

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

_____))
))
AMERICAN BROADCASTING COMPANIES, INC.,)
THE ASSOCIATED PRESS, CABLE NEWS NETWORK)
LP, LLLP, CBS BROADCASTING INC., FOX NEWS)
NETWORK, L.L.C. and NBC UNIVERSAL, INC.,)
))
Plaintiffs,)
))
- against -)
))
JENNIFER BRUNNER, in her official capacity as the)
SECRETARY OF STATE OF OHIO,)
))
Defendant.)
_____)

Cause No.: 1:04-CV-750
District Judge Michael H. Watson

**AFFIDAVIT OF SUSAN BUCKLEY
IN SUPPORT OF PLAINTIFFS'
SECOND MOTION FOR AN
AWARD OF ATTORNEYS' FEES
PURSUANT TO 42 U.S.C. § 1988**

STATE OF NEW YORK)
:)
COUNTY OF NEW YORK)

ss.:

SUSAN BUCKLEY, being duly sworn, hereby deposes and says:

1. I am a member of the Bar of the State of New York and a member of the firm of Cahill Gordon & Reindel LLP, 80 Pine Street, New York, NY 10005. My firm, along with Frost Brown Todd LLC, has represented plaintiffs American Broadcasting Companies, Inc. ("ABC"), The Associated Press ("AP"), Cable News Network LP, LLLP ("CNN"), CBS Broadcasting Inc. ("CBS"), Fox News Network, L.L.C. ("Fox News") and NBC Universal, Inc.

("NBC") (collectively "Plaintiffs") in their action against the Secretary of State of Ohio challenging, on constitutional grounds, the Secretary's oral directive to state election officials instructing them to prohibit exit polling within 100 feet of polling places, purportedly pursuant to Ohio Revised Code §§ 3501.30, 3501.35 and 3599.24 (the "Loitering Statutes"). I submit this affidavit in support of Plaintiffs' second motion for an award of attorneys' fees and expenses pursuant to 42 U.S.C. § 1988 (2000) ("section 1988").

2. On September 26, 2006, this Court declared that the Secretary of State's directive to state election officials prohibiting exit polling within 100 feet of polling places violated the First Amendment and that the Loitering Statutes cannot be interpreted to prohibit exit polls within the 100-foot designated area around polling places without violating the First Amendment. This Court also entered permanent injunctions against the enforcement of the Secretary of State's Oral Directive and against the issuance or enforcement of any rule, directive, advisory, policy or communication that would prohibit exit polls within the 100-foot designated area around polling places, and ordered the Secretary of State to issue a written directive stating that it would be unlawful and unconstitutional to interpret, apply, or enforce the Loitering Statutes to prohibit exit polls within 100 feet of polling places. On October 26, 2006, the Secretary appealed this Court's judgment to the United States Court of Appeals for the Sixth Circuit.

(Doc. # 67)

3. As required by Federal Rule of Civil Procedure 54(d)(2)(B), on October 11, 2006 Plaintiffs, as prevailing parties in the action, filed their motion for an award of attorneys' fees incurred in connection with the proceedings before this Court. (Doc. # 65, "First Fee

Motion”)) Rather than respond to the motion (and without seeking an extension of time to do so), on October 31, 2006, Defendant filed a “motion to defer” any ruling on Plaintiffs’ motion for attorneys’ fees in light of the pendency of the appeal. (Doc. # 74) Plaintiffs’ First Fee Motion remains pending.

4. After receiving the Secretary’s Notice of Appeal, on October 31, 2006, Plaintiffs filed a notice of cross-appeal directed to so much of this Court’s ruling granting summary judgment to the Secretary on the vagueness claim asserted in Count II of the Second Amended Complaint. However, in light of the permanent injunction entered by this Court, effectively granting the relief sought on Count II, and election officials’ substantial compliance with this Court’s injunction on Election Day 2006, Plaintiffs voluntarily dismissed their cross-appeal before any briefing on the issues raised therein.

5. On November 9, 2007, the Court of Appeals entered a scheduling order for the submission of appellate briefs. Proof briefs were submitted by Defendant on January 9, 2007 and by Plaintiffs on February 12, 2007. The Joint Appendix was prepared and was filed on March 27, 2007. Final briefs were submitted by the parties on April 16, 2007. Oral argument was definitively scheduled for July 18, 2007.

