

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA;
COLEHOUR BONDERA and MELANIE
BONDERA, husband and wife d/b/a
KANALANI OHANA FARM; ROBERT
SMITH and CECELIA SMITH, husband and
wife d/b/a SMITHFARMS; and SMITHFARMS,
LLC, a Hawaii limited liability company, on
behalf of themselves and others similarly
situated,

Plaintiffs,

v.

COSTCO WHOLESALE CORPORATION, a
Washington corporation; AMAZON.COM,
INC., a Delaware corporation; HAWAIIAN
ISLES KONA COFFEE, LTD., LLC, a
Hawaiian limited liability company; COST
PLUS/WORLD MARKET, a subsidiary of BED
BATH & BEYOND, a New York corporation;
BCC ASSETS, LLC d/b/a BOYER'S COFFEE
COMPANY, INC., a Colorado corporation;
L&K COFFEE CO. LLC, a Michigan limited
liability company; MULVADI
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;

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

**DECLARATION OF NATHAN T. PAINE
IN SUPPORT PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS**

The Honorable Robert S. Lasnik

1 COFFEE CO., INC., a Florida Corporation; and
2 KEVIN KIHNKE, an individual,

3 Defendants.

4 I, Nathan T. Paine, declare as follows:

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

11 2. I have been involved in all aspects of this litigation since its pre-filing
12 investigation and filing of initial complaint in February 2019.

13 **I. KTC’s Work in this Matter**

14 3. KTC is one of Seattle’s oldest law firms with a diverse practice that includes a
15 robust commercial litigation group involving intellectual property, asset recovery, class action
16 litigation, employment law, and other complex commercial matters. A copy of the firm’s resume
17 was filed with my declaration in support of preliminary approval, at Dkt. 395-1.

18 4. My partner Paul Richard Brown and I, along with other KTC attorneys and staff,
19 were exclusively responsible for all the pre-suit investigation into potential claims that authentic
20 Kona coffee growers might have against the manufacturers and retailers of coffee products that
21 falsely designated Kona as the origin of the coffee. The pre-suit investigation was expansive yet
22 meticulous, and included the following:

23 a. Multiple meetings with Kona coffee farmers, processors, potential
24 witnesses and industry insiders in Hawaii to understand the unique Kona coffee industry, coffee
25 farming and processing practices, the universal harm being inflicted on the farmers, the
26

1 commonality between the farmers, and any potential claims and remedies that might be available
2 to the farmers;

3 b. Multiple visits to various Kona coffee farms and processing facilities
4 throughout the Kona region;

5 c. Extensive lay and potential expert witness interviews;

6 d. Interviews of potential scientific experts to determine the available science
7 that might be employed to identify the origin of the coffee beans contained in a retail coffee
8 product with Kona on the label;

9 e. Collection of over 100 samples of Kona coffee beans grown on farms
10 within the Kona region;

11 f. Retention of various experts across multiple fields to assist in our pre-suit
12 investigation at considerable expense to KTC;

13 g. Research of laws and regulations concerning the production, distribution,
14 sale, and labeling of Kona coffee products;

15 h. Legal research into potential causes of action and remedies potentially
16 available to the Kona coffee farmers;

17 i. Identification and research into Kona coffee products sold within the
18 continental United States and then the collection of the same for potential testing to determine
19 whether the labels of the products accurately identified Kona as the origin of the coffee beans;
20 and

21 5. The information learned throughout the course of the extensive pre-suit
22 investigation culminated in a 65-page complaint for a proposed class of over 600 Kona coffee
23 farms, most operating only small farms of three to five acres on average, bringing Lanham Act
24 claims against nineteen different defendants, some of whom are the largest most sophisticated
25 corporations in the world. This was only made possible by the tremendous amount of time,
26

1 costs, and effort that KTC, Mr. Brown and I were willing to commit to help these Kona coffee
2 farmers who otherwise did not have the resources or the means to develop the case.

