25 approved in 2021); *In re Navistar Maxxforce Engines Marketing, Sales Practices, Products Liab.*
26 *Litig.*, No. 14-10318 (N.D. Ill.) (\$135 million settlement approved in 2020); and *Dover v. British*

1 *Airways*, No. 12-5567 (E.D.N.Y.) (class certified, settlement approved in 2018 for between \$27
2 million and \$63 million); *In re Anthem, Inc. Data Breach Litig.*, No. 15-2617 (N.D. Cal.) (class
3 certified, \$115 million settlement approved in 2018); and *In re Whirlpool Corp. Front-Loading*
4 *Washer Prods. Liab. Litig.*, MDL No. 2001 (N.D. Ohio) (class certified, nationwide settlement
5 approved in 2016).

6 5. Plaintiffs' counsel, including LCHB, have actively litigated this case for more
7 than two years. As the Court knows, this case has been hotly litigated, and included motions to
8 dismiss filed by all defendants (Dkt. 100, 106, 107), a motion for summary judgment (Dkt. 121),
9 a motion to strike (Dkt. 179), several motions to compel or for a protective order (Dkt. 180, 188,
10 206, 211, 222, 227, 252, 257, 294, 300, 304, 317, 330, 355, 372), a motion for sanctions (Dkt.
11 319), and several motions to amend the pleadings to add new defendants (Dkt. 71, 268, 344).

12 6. Discovery has been extensive and difficult. This case initially involved 19
13 separate defendants. That meant that every element of discovery—issuing of requests, analyzing
14 responses, initiating meet and confers, resolving disputes, moving to compel where no resolution
15 was possible, receiving, reviewing, and analyzing documents and information, formulating and
16 serving follow-up requests, meeting and conferring over those, etc.—was multiplied by 19.
17 Plaintiffs served discovery and received responses and documents from every defendant other
18 than Copper Moon and Cost Plus (who each entered into early litigation stays, but who produced
19 information for mediation purposes). This case also involved ESI. Plaintiffs negotiated search
20 terms with, and received ESI from, most of the 19 defendants. In total, Plaintiffs have served 781
21 requests for production and 177 interrogatories. Plaintiffs have received and reviewed more than
22 39,526 documents including 197,850 pages (including large spreadsheets of data). Plaintiffs have
23 also taken 5 depositions.

24 7. Defensive discovery has also required extensive effort. The named plaintiffs have
25 responded to 543 requests for production, 261 interrogatories, and 514 requests for admission.
26 Plaintiffs have produced more than 58,027 documents including 114,087 pages, including both

1 paper documents gathered by hand (with in-person assistance from myself and others from
2 LCHB at the plaintiffs' farms) and collated and ESI. Each named plaintiff has sat for a full-day
3 deposition.

4 8. The parties also engaged in extensive third-party discovery, collectively serving
5 36 subpoenas, which have yielded 4,801 documents and more than 106,000 pages.

6 9. Attorneys from LCHB (principally myself, Daniel Seltz, and Andrew Kaufman)
7 have played a significant and active role in virtually every aspect of this case, including:

8 a. Authored or edited the briefs and motions that have been presented in the
9 litigation to date, including oppositions to motions to dismiss and discovery motions;

10 b. drafted and propounding dozens of requests for production,
11 interrogatories, and requests for admissions;

12 c. oversaw the production of tens of thousands of documents;

13 d. assisted with the preparation of the depositions of five named plaintiffs;

14 e. identified and worked with numerous consulting experts in preparation for
15 mediation and litigation, on issues such as damages, marketing, consumer behavior, and
16 accounting; and

17 f. developed numerous settlement proposals and negotiated extensively with
18 Defendants, including with the assistance of Judge Garcia and Judge Infante, as well as
19 Mr. LeHocky.

20 g. The core team of personnel litigating this case for LCHB consisted of the
21 following.

