HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

AMIGA, INC., a Delaware corporation,

Plaintiffs,

v.

HYPERION VOF, a Belgian corporation,

Defendant.

No. 07-0631-RSM

DECLARATION OF WILLIAM A. KINSEL IN OPPOSITION TO AMIGA DELAWARE'S MOTION FOR PROTECTIVE ORDER

Note on Motion Calendar: 12/17/08

William A. Kinsel, under penalty of perjury, declares and states as follows:

1. I am counsel for defendant/counterclaim plaintiff Hyperion VOF. I am over the age of 18. I have personal knowledge of the matters stated herein and am competent to testify.

2. Prior to contacting Amiga Delaware's counsel to dispute its "Outside Counsel's Eyes Only" designations for the Cairncross document production, my legal assistant, Ms. Lori Peters, spent 3.0 hours segregating all of the merely "confidential" documents from those designated "outside counsel's eyes only," both so that Hyperion (specifically Ben Hermans and Evert Carton) could review what was designated as "confidential" and so attorney Kinsel could review what was marked for "his eyes only." One of the products of Ms. Peters' work was the list attached hereto as Exhibit 1. This list identifies each "document" marked as "outside

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counsel's eyes only" in the Cairncross document production. I then spent 13.2 hours reviewing each "document" that was designated as being for his eyes only. At the conclusion of that process, I concluded that not one of those documents was properly restricted to the review of outside counsel only. There are three entries that I put in bold type and underlined for easy reference, however, as they relate to the business plans discussed in more detail in the motion.

3. On October 27, 2008, I wrote to Amiga Delaware and Cairncross & Hempelmann to explain my conclusions and to demand under §6.2 of the Stipulated Protective Order that the interested parties meet and confer to discuss the problem. A true and accurate copy of that letter is attached hereto as Exhibit 2. On Friday, November 7, 2008, I met with Mr. Lawrence Cock and conferred without success in an effort to resolve the present dispute.

4. Accordingly, on November 12, 2008, I wrote another letter invoking the judicial dispute resolution process required by §6.3 of the Stipulated Protective Order. A true and accurate copy of that letter is attached hereto as Exhibit 3. I spent an additional 3 hours preparing these §§6.2 and 6.3 notices, i.e., Exhibits 2 and 3.

5. Two additional miscellaneous matters need to be addressed. First, Amiga Delaware accuses Hyperion of having "unclean hands" because Hyperion failed to produce some documents. In fact, Hyperion produced all responsive documents to me in 2007, and after the stipulated protective order was finally entered in August 2008, I was mistakenly under the impression that all of those materials had been produced to Amiga Delaware. When that mistake was pointed out to me by Lawrence Cock, we promptly rectified the matter. True and accurate copies of emails and correspondence regarding that exchange are attached hereto as Exhibit 4. Thus, Amiga Delaware now has all documents it has requested from Hyperion, and not one of those documents was marked with the restrictive "Outside Counsel's Eyes Only" designation.

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6. Amiga Delaware implies in its motion papers that Hyperion is somehow interfering with the mediation process by pressing its demands to make the "outside counsel's eyes only" documents available to Mr. Evert Carton and Mr. Ben Hermans for review. In fact, the subpoena duces tecum for the disputed documents was served on Cairncross & Hempelmann on December 21, 2007, or almost exactly one year ago. It should come as no surprise to Amiga Delaware that one typical element of *successful* mediations is the possession by each party concerned of the information it needs to properly assess the risks and benefits of settlement versus ongoing litigation. Simply put, by refusing to give Hyperion access to these materials, Amiga Delaware has frustrated that goal and made it more difficult to reach settlement. For the Court's information, the mediation effort is nonetheless continuing with the assistance of the Honorable Judge Kelley Arnold.

7. I have attached hereto as Exhibit 5 a true and accurate statement of legal time spent reviewing the documents inappropriately designated as "Outside Attorney's Eyes Only." As mentioned in paragraph 2 above, Lori Peters spent 3 hours segregating the "Outside Attorney's Eyes Only" documents and preparing a list of the same. Her time appears on the entries for October 6 and 7, 2008. Ms. Peters' hourly rate on this matter is $90. Ms. Peters has worked for me almost continuously since 1990, when we were both at Perkins Coie. Ms. Peters is a skilled legal assistant, and I know that her rate is reasonable within the Western Washington legal market.