3 6. Shortly after filing suit in February 2019, KTC also brought aboard attorneys
4 from LCHB to assist in the prosecution of the case. We identified LCHB primarily for their
5 expertise in the litigation and certification of complex class actions, including cases requiring the
6 modelling of economic damages on a class-wide basis. As Jason Lichtman explains in his
7 declaration, LCHB has extensive experience in litigating issues involving class-wide damages in
8 complex consumer class actions.

9 7. Plaintiffs' counsel, including LCHB, have actively litigated this case for more
10 than two years. As the Court knows, this case has been hotly contested since its inception,
11 including motions to dismiss filed by all defendants (Dkts. 100, 106, 107), a motion for summary
12 judgment (Dkt. 121), a motion to strike (Dkt. 179), several motions to compel or for a protective
13 order (Dkts. 180, 188, 206, 211, 222, 227, 252, 257, 294, 300, 304, 317, 330, 355, 372),
14 defendants' motion to stay discovery (a motion for sanctions (Dkt. 319), and several motions to
15 amend the pleadings to add new defendants (Dkt. 71, 268, 344) bringing the total number of
16 defendants now to 22.

17 8. Discovery has been extensive and difficult. This case initially involved 19
18 separate defendants. That meant that every element of discovery—issuing of requests, analyzing
19 responses, initiating meet and confers, resolving disputes, moving to compel where no resolution
20 was possible, receiving, reviewing, and analyzing documents and information, formulating and
21 serving follow-up requests, meeting and conferring over those, etc.—was multiplied by 19 and
22 then by 22, with the addition of new defendants. Plaintiffs served discovery and received
23 responses and documents from every defendant other than Copper Moon and Cost Plus (who
24 each entered into early litigation stays, but who produced information for mediation purposes).

1 9. This case also involved Electronically Stored Information (ESI). Plaintiffs
2 negotiated search terms with, and received ESI from, most of the 19 defendants. In total,
3 Plaintiffs have served 781 requests for production and 177 interrogatories. Plaintiffs have
4 received and reviewed more than 39,526 documents including 197,850 pages (including large
5 spreadsheets of data). Plaintiffs have also taken five depositions.

6 10. Defensive discovery has also required extensive effort. The named plaintiffs have
7 responded to 543 requests for production, 261 interrogatories, and 514 requests for admission.
8 Plaintiffs have produced more than 58,027 documents together with 114,087 pages. Plaintiffs
9 production includes both paper documents gathered by hand (with in-person assistance from Mr.
10 Brown, myself and others from LCHB at the plaintiffs' farms) and collated as well as ESI. Each
11 of the five named plaintiffs has sat for a full-day deposition, which required Mr. Brown and I to
12 travel to Kona when Hawaii was in the midst of a mandated lockdown due to the pandemic.

13 11. The parties also engaged in extensive third-party discovery, collectively serving
14 36 subpoenas, which have yielded 4,801 documents and more than 106,000 pages.

15 12. To compound the challenge of litigating against 22 defendants, much of our work
16 was accomplished during the COVID-19 pandemic, which presented its own unique set of
17 challenges, thereby adding additional unanticipated cost and delays.

18 13. Attorneys from KTC (principally Paul Richard Brown, Dan Hagen, Josh Howard,
19 Mark Bailey and I) have played a significant and active role in virtually every aspect of this case,
20 including:

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

23 b. drafted and propounding dozens of requests for production,
24 interrogatories, and requests for admissions;

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

- 1 d. reviewed hundreds of thousands of documents produced by defendants;
- 2 e. prepared for and conducted five full-day depositions, all occurring during
- 3 the pandemic presenting its own unique challenge;
- 4 f. assisted with the preparation of the depositions of five named plaintiffs,
- 5 and then defended the same in Kona;
- 6 g. identified and interviewed dozens of lay and expert witnesses;
- 7 h. prepared and served multiple subpoenas to third parties and then worked
- 8 with those third parties or their counsel to secure the production of responsive documents;
- 9 i. helped to defend certain third parties from defendants' subpoenas;
- 10 j. identified and worked with numerous consulting experts in preparation for
- 11 mediation and litigation, on issues such as damages, marketing, consumer behavior, and
- 12 accounting;
- 13 k. developed numerous settlement proposals and negotiated extensively with
- 14 Defendants, with the assistance of Judge Garcia and Judge Infante, as well as Mr. LeHocky; and
- 15 l. helped prepare and finalize multiple settlement agreements as well as the
- 16 motions for the Court's preliminary approval of same.

