

# Exhibit 16

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

Tax ID No. 57-0215445

Post Office Box 11070 / Columbia, South Carolina 29211

Tel: 803.799.2000

Cleveland Golf  
ATTN: Stephen Gingrich  
5601 Skylab Road  
Huntington Beach, CA 92647

November 15, 2010  
Invoice 1220481 Page 1

Our Matter # 34230/01504 For Services Through 10/29/10  
Name of Matter: Cleveland Golf v. copenatclubs.com

10/01/10	Review and respond to emails organizing video conference depositions. J.C. MCELWAINE	0.30 hrs.
10/01/10	Review and respond to emails regarding Bright Builder deposition. J.S. PATTERSON	0.20 hrs.
10/05/10	Begin review and analysis of documents relating to damages collected by client. J.C. MCELWAINE	2.20 hrs.
10/06/10	Continue to review documents produced by Cleveland; Draft motion to compel delinquent responses to requests to produce; Begin drafting deposition outline for Bright Builders' employees. J.C. MCELWAINE	3.60 hrs.
10/07/10	Continue to review documents produced by Bright Builders; Select exhibits, organize and send to court reporter. J.C. MCELWAINE	4.60 hrs.
10/08/10	Review and analyze exhibits and prepare deposition outline for Mr. Johnson; Telephone conference with Attorney Patterson to discuss deposition strategy. J.C. MCELWAINE	5.50 hrs.
10/08/10	prepare for Rule 30 (b)(6) deposition of Bright Builders; work on outline for deposition and exhibits; conference call with Attorney McElwaine regarding strategy. J.S. PATTERSON	1.20 hrs.
10/08/10	Review documents in preparation for BrightBuilder depositions; meet with Attorney Patterson regarding same; phone calls with Attorney McElwaine regarding same. M.T. NICKERSON	0.80 hrs.
10/11/10	Telephone call with Attorney McElwaine and Attorney Finnerty regarding deposition strategy; prepare for deposition of Bright Builders; final work and identification of exhibits for Rule 30(b)(6) deposition. J.S. PATTERSON	1.20 hrs.
10/11/10	Preparation for and take the deposition of Mr. Johnson; Discuss results of said deposition with trial team. J.C. MCELWAINE	7.70 hrs.

- 10/11/10 Phone call with John McElwaine regarding copycat depositions; phone call with Attorney Finnerty and Patterson regarding deposition strategy; review financial documents received from bright Builders; prepare financial documents for Attorney Patterson for deposition; conduct legal research regarding standard for contributory and vicarious trademark infringement in Fourth Circuit; draft memorandum regarding same.  
M.T. NICKERSON 3.50 hrs.
- 10/12/10 Preparation for and attend deposition of Bright Builders 30(b)(6), Greg Cole and Brian Cole; Telephone conference with trial team to discuss depositions.  
J.C. MCELWAINE 3.00 hrs.
- 10/12/10 Review all financial documents and outline same for Attorney Patterson; meet with Attorney Patterson in preparation for 30b6 of Bright Builders; attend deposition and assist Attorney Patterson with same; meet with Attorney Patterson and Finnerty regarding litigation strategy; conduct legal research on contributory liability.  
M.T. NICKERSON 1.10 hrs.
- 10/13/10 Review and analyze documents produced by Bright Builders and Bright Builders' responses to second set of requests to produce; Review important documents, scan and email to Attorney Nickerson with explanation of importance or points that the evidence supports.  
J.C. MCELWAINE 2.50 hrs.
- 10/13/10 Draft Opposition to Summary Judgment; research case law for same; phone call with Attorney McElwaine regarding same.  
M.T. NICKERSON 6.60 hrs.
- 10/14/10 Review and analyze deposition transcript of Mr. Johnson; Review and analyze draft of memorandum in opposition to motion for summary judgment prepared by Attorney Nickerson.  
J.C. MCELWAINE 3.50 hrs.
- 10/14/10 Draft and edit Opposition to Summary Judgment; phone call with Attorney McElwaine regarding same; meet with Attorney Finnerty regarding same.  
M.T. NICKERSON 1.80 hrs.
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- 10/15/10 Draft and incorporate revisions to memorandum in opposition to motion for summary judgment; Assemble exhibits to be filed with memorandum; Draft email to team providing a copy of memorandum for their review and comment.  
J.C. MCELWAINE 7.30 hrs.
- 10/15/10 Draft affidavit of fees for Summary judgment; draft Proposed Order for Summary judgment; draft email to Attorneys Finnerty and Patterson regarding filing procedure for same.  
M.T. NICKERSON 1.10 hrs.