8. As stated above in paragraph 2, I spent 13.2 hours reviewing the "Outside Attorney's Eyes Only" documents that are listed on Exhibit 1 hereto. I spent those hours on October 21, 23, 24, 26 and 27. I then spent an additional 3 hours preparing the §§6.2 and 6.3 notices to Amiga Delaware and Cairncross & Hempelmann on October 27 and November 12,

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2008. Where necessary, I have indicated on Exhibit 5 the allocation of time to activities not related to this motion and the underlying documents.

9. I spent 3.7 hours on December 11, 2008 beginning to work on the memorandum and declarations in opposition to Amiga Delaware's motion for a protective order (Exhibit 5), and spent an additional 5 hours completing that opposition today, on December 12, 2008. Therefore, I have spent 21.9 hours of time as a result of Amiga Delaware's mass, indiscriminant and improper document designations.

10. My hourly rate on this matter is $190. I was admitted to the Washington bar 1988 and have concentrated my practice on civil litigation for that entire period. Based on my personal knowledge of the hourly rates of other attorneys in this area with comparable skills and experience, I know that this rate is reasonable.

11. I accordingly ask this Court to enter sanctions against Amiga Delaware in the amount of $5,001, payable to Hyperion, care of Kinsel Law Offices, within 10 days of entry of the Court's order. Said award is based upon 24.9 hours times $190, or $4,731 plus 3 hours times $90, or $270.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

December 12, 2008
Date

William A. Kinsel
William A. Kinsel

Seattle, WA
Place

540p.doc

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LIST OF CAIRNCROSS & HEMPLEMANN
ATTORNEY EYES ONLY DOCUMENTS

0001	1186	1395	1906	2473	3236	3761
0007	1192	1402	1917	2501	3246	3772
0044	1194	1406	1994	2520	3265	3786
0066	1196	1409	2019	2534	3273	3799
0079	1199	1449	2021	2534	3277	3811
0091	1201	1684	2027	2539	3282	3823
0117	1203	1685	2047	2559	3291	3828
0138	1204	1690	2057	2568	3338	3830
0235	1206	1700	2058	2576	3341	3850
0256	1208	1709	2059	2580	3344	3867
0263	1209	1717	2060	2599	3355	3883
0861	1211	1723	2068	2623	3359	3896
0898	1213	1729	2079	2634	3380	3910
0906	1217	1736	2080	2636	3383	3935
0909	1219	1741	2083	2637	3408	3960
0968	1221	1743	2086	2641	3410	3967
0980	1223	1747	2089	2705	3412	3974
0983	1225	1748	2092	2734	3414	3995
0994	1227	1751	2095	2737	3429	4021
0995	1230	1753	2098	3809	3431	4027
1002	1232	1755	2101	2811	2446	4032
1006	1233	1761	2104	2833	3461	4039
1009	1236	1769	2107	2845	3475	4049
1011	1237	1773	2110	2852	3491	4069
1016	1246	1774	2113	2865	3511	4070
1018	1249	1776	2116	2875	3532	4074
1021	1250	1780	2124	2887	3549	4075
1031	1258	1781	2132	2924	3567	4084
1037	1260	1786	2140	2926	3574	4086
1051	1261	1794	2148	2932	3580	4089
1059	1263	1797	2156	2935	3585	4094
1065	1285	1800	2164	2950	3591	4105
1070	1288	1801	2172	2965	3596	4120
1081	1296	1803	2180	2976	3603	4130
1083	1307	1826	2188	3002	3619	4202
1090	1308	1829	2196	3011	3635	4207
1097	1328	1831	2204	3015	3649	
1099	1329	1834	2216	3106	3664	
1105	1339	1838	2245	3145	3666	
1109	1340	1846	2255	3151	3668	
1117	1342	1851	2258	3161	3670	
1120	1348	1852	2260	3175	3726	
1123	1356	1876	2262	3196	3732	
1133	1361	1886	2295	3206	3734	
1139	1364	1895	2333	3212	3743	
1153	1366	1897	2345	3217	3752	
1167	1388	1904	2451	3227	3754	

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WILLIAM A. KINSEL
ADMITTED IN:
WASHINGTON & OREGON

October 27, 2008

VIA EMAIL & U.S. MAIL

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New York, NY 10022-7650

Kenneth J. Philpot
Alison B. Riddell
Reed Smith LLP
Two Embarcadero Center, Suite 2000
San Francisco, CA 94111-3922

Re: Amiga Delaware v. Hyperion
Challenge to C & H Document Designation Under the Stipulated Protective Order

Dear Counsel:

I am writing to object to the designation of documents as "Highly Confidential—Outside Counsel's Eyes Only" in the recent document production from Cairncross & Hempelmann. Because I am uncertain as to who actually was responsible for those designations, I am writing to each of you to inform you that Hyperion is, through this letter, commencing the formal process required to have those materials re-designated under Section 6 of the Stipulated Protective Order.