17 14. The core team of personnel litigating this case for KTC consisted of the following

18 attorneys.

19 a. I am a shareholder at KTC where I am the chair of the intellectual property

20 group. I graduated from the University of California's Berkeley law school with my JD in 2003.

21 While attending law school I externed with Earthjustice and worked for Dakota Plains Legal

22 Services on the Rosebud Reservation in South Dakota. I graduated Wesleyan University in

23 Connecticut with honors. I am a member of the IP Inn of Court. For the past 18 years I have

24 litigated complex intellectual property matters involving patents, trademarks, trade secrets and

25 copyrights. I joined Karr Tuttle Campbell as a shareholder in 2016. I was the attorney who

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1 originally developed the case and identified the potential claims the farmers might bring under
2 the Lanham Act. I then brought my partners Paul Richard Brown and Mark Bailey into the fold,
3 who were integral in the considerable amount of work that was performed in the pre-suit
4 investigation. The pre-suit investigation included, but was not limited to, multiple trips to Kona
5 to meet and interview potential witnesses, learn about all aspects of the Kona coffee industry,
6 interviews of multiple consulting experts, retention of a scientific expert to conduct the testing of
7 products with Kona on the label to determine the origin of the coffee, and an investigation into
8 potential defendants and their products. I was the attorney who then took the information
9 learned in our investigation and used it to draft the 65-page complaint naming 19 separate
10 defendants at the time. Since the commencement of the suit, I have been involved in every
11 aspect of the case including drafting briefs, legal research, drafting discovery requests,
12 interacting with the class representatives on all matters, taking depositions, preparing the class
13 representatives for their depositions and then defending them, negotiation and settlement with
14 multiple defendants, and multiple mediations. For KTC, Mr. Brown and I have managed the
15 litigation team of approximately 12 attorneys.

16 b. Paul Richard Brown is a shareholder in KTC's litigation group, with over
17 31 years of trial experience. As lead trial counsel, Mr. Brown has handled patent, trademark,
18 trade dress, false advertising, and other complex commercial matters. Mr. Brown has extensive
19 experience in asset recovery and financial fraud matters, representing high net worth individuals
20 and financial institutions. He has conducted more than 100 bench trials and numerous jury trials
21 in various jurisdictions across the country. He is admitted to practice before the Ninth Circuit
22 Court of Appeals and the Supreme Court of the United States. Mr. Brown has negotiated
23 complex multimillion-dollar transactions for domestic and international high-technology
24 businesses worldwide, including in foreign jurisdictions such as Hong Kong, Taiwan,
25 Switzerland, the Peoples' Republic of China, Germany, Russia, Mongolia, Sweden, and the
26

1 Netherlands. He has been named “Super Lawyer” for the last seven years. Mr. Brown was the
2 second lawyer to join this case and worked with me in tandem all aspects of the pre-suit
3 investigation, during which he played a particularly critical role in the scientific testing. Since
4 the suit was filed, Mr. Brown has been involved in all aspects of the litigation including motions
5 practice, management of KTC’s document reviewers, taking and defending depositions, vetting
6 and working with selected experts, multiple farm site visits, extensive interaction with class
7 representatives including document production and deposition preparation, mediation and
8 settlement negotiations, with particular emphasis concerning financial issues. Mr. Brown’s
9 primary responsibility is to ensure that the case is ready for trial.

