

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CHARLES HADDAD,

Plaintiff,

Case No. 04-CV-74932

-vs-

Hon. ANNA DIGGS TAYLOR

INDIANA PACERS, an assumed name a/k/a PACERS  
BASKETBALL CORPORATION, an Indiana corporation,  
JERMAINE O'NEAL and ANTHONY JOHNSON,

Mag. Judge Donald A. Scheer

Defendants.

POTTER, DeAGOSTINO, O'DEA & PATTERSON

L.S. CHARFOOS (P11799)  
JASON J. THOMPSON (P47184)  
Attorneys for Plaintiff  
5510 Woodward Avenue  
Detroit, Michigan 48202  
(313) 875-8080/FAX 8522

Potter, DeAgostino, O'Dea & Patterson  
STEVEN M. POTTER (P33344)  
Attorney for Indiana Pacers  
2701 Cambridge Court, Suite 223  
Auburn Hills, Michigan 48326  
(248) 377-1700/FAX 0051

LAWRENCE G. CAMPBELL (P11553)  
BRIAN M. AKKASHIAN (P55544)  
RICHARD M. APKARIAN, JR. (P66206)  
Attorneys for Jermaine O'Neal  
500 Woodward Avenue, Suite 4000  
Detroit, Michigan 48226  
(313) 223-3500

MATTHEW F. LEITMAN (P48999)  
HIDEAKI SANO (P61877)  
Attorneys for Anthony Johnson  
840 West Long Lake Road, Suite 200  
Troy, Michigan 48098  
(248) 267-3294/ FAX (248) 879-2001

WILLIAM D. TEMKO  
JOSEPH YBARRA  
Co-Counsel for Jermaine O'Neal  
355 S. Grand Avenue, 35<sup>th</sup> Floor  
Los Angeles, California 90071  
(213) 683-9266

**AFFIDAVIT OF STEVEN M. POTTER**

Steven M. Potter, being first duly sworn, deposes and states:

1. That this Affidavit is made upon the personal knowledge of Steven M. Potter and if sworn to provide testimony in support of this Affidavit, Mr. Potter will be able to testify from his own personal knowledge as to the correctness of each statement in this Affidavit.

2. That during the trial of the above-captioned cause of action, the following costs and fees and costs were incurred by Defendant:

A.	Expert witness fee of Dr. Brad A. Blaker	\$550.00
B.	Expert witness fee of Dr. William Leuchter	\$4,700.00
C.	Expert witness fee of Robert B. Forney, Ph.D.	\$4,862.50
D.	Expert witness fee of Ed Primeau	\$8,680.00
E.	Witness fee of Michael Dowding	\$18.00
F.	Witness fee & mileage costs of Sami Khal (240 miles & \$14 parking)	\$138.80
G.	Witness fee & mileage costs of Ronda Wilson (138 miles)	\$79.41
H.	Witness fee of Tim Smith	\$18.00
I.	Witness fee & mileage costs of Mary Fielder (360 miles & \$20 parking)	\$198.20
J.	Witness fee & mileage costs of Cheryl Hahnenberg (348 miles)	\$172.86
K.	Witness fee & mileage costs of Dewayne Sabourin (130.6 miles)	\$78.12
L.	Witness fee of Alvin Shackelford, Jr.	\$18.00
M.	Deposition costs for John Kemerer, D.O.	\$152.85
N.	Deposition costs for Bradley Sewick, Ph.D.	\$575.20
O.	Deposition costs for Alvin Shackelford, Jr.	\$459.70
P.	Deposition costs for Jermaine O'Neal	\$562.30
Q.	Deposition costs for Fouad Haddad	\$119.90

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R.	Deposition costs for Diana Haddad	\$100.10
S.	Deposition costs for Rose Siadi	\$210.30
T.	Deposition costs for Frank Haddad	\$210.30
U.	Deposition costs for Charlie Haddad	\$1,052.60
V.	Deposition costs for James Weintraub, D.O. (Discovery & De Bene Esse Depositions)	\$484.95
W.	Deposition costs for John P. Bederka, Ph.D.	\$170.40
X.	Deposition costs for Brad A. Blaker, D.O. (Including courtroom playback)	\$969.45
Y.	Deposition costs for Michael Dowding	\$216.18
Z.	Deposition costs for Sami Khal	\$216.17
AA.	Deposition costs for Timothy Smith	\$216.17
BB.	Deposition costs for Ronda Wilson	\$216.17
CC.	Deposition costs for Khawla Haddad	\$210.30
DD.	Process server fee for service of trial subpoena on Alvin Shackelford, Jr.	\$150.00
EE.	Trial costs	\$1,572.41
FF.	Court Reporter for partial trial transcript	<u>\$399.30</u>
	TOTAL COSTS:	\$27,778.64

(Invoices attached as Exhibit A)

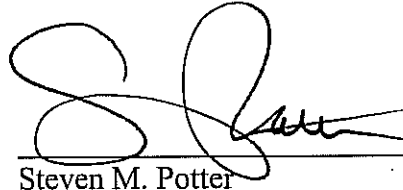
3. That each item of cost and disbursement claim is correct and was necessarily incurred in the defense of the above-captioned matter. That the costs requested for deposition transcripts were for depositions obtained for use in the case and were actually used in the trial of the case.

4 That the services for which fees have been charged were actually performed.

5. That each item of cost or disbursement claimed above is correct and has been necessarily incurred in the action and the services for which fees have been charged were actually performed. Additionally, the witness fees and mileage costs that are claimed for Alvin Shackelford, Jr., Michael Dowding, Sami Khal, Timothy Smith, Ronda Wilson, Mary Fielder, Cheryl Hahnenberg and Dewayne Sabourin are for testimony actually provided by these witnesses on October 11, 2006 and October 18, 2006.

6. That this Affidavit is made pursuant to USC 28 §1924.

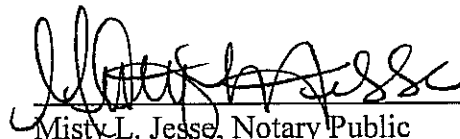
Further, Affiant sayeth not.

  
Steven M. Potter

POTTER, DeAGOSTINO, O'DEA & PATTERSON

STATE OF MICHIGAN )  
 ) SS:  
COUNTY OF OAKLAND )

On this 7th day of November, 2006, before me personally appeared Steven M. Potter, who being by me duly sworn, deposes and says that he has read the foregoing Affidavit by him subscribed, and knows the contents thereof, and that the same is true of his own knowledge, except as to those matters which are stated upon information and belief, which he believes to be true.

  
Misty L. Jesse, Notary Public  
County of Oakland, State of Michigan  
My Commission Expires: 06/05/2013  
A/County of Oakland