I am enclosing a list of the document designations that we challenge. For the information of those of you not involved in the production of the Cairncross documents, that firm produced its materials in PDF format on a disk. Each "document" is identified on the disk by the bates number that appears on the first page of the document. To explain, the first entry on the enclosed list is "0001." It refers to the document that begins with the page that is bates stamped C-H000001, and so forth and so on.

As you will see, the list of challenged documents is long. Unfortunately, this list encompasses **every single document** designated "Highly Confidential—Outside Counsel's Eyes Only" because none of those documents constitutes or contains trade secret information and/or other secret or sensitive information, the disclosure of which would injure a third party, or create

a substantial risk of serious injury to a party in this litigation. (*See* Stipulated Protective Order, §2.4.)

In fairness, there are three business plans commencing at C-H 2027, 2520 and 2935, which might under different circumstances be considered trade secret information properly subject to the "Outside Counsel's Eyes Only" designation. From what I can determine, however, those business plans were prepared in the years 2000 and 2002, or perhaps 2003, and they no longer contain any sensitive business information. Indeed, even when written those business plans were so generic as to contain nothing beyond the obvious idea that money was to be made, if a competitive product could be brought to market. Those business plans do, however, contain relevant statements that reflect on issues in dispute in this case, e.g., what Amiga Washington's overall (generic) priorities were, and when and how individuals relevant to the fraudulent conveyance claim became involved in that company. Those documents need, as a result, to be made available to my client for their review.

Again, I do not know who was responsible for the broad-brush use of the "Outside Counsel's Eyes Only" designation, but I am forced to conclude that that designation was used in violation of §5.1 ("Exercise of Restraint and Care in Designating Material for Protection") and §5.2 ("Mass, Indiscriminate, or Routinized Designations are Prohibited"). C-H 0001 is, for instance, a file folder. C-H 861 to 928 is a complete copy of the transcript and exhibits to Mr. Bill McEwen's deposition in the Thendic litigation—something which has been available only in part from the public record, yet which in total provides even stronger support for Hyperion's defense that Amiga Washington was insolvent for years during the periods relevant to this suit. Other documents are simply too numerous to list here—except by their inclusion in the enclosed list of challenged designations. I can, however, inform you that many of them are (a) routine corporate records of Amino Development/Amiga Washington, which are relevant among other things to Hyperion's claim of fraudulent conveyance (*see, e.g.,* C-H 2856), (b) additional records relevant to Amiga Washington's insolvency (*see, e.g.,* C-H 2696/2936.[1]), (c), transactional documents pertinent to which trademarks Amiga Washington, and thus ultimately Amiga Delaware, may or may not have owned, and (d), documents that appear relevant to Hyperion's claim that Amiga Washington breached its warranties and representations regarding its ability to deliver the code for AmigaOS. In sum, these are relevant documents that do not contain trade secret or sensitive information, and that I need to show to my client so that its personnel can aid in the defense and prosecution of this case.

[1] A numbering error appears in the produced documents when one compares the bates number that identifies the PDF file on the disk provided by Cairncross and then looks at what actually appears on the bottom of the page. Here, the disk identifies the document as starting at C-H 2696, while the page actually reads C-H 2936. This numbering error appears to begin at C-H 2669. I would appreciate it if someone could review this issue and let me know the full extent of the problem, and if I am missing any documents as a result of those errors.

Accordingly, and in compliance with §6.2 of the Stipulated Protective Order, I request that we meet and confer to discuss these issues by the end of the day on Friday, November 7, 2008. If we are unable to complete that process by that date, I will then present a §6.3 demand to start the formal judicial intervention process. It is my hope, however, that we will be able to resolve these issues without wasting Judge Martinez's time.

Very truly yours,

KINSEL LAW OFFICES

William A. Kinsel

Enclosure

cc: Hyperion (w/enc.)