10 c. Mark Bailey is a shareholder in KTC’s litigation department. Mr. Bailey
11 graduated with high honors from the University of Washington School of Law and served as the
12 articles editor for the Washington Law Review. He spent two years as a law clerk at the
13 Washington State Court of Appeals, Division I. Mr. Bailey has authored and edits the
14 *Bankruptcy Practice* Chapter of the Washington Lawyer’s Practice Manual, published by the
15 King County Bar Association. Mr. Bailey joined Karr Tuttle Campbell in 2011, after working as
16 an associate for Davis Wright Tremaine 1998 to 2002 and as a partner with Beresford Booth
17 from 2002 to 2011. He concentrates his practice in the areas of commercial litigation, creditors’
18 rights and asset recovery. Mr. Bailey was the third attorney to join this case, playing a key role
19 in the pre-suit investigation. He helped to identify and interview potential consulting experts and
20 helped with the initial legal research into complex issues that needed to be resolved before filing
21 suit. Since the complaint was filed, Mr. Bailey has assisted in discovery matters and motions
22 practice.

23 d. Daniel Hagen is an associate in KTC’s litigation group. Mr. Hagen joined
24 KTC in 2018 immediately after graduating from the University of Washington School of Law.
25 He also serves on the board of CENTS, an organization affiliated with the King County Bar
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1 Association that promotes financial literacy and provides funding for financial education and
 2 assistance programs. Mr. Hagen was responsible for conducting legal research, corresponding
 3 with clients and opposing counsel, conducting numerous discovery conferences, drafting and
 4 revising motions and memoranda, and reviewing and responding to discovery. Along with Mr.
 5 Howard, Mr. Hagen was also responsible for reviewing, summarizing, and analyzing
 6 Defendants' discovery responses and document production.

7 e. Joshua Howard is an associate in KTC's litigation department, joining the
 8 firm after graduating law school. He graduated *cum laude* from Seattle University School of Law
 9 in 2016. There he was an active member of the Alpha Sigma Nu Honor Society and helped
 10 found the Homeless Rights Advocacy Project. Mr. Howard obtained his B.A from the
 11 University of Washington. Mr. Howard was primarily responsible for of the day-to-day
 12 litigation (in partnership with our co-counsel at LCHB), including legal research, brief writing,
 13 conducting numerous discovery conferences, drafting memoranda, and assisting with deposition
 14 preparation. Along with Mr. Hagen, Mr. Howard was also responsible for reviewing,
 15 summarizing, and analyzing Defendants' discovery responses and document production.

16 f. Other members of KTC's litigation team that Paul and I managed includes
 17 shareholders Tom Adams, Barbara Brady, Mitzi Vaughn, and Robert Radcliffe. The following
 18 KTC associates also had active roles in supporting the case: Andrew Durland, Maria Hodgins,
 19 Nathaniel Strauss, and Lauren Ardorfer. The bios for each of these attorneys (excluding Mr.
 20 Strauss, who left KTC to join F5's in-house legal department) are available for review in KTC's
 21 attorney directory at www.karrtuttle.com. These attorneys had roles in all aspects of the case.

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

23 15. This case carried significant risk from inception.

24 16. To start, Defendants advanced a legal theory that the Lanham Act does not
 25 authorize the core claim in this case—false designation of geographic origin. Although the Court
 26

1 denied Defendants' motions to dismiss on that basis, the issue would remain alive in the case
2 through summary judgment, trial, and appeal.

3 17. Defendants also had factual defenses that (1) consumers were not confused by
4 false designations of Kona geographic origin and (2) Plaintiffs' claims were barred by laches.
5 Although Plaintiffs believed these defenses to be meritless, they posed a risk at summary
6 judgment, trial, and on appeal. In particular, whether consumers were confused or were likely to
7 be confused by Defendants' product labels would have come down to a "battle of the experts" at
8 trial, the result of which is always uncertain.