6. On June 28, 2007, more than seven months after filing his notice of appeal, and after all briefing in connection with the appeal had been completed, Defendant filed a notice of voluntary dismissal of the appeal with no prior notice to Plaintiffs. Treating the notice as a motion to dismiss the appeal, on July 9, 2007, the Court of Appeals granted the motion thus

ending the appellate phase of this case and leaving this Court's declaratory judgment and permanent injunction entirely intact.

7. The instant motion seeks an award for all fees and expenses incurred in connection with the appeal in this action and in connection with the submission of this motion. As is fully explained in the accompanying Memorandum of Law and in the Memorandum of Law submitted in support of Plaintiffs' First Fee Motion (Doc. # 65), Plaintiffs are entitled to these fees and expenses as prevailing parties in an action brought pursuant to 42 U.S.C. § 1983 (1996).

8. My affidavit submitted in support of the First Fee Motion a) describes the firm of Cahill Gordon & Reindel LLP ("Cahill Gordon") and its experience in constitutional litigation, b) advises the Court of counsels' qualifications as lead counsel in this action, c) sets forth the background of this action, d) explains the reasons why Plaintiffs believe that the issues raised here were important, e) describes the work Cahill Gordon attorneys performed prior to the appeal, f) sets forth the total amount of fees, expenses and disbursements incurred by Plaintiffs prior to the appeal, g) details the level of experience of each of the attorneys involved in this action, and h) advises the Court of the prevailing rates in New York City for the kind of work performed by Cahill Gordon during the relevant period. Also accompanying Plaintiffs' First Fee Motion is the Affidavit of Richard M. Goehler, Esq., which sets forth the work performed and the fees and expenses incurred by Frost Brown Todd LLC ("Frost Brown") prior to the appeal.

9. The purposes of this affidavit are a) to describe the work Cahill Gordon attorneys performed since the filing of the First Fee Motion, b) to set forth the total amount of fees, expenses and disbursements incurred by Cahill Gordon since the filing of the First Fee Motion, and c) to set forth the total amount of fees, expenses and disbursements incurred by Cahill Gordon since the filing of the First Fee Motion.

10. I had ultimate responsibility for the representation of Plaintiffs in this action. My background and experience are set forth in my affidavit in support of the First Fee Motion. Mr. Brian Markley, a seventh-year associate, assisted me during the course of the appeal in this case. Mr. Kayvan Sadeghi, a fourth-year associate, also assisted me during the course of the appeal in this case and assisted me in the preparation of this submission.

Work Performed and Expenses Incurred Since the First Fee Motion

11. The work performed and expenses incurred since the filing of the First Fee Motion are detailed below. First, the respective roles of each of the Cahill Gordon attorneys who assisted on the appeal and on this motion are described. (See ¶¶ 12-14) The contemporaneous line-item billing summaries setting forth each attorney's daily time records in connection with the work performed are also included as Exhibit A. I have carefully reviewed those time records to ensure that all the work performed is properly reimbursable under section 1988. In addition to the daily time summaries, for the convenience of the Court, the specific fees incurred are also detailed below. (See ¶¶ 15-16) Finally, for the Court's reference, a second amount, derived by

applying prevailing rates for attorneys in Cincinnati to the work performed by Cahill Gordon, is also described. (*See* ¶ 20)

12. As the partner in charge of this matter, I was responsible for managing and overseeing the day-to-day progress of the appeal. I was principally responsible for communications with and coordination with Frost Brown, with the clients and with the Court of Appeals. I had ultimate responsibility for preparing, and revised and edited, Plaintiffs' appellate brief and all other submissions to the Sixth Circuit. I was also responsible for monitoring and reporting to the six clients regarding the status of the appeal. Finally, I was responsible for, and revised and edited, the papers being submitted in connection with this submission, including this affidavit (and its attachment) and the memorandum of law submitted herewith. I also directed and supervised the legal research undertaken to determine to which court this motion should be made, the timing of this submission and the propriety of awarding fees under section 1988 for appellate work. My daily time records in connection with this work, as detailed in the contemporaneous line-item billing entries, are included in Exhibit A.

