

IN THE SUPREME COURT OF THE STATE OF NEVADA

JAMES J. COTTER, JR., derivatively on
behalf of Reading International, Inc.,

Appellant,

v.

DOUGLAS MCEACHERN, EDWARD
KANE, JUDY CODDING, WILLIAM
GOULD, MICHAEL WROTONIAK, and
nominal defendant READING
INTERNATIONAL, INC., A NEVADA
CORPORATION

Respondents.

Electronically Filed
Aug 30 2019 03:53 p.m.
Supreme Court Case No. 75053
Consolidated with Supreme Court
Case Nos. 76981, 77648 & 77733

District Court Case
No. A-15-719860-B

Coordinated with:
Case No. P-14-0824-42-E

Appeal (77648 & 76981)

Eighth Judicial District Court, Dept. XI
The Honorable Elizabeth G. Gonzalez

JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981
Volume XXXVI
JA8809– JA9058

Steve Morris, Esq. (NSB #1543)
Akke Levin, Esq. (NSB #9102)
Morris Law Group
411 E. Bonneville Ave., Ste. 360
Las Vegas, NV 89101
Telephone: (702) 474-9400

Attorneys for Appellant
James J. Cotter, Jr.

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2015-06-12	Complaint	I	JA1-JA31
2015-06-18	Amended AOS - Douglas McEachern	I	JA32-JA33
2015-06-18	Amended AOS - Edward Kane	I	JA34-JA35
2015-06-18	Amended AOS - Ellen Cotter	I	JA36-JA37
2015-06-18	Amended AOS - Guy Adams	I	JA38-JA39
2015-06-18	Amended AOS - Margaret Cotter	I	JA40-JA41
2015-06-18	Amended AOS - RDI	I	JA42-JA43
2015-06-18	Amended AOS – Timothy Storey	I	JA44-JA45
2015-06-18	Amended AOS – William Gould	I	JA46-JA47
2015-08-10	Motion to Dismiss Complaint	I	JA48-JA104
2015-08-20	Reading International, Inc. ("RDI")'s Joinder to Margaret Cotter, Ellen Cotter, Douglas McEachern, Guy Adams, & Edward Kane ("Individual Defendants") Motion to Dismiss Complaint	I	JA105-JA108
2015-08-28	T2 Plaintiffs' Verified Shareholder Derivative Complaint	I	JA109-JA126
2015-08-31	RDI's Motion to Compel Arbitration	I	JA127-JA148
2015-09-03	Individual Defendants' Motion to Dismiss Complaint	I	JA149-JA237
2015-10-06	Transcript of 9-10-15 Hearing on Defendants' Motion to Dismiss & Plaintiff Cotter Jr. ("Cotter Jr.")'s Motion for Preliminary Injunction	I, II	JA238-JA256
2015-10-12	Order Denying RDI's Motion to Compel Arbitration	II	JA257-JA259
2015-10-19	Order Re Motion to Dismiss Complaint	II	JA260-JA262
2015-10-22	First Amended Verified Complaint	II	JA263-JA312
2015-11-10	Scheduling Order and Order Setting Civil Jury Trial, Pre-Trial Conference and Calendar Call	II	JA313-JA316

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-02-12	T2 Plaintiffs' First Amended Complaint	II	JA317-JA355
2016-02-23	Transcript of 2-18-16 Hearing on Motion to Compel & Motion to File Document Under Seal	II	JA356-JA374
2016-03-14	Individual Defendants' Answer to Cotter's First Amended Complaint	II	JA375-JA396
2016-03-29	RDI's Answer to Cotter, Jr.'s First Amended Complaint	II	JA397-JA418
2016-03-29	RDI's Answer to T2 Plaintiffs' First Amended Complaint	II	JA419-JA438
2016-04-05	Codding and Wrotniak's Answer to T2 Plaintiffs' First Amended Complaint	II	JA439-JA462
2016-06-21	Stipulation and Order to Amend Deadlines in Scheduling Order	II	JA463-JA468
2016-06-23	Transcript of 6-21-16 Hearing on Defendants' Motion to Compel & Motion to Disqualify T2 Plaintiffs	II	JA469-JA493
2016-08-11	Transcript of 8-9-16 Hearing on Cotter Jr.'s Motion for Partial Summary Judgment, Motion to Compel & Motion to Amend	II, III	JA494-JA518
2016-09-02	Cotter Jr.'s Second Amended Verified Complaint	III	JA519-JA575
2016-09-23	Defendant William Gould ("Gould")'s MSJ	III, IV, V, VI	JA576-JA1400
2016-09-23	MIL to Exclude Expert Testimony of Steele, Duarte-Silva, Spitz, Nagy, & Finnerty	VI	JA1401-JA1485
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 1) Re: Plaintiff's Termination and Reinstatement Claims ("Partial MSJ No. 1)	VI, VII, VIII, IX	JA1486-JA2216 (FILED UNDER SEAL JA2136A-D)

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 2) Re: The Issue of Director Independence ("Partial MSJ No. 2")	IX, X	JA2217-JA2489 (FILED UNDER SEAL JA2489A-HH)
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 3) On Plaintiff's Claims Related to the Purported Unsolicited Offer ("Partial MSJ No. 3")	X, XI	JA2490-JA2583
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 4) On Plaintiff's Claims Related to the Executive Committee ("Partial MSJ No. 4")	XI	JA2584-JA2689
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 5) On Plaintiff's Claims Related to the Appointment of Ellen Cotter as CEO ("Partial MSJ No. 5")	XI, XII	JA2690-JA2860
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 6) Re Plaintiff's Claims Re Estate's Option Exercise, Appointment of Margaret Cotter, Compensation Packages of Ellen Cotter and Margaret Cotter, and related claims Additional Compensation to Margaret Cotter and Guy Adams ("Partial MSJ No. 6")	XII, XIII, XIV	JA2861-JA3336
2016-09-23	Cotter Jr.'s Motion for Partial Summary Judgment ("MPSJ")	XIV, XV	JA3337-JA3697
2016-10-03	Order Granting Cotter Jr.'s Motion to Compel Production of Documents & Communications Re the Advice of Counsel Defense	XV	JA3698-JA3700

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-10-03	Order Re Cotter Jr.'s Motion to Permit Certain Discovery re Recent "Offer"	XV	JA3701-JA3703
2016-10-03	RDI's Joinder to MIL to Exclude Expert Testimony	XV	JA3704-JA3706
2016-10-03	RDI's Joinder to Individual Defendants' Partial-MSJ No. 1	XV	JA3707-JA3717
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 2	XV	JA3718-JA3739
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 3	XV	JA3740-JA3746
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 4	XV	JA3747-JA3799
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 5	XV	JA3800-JA3805
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 6	XV, XVI	JA3806-JA3814
2016-10-13	Individual Defendants' Opposition to Cotter Jr.'s MPSJ	XVI	JA3815-JA3920
2016-10-13	RDI's Joinder to Individual Defendants' Opposition to Cotter Jr.'s MPSJ	XVI	JA3921-JA4014
2016-10-13	Cotter Jr.'s Opposition to Gould's MSJ	XVI	JA4015-JA4051
2016-10-13	Cotter Jr.'s Opposition to Partial MSJ No. 1	XVI, XVII	JA4052-JA4083
2016-10-13	Cotter, Jr.'s Opposition to Partial MSJ No. 2	XVII	JA4084-JA4111
2016-10-13	Cotter, Jr.'s Opposition to Partial MSJ No. 6	XVII	JA4112-JA4142
2016-10-17	Cotter Jr.'s Appendix of Exhibits ISO Opposition to Individual Defendants' Partial MSJ No. 1	XVII, XVIII	JA4143-JA4311 (FILED UNDER SEAL JA4151A-C)

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-10-17	Cotter Jr.'s Appendix of Exhibits ISO Opposition to Individual Defendants' Partial MSJ No. 2	XVIII	JA4312-JA4457
2016-10-17	Cotter Jr.'s Appendix of Exhibits ISO Opposition to Gould's MSJ	XVIII	JA4458-JA4517
2016-10-21	Individual Defendants' Reply ISO of Partial MSJ No. 1	XVIII	JA4518-JA4549
2016-10-21	Individual Defendants' Reply ISO Partial MSJ No. 2	XVIII, XIX	JA4550-JA4567
2016-10-21	RDI's Reply ISO Individual Defendants' Partial MSJ No. 1	XIX	JA4568-JA4577
2016-10-21	RDI's Reply ISO Individual Defendants' Partial MSJ No. 2	XIX	JA4578-JA4588
2019-10-21	RDI's Consolidated Reply ISO Individual Defendants' Partial MSJ Nos. 3, 4, 5 & 6	XIX	JA4589-JA4603
2016-10-21	RDI's Reply ISO Gould's MSJ	XIX	JA4604-JA4609
2016-10-21	Gould's Reply ISO MSJ	XIX	JA4610-JA4635
2016-10-21	Declaration of Barnett ISO Gould's Reply ISO MSJ	XIX	JA4636-JA4677
2016-10-21	Individual Defendants' Reply ISO Partial MSJ Nos. 3, 4, 5, and 6	XIX	JA4678-JA4724
2016-10-26	Individual Defendants' Objections to Declaration of Cotter, Jr. Submitted in Opposition to Partial MSJs	XIX	JA4725-JA4735
2016-11-01	Transcript of 10-27-16 Hearing on Motions	XIX, XX	JA4736-JA4890
2016-12-20	RDI's Answer to Cotter Jr.'s Second Amended Complaint	XX	JA4891-JA4916
2016-12-21	Order Re Individual Defendants' Partial MSJ Nos. 1-6 and MIL to Exclude Expert Testimony	XX	JA4917-JA4920
2016-12-22	Notice of Entry of Order Re Partial MSJ Nos. 1-6 and MIL to Exclude Expert Testimony	XX	JA4921-JA4927

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-10-04	First Amended Order Setting Civil Jury Trial, Pre-Trial Conference, and Calendar Call	XX	JA4928-JA4931
2017-10-11	Individual Defendants' Motion for Evidentiary Hearing Re Cotter Jr.'s Adequacy as Derivative Plaintiff	XX	JA4932-JA4974
2017-10-17	Gould's Joinder to Motion for Evidentiary Hearing re Cotter Jr.'s Adequacy as Derivative Plaintiff	XX	JA4975-JA4977
2017-10-18	RDI's Joinder to Motion for Evidentiary Hearing re Cotter Jr.'s Adequacy as Derivative Plaintiff	XX	JA4978-JA4980
2017-11-09	Individual Defendants' Supplement to Partial MSJ Nos. 1, 2, 3, 5, and 6	XX	JA4981-JA5024
2017-11-21	RDI's Joinder to Individual Defendants' Supplement to Partial MSJ Nos. 1, 2, 3, 5 & 6	XX	JA5025-JA5027
2017-11-27	Transcript of 11-20-17 Hearing on Motion for Evidentiary Hearing re Cotter Jr.'s Adequacy & Motion to Seal	XX	JA5028-JA5047
2017-11-28	Individual Defendants' Answer to Cotter Jr.'s Second Amended Complaint	XX, XXI	JA5048-JA5077
2017-12-01	Gould's Request For Hearing on Previously-Filed MSJ	XXI	JA5078-JA5093
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 1 & 2 & Gould MSJ	XXI	JA5094-JA5107
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 1 & 2 & Gould MSJ	XXI	JA5108-JA5118