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ADMITTED IN:
WASHINGTON & OREGON

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November 12, 2008

VIA EMAIL & U.S. MAIL

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Reed Smith LLP
Two Embarcadero Center, Suite 2000
San Francisco, CA 94111-3922

Re: Amiga Delaware v. Hyperion
Challenge to C & H Document Designation Under the Stipulated Protective Order

Dear Counsel:

Lawrence Cock and I fulfilled the "meet and confer" requirement of §6.2 of the Stipulated Protective Order last Friday, when he called to respond to my October 27, 2008 challenge to the designation of documents as "Highly Confidential—Outside Counsel's Eyes Only" in the recent document production from Cairncross & Hempelmann. Lawrence indicated that you all prefer to focus on the upcoming mediation rather than to deal with the document-designation issue now. As I understood it, at least as of last Friday, Amiga had no substantive response to my objections to the document designations, except for the observation that a file folder should clearly not be subject to the "Outside Counsel's Eyes Only" designation.

Lawrence did invite me to choose some of the documents on the challenged list, and he said that Amiga would then consider whether it would waive or change its designation for those specific documents. Because I conclude that my client needs access to all of the documents, and because I do not think it appropriate for me to spend more time culling through the hundreds of pages of inappropriately-designated documents that I have already spent substantial time reviewing, we must decline that proposal.

Accordingly, pursuant to §6.3 of the Stipulated Protective Order, I hereby provide written notice of Hyperion's objection to the application of the "Highly Confidential—Outside Counsel's Eyes Only" designation to the documents in the attached list. Furthermore, I specifically refer to an incorporate my letter of October 27 for a discussion of the bases for this objection.

Under §6.3 of the Stipulated Protective Order, either or both Amiga Delaware and Cairncross have 20 days in which to file a motion for protective order, or those designations are automatically removed. By my count, that means your motion will be due by Tuesday, December 2, 2008, or well after both the mediation and the Thanksgiving holiday. Therefore, Amiga may concentrate on the upcoming mediation, as Lawrence indicates that it wants to do, and wait to see how that process goes before putting any further effort into this matter. By serving this objection now, however, Hyperion serves its need to avoid useless delay, if in fact the mediation does not succeed.

Very truly yours,

KINSEL LAW OFFICES

William A. Kinsel

Enclosure

cc: Hyperion (w/enc.)

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LIST OF CAIRNCROSS & HEMPLEMANN
ATTORNEY EYES ONLY DOCUMENTS

0001
0007
0044
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Bill Kinsel

From: Bill Kinsel [wak@kinsellaw.com]
Sent: Thursday, November 13, 2008 9:40 AM
To: 'Lawrence Cock'
Cc: 'Gotthoffer, Lance'; 'Shatan, Gregory S.'; 'svanderhoef@cairncross.com'
Subject: RE: Amiga Delaware adverse Hyperion: Hyperion's Section 6.3 Objection

Hi, Lawrence:

Here are the responses to your three inquiries below:

1) Per my request, Hyperion has checked and confirmed that there are no additional contracts to produce. I do recollect thinking that there were earlier in the case, but that may have been my mistake. My memory on that issue is not exact enough at this point.
2) I am not aware of other documents that were not produced. Are you thinking of anything in particular?
3) My client is not willing to arrange access to the source code. We believe that your clients are generally knowledgeable of the substantial manpower that has been devoted to AmigaOS 4 to realize that a significant investment has been made that vastly exceeds the several hundred thousand dollars you mention below.

Bill

From: Lawrence Cock [mailto:lrc@cablelang.com]
Sent: Wednesday, November 12, 2008 10:26 AM
To: Bill Kinsel
Cc: Gotthoffer, Lance; Shatan, Gregory S.; svanderhoef@cairncross.com
Subject: RE: Amiga Delaware adverse Hyperion: Hyperion's Section 6.3 Objection

Bill:

Thank you for your e-mail.

Will you please address my outstanding concerns: 1) Agreements with third party developers previously withheld from production by Hyperion, 2) other documents that are responsive to our earlier requests that your client withheld on grounds that a protective order was necessary prior to production, and 3) arranging access to the source code prior to the mediation so that my clients have a chance to evaluate your client's assertion that it has performed services worth several hundred thousand dollars?