22 i. I am a partner in the firm's New York office. I graduated *cum*
23 *laude* from the University of Michigan Law School in 2006, where I received the Clarence M.
24 Darrow Scholar award (Michigan's highest merit-based scholarship), and I clerked for The
25 Honorable Kathleen M. O'Malley of the U.S. District Court for the Northern District of Ohio
26 between 2008 and 2010. I have worked at LCHB since 2010, starting as an associate and

1 advancing through to partnership. I also serve on the executive committee for Public Justice
2 Foundation and am the Vice Chair of the Public Justice Class Action Committee and was named
3 a “Rising Star” for Consumer Protection by Law360, which published a profile of my work. I
4 was responsible for strategic management of the litigation. In particular, I was the point person at
5 LCHB responsible for settlement negotiations with the defendants. I also had primary
6 responsibility for managing Plaintiffs’ consulting and testifying damages experts, which required
7 building a model of market price damages for the Kona coffee market. I was also the LCHB
8 attorney responsible for managing Plaintiffs’-side document review and production.

9 ii. Daniel Seltz is a partner in the firm’s New York office. Mr. Seltz
10 graduated from New York University School of Law in 2003 and joined the firm in 2004 after
11 clerking for Judge John T. Nixon on the U.S. District Court for the Middle District of Tennessee.
12 He was promoted to partner in 2010. Along with Mr. Kaufman, Mr. Seltz was responsible for
13 day-to-day management of the litigation (in partnership with our co-counsel at Karr Tuttle),
14 including brief writing, drafting discovery requests, handling meet and confers (both letters and
15 phone calls), drafting motions to compel, drafting mediation statements, negotiating the details
16 of settlement agreements, working with a coffee industry expert, and working with JND and the
17 settling defendants to design the class notice.

18 iii. Andrew Kaufman is a partner in the firm’s Nashville office. Mr.
19 Kaufman graduated *cum laude* from Harvard Law School in 2012. He joined the firm in 2015
20 after completing a fellowship at Public Citizen Litigation Group, and clerkships for Judge
21 Martha Steven Glickman on the District of Columbia Court of Appeals and Judge Martha Craig
22 Daughtrey on the United States Court of Appeals for the Sixth Circuit. In 2020, he was promoted
23 to partner. Along with Mr. Seltz, Mr. Kaufman was responsible for day-to-day management of
24 the litigation (in partnership with our co-counsel at Karr Tuttle), including brief writing, drafting
25 discovery requests, handling meet and confers (both letters and phone calls), drafting motions to
26 compel, and drafting mediation statements. Along with me, Mr. Kaufman also was responsible

1 for working with Plaintiffs' consulting and testifying liability experts on the issues of coffee
2 content and consumer confusion.

3 iv. Kelly Gralewski is a staff attorney in the firm's San Francisco
4 office. Ms. Gralewski graduated from California Western School of Law in 1997. In her 11 years
5 with the firm, she has worked on numerous complex litigation cases, such as *In re Wells Fargo*
6 *& Co. Shareholder Derivative Litigation*, *In re Bank of New York Mellon Corp. Forex*
7 *Transactions Litigation*, as well as other high-profile cases such as *In Re: National Prescription*
8 *Opiate Litigation*, *In Re: Chrysler-Dodge-Jeep 'EcoDiesel' Marketing, Sales Practices, and*
9 *Products Liability Litigation*, *In Re: Volkswagen 'Clean Diesel' Marketing, Sales Practices, and*
10 *Products Liability Litigation*, *In Re: Takata Airbag Products Liability Litigation*, *Pro-Sys*
11 *Consultants Ltd. et al v. Microsoft Corporation et al.*, and *In Re: Checking Account Overdraft*
12 *Litigation*. Along with Ms. Krainsky and Ms. Pustilnik, Ms. Gralewski was primarily responsible
13 for reviewing documents produced by Defendants and potentially to be produced by Plaintiffs.
14 This required a sophisticated understanding of the case in order both to understand, process, and
15 explain the contents of Defendants' productions, and to recognize which of the Plaintiffs'
16 business records was responsive to Defendants' discovery requests. Ms. Gralewski, Ms.
17 Krainsky, and Ms. Pustilnik each spent significant amounts of time drafting memoranda
18 explaining the contents of both Defendants' and Plaintiffs' document productions, and
19 supervising other, lower-level reviewers.

20 v. Ella Krainsky was a staff attorney in the firm's San Francisco
21 office. She graduated from The George Washington University Law School in 2001. Prior to
22 joining the firm in 2017, Ms. Krainsky was a staff attorney at the Federal Trade Commission,
23 where she investigated deceptive marketing cases. Previously, Ms. Krainsky was an Attorney
24 Advisor to Federal Trade Commissioner William E. Kovacic. Ms. Krainsky was also an
25 appellate attorney and an attorney advisor with the U.S. Department of Veterans Affairs. Along
26

1 with Ms. Gralewski and Ms. Pustilnik, Ms. Krainsky was responsible for the document review
2 tasks described in the paragraph discussing Ms. Gralewski.