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 5 & Gould MSJ	XXI	JA5119-JA5134
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 5 & Gould MSJ	XXI	JA5135-JA5252
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 6 & Gould MSJ	XXI	JA5253-JA5264
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 6 & Gould MSJ	XXI	JA5265-JA5299
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 3 & Gould MSJ	XXI, XXII	JA5300-JA5320
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to So-Called MSJ Nos. 2 & 3 & Gould MSJ	XXII	JA5321-JA5509
2017-12-04	Individual Defendants' Reply ISO Renewed Partial MSJ Nos. 1 & 2	XXII	JA5510-JA5537
2017-12-04	Gould's Supplemental Reply ISO of MSJ	XXII	JA5538-JA5554
2017-12-05	Declaration of Bannett ISO Gould's Supplemental Reply ISO MSJ	XXII, XXIII	JA5555-JA5685
2017-12-08	Joint Pre-Trial Memorandum	XXIII	JA5686-JA5717
2017-12-11	Transcript of 12-11-2017 Hearing on [Partial] MSJs, MILs, and Pre-Trial Conference	XXIII	JA5718-JA5792
2017-12-19	Cotter Jr.'s Motion for Reconsideration of Ruling on Partial MSJ Nos. 1, 2 & 3 and Gould's MSJ on OST ("Motion for Reconsideration")	XXIII, XXIV	JA5793-JA5909

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-26	Individual Defendants' Opposition to Cotter Jr.'s Motion For Reconsideration	XXIV	JA5910-JA5981
2017-12-27	Gould's Opposition to Cotter Jr.'s Motion for Reconsideration	XXIV	JA5982-JA5986
2017-12-27	Declaration of Bennett ISO Gould's Opposition to Cotter Jr.'s Motion for Reconsideration	XXIV, XXV	JA5987-JA6064
2017-12-28	Order Re Individual Defendants' Partial MSJs, Gould's MSJ, and MILs	XXV	JA6065-JA6071
2017-12-28	Cotter Jr.'s Motion to Stay on OST	XXV	JA6072-JA6080
2017-12-29	Notice of Entry of Order Re Individual Defendants' Partial MSJs, Gould's MSJ, and MIL	XXV	JA6081-JA6091
2017-12-29	Cotter Jr.'s Motion for Rule 54(b) Certification and Stay on OST	XXV	JA6092-JA6106
2017-12-29	Transcript of 12-28-17 Hearing on Motion for Reconsideration and Motion for Stay	XXV	JA6107-JA6131
2018-01-02	Individual Defendants' Opposition to Cotter Jr.'s Motion for Rule 54(b) Certification and Stay	XXV	JA6132-JA6139
2018-01-03	RDI's Joinder to Individual Defendants' Opposition to Cotter Jr.'s Motion for Rule 54(b) Certification and Stay	XXV	JA6140-JA6152
2018-01-03	RDI's Errata to Joinder to Individual Defendants' Opposition to Motion for Rule 54(b) Certification and Stay	XXV	JA6153-JA6161
2018-01-03	RDI's Motion to Dismiss for Failure to Show Demand Futility	XXV	JA6162-JA6170
2018-01-03	Cotter Jr.'s Reply ISO Motion for Rule 54(b) Certification and Stay	XXV	JA6171-JS6178

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-01-04	Order Granting Cotter Jr.'s Motion for Rule 54(b) Certification	XXV	JA6179-JA6181
2018-01-04	Notice of Entry of Order Granting Cotter Jr.'s Motion for Rule 54(b) Certification	XXV	JA6182-JA6188
2018-01-04	Order Denying Cotter Jr.'s Motion for Reconsideration and Stay	XXV	JA6189-JA6191
2018-01-04	Adams and Cotter sisters' Motion for Judgment as a Matter of Law	XXV	JA6192-JA6224 (FILED UNDER SEAL JA6224A-F)
2018-01-05	Cotter Jr.'s Opposition to RDI's Motion to Dismiss for Failure to Show Demand Futility	XXV	JA6225-JA6228
2018-01-05	Cotter Jr.'s Opposition to Defendants' Motion for Judgment as a Matter of Law	XXV	JA6229-JA6238
2018-01-05	Declaration of Krum ISO Cotter Jr.'s Opposition to Motion for Judgment as a Matter of Law	XXV	JA6239-JA6244
2018-01-05	Transcript of 1-4-18 Hearing on Cotter Jr.'s Motion for Rule 54(b) Certification	XXV	JA6245-JA6263
2018-01-08	Transcript of Hearing on Demand Futility Motion and Motion for Judgment	XXV	JA6264-JA6280
2018-01-10	Transcript of Proceedings of 01-8-18 Jury Trial–Day 1	XXV	JA6281-JA6294
2018-02-01	Cotter Jr.'s Notice of Appeal	XXV	JA6295-JA6297
2018-04-18	Cotter Jr.'s Motion to Compel (Gould)	XXV, XXVI	JA6298-JA6431

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-04-23	Cotter Jr.'s Motion for Omnibus Relief on OST	XXVI, XXVII	JA6432-JA6561 (FILED UNDER SEAL JA6350A; JA6513A-C)
2018-04-24	Gould's Opposition to Cotter Jr.'s Motion to Compel	XXVII	JA6562-JA6568
2018-04-24	Gould's Declaration ISO Opposition to Motion to Compel	XXVII	JA6569-JA6571
2018-04-24	Bannett's Declaration ISO Gould's Opposition to Motion to Compel	XXVII	JA6572-JA6581
2018-04-27	Cotter Jr.'s Reply ISO Motion to Compel (Gould)	XXVII	JA6582-JA6599
2018-04-27	RDI's Opposition to Cotter's Motion for Omnibus Relief	XXVII	JA6600-JA6698
2018-05-03	Transcript of 4-30-18 Hearing on Motions to Compel & Seal	XXVII	JA6699-JA6723
2018-05-04	Second Amended Order Setting Jury Trial, Pre-trial Conference, and Calendar Call	XXVII	JA6724-JA6726
2018-05-07	Transcript of 5-2-18 Hearing on Evidentiary Hearing	XXVII, XXVIII	JA6727-JA6815
2018-05-11	Cotter Jr.'s Opposition to RDI's Motion for Leave to File Motion	XXVIII	JA6816-JA6937
2018-05-15	Adams and Cotter sisters' Motion to Compel Production of Docs re Expert Fee Payments on OST	XXVIII, XXIX	JA6938-JA7078
2018-05-18	Cotter Jr.'s Opposition to Motion to Compel Production of Docs re Expert Fee Payments	XXIX	JA7079-JA7087
2018-05-18	Adams and Cotter sisters' Pre-Trial Memo	XXIX	JA7088-JA7135
2018-05-18	Cotter Jr.'s Pre-Trial Memo	XXIX	JA7136-JA7157

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-05-24	Transcript of 05-21-18 Hearing on Adams and Cotter sisters' Motion to Compel	XXIX	JA7158-JA7172
2018-06-01	Adams and Cotter sisters' Motion for Summary Judgment ("Ratification MSJ")	XXIX	JA7173-JA7221
2018-06-08	Cotter Jr.'s Motion to Compel on OST	XXIX, XXX, XXXI	JA7222-JA7568
2018-06-12	Cotter Jr.'s Motion for Relief Based on Noncompliance with Court's May 2, 2018 Rulings on OST ("Motion for Relief")	XXXI	JA7569-JA7607
2018-06-13	Cotter Jr.'s Opposition to Ratification MSJ	XXXI	JA7608-JA7797
2018-06-13	Cotter Jr.'s Opposition to RDI's Demand Futility Motion	XXXI, XXXII	JA7798-JA7840
2018-06-15	Adams and Cotter sisters' Reply ISO of Ratification MSJ	XXXII	JA7841-JA7874
2018-06-18	RDI's Combined Opposition to Cotter Jr.'s Motion to Compel & Motion for Relief	XXXII	JA7875-JA7927
2018-06-18	Adams and Cotter sisters' Joinder to RDI's Combined Opposition to Cotter Jr.'s Motion to Compel & Motion for Relief	XXXII, XXXIII	JA7928-JA8295
2018-06-18	Gould's Joinder to RDI's Combined Opposition to Cotter Jr.'s Motion to Compel & Motion for Relief	XXXIII	JA8296-JA8301
2018-06-18	Cotter Jr.'s Reply ISO Motion for Relief Re: 05-02-18 Rulings	XXXIII, XXXIV	JA8302-JA8342
2018-06-20	Transcript of 06-19-18 Omnibus Hearing on discovery motions and Ratification MSJ	XXXIV	JA8343-JA8394

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-07-12	Order Granting In Part Cotter Jr.'s Motion to Compel (Gould) & Motion for Relief	XXXIV	JA8395-JA8397
2018-07-12	Order Granting in Part Cotter Jr.'s Motion for Omnibus Relief & Motion to Compel	XXXIV	JA8398-JA8400
2018-08-14	Findings of Fact and Conclusions of Law and Judgment	XXXIV	JA8401-JA8411
2018-08-16	Notice of Entry of Findings of Fact and Conclusions of Law and Judgment	XXXIV	JA8412-JA8425
2018-08-24	Memorandum of Costs submitted by RDI for itself & the director defendants	XXXIV	JA8426-JA8446
2018-08-24	RDI's Appendix of Exhibits to Memorandum of Costs	XXXIV, XXXV, XXXVI	JA8447-JA8906
2018-09-05	Notice of Entry of SAO Re Process for Filing Motion for Attorney's Fees	XXXVI	JA8907-JA8914
2018-09-05	Cotter Jr.'s Motion to Retax Costs	XXXVI	JA8915-JA9018
2018-09-07	RDI's Motion for Attorneys' Fees	XXXVI, XXXVII	JA9019-JA9101
2018-09-12	RDI's Motion for Judgment in Its Favor	XXXVII	JA9102-JA9107
2018-09-13	Cotter Jr.'s Notice of Appeal	XXXVII	JA9108-JA9110
2018-09-14	RDI's Opposition to Cotter Jr.'s Motion to Retax Costs	XXXVII	JA9111-JA9219
2018-09-14	RDI's Appendix ISO Opposition to Motion to Retax ("Appendix") Part 1	XXXVII, XXXVIII, XXXIX	JA9220-JA9592
2018-09-14	RDI's Appendix, Part 2	XXXIX, XL, XLI	JA9593- JA10063
2018-09-14	RDI's Appendix, Part 3	XLI, XLII, XLIII	JA10064- JA10801