13. Brian Markley, who was a seventh-year associate when his services were rendered, directly supervised the progress of, and had responsibility for, the initial draft of Plaintiffs' appellate brief. Mr. Markley drafted sections of the brief, supervised Mr. Sadeghi in drafting other sections of the brief and conducting legal research, and worked closely with me and Mr. Sadeghi in revising the brief. Mr. Markley also assisted with communications with the clients. His hours are also detailed in the line-item billing entries attached hereto as Exhibit A.

14. Kayvan Sadeghi, who was a fourth-year associate when his services were rendered, conducted legal research in connection with Plaintiffs' appellate brief, drafted discrete sections of the appellate brief, worked closely with me and Mr. Markley in revising the brief, and prepared the brief for filing. Mr. Sadeghi also conducted legal research for, and prepared drafts of the papers submitted with, this submission. His hours are also detailed in Exhibit A.

15. The following is a breakdown of individual attorney time during spent in connection with the appeal in this litigation:

ATTORNEY	RATE	HOURS	AMOUNT
S. Buckley	768.00	36.75	28,224.00
B. Markley	560.00	73.75	41,300.00
K. Sadeghi	460.00	51.75	23,805.00
		TOTAL	\$ 93,329.00

16. The following is a breakdown of individual attorney time during spent in connection with the preparation of this Second Fee Motion:

ATTORNEY	RATE	HOURS	AMOUNT
S. Buckley	768.00	8.50	6,528.00
K. Sadeghi	460.00	13.50	6,210.00
		TOTAL	\$ 12,738.00

17. All of the fees sought in connection with this motion and the First Fee Motion have been billed to the clients in full with the exception of the modest fees and expenses incurred since June 30, 2007, all of which will be billed to the clients in our next statement.

The Recoverable Amount

18. Cahill Gordon's rate structures for client billing are more fully set forth in my affidavit in support of Plaintiffs' First Fee Motion. As before, the rates charged for all work performed since the filing of the First Fee Motion are the minimum rates currently charged by Cahill Gordon.

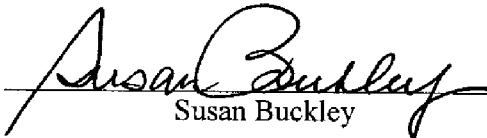
19. In my opinion, the sum of \$93,329.00, represents a reasonable fee for the services rendered by Cahill Gordon in connection with the appeal in this case. In addition, the sum of \$12,738.00, represents a reasonable fee for the services rendered by Cahill Gordon for the preparation of the Second Fee Motion.

20. We have also calculated the Cahill Gordon fee component using rates comparable to those prevailing in Cincinnati, Ohio for attorneys of like experience and expertise based on information supplied to me by Mr. Goehler. (See Affidavit of Richard Goehler submitted herewith.) For myself, a rate of \$400/hour was applied. The rate applied to Mr. Markley's hours was \$225/hour (seventh year); the rate applied to Mr. Sadeghi's hours was \$210/hour (fourth year). Using these rates results in an attorneys' fee in the amount of \$42,161.25 for the work performed by Cahill Gordon in connection with the appeal, and \$6,235.00 for work performed in connection with preparing this submission, for a total of \$48,396.25.

21. Disbursements have been incurred by Cahill Gordon in the amount of \$10,165.09 since the filing of the First Fee Motion. This sum reflects disbursements actually and necessarily incurred. These disbursements — all of which are costs routinely billed to all of the

firm's clients -- are itemized on page 10 of Exhibit A hereto. All of the expenses for which reimbursement is sought in this motion and in the First Fee Motion have been billed in full to the clients with the exception of the modest expenses incurred since June 30, 2007, all of which will be billed to the clients in our next statement.

Wherefore, I respectfully request that this Court grant Plaintiffs' First Fee Motion and award Plaintiffs the fees and expenses detailed therein and grant this Second Fee Motion and award Plaintiffs the fees and expenses detailed herein.


Susan Buckley

Sworn to before me this
__th day of July, 2007.

