

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADVANCEME, INC.

Plaintiff

VS.

**RAPIDPAY, LLC, BUSINESS CAPITAL
CORPORATION, FIRST FUNDS LLC,
MERCHANT MONEY TREE, INC.,
REACH FINANCIAL, LLC and
FAST TRANSACT, INC. d/b/a
SIMPLE CASH**

Defendants

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CAUSE NO. 6:05-CV-424 LED

MOTION FOR ENTRY OF AGREED BILL OF COSTS

COME NOW Defendants Merchant Money Tree, Inc. and Reach Financial, LLC (collectively referred to as “Defendants”) and file this Motion for Entry of Agreed Bill of Costs as set out in the Court’s August 14, 2007 Memorandum Opinion and Order (Dkt. 341) and the Court’s June 20, 2007 Standing Order Regarding Bills of Costs.

The parties have conferred and agree that the following costs are taxable to the Plaintiff:

CATEGORY	AGREED COSTS
Court Reporter Fees	\$ 15,342.41
Witness Fees	\$4,631.59
Exemplification and copy costs	\$7,818.37
Court Appointed Expert Fee	\$6,250.00
TOTAL	\$34,042.37

Attached hereto as Exhibits 1-4 are spreadsheets and invoices documenting these four categories of the taxable costs. Defendants respectfully request that the Court adopt these costs

as set out herein and enter an order instructing the Court Clerk to enter the Agreed Bill of Costs, attached hereto as Exhibit 5.

Dated: August 28 , 2007

Respectfully submitted,

By: /s/ Graham E. Sutliff

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*Counsel for Defendants Merchant Money Tree,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 28, 2007. Any other counsel of record will be served by First Class mail on this same date.

/s/ Graham E. Sutliff

CERTIFICATE OF CONFERENCE

Counsel for the Defendants and counsel for Plaintiff conferred several times between August 24, 2007 and August 28, 2007 on the terms of the Bill of Costs. Counsel for Plaintiff confirmed via electronic mail on August 28, 2007 that Plaintiff does not oppose the relief sought herein.

/s/ Graham E. Sutliff