9 18. This case was also risky because it was a class action. Although I am confident
10 that Plaintiffs would ultimately have prevailed on class certification in this case because many
11 elements of a Lanham Act claim map well onto the Rule 23 class certification requirements,
12 successful Lanham Act cases are rare bordering on non-existent. The typical Lanham Act
13 plaintiff is an individual or corporation holding rights to a trademark. There is virtually no such
14 thing as collective ownership of trademarks. A class case was possible here only because the
15 geographic designation at issue is legitimately used by a relatively small group of people.

16 19. Class certification here posed particular risks because of the need to prove that
17 damages could be measured on a class-wide basis. This required assessing the market for coffee
18 in general, specialty coffees more specifically, and Kona coffee more specifically, and then
19 creating a "but-for" world where there was no counterfeiting of coffee. Doing so required
20 accounting for variations in how coffee is sold (green, cherry, or roasted) which we were able to
21 accomplish in no small part due to the extensive pre-suit investigation that Mr. Brown and I
22 conducted to fully understand all aspects of the industry. Defendants would have attacked such
23 analysis at both *Daubert* and summary judgment and would have put forward their own experts
24 to testify that market price damages are not measurable on a class-wide basis or, in the
25 alternative, that damages were small. Plaintiffs were prepared to put forward a reliable,
26

1 admissible, and ultimately persuasive damages model, but if that effort failed, then no class
 2 could be certified and the case as a whole would have problems, for no individual Kona farmer
 3 could prove their damages without such a model. While Plaintiffs were very confident about
 4 their damages models, those models were also tremendously expensive to develop.

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

10 21. Finally, this case was inherently risky because it involved 22 defendants. Any
 11 task, any work, any expense could potentially be multiplied by 22. Although the case did
 12 produce some efficiencies of scale, this risk materialized in very real form in conducting
 13 discovery against so many defendants simultaneously. This case involved only two law firms,
 14 together responsible for 100% of the work and 100% of the expenses. When filed, there was a
 15 very real possibility in this case that every one of the 22 defendants would proceed to trial,
 16 requiring a massive investment of time and money from KTC and LCHB.

17 **III. KTC's Lodestar Cross-Check Submission**

18 22. Attached as **Exhibit A** is a true and correct summary by individual of the hours,
 19 billing rate, and lodestar for each biller's work on this matter from its inception to March 30,
 20 2021. The time for any billers who submitted fewer than 40 hours has been removed. During this
 21 period of time, the KTC expended **11,210.60** hours on this matter, with work still continuing.
 22 This total does not include approximately 1,000 hours of time that KTC wrote off in accordance
 23 with its standard billing practices to remove time entries that Mr. Brown and I determined were
 24 not reasonable for the associated task. Calculated at current rates and taking into consideration
 25
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1 excluded time, for purposes of the cross-check, the lodestar invested in this case by KTC during
2 this period comes to **\$4,647,367**.

3 23. The rates set forth in **Exhibit A** are KTC's average billing rates since inception of
4 this engagement to 2021, as KTC's rates change from year-to-year based upon market
5 evaluations. Hence, the hourly rates charged by timekeepers are the firm's standard rates set by
6 the firm's management based on the market rate in Seattle for attorneys of comparable
7 experience. As one of Seattle's oldest law firms, the firm management maintains an excellent
8 working knowledge of Seattle's legal market, which it uses to determine each attorney and staff
9 person's hourly rate. Compared to other markets such as Los Angeles, San Francisco, or New
10 York, the market rates in Seattle are on the lower end of the spectrum. All of the KTC attorneys
11 and staff typically bill their clients on an hourly basis at these rates, which the clients agree to
12 pay in the standard engagement. Unlike LCHB, KTC's attorneys principally are paid for their
13 work on an hourly basis.