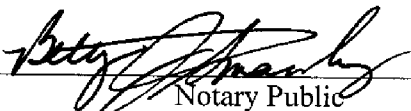

Notary Public
BETTY J. SMAWLEY
Notary Public, State of New York
No. 01SM6146748
Qualified in New York County
Commission Expires May 22, 2010

EXHIBIT A

FOR PROFESSIONAL SERVICES RENDERED

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
01/10/07	BUCKLEY, S	E-corr. D Goehler re: 6th Cir. brief and counsel issue.	.25
01/12/07	BUCKLEY, S	Review Blackwell's brief to the 6th Circuit; conf. B. Markley re: same; forward materials to BM.	2.00
01/12/07	SADEGHI, KB	Review Blackwell's brief.	.50
01/16/07	MARKLEY, BT	Reviewed briefs and district court order; outlined arguments; confs. w/ S. Buckley and K. Sadeghi re: same; IL re: same.	6.00
01/16/07	BUCKLEY, S	Conf. B. Markley re: ideas for appellate brief and how to proceed.	.50
01/16/07	SADEGHI, KB	Review papers filed in district court; meet w/ B. Markley to discuss brief; I.L. for same; corr. w/ B. Markley re: same.	2.00
01/17/07	BUCKLEY, S	Corr. clients re: appeal brief.	.25
01/17/07	SADEGHI, KB	I.L. for opposition brief.	1.50
01/18/07	SADEGHI, KB	I.L. for opposition brief.	1.50
01/19/07	MARKLEY, BT	Conf. and emails w/ K. Sadeghi re: research for appellate brief.	.50
01/19/07	SADEGHI, KB	Draft opposition brief.	2.25
01/22/07	SADEGHI, KB	Draft opposition brief and send to B. Markley.	6.00
01/23/07	MARKLEY, BT	Reviewed case law; emailed K. Sadeghi re: same; reviewed briefs and Watson decision;	2.00

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
		conf. w/ K. Sadeghi re: arguments.	
01/24/07	MARKLEY, BT	Drafted appellate brief; mult. confs. w/ K. Sadeghi re: same.	3.00
01/25/07	MARKLEY, BT	Rev. Appellate Brief.	2.00
01/26/07	MARKLEY, BT	Rev. brief.	9.00
01/26/07	SADEGHI, KB	Draft rider to opposition brief re: standard of review; review requirements for briefs in the 6th circuit; discuss brief w/ B. Markley.	2.00
01/28/07	SADEGHI, KB	Revise brief; corr. w/ B. Markley re: same.	1.25
01/29/07	MARKLEY, BT	Rev. brief; mult. confs. w/ K. Sadeghi re: same.	11.00
01/29/07	BUCKLEY, S	Rev. corr. from RGoehler; e-corr. to/from Brian Markley; briefly rev. and forward ACLU brief to 6th Circuit on mootness; briefly rev. 6th Cir. rules; e-corr. RGoehler re a number of issues; e-corr. to/from BMarkley.	1.50
01/29/07	SADEGHI, KB	Discuss brief w/ B. Markley; draft rider for brief.	1.00
01/30/07	MARKLEY, BT	Rev. appellate brief; confs. w/ S. Buckley and K. Sadeghi re: same.	10.25
01/30/07	SADEGHI, KB	Discuss brief w/ B. Markley; draft rider for brief; discuss cross-appeal w/ B. Markley; draft argument.	4.00
01/31/07	MARKLEY, BT	Rev. brief; confs. w/ S. Buckley and K. Sadeghi re: same.	8.00
01/31/07	BUCKLEY, S	Conf. BMarkley.	1.00