3 vi. Alix Pustilnik is a staff attorney in the firm’s New York office. She
4 is a 1993 graduate of Harvard Law School. Prior to joining the firm, Ms. Pustilnik was General
5 Counsel at the Battery Park City Authority in New York, NY, and the Deputy Director of the
6 Legislative Division of the New York City Council. Along with Ms. Gralewski and Ms.
7 Krainsky, Ms. Pustilnik was responsible for the document review tasks described in the
8 paragraph discussing Ms. Gralewski.

9 **II. Assessment of the Risk in this Case**

10 10. This case carried significant risk from inception.

11 11. To start, Defendants advanced a legal theory that the Lanham Act does not
12 authorize the core claim in this case—false designation of geographic origin. Although the Court
13 denied Defendants’ motions to dismiss on that basis, the issue would remain alive in the case
14 through summary judgment, trial, and appeal.

15 12. Defendants also had factual defenses that (1) consumers were not confused by
16 false designations of Kona geographic origin and that (2) Plaintiffs’ claims were barred by
17 laches. Although Plaintiffs believed these defenses to be meritless, they posed a risk at summary
18 judgment, trial, and on appeal. In particular, whether consumers were confused or were likely to
19 be confused by Defendants’ product labels would have come down to a “battle of the experts” at
20 trial, the result of which is always uncertain.

21 13. This case was also risky because it was a class action. Although I am confident
22 that Plaintiffs would ultimately have prevailed on class certification in this case because many
23 elements of a Lanham Act claim map well onto the Rule 23 class certification requirements,
24 successful Lanham Act cases are rare bordering on non-existent. The typical Lanham Act
25 plaintiff is an individual or corporation holding rights to a trademark. There is virtually no such
26

1 thing as collective ownership of trademarks. A class case was possible here only because the
2 geographic designation at issue is legitimately used by a relatively small group of people.

3 14. Class certification here posed particular risks because of the need to prove that
4 damages could be measured on a class-wide basis. This required assessing the market for coffee
5 in general, specialty coffees more specifically, and Kona coffee more specifically, and then
6 creating a “but-for” world where there was no counterfeiting of coffee. Doing so required
7 accounting for variations in how coffee is sold (green, cherry, or roasted). LCHB is very
8 experienced in doing this kind of work, and so is well aware of the risks attendant to it. Plaintiffs
9 recognize that Defendants would have attacked such analysis at both *Daubert* and summary
10 judgment and would have put forward their own experts to testify that market price damages are
11 not measurable on a class-wide basis or, in the alternative, that damages were small. Plaintiffs
12 were prepared to put forward a reliable, admissible, and ultimately persuasive damages model,
13 but if that effort failed, then no class could be certified and the case as a whole would have
14 problems, for no individual Kona farmer could prove their damages without such a model.

15 15. Other forms of damages carried real risks too. When this case was filed, the law
16 of the Ninth Circuit, since reversed by the Supreme Court, was that a finding of willfulness was a
17 prerequisite to an award of profits. Plaintiffs also sought to recover funds for corrective
18 advertising. Undoubtedly, Defendants would have submitted competing expert testimony
19 challenging the existence and amount of any corrective advertising damages.

20 16. Finally, this case was inherently risky because it involved 22 defendants. Any
21 task, any work, any expense could potentially be multiplied by 22. Although the case did
22 produce some efficiencies of scale, this risk materialized in very real form in conducting
23 discovery against so many defendants simultaneously. Many of LCHB’s cases are large matters,
24 often MDLs, against dozens of defendants. But those cases typically involve several co-lead
25 firms, large PECs, and even more assisting firms. This case involved only two law firms,
26 together responsible for 100% of the work and 100% of the expenses. When filed, there was a

1 very real possibility in this case that every one of the 22 defendants would proceed to trial,
2 requiring a massive investment of time and money from LCHB and Karr Tuttle.