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-09-14	RDI's Appendix, Part 4	XLIII, XLIV	JA10802- JA10898
2018-09-14	RDI's Appendix Part 5	XLIV, XLV	JA10899- JA11270
2018-09-14	RDI's Appendix, Part 6	XLV, XLVI	JA11271- JA11475
2018-09-14	RDI's Appendix, Part 7	XLVI, XLVII, XLVIII, XLIX, L	JA11476- JA12496
2018-09-14	RDI's Appendix, Part 8	L, LI, LII	JA12497- JA12893
2018-09-14	Suggestion of Death of Gould Upon the Record	LII,	JA12894- JA12896
2018-09-24	Cotter Jr.'s Reply to RDI's Opp'n to Motion to Retax Costs	LII	JA12897- JA12921
2018-09-24	Cotter Jr.'s Appendix of Exhibits ISO Reply to RDI's Opposition to Motion to Retax Costs	LII, LIII	JA12922- JA13112
2018-10-01	Cotter Jr.'s Opposition to RDI's Motion for Judgment in its Favor	LIII	JA13113- JA13125
2018-10-02	Transcript of 10-01-18 Hearing on Cotter Jr.'s Motion to Retax Costs	LIII	JA13126- JA13150
2018-11-02	Cotter Jr.'s Letter to Court Objecting to Proposed Order	LIII	JA13151- JA13156
2018-11-02	Cotter Jr.'s Errata to Letter to Court Objecting to Proposed Order	LIII	JA13157- JA13162
2018-11-06	Order Granting in Part Motion to Retax Costs & Entering Judgment for Costs ("Cost Judgment")	LIII	JA13163- JA13167
2018-11-06	Notice of Entry of Order of Cost Judgment	LIII	JA13168- JA13174
2018-11-16	Order Denying RDI's Motion for Attorneys' Fees	LIII	JA13175- JA13178

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

CHRONOLOGICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-11-06	Order Denying RDI's Motion for Judgment in Its Favor	LIII	JA13179- JA13182
2018-11-20	Notice of Entry of Order Denying RDI's Motion for Attorneys' Fees	LIII	JA13183- JA13190
2018-11-20	Notice of Entry of Order Denying RDI's Motion for Judgment in Its Favor	LIII	JA13191- JA13198
2018-11-26	Cotter Jr.'s Motion for Reconsideration & Amendment of Cost Judgment, for Limited Stay of Execution on OST	LIII	JA13199- JA13207
2018-11-30	RDI's Opposition to Cotter Jr.'s Motion for Reconsideration and Response to Motion for Limited Stay of Execution on OST	LIII	JA13208- JA13212
2018-11-30	Adams and Cotter sisters' Joinder to RDI's Opposition to Cotter Jr.'s Motion for Reconsideration and Response to Motion for Limited Stay of Execution	LIII	JA13213- JA13215
2018-12-06	Order Re Cotter Jr.'s Motion for Reconsideration & Amendment of Judgment for Costs and for Limited Stay	LIII	JA13216- JA13219
2018-12-06	Cotter Jr.'s Notice of Appeal from Cost Judgment	LIII	JA13220- JA13222
2018-12-07	Notice of Entry of Order Re Cotter Jr.'s Motion for Reconsideration & Amendment of Cost Judgment and for Limited Stay	LIII	JA13223- JA13229
2018-12-14	Cotter Jr.'s Notice of Posting Cost Bond on Appeal	LIII	JA13230- JA13232

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-06-18	Adams and Cotter sisters' Joinder to RDI's Combined Opposition to Cotter Jr.'s Motion to Compel & Motion for Relief	XXXII, XXXIII	JA7928- JA8295
2018-11-30	Adams and Cotter sisters' Joinder to RDI's Opposition to Cotter Jr.'s Motion for Reconsideration and Response to Motion for Limited Stay of Execution	LIII	JA13213- JA13215
2018-01-04	Adams and Cotter sisters' Motion for Judgment as a Matter of Law	XXV	JA6192- JA6224 (FILED UNDER SEAL JA6224A-F)
2018-06-01	Adams and Cotter sisters' Motion for Summary Judgment ("Ratification MSJ")	XXIX	JA7173- JA7221
2018-05-15	Adams and Cotter sisters' Motion to Compel Production of Docs re Expert Fee Payments on OST	XXVIII, XXIX	JA6938- JA7078
2018-05-18	Adams and Cotter sisters' Pre-Trial Memo	XXIX	JA7088- JA7135
2018-06-15	Adams and Cotter sisters' Reply ISO of Ratification MSJ	XXXII	JA7841- JA7874
2015-06-18	Amended AOS - Douglas McEachern	I	JA32-JA33
2015-06-18	Amended AOS - Edward Kane	I	JA34-JA35
2015-06-18	Amended AOS - Ellen Cotter	I	JA36-JA37
2015-06-18	Amended AOS - Guy Adams	I	JA38-JA39
2015-06-18	Amended AOS - Margaret Cotter	I	JA40-JA41
2015-06-18	Amended AOS - RDI	I	JA42-JA43
2015-06-18	Amended AOS – Timothy Storey	I	JA44-JA45
2015-06-18	Amended AOS – William Gould	I	JA46-JA47

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-04-24	Bannett's Declaration ISO Gould's Opposition to Motion to Compel	XXVII	JA6572- JA6581
2016-04-05	Codding and Wrotniak's Answer to T2 Plaintiffs' First Amended Complaint	II	JA439- JA462
2015-06-12	Complaint	I	JA1-JA31
2016-10-17	Cotter Jr.'s Appendix of Exhibits ISO Opposition to Gould's MSJ	XVIII	JA4458- JA4517
2016-10-17	Cotter Jr.'s Appendix of Exhibits ISO Opposition to Individual Defendants' Partial MSJ No. 1	XVII, XVIII	JA4143- JA4311 (FILED UNDER SEAL JA4151A-C)
2016-10-17	Cotter Jr.'s Appendix of Exhibits ISO Opposition to Individual Defendants' Partial MSJ No. 2	XVIII	JA4312- JA4457
2018-09-24	Cotter Jr.'s Appendix of Exhibits ISO Reply to RDI's Opposition to Motion to Retax Costs	LII, LIII	JA12922- JA13112
2018-11-02	Cotter Jr.'s Errata to Letter to Court Objecting to Proposed Order	LIII	JA13157- JA13162
2018-11-02	Cotter Jr.'s Letter to Court Objecting to Proposed Order	LIII	JA13151- JA13156
2018-04-23	Cotter Jr.'s Motion for Omnibus Relief on OST	XXVI, XXVII	JA6432- JA6561 (FILED UNDER SEAL JA6350A; JA6513A-C)
2016-09-23	Cotter Jr.'s Motion for Partial Summary Judgment ("MPSJ")	XIV, XV	JA3337- JA3697

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-11-26	Cotter Jr.'s Motion for Reconsideration & Amendment of Cost Judgment, for Limited Stay of Execution on OST	LIII	JA13199- JA13207
2017-12-19	Cotter Jr.'s Motion for Reconsideration of Ruling on Partial MSJ Nos. 1, 2 & 3 and Gould's MSJ on OST ("Motion for Reconsideration")	XXIII, XXIV	JA5793- JA5909
2018-06-12	Cotter Jr.'s Motion for Relief Based on Noncompliance with Court's May 2, 2018 Rulings on OST ("Motion for Relief")	XXXI	JA7569- JA7607
2017-12-29	Cotter Jr.'s Motion for Rule 54(b) Certification and Stay on OST	XXV	JA6092- JA6106
2018-04-18	Cotter Jr.'s Motion to Compel (Gould)	XXV, XXVI	JA6298- JA6431
2018-06-08	Cotter Jr.'s Motion to Compel on OST	XXIX, XXX, XXXI	JA7222- JA7568
2018-09-05	Cotter Jr.'s Motion to Retax Costs	XXXVI	JA8915- JA9018
2017-12-28	Cotter Jr.'s Motion to Stay on OST	XXV	JA6072- JA6080
2018-02-01	Cotter Jr.'s Notice of Appeal	XXV	JA6295- JA6297
2018-09-13	Cotter Jr.'s Notice of Appeal	XXXVII	JA9108- JA9110
2018-12-06	Cotter Jr.'s Notice of Appeal from Cost Judgment	LIII	JA13220- JA13222
2018-12-14	Cotter Jr.'s Notice of Posting Cost Bond on Appeal	LIII	JA13230- JA13232
2018-01-05	Cotter Jr.'s Opposition to Defendants' Motion for Judgment as a Matter of Law	XXV	JA6229- JA6238

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-10-13	Cotter Jr.'s Opposition to Gould's MSJ	XVI	JA4015- JA4051
2018-05-18	Cotter Jr.'s Opposition to Motion to Compel Production of Docs re Expert Fee Payments	XXIX	JA7079- JA7087
2016-10-13	Cotter Jr.'s Opposition to Partial MSJ No. 1	XVI, XVII	JA4052- JA4083
2018-06-13	Cotter Jr.'s Opposition to Ratification MSJ	XXXI	JA7608- JA7797
2018-06-13	Cotter Jr.'s Opposition to RDI's Demand Futility Motion	XXXI, XXXII	JA7798- JA7840
2018-10-01	Cotter Jr.'s Opposition to RDI's Motion for Judgment in its Favor	LIII	JA13113- JA13125
2018-05-11	Cotter Jr.'s Opposition to RDI's Motion for Leave to File Motion	XXVIII	JA6816- JA6937
2018-01-05	Cotter Jr.'s Opposition to RDI's Motion to Dismiss for Failure to Show Demand Futility	XXV	JA6225- JA6228
2018-05-18	Cotter Jr.'s Pre-Trial Memo	XXIX	JA7136- JA7157
2018-06-18	Cotter Jr.'s Reply ISO Motion for Relief Re: 05-02-18 Rulings	XXXIII, XXXIV	JA8302- JA8342
2018-01-03	Cotter Jr.'s Reply ISO Motion for Rule 54(b) Certification and Stay	XXV	JA6171- JS6178
2018-04-27	Cotter Jr.'s Reply ISO Motion to Compel (Gould)	XXVII	JA6582- JA6599
2018-09-24	Cotter Jr.'s Reply to RDI's Opp'n to Motion to Retax Costs	LII	JA12897- JA12921
2016-09-02	Cotter Jr.'s Second Amended Verified Complaint	III	JA519- JA575
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 1 & 2 & Gould MSJ	XXI	JA5094- JA5107

