

Play Visions, Inc. v. Dollar Tree Stores, Inc., et al., No. C09-1769 MJP

Spreadsheet on Attorneys' Fees

Date of Work	Amount	Description	Dkt 140-1 page number	Reduction/Deductions?
07/12/2010	\$105.00	Review deficiencies in production	23	
07/20/2010	\$735.00	Review Plaintiff's production	26	
07/21/2010	\$630.00	Draft memo on deficiencies	26	
7/21/2010	\$96.00	Meeting re: deficiencies	26	
07/26/2010	\$1,104.00	Discovery deficiency responses	28	
08/07/2010	\$792.00	Review of discovery reponses/deficiencies	35	
08/07/2010	\$1,008.00	Discuss deficiencies in discovery	35	
08/10/2010	\$984.00	Review of discovery and lack of full disclosure.	36	
08/10/2010	\$315.00	Draft discovery deficiency letter	36	
08/10/2010	\$3,080.00	Draft and revise discovery deficiency letter	36	
09/14/2010	\$1,590.00	Conference to review Plaintiff's markman expert report	52	
09/14/2010	\$366.00	Analysis of PI's markman expert	52	reduction to half of full entry
09/14/2010	\$1,197.00	Review PI's markman expert report	52	1/4 entry reduced
09/15/2010	\$1,567.50	More review and analysis of expert report	52	
09/15/2010	\$1,537.00	Conference re: PI's markman report	53	
09/15/2010	\$1,128.00	Conference re: PI's markman report	53	
09/16/2010	\$1,704.00	Draft analysis of pl's markman expert report	53	
09/16/2010	\$100.00	Meeting re: expert report	53	partial reduction to reflect work related to report
09/20/2010	\$90.00	Conference re: Markman Dep.	55	
09/20/2010	\$1,824.00	Interview of experts to rebut PI's expert report	55	
09/20/2010	\$4,200.00	Review and revise letter re: discovery issues and review more expert possibilities	55	
09/21/2010	\$300.00	Confer with possible experts	56	partial reduction to reflect billing on expert issue
09/22/2010	\$1,512.00	Expert deposition plans, travel plans, expert deposition prep	56	
09/24/2010	\$2,000.00	Deposition preparation for markman expert	58	partial reduction to reflect billing on expert issue
09/24/2010	\$400.00	Expert deposition preparation	58	

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09/24/2010	\$2,464.00	Deposition preparation for markman expert	58	
09/24/2010	\$337.50	Revise outline for markman expert deposition	58	
09/26/2010	\$550.00	Deposition preparation for markman expert	58	
09/27/2010	\$2,424.00	Deposition of markman expert	58	
09/27/2010	\$210.00	Prepare docs for deposition of expert	59	
09/28/2010	\$400.00	Review rebuttal report	59	partial reduction to reflect billing on expert issue
09/28/2010	\$2,464.00	Review expert rebuttal report and discuss expert reports	60	
09/29/2010	\$1,288.00	Review of expert reports	60	
10/25/2010	\$840.00	Review rebuttal report and discuss discovery response	68	
11/10/2010	\$3,304.00	Prepare for document review at Play Visions' warehouse	75	
11/10/2010	\$1,944.00	Plan and take trip to warehouse.	75	
11/10/2010	\$500.00	Take trip to PI's warehouse	76	partial reduction to reflect time spent on discovery review
11/11/2010	\$400.00	Draft letter to opposing counsel re defective discovery	76	partial reduction to reflect time spent on letter
11/15/2010	\$1,288.00	Draft discovery letter	78	partial reduction to reflect time spent on letter
11/29/2010	\$336.00	Confer re discovery responses	83	
12/01/2010	\$420.00	Review and revise letter to opposing counsel re: document production	84	
12/02/2010	\$270.00	Review and revise letter to opposing counsel re: document production	84	
12/16/2010	\$1,056.00	Confer with opposing counsel re: discovery problems etc.	87	
12/17/2010	\$336.00	Hold conference re: discovery issues	87	reduced as suggested by Def.
12/22/2010	\$728.00	Attend meeting and draft correspondence re: discovery problems	89	reduced as suggested by Def.
12/22/2010	\$672.00	Correspond with PI. re: discovery	89	