Lawrence
206-292-8800

From: Bill Kinsel [mailto:wak@kinsellaw.com]
Sent: Wednesday, November 12, 2008 10:08 AM
To: Lawrence Cock; 'Steve VanDerhoef'; 'Tamarin, Jeffrey M.'; 'Gotthoffer, Lance'; 'Philpot, Kenneth J.'
Subject: Amiga Delaware adverse Hyperion: Hyperion's Section 6.3 Objection

Counsel:

Attached you will find Hyperion's written objection under §6.3 of the Stipulated Protective Order. Your motion for a protective order, if any, must accordingly be filed by December 2, 2008. This leaves your client plenty of time to focus on the upcoming mediation, and to then turn to this matter only if necessary in light of the outcome of the November 20 mediation.

Bill Kinsel

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Bill Kinsel

From: Lawrence Cock [lrc@cablelang.com]
Sent: Tuesday, November 18, 2008 1:08 PM
To: Bill Kinsel
Subject: Documents - follow up

Bill:

In your June 18, 2007 letter, you declined to produce documents H 1 – 170, H182 – 476, and H558 – 586. You stated that a protective order needed to be entered before producing those documents. Because a protective order has been entered, I again request that you produce these documents in advance of the settlement conference. Because you referred to them by bates stamp numbers, I assume you have them in your office, numbered, and ready for production.

Sincerely,

Lawrence Cock
c/o Cable, Langenbach, Kinerk & Bauer, LLP
1000 Second Ave., Suite 3500
Seattle, WA 98104
LRC@CableLang.com

206-292-8800

KINSEL LAW OFFICES, PLLC

MARKET PLACE TOWER
2025 FIRST AVENUE, SUITE 440
SEATTLE, WASHINGTON 98121

TEL (206) 706-8148
FAX (206) 374-3201

December 2, 2008

VIA MESSENGER

Lawrence R. Cock, Esq.
Cable, Langenbach, Kinerk & Bauer, LLP
1000 Second Avenue, Suite 3500
Seattle, WA 98104

Re: Amiga Delaware v. Hyperion VOF
Hyperion's Responses to Amiga Delaware's First Request for Production

Dear Mr. Cock:

Enclosed please find the copy set of documents responsive to Amiga Delaware's First Request for Production. These documents have been Bates number stamped H 0001 - H 0586. Please note that H 0001 – 0170, H 0182 – 0476 and H 0558 – 0586 have been stamped "Confidential" in accordance with the Stipulated Protective Order entered in this matter.

If you have any questions on the enclosed, please contact Bill Kinsel or his assistant, Lori Peters.

Very truly yours,

KINSEL LAW OFFICES

Judy Monson

Judy Monson,
Legal Assistant to William A. Kinsel

RECEIVED DEC 3 2008 CABLE LANGENBACH KINERK & BAUER LLP

Enclosures

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LEGAL SERVICES
abclegal.com

SEATTLE	TACOMA	BELLEVUE	EVERETT	OLYMPIA
910 5TH AVE.	943 TACOMA AVE. SO.	10655 NE 4th	2927 ROCKEFELLER	119 W LEGION WAY
SEATTLE, WA 98104	TACOMA, WA 98402	Suite L101	EVERETT, WA 98201	OLYMPIA, WA 98501
PH: 206-623-8771	PH: 253-383-1791	BELLEVUE, WA 98004	PH: 425-258-4591	PH: 360-154-6595
206-682-1675	1-800-383-1791	PH: 425-455-0102	1-800-869-7785	1-800-828-0199
1-800-736-7295	FAX: 253-272-9359	FAX: 425-455-3153	FAX: 425-252-9322	FAX: 360-357-3302
FAX: 206-625-9247	tac@abclegal.com	bel@abclegal.com	eve@abclegal.com	oly@abclegal.com
sea@abclegal.com				

MESSENGER SERVICE	FIRM NAME	PHONE	EXT.#	EMAIL (SECRETARY)
LAST DAY	Kinsel Law Offices	206-706-8148		judy@kinsellaw.com

DATE/TIME	ADDRESS	ATTY	SECRETARY
12/3/08 by 4:30 pm	2025 First Avenue, Suite 440	WAK	Judy

CASE NAME	YOUR ABC ACCT. NO
Amiga Delaware v. Hyperion VOF	100813

CAUSE NO.	CLIENT MATER #	DATE
CV 07-0631-RSM	822.001	12/2/2008

DOCUMENTS
Cover letter w/copy for conforming and stack of production documents.