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 3 & Gould MSJ	XXI, XXII	JA5300-JA5320
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 5 & Gould MSJ	XXI	JA5119-JA5134
2017-12-01	Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 6 & Gould MSJ	XXI	JA5253-JA5264
2016-10-13	Cotter, Jr.'s Opposition to Partial MSJ No. 2	XVII	JA4084-JA4111
2016-10-13	Cotter, Jr.'s Opposition to Partial MSJ No. 6	XVII	JA4112-JA4142
2017-12-27	Declaration of Bannett ISO Gould's Opposition to Cotter Jr.'s Motion for Reconsideration	XXIV, XXV	JA5987-JA6064
2016-10-21	Declaration of Bannett ISO Gould's Reply ISO MSJ	XIX	JA4636-JA4677
2017-12-05	Declaration of Bannett ISO Gould's Supplemental Reply ISO MSJ	XXII, XXIII	JA5555-JA5685
2018-01-05	Declaration of Krum ISO Cotter Jr.'s Opposition to Motion for Judgment as a Matter of Law	XXV	JA6239-JA6244
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 1 & 2 & Gould MSJ	XXI	JA5108-JA5118
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 5 & Gould MSJ	XXI	JA5135-JA5252
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to Partial MSJ Nos. 2 & 6 & Gould MSJ	XXI	JA5265-JA5299

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-01	Declaration of Levin ISO Cotter Jr.'s Supplemental Opposition to So-Called MSJ Nos. 2 & 3 & Gould MSJ	XXII	JA5321-JA5509
2016-09-23	Defendant William Gould ("Gould")'s MSJ	III, IV, V, VI	JA576-JA1400
2018-08-14	Findings of Fact and Conclusions of Law and Judgment	XXXIV	JA8401-JA8411
2017-10-04	First Amended Order Setting Civil Jury Trial, Pre-Trial Conference, and Calendar Call	XX	JA4928-JA4931
2015-10-22	First Amended Verified Complaint	II	JA263-JA312
2018-04-24	Gould's Declaration ISO Opposition to Motion to Compel	XXVII	JA6569-JA6571
2017-10-17	Gould's Joinder to Motion for Evidentiary Hearing re Cotter Jr.'s Adequacy as Derivative Plaintiff	XX	JA4975-JA4977
2018-06-18	Gould's Joinder to RDI's Combined Opposition to Cotter Jr.'s Motion to Compel & Motion for Relief	XXXIII	JA8296-JA8301
2017-12-27	Gould's Opposition to Cotter Jr.'s Motion for Reconsideration	XXIV	JA5982-JA5986
2018-04-24	Gould's Opposition to Cotter Jr.'s Motion to Compel	XXVII	JA6562-JA6568
2016-10-21	Gould's Reply ISO MSJ	XIX	JA4610-JA4635
2017-12-01	Gould's Request For Hearing on Previously-Filed MSJ	XXI	JA5078-JA5093
2017-12-04	Gould's Supplemental Reply ISO of MSJ	XXII	JA5538-JA5554
2017-11-28	Individual Defendants' Answer to Cotter Jr.'s Second Amended Complaint	XX, XXI	JA5048-JA5077

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-03-14	Individual Defendants' Answer to Cotter's First Amended Complaint	II	JA375- JA396
2017-10-11	Individual Defendants' Motion for Evidentiary Hearing Re Cotter Jr.'s Adequacy as Derivative Plaintiff	XX	JA4932- JA4974
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 1) Re: Plaintiff's Termination and Reinstatement Claims ("Partial MSJ No. 1)	VI, VII, VIII, IX	JA1486- JA2216 (FILED UNDER SEAL JA2136A-D)
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 2) Re: The Issue of Director Independence ("Partial MSJ No. 2")	IX, X	JA2217- JA2489 (FILED UNDER SEAL JA2489A- HH)
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 3) On Plaintiff's Claims Related to the Purported Unsolicited Offer ("Partial MSJ No. 3")	X, XI	JA2490- JA2583
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 4) On Plaintiff's Claims Related to the Executive Committee ("Partial MSJ No. 4")	XI	JA2584- JA2689
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 5) On Plaintiff's Claims Related to the Appointment of Ellen Cotter as CEO ("Partial MSJ No. 5")	XI, XII	JA2690- JA2860

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2016-09-23	Individual Defendants' Motion for Partial Summary Judgment (No. 6) Re Plaintiff's Claims Re Estate's Option Exercise, Appointment of Margaret Cotter, Compensation Packages of Ellen Cotter and Margaret Cotter, and related claims Additional Compensation to Margaret Cotter and Guy Adams ("Partial MSJ No. 6")	XII, XIII, XIV	JA2861- JA3336
2015-09-03	Individual Defendants' Motion to Dismiss Complaint	I	JA149- JA237
2016-10-26	Individual Defendants' Objections to Declaration of Cotter, Jr. Submitted in Opposition to Partial MSJs	XIX	JA4725- JA4735
2017-12-26	Individual Defendants' Opposition to Cotter Jr.'s Motion For Reconsideration	XXIV	JA5910- JA5981
2018-01-02	Individual Defendants' Opposition to Cotter Jr.'s Motion for Rule 54(b) Certification and Stay	XXV	JA6132- JA6139
2016-10-13	Individual Defendants' Opposition to Cotter Jr.'s MPSJ	XVI	JA3815- JA3920
2016-10-21	Individual Defendants' Reply ISO of Partial MSJ No. 1	XVIII	JA4518- JA4549
2016-10-21	Individual Defendants' Reply ISO Partial MSJ No. 2	XVIII, XIX	JA4550- JA4567
2016-10-21	Individual Defendants' Reply ISO Partial MSJ Nos. 3, 4, 5, and 6	XIX	JA4678- JA4724
2017-12-04	Individual Defendants' Reply ISO Renewed Partial MSJ Nos. 1 & 2	XXII	JA5510- JA5537
2017-11-09	Individual Defendants' Supplement to Partial MSJ Nos. 1, 2, 3, 5, and 6	XX	JA4981- JA5024

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-08	Joint Pre-Trial Memorandum	XXIII	JA5686- JA5717
2018-08-24	Memorandum of Costs submitted by RDI for itself & the director defendants	XXXIV	JA8426- JA8446
2016-09-23	MIL to Exclude Expert Testimony of Steele, Duarte-Silva, Spitz, Nagy, & Finnerty	VI	JA1401- JA1485
2015-08-10	Motion to Dismiss Complaint	I	JA48-JA104
2018-08-16	Notice of Entry of Findings of Fact and Conclusions of Law and Judgment	XXXIV	JA8412- JA8425
2018-11-20	Notice of Entry of Order Denying RDI's Motion for Attorneys' Fees	LIII	JA13183- JA13190
2018-11-20	Notice of Entry of Order Denying RDI's Motion for Judgment in Its Favor	LIII	JA13191- JA13198
2018-01-04	Notice of Entry of Order Granting Cotter Jr.'s Motion for Rule 54(b) Certification	XXV	JA6182- JA6188
2018-11-06	Notice of Entry of Order of Cost Judgment	LIII	JA13168- JA13174
2018-12-07	Notice of Entry of Order Re Cotter Jr.'s Motion for Reconsideration & Amendment of Cost Judgment and for Limited Stay	LIII	JA13223- JA13229
2017-12-29	Notice of Entry of Order Re Individual Defendants' Partial MSJs, Gould's MSJ, and MIL	XXV	JA6081- JA6091
2016-12-22	Notice of Entry of Order Re Partial MSJ Nos. 1-6 and MIL to Exclude Expert Testimony	XX	JA4921- JA4927
2018-09-05	Notice of Entry of SAO Re Process for Filing Motion for Attorney's Fees	XXXVI	JA8907- JA8914

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-01-04	Order Denying Cotter Jr.'s Motion for Reconsideration and Stay	XXV	JA6189- JA6191
2018-11-16	Order Denying RDI's Motion for Attorneys' Fees	LIII	JA13175- JA13178
2018-11-06	Order Denying RDI's Motion for Judgment in Its Favor	LIII	JA13179- JA13182
2015-10-12	Order Denying RDI's Motion to Compel Arbitration	II	JA257- JA259
2018-01-04	Order Granting Cotter Jr.'s Motion for Rule 54(b) Certification	XXV	JA6179- JA6181
2016-10-03	Order Granting Cotter Jr.'s Motion to Compel Production of Documents & Communications Re the Advice of Counsel Defense	XV	JA3698- JA3700
2018-07-12	Order Granting in Part Cotter Jr.'s Motion for Omnibus Relief & Motion to Compel	XXXIV	JA8398- JA8400
2018-07-12	Order Granting In Part Cotter Jr.'s Motion to Compel (Gould) & Motion for Relief	XXXIV	JA8395- JA8397
2018-11-06	Order Granting in Part Motion to Retax Costs & Entering Judgment for Costs ("Cost Judgment")	LIII	JA13163- JA13167
2018-12-06	Order Re Cotter Jr.'s Motion for Reconsideration & Amendment of Judgment for Costs and for Limited Stay	LIII	JA13216- JA13219
2016-10-03	Order Re Cotter Jr.'s Motion to Permit Certain Discovery re Recent "Offer"	XV	JA3701- JA3703
2016-12-21	Order Re Individual Defendants' Partial MSJ Nos. 1–6 and MIL to Exclude Expert Testimony	XX	JA4917- JA4920

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-28	Order Re Individual Defendants' Partial MSJs, Gould's MSJ, and MILs	XXV	JA6065-JA6071
2015-10-19	Order Re Motion to Dismiss Complaint	II	JA260-JA262
2016-12-20	RDI's Answer to Cotter Jr.'s Second Amended Complaint	XX	JA4891-JA4916
2016-03-29	RDI's Answer to Cotter, Jr.'s First Amended Complaint	II	JA397-JA418
2016-03-29	RDI's Answer to T2 Plaintiffs' First Amended Complaint	II	JA419-JA438
2018-08-24	RDI's Appendix of Exhibits to Memorandum of Costs	XXXIV, XXXV, XXXVI	JA8447-JA8906
2018-09-14	RDI's Appendix ISO Opposition to Motion to Retax ("Appendix") Part 1	XXXVII, XXXVIII, XXXIX	JA9220-JA9592
2018-09-14	RDI's Appendix, Part 2	XXXIX, XL, XLI	JA9593-JA10063
2018-09-14	RDI's Appendix, Part 3	XLI, XLII, XLIII	JA10064-JA10801
2018-09-14	RDI's Appendix, Part 4	XLIII, XLIV	JA10802-JA10898
2018-09-14	RDI's Appendix Part 5	XLIV, XLV	JA10899-JA11270
2018-09-14	RDI's Appendix, Part 6	XLV, XLVI	JA11271-JA11475
2018-09-14	RDI's Appendix, Part 7	XLVI, XLVII, XLVIII, XLIX, L	JA11476-JA12496
2018-09-14	RDI's Appendix, Part 8	L, LI, LII	JA12497-JA12893