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01/12/2011	\$1,672.00	Perform supplemental discovery review	94	partial reduction to reflect time spent on discovery review
01/13/2011	\$330.00	Draft discovery demand letter	95	
01/17/2011	\$2,835.00	Work up Rule 56(d) motion and work on discovery deficiencies	96	
01/17/2011	\$336.00	Draft summary of 56(d) issues	96	
01/17/2011	\$250.00	Analysis in preparation for 56(d) motion	97	partial reduction to reflect time spent on Rule 56(d) motion
01/18/2011	\$724.50	Research for 56(d) motion	97	
01/19/2011	\$2,614.50	Draft and prepare 56(d) motion	98	
01/20/2011	\$2,016.00	Draft and prepare 56(d) motion	98	
01/24/2011	\$1,213.33	Attend meetings and review materials re: 56(d) motion	100	
01/24/2011	\$2,400.00	Revise and draft 56(d) motion	101	partial reduction to reflect time spent on Rule 56(d) motion
01/25/2011	\$2,800.00	Review of new production and review 56(d) motion	102	partial reduction to reflect time spent on Rule 56(d) motion
01/25/2011	\$2,394.00	Finalize 56(d) motion	101	
01/25/2011	\$1,392.00	Finalize 56(d) motion	102	reduced as suggested by Def.
01/25/2011	\$1,102.50	Review 56(d) motion and edit it	102	partial reduction to reflect time spent on Rule 56(d) motion
01/25/2011	\$440.00	Assemble materials for 56(d) motion		
01/26/2011	\$2,258.66	Review and revise 56(d) motion	103	
01/26/2011	\$2,200.00	Review and revise 56(d) motion	103	
01/26/2011	\$1,798.00	Review and finalize 56(d) motion	103	partial reduction to reflect time spent on Rule 56(d) motion
01/27/2011	\$1,372.67	Review and finalize 56(d) motion	105	partial reduction to reflect time spent on Rule 56(d) motion
01/27/2011	\$1,500.00	Review and edit 56(d) motion	105	partial reduction to reflect time spent on Rule 56(d) motion
01/27/2011	\$2,520.00	Finalize 56(d) motion	105	partial reduction to reflect time spent on Rule 56(d) motion

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02/02/2011	\$1,800.00	review pl's opposition to Rule 56(d) and refine research	110	partial reduction to reflect time spent on Rule 56(d) motion
02/03/2011	\$231.00	Provide advice on what discovery is need for 56(d) continuance	110	
02/03/2011	\$504.00	Review 56(d) opposition	110	
02/03/2011	\$2,500.00	Review new production / commence 56(d) reply drafting	110	reduction for excessive hours
02/03/2011	\$1,798.00	Review new production / 56(d) opposition review	110	
02/04/2011	\$2,688.00	Review new production/ 56(d) reply drafting	110	
02/04/2011	\$693.00	Analyze draft 56(d) reply brief	111	
02/04/2011	\$726.00	Research for reply on rule 56(d) motion	111	
02/04/2011	\$880.00	Review 56(d) reply brief and prepare docs	111	
02/05/2011	\$638.00	Review and revise reply 56(d) brief	111	
02/08/2011	\$600.00	Draft discovery letter	111	
02/10/2011	\$609.00	Meet and confer on discovery	114	
02/11/2011	\$1,498.00	Meet and confer on discovery	114	
02/14/2011	\$1,204.00	Review new production	115	
02/15/2011	\$3,024.00	Review new production	115	
02/16/2011	\$110.00	Revise sanctions motion	116	
02/16/2011	\$1,624.00	sanctions and discovery	116	reduced as suggested by Def.
02/21/2011	\$1,063.00	Confer re sanctions motion	118	reduced as suggested by Def.
02/21/2011	\$1,428.00	Prepare for 30(b)(6) Dep of Keron	118	
02/22/2011	\$777.00	Prepare for 30(b)(6) Dep of Keron	118	partial reduction
02/22/2011	\$4,872.00	Prepare for and take 30(b)(6) Dep of Keron	119	
02/23/2011	\$2,380.00	Draft sanctions motion	119	
02/24/2011	\$2,884.00	Draft sanctions motion	119	
02/24/2011	\$2,958.00	Revise sanctions motion	119	
02/24/2011	\$990.00	Draft sanctions motion stuff	119	
03/07/2011	\$130.00	Review sanctions briefing	121	
03/08/2011	\$220.00	Review opposition to motion for sanctions	121	
03/08/2011	\$2,500.00	Draft reply brief ISO sanctions motion	121	reduction for excessive hours

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03/08/2011	\$2,204.00	Review and discuss reply brief ISO sanctions motion	121	
03/09/2011	\$97.50	Strategize for reply brief ISO sanctions motion	122	
03/10/2011	\$1,932.00	Draft reply brief ISO sanctions motion	122	
03/10/2011	\$1,566.00	Review and revise reply brief ISO sanctions motion	122	
03/11/2011	\$638.00	Prepare for expert discussion for sanctions	122	
03/11/2011	\$2,156.00	Prepare expert for sanctions; draft reply brief ISO sanctions motion	122	
03/11/2011	\$726.00	Review reply brief ISO sanctions motion	122	
03/11/2011	\$520.00	Review reply brief ISO sanctions motion	122	
	\$1,234.75	Chernick Deposition Costs	236	

Total	\$137,168.41
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