January 1, 2007 - July 19, 2007

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
01/31/07	SADEGHI, KB	Discuss brief w/ B. Markley; review brief and discuss comments w/ B. Markley.	1.50
02/01/07	MARKLEY, BT	Rev. brief.	2.00
02/03/07	MARKLEY, BT	Reviewed draft brief; drafted riders for same; mult. confs. w/ S. Buckley and K. Sadeghi re: same.	2.00
02/05/07	BUCKLEY, S	Working on 6th Cir. brief; consolidate statement; reviewing Blackwell arguments below; conf. BMarkley re specific case law issues; review of our opp. brief below; drafting.	4.00
02/05/07	SADEGHI, KB	Corr. w/ B. Markley re: riders to Appellate Brief.	.25
02/06/07	MARKLEY, BT	Mult. conf. and emails re: brief; reviewed same.	1.00
02/06/07	BUCKLEY, S	Revising 6th Circuit brief; tel. cs. BM and KS.	7.50
02/06/07	SADEGHI, KB	Draft riders to Appellate Brief; discuss same w/ B. Markley and S. Buckley.	2.75
02/07/07	MARKLEY, BT	Rev. brief; mult. conf/emails re: same.	3.25
02/07/07	BUCKLEY, S	Hard edit 6th Cir. brief; circulate to clients; e-corr. BMarkley.	4.25
02/07/07	SADEGHI, KB	Discuss brief and outstanding work w/ B. Markley.	.25
02/08/07	MARKLEY, BT	Rev. brief; mult. confs/emails re: same.	7.00
02/08/07	BUCKLEY, S	Conf. BMarkley and KSadeghi re issues that need nailing down before filing; tel. c. BM.	1.00
02/08/07	SADEGHI, KB	Revise brief; proofread same; corr. w/ Library	5.75

January 1, 2007 - July 19, 2007

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
		re: same; discuss same w/ S. Buckley and B. Markley; I.L. for same.	
02/09/07	MARKLEY, BT	Rev. brief; mult. confs/emails re: same.	2.50
02/09/07	BUCKLEY, S	Tel. c. Zucker; review and revise; e-corr. BM, KS and PW.	2.00
02/09/07	SADEGHI, KB	Discuss brief w/ B. Markley; revise same; corr. w/ S. Buckley re: same; review sixth Circuit rules and corr. w/ B. Markley re: same.	3.75
02/11/07	SADEGHI, KB	Enter Mark up to Brief; proofread draft certificates of compliance and service and designation of joint appendix and shepardize; send brief to S. Buckley and B. Markley.	4.00
02/12/07	MARKLEY, BT	Rev. brief; mult. conf/emails re: same.	3.00
02/12/07	BUCKLEY, S	Final revisions on 6th Cir. brief; revise certificates; draft corr. to clerk; conf. BM; multiple confs. KSadeghi.	3.75
02/12/07	SADEGHI, KB	Draft statement in support of oral argument; corr. w/ B. Markley re: same; finalize brief and prepare for filing; corr. w/ S. Buckley re: same; mail same.	5.25
02/16/07	BUCKLEY, S	Corr. RGoehler; e-corr. to/from RG.	.25
02/21/07	BUCKLEY, S	2 tel. es. 6th Cir. clerk's office; draft and complete motion; tel. c. KS; conf. KS.	1.50
02/21/07	SADEGHI, KB	Discuss withdrawal of Appeal w/ S. Buckley; I.L. re: same; review draft and revise same.	1.00
02/22/07	BUCKLEY, S	E-corr. RG; letter to clerk; assemble service copies; rev. corr. from RG.	1.00

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
03/01/07	BUCKLEY, S	Rev. NOA; v-mem. RG; e-corr. clients.	.25
03/05/07	BUCKLEY, S	Rev. motion to withdraw; e-corr. MM.	.25
03/29/07	MARKLEY, BT	Tel. c. and emails w/ S. Buckley and K. Sadeghi re: State's appendix and brief.	.50
03/29/07	SADEGHI, KB	Corr w/ N. Marcantonio re filing deadlines; corr w/ B. Markley re same.	.50
03/30/07	MARKLEY, BT	Drafted email to clients re: developments; emails w/ S. Buckley re: same; reviewed appendix.	.75
03/30/07	BUCKLEY, S	Conf. c. BM re reply brief issue and joint appendix; review and revise BM memo to clients; tel. c. BM; e-corr. re same.	.75
04/05/07	SADEGHI, KB	Revise brief to include joint appendix page numbers; corr. w/ B. Markley re: same.	1.00
04/09/07	BUCKLEY, S	E-mem. to JZucker.	.25
04/10/07	BUCKLEY, S	Tel. cs. BM and KS re progress of "final brief" and record issues.	.50
04/12/07	BUCKLEY, S	Review final proof; e-mem. BM and KS; conf. KS.	.75
04/12/07	SADEGHI, KB	Corr. w/ S. Buckley re: final version of appellate brief; tel. c. w/ B. Markley re: same.	.25
04/13/07	BUCKLEY, S	Rev. e-mem. from KS re issues to be raised with clerk; tel. c. 6th Circuit's clerks office; e-corr. to/from KS; finalize and sign brief; approve COF; draft letter to clerk; 2 confs. KS.	2.00
04/13/07	SADEGHI, KB	Finalize brief, prepare copies and cover letter; discuss same w/ S. Buckley.	2.00