3 **III. LCHB's Lodestar Cross-Check Submission**

4 17. Attached as **Exhibit A** is a true and correct summary by individual of the hours,
5 billing rate, and lodestar for each biller's work on this matter from its inception to March 30,
6 2021. The time for any billers who submitted fewer than 40 hours, has been removed. During
7 this period of time, the firm expended **7,460.40** hours on this matter, with work still continuing.
8 Calculated at current rates and taking into consideration excluded time, for purposes of the cross-
9 check, the lodestar invested in this case by LCHB during this period comes to **\$3,712,607**.

10 18. The rates set forth in **Exhibit A** are my firm's current billing rates for 2021. The
11 hourly rates charged by timekeepers are the firm's regular rates for contingent cases and those
12 generally charged to clients for their services in non-contingent/hourly matters. While LCHB
13 principally works on contingency, our rate structure is occasionally paid to our firm by hourly-
14 paying clients.

15 19. Over its nearly five decades, LCHB's rate structure has been approved by
16 countless courts, sometimes as the basis for a lodestar fee, other times on cross-check. The
17 following are a small sample of more recent matters:

- 18 • *Nashville Gen. Hosp. v. Momenta Pharms., Inc.*, No. 15-1100, Dkt. 520 (M.D.
19 Tenn. May 29, 2020);
- 20 • *In re Samsung Top-Load Washing Machine Marketing, Sales Practices &*
21 *Products Liability Litig.*, No. 17-2792, Dkt. 256 (W.D. Okla. June 11, 2020);
- 22 • *Seaman v. Duke Univ.*, No. 15-462, 2019 WL 4674758, at *1 (M.D.N.C. Sept. 25,
23 2019);
- 24 • *Hale v. State Farm Mut. Auto. Ins. Co.*, No. 12-660, 2018 WL 6606079, at *13-14
25 (S.D. Ill. Dec. 16, 2018)

- 1 • *In re Volkswagen “Clean Diesel” Mktg., Sales Practices, & Prods. Liab. Litig.*,
2 No. 2672 CRB (JSC), 2017 WL 1047834, at *5 (N.D. Cal. Mar. 17, 2017);
- 3 • *Allaga v. BP Solar Int’l, Inc.*, No. 14-560, Dkt. 201 (N.D. Cal. Dec. 22, 2016);
- 4 • *In re: Sears, Roebuck & Co. Front-Loading Washer Prods. Liab. Litig.*, No. 06-
5 7023, Dkt. 598 (N.D. Ill. Sept. 13, 2016)
- 6 • *In re High-Tech Emp. Antitrust Litig.*, No. 11-CV-02509-LHK, 2015 WL
7 5158730, at *9 (N.D. Cal. Sept. 2, 2015);
- 8 • *In re TFT-LCD (Flat Panel) Antitrust Litig.*, No. M 07-1827 SI, 2013 WL 149692
9 (N.D. Cal. Jan. 14, 2013);
- 10 • *In re Bank of Am. Credit Prot. Mktg. & Sales Practices Litig.*, No. 11-MD-2269
11 TEH, 2013 WL 174056 (N.D. Cal. Jan. 16, 2013);
- 12 • *Brazil v. Dell Inc.*, No. C-07-01700 RMW, 2012 WL 1144303, at *1 (N.D. Cal.
13 Apr. 4, 2012);
- 14 • *White v. Experian Info. Sols., Inc.*, No. SACV 05-1070 DOC, 2011 WL 2971957,
15 at *3 (C.D. Cal. July 15, 2011);
- 16 • *Lonardo v. Travelers Indem. Co.*, 706 F. Supp. 2d 766, 793–94 (N.D. Ohio 2010);
- 17 • *Pelletz v. Weyerhaeuser Co.*, 592 F. Supp. 2d 1322, 1326–27 (W.D. Wash. 2009);
- 18 • *Grays Harbor Adventist Christian Sch. v. Carrier Corp.*, No. 05-05437 RBL,
19 2008 WL 1901988, at *3 (W.D. Wash. Apr. 24, 2008);
- 20 • *Fleming v. Kemper Nat’l Servs., Inc.*, 373 F. Supp. 2d 1000, 1012 (N.D. Cal.
21 2005).
- 22
- 23
- 24
- 25
- 26