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-06-18	RDI's Combined Opposition to Cotter Jr.'s Motion to Compel & Motion for Relief	XXXII	JA7875- JA7927
2019-10-21	RDI's Consolidated Reply ISO Individual Defendants' Partial MSJ Nos. 3, 4, 5 & 6	XIX	JA4589- JA4603
2018-01-03	RDI's Errata to Joinder to Individual Defendants' Opposition to Motion for Rule 54(b) Certification and Stay	XXV	JA6153- JA6161
2016-10-13	RDI's Joinder to Individual Defendants' Opposition to Cotter Jr.'s MPSJ	XVI	JA3921- JA4014
2018-01-03	RDI's Joinder to Individual Defendants' Opposition to Cotter Jr.'s Motion for Rule 54(b) Certification and Stay	XXV	JA6140- JA6152
2016-10-03	RDI's Joinder to Individual Defendants' Partial-MSJ No. 1	XV	JA3707- JA3717
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 2	XV	JA3718- JA3739
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 3	XV	JA3740- JA3746
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 4	XV	JA3747- JA3799
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 5	XV	JA3800- JA3805
2016-10-03	RDI's Joinder to Individual Defendants' Partial MSJ No. 6	XV, XVI	JA3806- JA3814
2017-11-21	RDI's Joinder to Individual Defendants' Supplement to Partial MSJ Nos. 1, 2, 3, 5 & 6	XX	JA5025- JA5027
2016-10-03	RDI's Joinder to MIL to Exclude Expert Testimony	XV	JA3704- JA3706

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-10-18	RDI's Joinder to Motion for Evidentiary Hearing re Cotter Jr.'s Adequacy as Derivative Plaintiff	XX	JA4978-JA4980
2018-09-07	RDI's Motion for Attorneys' Fees	XXXVI, XXXVII	JA9019-JA9101
2018-09-12	RDI's Motion for Judgment in Its Favor	XXXVII	JA9102-JA9107
2015-08-31	RDI's Motion to Compel Arbitration	I	JA127-JA148
2018-01-03	RDI's Motion to Dismiss for Failure to Show Demand Futility	XXV	JA6162-JA6170
2018-11-30	RDI's Opposition to Cotter Jr.'s Motion for Reconsideration and Response to Motion for Limited Stay of Execution on OST	LIII	JA13208-JA13212
2018-09-14	RDI's Opposition to Cotter Jr.'s Motion to Retax Costs	XXXVII	JA9111-JA9219
2018-04-27	RDI's Opposition to Cotter's Motion for Omnibus Relief	XXVII	JA6600-JA6698
2016-10-21	RDI's Reply ISO Gould's MSJ	XIX	JA4604-JA4609
2016-10-21	RDI's Reply ISO Individual Defendants' Partial MSJ No. 1	XIX	JA4568-JA4577
2016-10-21	RDI's Reply ISO Individual Defendants' Partial MSJ No. 2	XIX	JA4578-JA4588
2015-08-20	Reading International, Inc. ("RDI")'s Joinder to Margaret Cotter, Ellen Cotter, Douglas McEachern, Guy Adams, & Edward Kane ("Individual Defendants") Motion to Dismiss Complaint	I	JA105-JA108
2015-11-10	Scheduling Order and Order Setting Civil Jury Trial, Pre-Trial Conference and Calendar Call	II	JA313-JA316

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2018-05-04	Second Amended Order Setting Jury Trial, Pre-trial Conference, and Calendar Call	XXVII	JA6724- JA6726
2016-06-21	Stipulation and Order to Amend Deadlines in Scheduling Order	II	JA463- JA468
2018-09-14	Suggestion of Death of Gould Upon the Record	LII,	JA12894- JA12896
2016-02-12	T2 Plaintiffs' First Amended Complaint	II	JA317- JA355
2015-08-28	T2 Plaintiffs' Verified Shareholder Derivative Complaint	I	JA109- JA126
2015-10-06	Transcript of 9-10-15 Hearing on Defendants' Motion to Dismiss & Plaintiff Cotter Jr. ("Cotter Jr.")'s Motion for Preliminary Injunction	I, II	JA238- JA256
2016-02-23	Transcript of 2-18-16 Hearing on Motion to Compel & Motion to File Document Under Seal	II	JA356- JA374
2016-06-23	Transcript of 6-21-16 Hearing on Defendants' Motion to Compel & Motion to Disqualify T2 Plaintiffs	II	JA469- JA493
2016-08-11	Transcript of 8-9-16 Hearing on Cotter Jr.'s Motion for Partial Summary Judgment, Motion to Compel & Motion to Amend	II, III	JA494- JA518
2016-11-01	Transcript of 10-27-16 Hearing on Motions	XIX, XX	JA4736- JA4890
2017-11-27	Transcript of 11-20-17 Hearing on Motion for Evidentiary Hearing re Cotter Jr.'s Adequacy & Motion to Seal	XX	JA5028- JA5047
2017-12-11	Transcript of 12-11-2017 Hearing on [Partial] MSJs, MILs, and Pre-Trial Conference	XXIII	JA5718- JA5792

**JOINT APPENDIX TO OPENING BRIEFS
FOR CASE NOS. 77648 & 76981**

ALPHABETICAL INDEX

Date	Description	Vol. #	Page Nos.
2017-12-29	Transcript of 12-28-17 Hearing on Motion for Reconsideration and Motion for Stay	XXV	JA6107-JA6131
2018-01-05	Transcript of 1-4-18 Hearing on Cotter Jr.'s Motion for Rule 54(b) Certification	XXV	JA6245-JA6263
2018-01-08	Transcript of Hearing on Demand Futility Motion and Motion for Judgment	XXV	JA6264-JA6280
2018-01-10	Transcript of Proceedings of 01-8-18 Jury Trial–Day 1	XXV	JA6281-JA6294
2018-05-03	Transcript of 4-30-18 Hearing on Motions to Compel & Seal	XXVII	JA6699-JA6723
2018-05-07	Transcript of 5-2-18 Hearing on Evidentiary Hearing	XXVII, XXVIII	JA6727-JA6815
2018-05-24	Transcript of 05-21-18 Hearing on Adams and Cotter sisters' Motion to Compel	XXIX	JA7158-JA7172
2018-06-20	Transcript of 06-19-18 Omnibus Hearing on discovery motions and Ratification MSJ	XXXIV	JA8343-JA8394
2018-10-02	Transcript of 10-01-18 Hearing on Cotter Jr.'s Motion to Retax Costs	LIII	JA13126-JA13150

CERTIFICATE OF SERVICE

I certify that I am an employee of MORRIS LAW GROUP; I am familiar with the firm's practice of collection and processing documents for mailing; that, in accordance therewith, I caused the following document to be e-served via the Supreme Court's electronic service process. I hereby certify that on the 28th day of August, 2019, a true and correct copy of the foregoing **JOINT APPENDIX TO OPENING BRIEFS FOR CASE NOS. 77648 & 76981**, was served by the following method(s):

☒ Supreme Court's EFlex Electronic Filing System:

Stan Johnson
Cohen-Johnson, LLC
255 East Warm Springs Road, Ste. 110
Las Vegas, Nevada 89119

Christopher Tayback
Marshall Searcy
Quinn Emanuel Urquhart & Sullivan LLP
865 South Figueroa Street, 10th Floor
Los Angeles, CA

Attorneys for Respondents
Edward Kane, Douglas McEachern, Judy
Coddington, and Michael Wrotniak

Mark Ferrario
Kara Hendricks
Tami Cowden
Greenberg Traurig, LLP
10845 Griffith Peak Drive Suite 600
Las Vegas, Nevada 89135

Attorneys for Nominal Defendant
Reading International, Inc.

Donald A. Lattin
Carolyn K. Renner
Maupin, Cox & LeGoy
4785 Caughlin Parkway
Reno, Nevada 89519

Ekwan E. Rhow
Shoshana E. Bannett
Bird, Marella, Boxer, Wolpert,
Nessim, Drooks, Lincenberg &
Rhow, P.C.
1875 Century Park East, 23rd Fl.
Los Angeles, CA 90067-2561

Attorneys for Respondent
William Gould

Judge Elizabeth Gonzalez
Eighth Judicial District
court of
Clark County, Nevada
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89101