10/18/10 Review and revise opposition to Bright Builders motion for summary judgment.  
 J.S. PATTERSON 1.10 hrs.

10/20/10 Review and analyze damages documents produced by Cleveland Golf; Research and obtain  
 scholarly articles concerning the economic impact of counterfeit products.  
 J.C. MCELWAINE 1.50 hrs.

10/28/10 Preparation for deposition of Emily Daviés; Draft and incorporate revisions to deposition  
 outline for Ms. Davies and assemble exhibits.  
 J.C. MCELWAINE 3.50 hrs.

**Fees for Legal Services..... \$25,186.00**

**BILLING SUMMARY**

	Hours	Rate/Hr	Dollars
J.C. MCELWAINE	45.20	400.00	18,080.00
J.S. PATTERSON	4.00	400.00	1,600.00
M.T. NICKERSON	14.90	300.00	4,470.00
<b>TOTAL</b>	<b>67.50</b>	<b>373.13</b>	<b>25,186.00</b>

**CHARGES FOR OTHER SERVICES PROVIDED/EXPENSES INCURRED**

10/21/2010 VENDOR: DepomaxMerit Litigation Services; INVOICE#: 142624; 562.60  
 DATE: 10/21/2010 - Deposition of Michael A. Johnson on 10/11/10

10/21/2010 VENDOR: Wasatch Constables LC; INVOICE#: 2010003608; 85.00  
 DATE: 10/21/2010 - Service of deposition subpoena on Emily  
 Davies on 10/5/10

10/27/2010 VENDOR: DepomaxMerit Litigation Services; INVOICE#: 142683; 831.35  
 DATE: 10/27/2010 - Depositions of Gregory P. Cole and Brian R.  
 Cole on 10/12/10

10/27/2010 VENDOR: Wasatch Constables LC; INVOICE#: 2010003609; 5.00  
 DATE: 10/27/2010 - Attempted service of deposition subpoena to  
 Brigham Budd

**Total Charges for Other Services Provided/Expenses Incurred..... \$1,496.68**

**DISBURSEMENT SUMMARY**

Description	Dollars
Court Reporters	1,393.95
Postage	
Service	90.00
<b>TOTAL</b>	

Net current billing for this invoice..... \$26,682.68

**GRAND TOTAL ..... \$26,682.68**

**REMITTANCE COPY**

Please Return With Your Payment To:

ATTN: Accounts Receivable  
Nelson Mullins Riley & Scarborough LLP  
Post Office Drawer 11009  
Columbia, South Carolina 29211  
Telephone (803) 799-2000  
accounts.receivable@nelsonmullins.com

Cleveland Golf  
ATTN: Stephen Gingrich  
5601 Skylab Road  
Huntington Beach, CA 92647

Our Matter # 34230/01504 For Services Through 10/29/10  
Name of Matter: Cleveland Golf v. copycatclubs.com

Fees for Professional Services	\$25,186.00
Charges for Other Services Provided/Expenses Incurred	
<b>Net current billing for this invoice.....</b>	<b>\$26,682.68</b>
<b>GRAND TOTAL .....</b>	<b>\$26,682.68</b>

**Terms of Payment: Balance due within thirty days of invoice date**

<u>Domestic Wire Transfer</u>	<u>Foreign Wire (USD) Transfer</u>	<u>Automated Clearing House (ACH) Transfer</u>
<b>Receiving Bank:</b> Columbus Bank & Trust (CB&T) 1148 Broadway Columbus, GA 31901 <b>ABA Number:</b> 061100606 <b>Beneficiary Customer:</b> Nelson Mullins Riley & Scarborough LLP Operating Account <b>Beneficiary Account:</b> 1002720611	<b>Intermediary Bank:</b> Standard Chartered Bank New York, NY <b>SWIFT Code:</b> SCBLUS33 <b>Beneficiary Bank:</b> First Commercial Bank Birmingham, AL <b>SWIFT Code:</b> FICOUS44 <b>Beneficiary Customer:</b> Nelson Mullins Riley & Scarborough LLP Operating Account <b>Beneficiary Account:</b> 1002720611	<b>Beneficiary Bank:</b> National Bank of SC PO Box 1798 Sumter, SC 29151-1798 <b>ABA Number:</b> 053200666 <b>Beneficiary Customer:</b> Nelson Mullins Riley & Scarborough LLP Operating Account <b>Beneficiary Account:</b> 1002720611

Wire Reference Field: Note the NMRS Invoice and Matter Number