1 20. LCHB attorneys and staff enter their time contemporaneously. The *Firm Policy*
2 *Manual*, “Time-Keeping Policy,” requires timekeepers to keep time sheets on a daily basis, and
3 to submit them by the close of each business week. LCHB’s accounting department runs a
4 regular time report that lists timekeepers without time in the system for any given week. Kelly
5 M. Dermody, managing partner of the San Francisco office of the firm, receives that report and
6 personally follows up with tardy attorney timekeepers, and instructs staff managers to follow up
7 with any tardy staff. The firm does not abide late timekeeping, and we advise employees,
8 “Failure to comply with the Firm’s timekeeping policy may be taken into account in connection
9 with promotions, raises, and bonuses, and may subject the delinquent timekeeper to discipline,
10 up to and including termination.”

11 21. LCHB has devoted, and will continue to devote, its time and resources to
12 prosecute the class action claims in this matter on a contingent-fee basis.

13 **IV. LCHB’s Expenses Submission**

14 22. LCHB has to date incurred **\$542,017.28** in unreimbursed expenses in connection
15 with the investigation, prosecution, and settlement of this case, as set forth in the table attached
16 as **Exhibit B**. The expenses listed in **Exhibit B** are reflected in the books and records LCHB
17 maintains in the ordinary course of business, which books and records are prepared from expense
18 vouchers and check records.

19 23. These costs were reasonable and necessary to prosecute this matter, and include
20 typical litigation costs such as expert work, filing fees, electronic database research, and travel.
21

22 I declare under penalty of perjury that the forgoing is true and correct. Executed this 21st
23 day of April 2021, in Heber City, UT.
24

25 
26 _____
Jason L. Lichtman

EXHIBIT A

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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From
ToInception
Present**Matter Number: 4013-0001 KONA COFFEE - General Matter****PARTNER**

NAME	HOURS	RATE	TOTAL
MICHAEL SOBOL	119.70	1,000.00	119,700.00
ANDREW KAUFMAN	236.00	560.00	132,160.00
JASON LICHTMAN	937.30	665.00	623,304.50
DANIEL SELTZ	872.70	730.00	637,071.00
	2,165.70		1,512,235.50

ASSOCIATE

NAME	HOURS	RATE	TOTAL
ANDREW KAUFMAN	163.30	510.00	83,283.00
FRANK WHITE	120.70	465.00	56,125.50
	284.00		139,408.50

STAFF ATTORNEY

NAME	HOURS	RATE	TOTAL
MICHELLE BAKER	128.80	415.00	53,452.00
BRITT CIBULKA	93.20	415.00	38,678.00
KELLY GRALEWSKI	1,535.40	415.00	637,191.00
KAREN JONES	202.80	415.00	84,162.00
ELLA KRAINSKY	693.60	415.00	287,844.00
PHIANH NGUYEN	149.00	415.00	61,835.00
ALIX PUSTILNIK	1,345.70	415.00	558,465.50
PETER ROOS	136.90	415.00	56,813.50
RYAN STURTEVANT	137.40	415.00	57,021.00
	4,422.80		1,835,462.00

LAW CLERK

NAME	HOURS	RATE	TOTAL
NICHOLAS LEE	67.70	370.00	25,049.00
	67.70		25,049.00

PARALEGAL/CLERK

NAME	HOURS	RATE	TOTAL
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LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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		From To	Inception Present
JANE BALKOSKI	167.30	360.00	60,228.00
EMILY LOVELL	44.40	385.00	17,094.00
HANNAH SELHORST	257.60	395.00	101,752.00
	469.30		179,074.00

LITIGATION SUPPORT / RESEARCH

NAME	HOURS	RATE	TOTAL
RICHARD ANTHONY	50.90	420.00	21,378.00
	50.90		21,378.00

MATTER TOTALS	7,460.40		3,712,607.00
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EXHIBIT B

Lieff Cabraser Heimann & Bernstein, LLP
Costs Summary

Costs	Total to Date
In-House Copies	\$95.00
Print	\$931.40
Telephone	\$954.66
Computer Research	\$7,275.19
Electronic Database	\$57,256.07
Experts/Consultants	\$376,890.00
Federal Express/Messenger	\$306.11
Mediation Expenses	\$29,093.43
Research sources	\$1,468.24
Postage	\$85.57
Process Service	\$782.00
Supplies	\$759.50
Travel	\$83,055.17
Total	\$558,952.34