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
04/16/07	BUCKLEY, S	E-corr. and tel. cs. KS re final brief, filing and service.	.50
04/16/07	SADEGHI, KB	Correct certificates, prepare corrected copies and file brief; corr. w/ S. Buckley and B. Markley re: same.	1.50
06/05/07	BUCKLEY, S	Rev. order from 6th Circuit re: appeal and respond to oral argument request	.50
06/19/07	BUCKLEY, S	Tel. cs. to summer associate re fee timing on appeal; forward fee motion re same.	.50
06/20/07	BUCKLEY, S	Pull initial motion for assignment re timing of fee application for appeal; conf. APerlman.	.50
06/27/07	BUCKLEY, S	Tel. c. and e-corr. BM re argument.	.25
06/28/07	BUCKLEY, S	Rev. AG notice; conf. AP re fee research; rev. case law re timing; tel. c. BM; tel. c. RG; draft mem. to clients.	2.00
06/29/07	BUCKLEY, S	Tel. c. KS; conf. KS re fee motion.	.50
06/29/07	SADEGHI, KB	Review first fee application; meet w/ S. Buckley re: second fee application.	.75
07/06/07	SADEGHI, KB	I.L. re: fee applications for services performed on appeal and prevailing party when appeal is voluntarily dismissed; begin drafting fee application.	3.00
07/09/07	BUCKLEY, S	TC 6th Cir. clerk's office; e-corr. K. Sadeghi re: fee application and brief re: appeal; e-mem. MM to search for order; e-corr KS re: progress of papers	1.00

January 1, 2007 - July 19, 2007

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
07/09/07	SADEGHI, KB	Draft fee application; corr. w/ S. Buckley re: same; draft affidavit of S. Buckley.	5.25
07/10/07	BUCKLEY, S	Rev. mem. from MM on 6th Circuit docket; rev. electronic order received from 6th Circuit re: dismissal; TC KS re: fee application questions; e-corr to/from R. Goehler re: docs/info needed from FBT; briefly rev. KS drafts; e-corr. to/from BM	1.50
07/10/07	SADEGHI, KB	Revise fee application brief and accompanying affidavit and send same to S. Buckley and B. Markley; discuss same w/ S. Buckley.	3.00
07/12/07	BUCKLEY, S	Review and revise fee brief re: appeal; review and revise Buckley affidavit re: appeal fees; e-corr. KS and BM re: same	2.00
07/12/07	SADEGHI, KB	Corr. w/ S. Buckley and B. Markley re: fee application papers.	.25
07/13/07	SADEGHI, KB	Revise fee application papers in response to comments from S. Buckley and B. Markley; corr. w/ M. McLoughlin re: docket and relevant dates.	1.00
07/16/07	BUCKLEY, S	review DG drafts of motion and FBT affidavit; e-corr. DG	.50
07/16/07	SADEGHI, KB	Review correspondence and draft affidavit and motion from D. Goehler; corr. w/ S. Buckley re: same.	.25
		TOTAL TIME	<hr/> 184.25

----- TIME RECAP -----

<u>INIT</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SB	BUCKLEY, S	768.00	45.25	34,752.00
BTM	MARKLEY, B	560.00	73.75	41,300.00
KBS	SADEGHI, K	460.00	65.25	30,015.00
	TOTAL		184.25	\$106,067.00

<u>DISBURSEMENTS AND CHARGES</u>	<u>AMOUNT</u>
Air Freight Delivery Charge	184.37
Data Bank Research	42.64
Lexis and Database Charges	245.75
Local Transportation	445.03
Messenger Services	23.00
Overtime Meals	184.16
Rapifax	4.50
Reproduction	1,671.80
Telephone Charges	12.24
Velo Bind	183.00
Westlaw Searches	5,787.35
Word Processing	1,381.25
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TOTAL DISBURSEMENTS AND CHARGES	\$10,165.09