

## EXHIBIT A

**Defendants' Fees and Costs in Pursuing Motion for Rule 37 Sanctions**

<b>Date</b>	<b>Name</b>	<b>Hours</b>	<b>Amount</b>	<b>Description</b>
9/12/2014	SRS	.8	\$340.00	Review certificate of non-appearance (plaintiff's deposition). Research regarding motion to strike plaintiff's complaint for failure to attend deposition.
9/12/2014	AKA	.8	\$180.00	Research regarding motion for sanctions for failing to appear for deposition.
9/15/2014	SRS	.3	\$127.50	Research and draft memo to Plaintiff's counsel regarding Rule 37 motion and review response to same.
9/29/2014	AKA	2.8	\$630.00	Draft Rule 37 motion for sanctions for failure to appear for deposition.
10/8/2014	SRS	1.4	\$595.00	Revise motion for Rule 37 sanctions against plaintiff.
10/9/2014	AKA	1.6	\$360.00	Research cases for, prepare exhibits for, and file the motion for Rule 37 sanctions.
10/15/2014	SRS	.2	\$85.00	Review plaintiff's response to motion for Rule 37 sanctions.
10/16/2014	AKA	.2	\$45.00	Review plaintiff's response to motion for Rule 37 sanctions.
10/20/2014	AKA	.7	\$157.50	Draft defendants' reply in support of the motion for sanctions.
10/22/2014	AKA	2.7	\$607.50	Draft defendants' reply in support of the motion for sanctions.
10/27/2014	SRS	1.1	\$467.50	Revise defendants' reply in support of the motion for sanctions.

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10/27/2014	AKA	.8	\$180.00	Finalize and file reply memorandum in support of the defendant's motion for sanctions.
11/5/2014	SRS	2.9	\$1232.50	Prepare for and attend hearing on motion for sanctions.
11/5/2014	AKA	2.3	\$517.50	Research for and attend hearing on motion for sanctions.
<b>TOTAL</b>		<b>18.6</b>	<b>\$5,525.00</b>	