By: /s/ Gabriela Mercado

Exhibit 6

Summarize To	Work Date	Ref Amt	Narrative
2058 Conference Fee	6/28/2015	\$1.60	AT CONFERENCE - Conference call 2015-06-28, 43 minute(s)
2058 Conference Fee	7/1/2015	\$6.26	AT CONFERENCE - Conference call 2015-07-01, 169 minute(s)
2058 Conference Fee	8/8/2015	\$3.48	AT CONFERENCE - Conference call 2015-08-08, 94 minute(s)
2058 Conference Fee	8/13/2015	\$2.42	AT CONFERENCE - Conference call 2015-08-13, 69 minute(s)
2058 Conference Fee	8/14/2015	\$2.67	AT CONFERENCE - Conference call 2015-08-14, 72 minute(s)
2058 Conference Fee	8/17/2015	\$5.29	AT CONFERENCE - Conference call 2015-08-17, 143 minute(s)
2058 Conference Fee	8/17/2015	\$0.52	AT CONFERENCE - Conference call 2015-08-17, 14 minute(s)
2058 Conference Fee	8/25/2015	\$11.36	AT CONFERENCE - Conference call 2015-08-25, 307 minute(s)
2058 Conference Fee	9/3/2015	\$8.18	AT CONFERENCE - Conference call 2015-09-03, 221 minute(s)
2058 Conference Fee	9/16/2015	\$6.81	AT CONFERENCE - Conference call 2015-09-16, 184 minute(s)
2058 Conference Fee	9/21/2015	\$3.18	AT CONFERENCE - Conference call 2015-09-21, 86 minute(s)
2058 Conference Fee	9/23/2015	\$6.00	AT CONFERENCE - Conference call 2015-09-23, 162 minute(s)
2058 Conference Fee	10/8/2015	\$7.45	AT CONFERENCE - Conference call 2015-10-08, 202 minute(s)
2058 Conference Fee	10/14/2015	\$1.48	AT CONFERENCE - Conference call 2015-10-14, 40 minute(s)
2058 Conference Fee	10/14/2015	\$9.63	AT CONFERENCE - Conference call 2015-10-14, 261 minute(s)
2058 Conference Fee	10/16/2015	\$1.77	AT CONFERENCE - Conference call 2015-10-16, 48 minute(s)
2058 Conference Fee	1/8/2016	\$13.94	AT CONFERENCE - Conference call 2016-01-08, 373 minute(s)
2058 Conference Fee	1/11/2016	\$9.34	AT CONFERENCE - Conference call 2016-01-11, 250 minute(s)
2058 Conference Fee	1/28/2016	\$2.62	AT CONFERENCE - Conference call 2016-01-28, 70 minute(s)
2058 Conference Fee	2/5/2016	\$0.04	AT CONFERENCE - Conference call 2016-02-05, 1 minute(s)
2058 Conference Fee	2/5/2016	\$0.07	AT CONFERENCE - Conference call 2016-02-05, 2 minute(s)
2058 Conference Fee	2/5/2016	\$15.55	AT CONFERENCE - Conference call 2016-02-05, 415 minute(s)
2058 Conference Fee	2/18/2016	\$0.15	AT CONFERENCE - Conference call 2016-02-18, 4 minute(s)
2058 Conference Fee	2/18/2016	\$0.07	AT CONFERENCE - Conference call 2016-02-18, 2 minute(s)
2058 Conference Fee	2/18/2016	\$2.29	AT CONFERENCE - Conference call 2016-02-18, 61 minute(s)
2058 Conference Fee	3/4/2016	\$8.06	AT CONFERENCE - Conference call 2016-03-04, 215 minute(s)
2058 Conference Fee	3/9/2016	\$4.12	AT CONFERENCE - Conference call 2016-03-09, 110 minute(s)
2058 Conference Fee	3/14/2016	\$2.51	AT CONFERENCE - Conference call 2016-03-14, 67 minute(s)
2058 Conference Fee	3/16/2016	\$6.37	AT CONFERENCE - Conference call 2016-03-16, 170 minute(s)
2058 Conference Fee	3/21/2016	\$0.19	AT CONFERENCE - Conference call 2016-03-21, 5 minute(s)
2058 Conference Fee	3/25/2016	\$6.33	AT CONFERENCE - Conference call 2016-03-25, 169 minute(s)
2058 Conference Fee	4/7/2016	\$8.60	AT CONFERENCE - Conference call 2016-04-07, 230 minute(s)
2058 Conference Fee	4/14/2016	\$4.78	AT CONFERENCE - Conference call 2016-04-14, 128 minute(s)
2058 Conference Fee	4/14/2016	\$13.57	AT CONFERENCE - Conference call 2016-04-14, 363 minute(s)
2058 Conference Fee	4/21/2016	\$12.45	AT CONFERENCE - Conference call 2016-04-21, 333 minute(s)
2058 Conference Fee	5/6/2016	\$13.90	AT CONFERENCE - Conference call 2016-05-06, 372 minute(s)
2058 Conference Fee	5/9/2016	\$22.39	AT CONFERENCE - Conference call 2016-05-09, 599 minute(s)
2058 Conference Fee	6/1/2016	\$2.77	AT CONFERENCE - Conference call 2016-06-01, 74 minute(s)
2058 Conference Fee	6/7/2016	\$9.61	AT CONFERENCE - Conference call 2016-06-07, 257 minute(s)
2058 Conference Fee	6/20/2016	\$7.21	AT CONFERENCE - Conference call 2016-06-20, 193 minute(s)
2058 Conference Fee	6/23/2016	\$17.38	AT CONFERENCE - Conference call 2016-06-23, 465 minute(s)
2058 Conference Fee	6/24/2016	\$25.08	AT CONFERENCE - Conference call 2016-06-24, 671 minute(s)
2058 Conference Fee	6/30/2016	\$17.60	AT CONFERENCE - Conference call 2016-06-30, 471 minute(s)
2058 Conference Fee	7/12/2016	\$0.30	AT CONFERENCE - Conference call 2016-07-12, 8 minute(s)
2058 Conference Fee	7/12/2016	\$2.24	AT CONFERENCE - Conference call 2016-07-12, 60 minute(s)
2058 Conference Fee	7/13/2016	\$3.29	AT CONFERENCE - Conference call 2016-07-13, 88 minute(s)
2058 Conference Fee	7/20/2016	\$6.43	AT CONFERENCE - Conference call 2016-07-20, 172 minute(s)
2058 Conference Fee	7/21/2016	\$2.35	AT CONFERENCE - Conference call 2016-07-21, 63 minute(s)
2058 Conference Fee	7/27/2016	\$9.94	AT CONFERENCE - Conference call 2016-07-27, 266 minute(s)
2058 Conference Fee	8/4/2016	\$3.96	AT CONFERENCE - Conference call 2016-08-04, 106 minute(s)
2058 Conference Fee	8/5/2016	\$0.04	AT CONFERENCE - Conference call 2016-08-05, 1 minute(s)

2058 Conference Fee	8/5/2016	\$10.02	AT CONFERENCE - Conference call 2016-08-05, 268 minute(s)
2058 Conference Fee	8/17/2016	\$13.61	AT CONFERENCE - Conference call 2016-08-17, 364 minute(s)
2058 Conference Fee	8/31/2016	\$8.11	AT CONFERENCE - Conference call 2016-08-31, 217 minute(s)
2058 Conference Fee	9/5/2016	\$4.19	AT CONFERENCE - Conference call 2016-09-05, 112 minute(s)
2058 Conference Fee	9/20/2016	\$1.94	AT CONFERENCE - Conference call 2016-09-20, 52 minute(s)
2058 Conference Fee	9/25/2016	\$2.54	AT CONFERENCE - Conference call 2016-09-25, 68 minute(s)
2058 Conference Fee	10/3/2016	\$4.52	AT CONFERENCE - Conference call 2016-10-03, 121 minute(s)
2058 Conference Fee	10/11/2016	\$3.09	AT CONFERENCE - Conference call 2016-10-11, 83 minute(s)
2058 Conference Fee	10/16/2016	\$2.83	AT CONFERENCE - Conference call 2016-10-16, 76 minute(s)
2058 Conference Fee	10/17/2016	\$2.46	AT CONFERENCE - Conference call 2016-10-17, 66 minute(s)
2058 Conference Fee	10/17/2016	\$11.65	AT CONFERENCE - Conference call 2016-10-17, 313 minute(s)
2058 Conference Fee	10/18/2016	\$18.39	AT CONFERENCE - Conference call 2016-10-18, 494 minute(s)
2058 Conference Fee	10/18/2016	\$16.19	AT CONFERENCE - Conference call 2016-10-18, 435 minute(s)
2058 Conference Fee	10/28/2016	\$25.20	AT CONFERENCE - Conference call 2016-10-28, 677 minute(s)
2058 Conference Fee	11/26/2016	\$1.97	AT CONFERENCE - Conference call 2016-11-26, 53 minute(s)
2058 Conference Fee	11/29/2016	\$15.78	AT CONFERENCE - Conference call 2016-11-29, 424 minute(s)
2058 Conference Fee	12/7/2016	\$12.43	AT CONFERENCE - Conference call 2016-12-07, 334 minute(s)
2058 Conference Fee	12/7/2016	\$12.21	AT CONFERENCE - Conference call 2016-12-07, 328 minute(s)
2058 Conference Fee	12/13/2016	\$0.07	AT CONFERENCE - Conference call 2016-12-13, 2 minute(s)
2058 Conference Fee	12/13/2016	\$0.07	AT CONFERENCE - Conference call 2016-12-13, 2 minute(s)
2058 Conference Fee	12/13/2016	\$4.21	AT CONFERENCE - Conference call 2016-12-13, 113 minute(s)
2058 Conference Fee	12/14/2016	\$5.21	AT CONFERENCE - Conference call 2016-12-14, 140 minute(s)
2058 Conference Fee	12/23/2016	\$1.54	AT CONFERENCE - Conference call 2016-12-23, 46 minute(s)
2058 Conference Fee	12/27/2016	\$7.58	AT CONFERENCE - Conference call 2016-12-27, 231 minute(s)
2058 Conference Fee	12/28/2016	\$2.11	AT CONFERENCE - Conference call 2016-12-28, 63 minute(s)
2058 Conference Fee	12/30/2016	\$2.97	AT CONFERENCE - Conference call 2016-12-30, 94 minute(s)
2058 Conference Fee	1/4/2017	\$6.21	AT CONFERENCE - Conference call 2017-01-04, 184 minute(s)
2058 Conference Fee	1/5/2017	\$0.07	AT CONFERENCE - Conference call 2017-01-05, 2 minute(s)
2058 Conference Fee	1/5/2017	\$1.43	AT CONFERENCE - Conference call 2017-01-05, 43 minute(s)
2058 Conference Fee	1/18/2017	\$2.73	AT CONFERENCE - Conference call 2017-01-18, 77 minute(s)
2058 Conference Fee	3/6/2017	\$4.43	AT CONFERENCE - Conference call 2017-03-06, 140 minute(s)
2058 Conference Fee	3/20/2017	\$15.88	AT CONFERENCE - Conference call 2017-03-20, 454 minute(s)
2058 Conference Fee	3/27/2017	\$0.67	AT CONFERENCE - Conference call 2017-03-27, 20 minute(s)
2058 Conference Fee	5/3/2017	\$5.59	AT CONFERENCE - Conference call 2017-05-03, 170 minute(s)
2058 Conference Fee	5/4/2017	\$0.41	AT CONFERENCE - Conference call 2017-05-04, 13 minute(s)
2058 Conference Fee	5/5/2017	\$2.48	AT CONFERENCE - Conference call 2017-05-05, 76 minute(s)
2058 Conference Fee	5/5/2017	\$9.54	AT CONFERENCE - Conference call 2017-05-05, 295 minute(s)
2058 Conference Fee	6/21/2017	\$3.26	AT CONFERENCE - Conference call 2017-06-21, 103 minute(s)
2058 Conference Fee	7/3/2017	\$1.58	AT CONFERENCE - Conference call 2017-07-03, 50 minute(s)
2058 Conference Fee	7/6/2017	\$3.46	AT CONFERENCE - Conference call 2017-07-06, 104 minute(s)
2058 Conference Fee	7/12/2017	\$4.27	AT CONFERENCE - Conference call 2017-07-12, 128 minute(s)
2058 Conference Fee	7/14/2017	\$1.48	AT CONFERENCE - Conference call 2017-07-14, 43 minute(s)
2058 Conference Fee	8/9/2017	\$4.12	AT CONFERENCE - Conference call 2017-08-09, 123 minute(s)
2058 Conference Fee	9/21/2017	\$18.41	AT CONFERENCE - Conference call 2017-09-21, 554 minute(s)
2058 Conference Fee	9/23/2017	\$7.71	AT CONFERENCE - Conference call 2017-09-23, 230 minute(s)
2058 Conference Fee	10/8/2017	\$1.39	AT CONFERENCE - Conference call 2017-10-08, 44 minute(s)
2058 Conference Fee	10/11/2017	\$3.58	AT CONFERENCE - Conference call 2017-10-11, 109 minute(s)
2058 Conference Fee	11/9/2017	\$0.63	AT CONFERENCE - Conference call 2017-11-09, 20 minute(s)
2058 Conference Fee	11/15/2017	\$2.46	AT CONFERENCE - Conference call 2017-11-15, 71 minute(s)
2058 Conference Fee	11/15/2017	\$8.15	AT CONFERENCE - Conference call 2017-11-15, 226 minute(s)
2058 Conference Fee	11/17/2017	\$0.48	AT CONFERENCE - Conference call 2017-11-17, 14 minute(s)
2058 Conference Fee	11/18/2017	\$3.02	AT CONFERENCE - Conference call 2017-11-18, 90 minute(s)
2058 Conference Fee	11/20/2017	\$7.85	AT CONFERENCE - Conference call 2017-11-20, 220 minute(s)
2058 Conference Fee	11/20/2017	\$0.23	AT CONFERENCE - Conference call 2017-11-20, 6 minute(s)