14 24. KTC's rate structure has been approved by courts in numerous jurisdictions,
15 sometimes as a loadstar, others as a cross-check and finally has a hold-back/success fee. Below
16 is a sample of matters Mr. Brown handled as lead counsel where KTC's rate structure was
17 approved:

- 18 a. *J. Douglas Jennings, Jr. et al*, Case No. 11-04720-LA7 (S.D. Cal.);
- 19 b. *Michael R Mastro*, Case No. 09-16841-MLB Ch 7 (W.D. Wash.);
- 20 c. *Dallen and Peggy Wendt v. HTD, et al.*, Case No. 08-CV-03612 (N.D. Ill);
- 21 d. *Display Research Lab., Inc. v. Telegen Corp., et al.* Case No. 00-4261-SI
22 (N.D. Cal.)

23 25. KTC attorneys and staff enter their time contemporaneously. Firm policy requires
24 timekeepers to keep their time on a daily basis through its timekeeping software. KTC's
25 accounting department runs regular time reports, which are reviewed by Mr. Brown to ensure
26

1 accuracy and reasonableness. Through this process, Mr. Brown has written off approximately
2 1,000 hours of attorney and staff time.

3 26. KTC has devoted, and will continue to devote, its time and resources to prosecute
4 the class action claims in this matter on a contingent-fee basis.

5 **IV. KTC's Expenses Submission**

6 27. KTC has to date incurred **\$1,030,742.22** in unreimbursed expenses in connection
7 with the investigation, prosecution, and settlement of this case, as set forth in the table attached
8 as **Exhibit B**. The expenses listed in **Exhibit B** are reflected in the books and records KTC
9 maintains in the ordinary course of business, which books and records are prepared from
10 invoices, expense vouchers and check records.
11

12
13 I declare under penalty of perjury that the forgoing is true and correct. Executed this 21st
14 day of April, 2021, at Seattle, WA.

15 */s/ Nathan T. Paine*
16 _____
Nathan T. Paine

EXHIBIT A

Attorney Summary Report			
Billed			
Kona Coffee / Growers' Class Action (72448-1)			
Name	Description	Hours	Amount
Arndorfer, Lauren	Associate	104.00	33,800.00
Bailey, Mark A.	Shareholder	887.30	376,376.00
Brady, Barbara J.	Shareholder	801.50	325,730.00
Brown, Paul R.	Shareholder	2,678.60	1,621,288.50
Dickie, Christopher	Paralegal	1,188.50	297,125.00
Durland, Andrew W.	Associate	517.60	165,632.00
Fagan, Morgan	Paralegal	644.10	84,276.50
Hagen, Daniel	Associate	831.20	224,424.00
Hodgins, Maria Y.	Associate	109.40	28,991.00
Howard, Joshua M.	Associate	518.40	147,744.00
Oppie, Pamela	Paralegal	56.90	15,647.50
Paine, Nathan	Shareholder	1,842.10	924,010.00
Radcliffe, Robert A.	Shareholder	300.30	121,070.00
Rosenberg, Joshua R.M.	Law Clerk	99.30	16,200.00
Stanton, Amy	Paralegal	180.40	49,610.00
Strauss, Nathaniel	Associate	44.70	12,292.50
Vaughn, Mitzi	Shareholder	406.30	203,150.00
GRAND TOTAL		11,210.60	\$ 4,647,367.00

EXHIBIT B

Service Code Summary Report

Billed

Kona Coffee / Growers' Class Action (72448-1)

Service Code	Description	Amount
00100	Data Storage - Lighthouse	134,615.74
00102	Data Retention	42,359.29
00106	Online Research	822.92
00107	Delivery Services/Messengers	9,116.01
00110/00111	Travels/Accommodations/Meals	87,884.61
00112	Court Fees	1,330.64
00115	Deposition Transcripts	8,781.60
00119	Experts	736,120.01
00122	Local Counsel	4,869.50
00510	Copies	1,710.38
00560	Color Copies & Prints	895.50
00580	Postage	81.45
00590	Facsimile	15.00
00600	Document Scanning	7.40
00610	Copy Center	2,132.17
		<u>1,030,742.22</u>