	SIGNATURE REQUIRED ON DOCUMENTS	X	RETURN CONFORMED ABC SLIP ONLY	X	RETURN CONFORMED COPY		CONFORM ORIGINAL DO NOT FILE

OTHER INSTRUCTIONS
Please deliver the cover letter and stack of production documents and return stamped cover page to me.

1 Lawrence R. Cock, Esq.
Cable, Langenbach, Kinerk & Bauer, LLP
1000 Second Avenue, Suite 3500
Seattle, WA 98104

931
12/3

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BULK CHARGE 0

FILING	COUNTY	SUPERIOR COURT	DISTRICT COURT (INDICATE DISTRICT)	AUDITOR	APPEALS		FEDERAL COURT		SEA	TAC	STATE SUPREME COURT	SEC STATE CORP.
					I-SEA	II-TAC	CIVIL	BANKRUPTCY				

THIS FORM NOT FOR PROCESS

Time Listing
Nov 12/2008 To Nov 12/2008

Date / Entry#	Matter / Task	Client / Matter Description / Explanation	Law Type	Hours	Rate	Total
Lawyer: WAK - William A. Kinsel						
Nov 12/2008 20524	822.001 BW	Hyperion VOF Redacted Prepare and serve the Section 6.3 Objection regarding Cairncross' improper document designations.	lit	~~5.40~~ 1.0	190.00	1216.00

*** Summary by Working Lawyer ***

Time Listing
Dec 11/2008 To Dec 11/2008

Date / Entry#	Matter / Task	Client / Matter Description / Explanation	Law Type	Hours	Rate	Total
Lawyer: WAK - William A. Kinsel						
Dec 11/2008 20983	822.001 BW	Hyperion VOF Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Attend the mediation conference with Judge Arnold in Tacoma, return to Seattle. (5.3) Begin working on the memorandum in opposition to motion for protective order. (3.7)	lit	~~9.10~~ 3.7	190.00	1729.00

ite / ntry#	Matter / Task	Client Matter Description / Explanation	Law Type	Hours	Rate	Total
awyer: LJP - Lori J. Peters						
:t 6/2008 822.001		Hyperion VOF				
0019	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Begin reviewing Cairncross & Hemplemann documents to identify the "attorney eyes only" documents.	lit	0.40	90.00	36.00
awyer: WAK - William A. Kinsel						
:t 6/2008 822.001		Hyperion VOF				
0045	BW	Redacted			190.0	
awyer: LJP - Lori J. Peters						
:t 7/2008 822.001		Hyperion VOF				
0020	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Finish reviewing the Cairncross & Hemplemann documents to identify the "attorney eyes only" documents. Copy the "confidential" documents onto a separate CD for forwarding to Ben and Evert.	lit	2.60	90.00	234.00
awyer: WAK - William A. Kinsel						
:t 15/2008 822.001		Hyperion VOF				
0147	BW	Redacted				
:t 20/2008 822.001		Hyperion VOF				
0179	BW	Redacted				
:t 21/2008 822.001		Hyperion VOF				
0381	BW	Redacted Begin review of the outside Attorney's Eyes Only documents received from Cairncross.		2.00 1.7	190.00	380.00
:t 22/2008 822.001		Hyperion VOF				
0210	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Redacted	lit			
:t 23/2008 822.001		Hyperion VOF				
0231	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Complete the review of McEwen's deposition transcript in the Thendic matter. Continue review of the "outside attorney's eyes only" documents.	lit	1.90	190.00	361.00
:t 24/2008 822.001		Hyperion VOF				
0242	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Redacted Continue my review of those documents.	lit	5.00 4.5	190.00	950.00
:t 26/2008 822.001		Hyperion VOF				
0246	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Continue reviewing the "outside attorney's eyes only" documents.	lit	3.80	190.00	722.00
:t 27/2008 822.001		Hyperion VOF				
0382	BW	Amiga, Inc. v. Hyperion VOF U.S. District Court, Western District o Complete the review of the documents recently received from Cairncross and Hempelmann. Review the provisions of the Stipulated Protective Order regarding challenging improper "Outside Attorney's Eyes Only" designations. Prepare a letter to opposing counsel and Cairncross and Hempelmann beginning the formal objection process.	lit	3.30	190.00	627.00

*** Summary by Working Lawyer ***