2058 Conference Fee	11/22/2017	\$0.98	AT CONFERENCE - Conference call 2017-11-22, 31 minute(s)
2058 Conference Fee	11/22/2017	\$2.85	AT CONFERENCE - Conference call 2017-11-22, 90 minute(s)
2058 Conference Fee	12/2/2017	\$4.81	AT CONFERENCE - Conference call 2017-12-02, 152 minute(s)
2058 Conference Fee	12/6/2017	\$23.80	AT CONFERENCE - Conference call 2017-12-06, 703 minute(s)
2058 Conference Fee	12/11/2017	\$14.99	AT CONFERENCE - Conference call 2017-12-11, 429 minute(s)
2058 Conference Fee	12/13/2017	\$9.95	AT CONFERENCE - Conference call 2017-12-13, 295 minute(s)
2058 Conference Fee	12/21/2017	\$5.78	AT CONFERENCE - Conference call 2017-12-21, 183 minute(s)
2058 Conference Fee	12/22/2017	\$7.47	AT CONFERENCE - Conference call 2017-12-22, 231 minute(s)
2058 Conference Fee	12/29/2017	\$3.70	AT CONFERENCE - Conference call 2017-12-29, 112 minute(s)
2058 Conference Fee	1/5/2018	\$5.48	AT CONFERENCE - Conference call 2018-01-05, 154 minute(s)
2058 Conference Fee	1/11/2018	\$25.32	AT CONFERENCE - Conference call 2018-01-11, 744 minute(s)
2058 Conference Fee	1/11/2018	\$0.03	AT CONFERENCE - Conference call 2018-01-11, 1 minute(s)
2058 Conference Fee	1/11/2018	\$0.04	AT CONFERENCE - Conference call 2018-01-11, 1 minute(s)
2058 Conference Fee	1/17/2018	\$6.15	AT CONFERENCE - Conference call 2018-01-17, 180 minute(s)
2058 Conference Fee	2/8/2018	\$7.98	AT CONFERENCE - Conference call 2018-02-08, 230 minute(s)
2058 Conference Fee	3/7/2018	\$2.76	AT CONFERENCE - Conference call 2018-03-07, 82 minute(s)
2058 Conference Fee	3/9/2018	\$2.97	AT CONFERENCE - Conference call 2018-03-09, 81 minute(s)
2058 Conference Fee	3/14/2018	\$2.26	AT CONFERENCE - Conference call 2018-03-14, 68 minute(s)
2058 Conference Fee	3/21/2018	\$2.15	AT CONFERENCE - Conference call 2018-03-21, 61 minute(s)
2058 Conference Fee	3/28/2018	\$2.05	AT CONFERENCE - Conference call 2018-03-28, 58 minute(s)
2058 Conference Fee	4/11/2018	\$2.48	AT CONFERENCE - Conference call 2018-04-11, 74 minute(s)
2058 Conference Fee	4/18/2018	\$4.26	AT CONFERENCE - Conference call 2018-04-18, 126 minute(s)
2058 Conference Fee	4/25/2018	\$1.57	AT CONFERENCE - Conference call 2018-04-25, 47 minute(s)
2058 Conference Fee	5/9/2018	\$15.19	AT CONFERENCE - Conference call 2018-05-09, 450 minute(s)
2058 Conference Fee	5/16/2018	\$3.77	AT CONFERENCE - Conference call 2018-05-16, 115 minute(s)
2058 Conference Fee	5/20/2018	\$1.42	AT CONFERENCE - Conference call 2018-05-20, 45 minute(s)
2058 Conference Fee	5/21/2018	\$1.63	AT CONFERENCE - Conference call 2018-05-21, 49 minute(s)
2058 Conference Fee	5/23/2018	\$0.57	AT CONFERENCE - Conference call 2018-05-23, 18 minute(s)
2058 Conference Fee	5/23/2018	\$0.04	AT CONFERENCE - Conference call 2018-05-23, 1 minute(s)
2058 Conference Fee	5/23/2018	\$4.34	AT CONFERENCE - Conference call 2018-05-23, 128 minute(s)
2058 Conference Fee	5/31/2018	\$2.01	AT CONFERENCE - Conference call 2018-05-31, 61 minute(s)
1917 Telephone	7/1/2015	\$0.07	Ext 3271 called 18584592950 at 12:11 PM for 2 m in(s)
1917 Telephone	7/1/2015	\$0.03	Ext 3271 called 18584592950 at 12:08 PM for 1 m in(s)
1917 Telephone	7/1/2015	\$0.03	Ext 3271 called 18584592950 at 12:09 PM for 1 m in(s)
1917 Telephone	7/1/2015	\$0.03	Ext 3271 called 18584592950 at 11:34 AM for 1 m in(s)
1917 Telephone	7/28/2015	\$0.54	Ext 3152 called 17029498217# at 02:34 PM for 16 min(s)
1917 Telephone	7/30/2015	\$0.03	Ext 3152 called 17027933773# at 02:43 PM for 1 min(s)
1917 Telephone	7/30/2015	\$0.14	Ext 3152 called 17027923773# at 02:44 PM for 4 min(s)
1917 Telephone	8/7/2015	\$0.02	Ext 3158 called 18186791176 at 05:33 PM for 2 m in(s)
1917 Telephone	8/17/2015	\$0.03	Ext 3152 called 16263183230# at 01:40 PM for 3 min(s)
1917 Telephone	8/17/2015	\$0.17	Ext 3152 called 18584592950# at 01:24 PM for 5 min(s)
1917 Telephone	8/18/2015	\$0.14	Ext 3152 called 16269755724# at 02:50 PM for 14 min(s)
1917 Telephone	8/18/2015	\$0.02	Ext 3152 called 13102012100#232 at 06:00 PM for 2 min(s)
1917 Telephone	8/19/2015	\$0.14	Ext 3152 called 13102012100# at 02:25 PM for 14 min(s)
1917 Telephone	8/24/2015	\$0.03	Ext 3152 called 19175262292# at 01:37 PM for 1 min(s)
1917 Telephone	8/25/2015	\$0.03	Ext 3152 called 17029386843# at 10:38 AM for 1 min(s)
1917 Telephone	8/25/2015	\$0.03	Ext 3152 called 17029498217# at 10:36 AM for 1 min(s)
1917 Telephone	8/28/2015	\$0.03	Ext 3271 called 18584592950 at 11:30 AM for 1 m in(s)
1917 Telephone	8/28/2015	\$0.03	Ext 3271 called 18584592950 at 11:57 AM for 1 m in(s)
1917 Telephone	9/2/2015	\$0.48	Ext 3271 called 17023857111 at 09:54 AM for 14 min(s)
1917 Telephone	9/3/2015	\$0.14	Ext 3271 called 17023857111 at 10:23 AM for 4 m in(s)
1917 Telephone	9/3/2015	\$0.03	Ext 3152 called 17029386843# at 01:52 PM for 1 min(s)
1917 Telephone	9/3/2015	\$0.03	Ext 3152 called 17025998046# at 01:56 PM for 1 min(s)
1917 Telephone	9/3/2015	\$0.03	Ext 3152 called 17029386843# at 01:40 PM for 1. 0000 min(s)

1917 Telephone	9/4/2015	\$0.06	Ext 3152 called 13232711054# at 10:32 AM for 6 min(s)
1917 Telephone	9/4/2015	\$0.14	Ext 7128 called 12134433152# at 01:26 PM for 4 min(s)
1917 Telephone	9/4/2015	\$0.20	Ext 3653 called 17027923773 at 01:25 PM for 6 m in(s)
1917 Telephone	9/4/2015	\$0.03	Ext 3152 called 17029386856# at 10:40 AM for 1 min(s)
1917 Telephone	9/8/2015	\$0.20	Ext 3152 called 17136537875# at 11:22 AM for 6 min(s)
1917 Telephone	9/8/2015	\$0.10	Ext 3152 called 16263183230# at 12:18 PM for 10 min(s)
1917 Telephone	9/14/2015	\$0.03	Ext 3653 called 17029386856 at 10:38 AM for 1 m in(s)
1917 Telephone	9/15/2015	\$0.34	Ext 3639 called 18185859632 at 09:13 AM for 10 min(s)
1917 Telephone	9/15/2015	\$0.03	Ext 3653 called 17029498217 at 03:20 PM for 1 m in(s)
1917 Telephone	9/17/2015	\$0.20	Telephone Ext 3152 called 17135981932# at 11:54 AM for 6 min(s)
1917 Telephone	9/17/2015	\$0.31	Telephone Ext 3152 called 17028123335# at 04:41 PM for 9 min(s)
1917 Telephone	9/17/2015	\$0.03	Telephone Ext 3152 called 17135981932# at 04:58 PM for 1 min(s)
1917 Telephone	9/18/2015	\$0.14	Telephone Ext 3152 called 17135981932# at 11:45 AM for 4 min(s)
1917 Telephone	9/21/2015	\$0.07	Telephone Ext 3653 called 17024758908 at 01:34 PM for 2 m in(s)
1917 Telephone	9/21/2015	\$0.03	Telephone Ext 3152 called 17027923773# at 02:38 PM for 1 min(s)
1917 Telephone	9/22/2015	\$0.03	Telephone Ext 3152 called 17028123335# at 11:19 AM for 1 min(s)
1917 Telephone	9/24/2015	\$0.44	Telephone Ext 3152 called 17025998046# at 05:17 PM for 13 min(s)
1917 Telephone	10/7/2015	\$0.02	Telephone Ext 3152 called 13102012100# at 03:31 PM for 2 min(s)
1917 Telephone	10/7/2015	\$0.09	Telephone Ext 3152 called 13102012100# at 04:17 PM for 9 min(s)
1917 Telephone	10/8/2015	\$0.07	Telephone Ext 3152 called 18188513850# at 04:34 PM for 2 min(s)
1917 Telephone	10/9/2015	\$0.07	Telephone Ext 3152 called 18188513850# at 10:02 AM for 2 min(s)
1917 Telephone	10/12/2015	\$0.02	Telephone Ext 3152 called 13102012100#1266673# at 06:32 P M for 2 min(s)
1917 Telephone	10/13/2015	\$0.08	Telephone Ext 3152 called 13102012100# at 04:35 PM for 8 min(s)
1917 Telephone	10/14/2015	\$0.03	Telephone Ext 3152 called 17135981932# at 03:52 PM for 1 min(s)
1917 Telephone	10/15/2015	\$0.03	Telephone Ext 3152 called 17028123335# at 04:03 PM for 1 min(s)
1917 Telephone	10/15/2015	\$0.03	Telephone Ext 3152 called 17028123335# at 02:47 PM for 1 min(s)
1917 Telephone	10/15/2015	\$0.20	Telephone Ext 3653 called 17135981932 at 02:19 PM for 6 m in(s)
1917 Telephone	10/16/2015	\$0.03	Telephone Ext 3152 called 12025818151# at 11:23 AM for 1 min(s)
1917 Telephone	10/16/2015	\$0.03	Telephone Ext 3152 called 12025838151# at 11:25 AM for 1 min(s)
1917 Telephone	10/21/2015	\$0.27	Telephone Ext 3152 called 19176891923# at 02:22 PM for 8 min(s)
1917 Telephone	10/30/2015	\$0.07	Telephone Ext 3152 called 17029498217# at 01:55 PM for 2 min(s)
1917 Telephone	10/30/2015	\$0.04	Telephone Ext 3152 called 13102012100# at 01:27 PM for 4. 0000 min(s)
1917 Telephone	11/2/2015	\$0.41	Telephone Ext 3271 called 170238571110 at 02:48 PM for 12 min(s)
1917 Telephone	11/3/2015	\$0.24	Telephone Ext 3152 called 16263183230# at 10:02 AM for 24 min(s)
1917 Telephone	11/3/2015	\$0.10	Telephone Ext 3271 called 17023857111 at 12:42 PM for 3 m in(s)
1917 Telephone	11/3/2015	\$0.24	Telephone Ext 3271 called 17023857111 at 09:34 AM for 7 m in(s)
1917 Telephone	11/4/2015	\$0.15	Telephone Ext 3152 called 16263183230# at 02:48 PM for 15 min(s)
1917 Telephone	11/5/2015	\$0.02	Telephone Ext 3152 called 12139891558# at 11:13 AM for 2 min(s)
1917 Telephone	11/5/2015	\$0.02	Telephone Ext 3152 called 12139891558# at 10:45 AM for 2 min(s)
1917 Telephone	11/5/2015	\$0.04	Telephone Ext 3152 called 12139891558# at 10:40 AM for 4. 0000 min(s)
1917 Telephone	11/6/2015	\$0.27	Telephone Ext 3152 called 19197249271# at 03:24 PM for 8 min(s)
1917 Telephone	11/6/2015	\$0.70	Telephone Ext 3152 called 13107031414#87202886 at 01:02 P M for 71 min(s)
1917 Telephone	11/19/2015	\$0.14	Telephone Ext 3152 called 17024010988# at 11:41 AM for 4 min(s)
1917 Telephone	12/9/2015	\$0.14	Telephone Ext 3152 called 18584592950# at 03:44 PM for 4 min(s)
1917 Telephone	12/9/2015	\$0.16	Telephone Ext 3152 called 13102283710# at 03:02 PM for 16 min(s)
1917 Telephone	12/10/2015	\$0.10	Telephone Ext 3152 called 19096218000#2 at 04:23 PM for 3 min(s)
1917 Telephone	12/11/2015	\$0.07	Telephone Ext 3152 called 12025388226# at 02:58 PM for 2 min(s)
1917 Telephone	12/18/2015	\$1.67	Telephone Ext 3653 called 14157737219 at 01:36 PM for 49 min(s)
1917 Telephone	12/28/2015	\$0.07	Telephone Ext 3271 called 17023857111 at 11:52 AM for 2 m in(s)
1917 Telephone	12/29/2015	\$0.07	Telephone Ext 3271 called 17023857111 at 12:41 PM for 2 m in(s)
1917 Telephone	12/29/2015	\$0.10	Telephone Ext 3271 called 17023857111 at 10:41 AM for 3 m in(s)
1917 Telephone	1/20/2016	\$0.14	Telephone Ext 3152 called 12128716834# at 12:02 PM for 4 min(s)
1917 Telephone	1/21/2016	\$0.07	Telephone Ext 3271 called 17023857111 at 10:25 AM for 2 m in(s)
1917 Telephone	1/26/2016	\$0.03	Telephone Ext 3152 called 17028123335# at 02:38 PM for 1 min(s)

1917 Telephone	1/26/2016	\$0.03	Telephone Ext 3152 called 17028123335# at 02:43 PM for 1 min(s)
1917 Telephone	1/28/2016	\$0.03	Telephone Ext 3653 called 17029386856 at 10:08 AM for 1 m in(s)
1917 Telephone	2/3/2016	\$0.07	Telephone Ext 3152 called 17027923773# at 03:24 PM for 2 min(s)
1917 Telephone	2/4/2016	\$0.03	Telephone Ext 3653 called 17027923773 at 10:33 AM for 1 m in(s)
1917 Telephone	2/5/2016	\$0.12	Telephone Ext 3653 called 15628826286 at 04:06 PM for 12. 0000 min(s)
1917 Telephone	2/8/2016	\$0.07	Telephone Ext 3653 called 14154216500 at 10:58 AM for 2 m in(s)
1917 Telephone	2/9/2016	\$0.04	Telephone Ext 3152 called 13102012100# at 03:53 PM for 4 min(s)
1917 Telephone	2/9/2016	\$1.09	Telephone Ext 3170 called 19143203626# at 11:10 AM for 32 min(s)
1917 Telephone	2/9/2016	\$0.03	Telephone Ext 3152 called 17029386870# at 03:57 PM for 1 min(s)
1917 Telephone	2/10/2016	\$0.54	Telephone Ext 3152 called 12128716834# at 11:09 AM for 16 min(s)
1917 Telephone	2/10/2016	\$0.05	Telephone Ext 3152 called 16263183230# at 02:46 PM for 5 min(s)
1917 Telephone	2/10/2016	\$0.03	Telephone Ext 3152 called 12128716828# at 11:09 AM for 1 min(s)
1917 Telephone	2/11/2016	\$0.03	Telephone Ext 3152 called 17028123335# at 02:04 PM for 1 min(s)
1917 Telephone	2/11/2016	\$0.03	Telephone Ext 3152 called 17027923773# at 01:59 PM for 1 min(s)
1917 Telephone	2/11/2016	\$0.20	Telephone Ext 3653 called 17027923773 at 11:09 AM for 6 m in(s)
1917 Telephone	2/11/2016	\$0.31	Telephone Ext 3653 called 17024758908 at 03:26 PM for 9 m in(s)
1917 Telephone	2/16/2016	\$0.24	Telephone Ext 3184 called 12626231716# at 06:26 PM for 7 min(s)
1917 Telephone	2/16/2016	\$0.27	Telephone Ext 3152 called 17028233500#0 at 04:35 PM for 8 min(s)
1917 Telephone	2/26/2016	\$0.27	Telephone Ext 3152 called 17135981932# at 03:39 PM for 8 min(s)
1917 Telephone	2/29/2016	\$0.12	Telephone Ext 3152 called 13105590581# at 05:03 PM for 12 min(s)
1917 Telephone	3/2/2016	\$0.27	Telephone Ext 3653 called 17027162385 at 02:00 PM for 8 m in(s)
1917 Telephone	3/3/2016	\$0.48	Telephone Ext 3653 called 17027923773 at 11:31 AM for 14 min(s)
1917 Telephone	3/3/2016	\$0.03	Telephone Ext 3653 called 16022625773 at 11:28 AM for 1 m in(s)
1917 Telephone	3/3/2016	\$0.03	Telephone Ext 3653 called 17029498217 at 11:29 AM for 1 m in(s)
1917 Telephone	3/4/2016	\$0.10	Telephone Ext 3271 called 170238824001 at 03:17 PM for 3 min(s)
1917 Telephone	3/4/2016	\$0.17	Telephone Ext 3271 called 17023882400 at 02:12 PM for 5 m in(s)
1917 Telephone	3/8/2016	\$0.65	Telephone Ext 3653 called 16507401194 at 05:40 PM for 19 min(s)
1917 Telephone	3/8/2016	\$0.03	Telephone Ext 3653 called 16507236433 at 03:44 PM for 1 m in(s)
1917 Telephone	3/9/2016	\$0.10	Telephone Ext 3653 called 17024758908 at 04:13 PM for 3 m in(s)
1917 Telephone	3/14/2016	\$0.03	Telephone Ext 3653 called 16507401194 at 10:06 AM for 1 m in(s)
1917 Telephone	3/15/2016	\$0.03	Telephone Ext 3653 called 17027162385 at 01:15 PM for 1 m in(s)
1917 Telephone	3/18/2016	\$0.10	Telephone Ext 3271 called 17025908888 at 03:02 PM for 3 m in(s)
1917 Telephone	3/18/2016	\$0.07	Telephone Ext 3653 called 16507401194 at 01:33 PM for 2 m in(s)
1917 Telephone	3/18/2016	\$0.03	Telephone Ext 3271 called 170259088880 at 03:01 PM for 1 min(s)
1917 Telephone	3/23/2016	\$0.07	Telephone Ext 3653 called 14157737219 at 02:25 PM for 2 m in(s)
1917 Telephone	3/24/2016	\$0.14	Telephone Ext 3224 called 19149217793# at 11:48 AM for 4 min(s)
1917 Telephone	3/28/2016	\$0.14	Telephone Ext 3224 called 12128947282# at 02:40 PM for 4 min(s)
1917 Telephone	4/5/2016	\$0.07	Telephone Ext 3224 called 12128947282# at 10:48 AM for 2 min(s)
1917 Telephone	4/6/2016	\$0.34	Telephone Ext 3184 called 19787616950# at 10:52 AM for 10 min(s)
1917 Telephone	4/11/2016	\$0.05	Telephone Ext 3224 called 12132352252# at 11:44 AM for 5 min(s)
1917 Telephone	4/11/2016	\$0.14	Telephone Ext 3224 called 12128947282# at 01:31 PM for 4 min(s)
1917 Telephone	4/12/2016	\$0.07	Telephone Ext 3224 called 12128947282# at 10:09 AM for 2 min(s)
1917 Telephone	4/13/2016	\$0.03	Telephone Ext 3152 called 17135981932# at 10:57 AM for 1 min(s)
1917 Telephone	4/14/2016	\$0.48	Telephone Ext 3271 called 17023857111 at 11:07 AM for 14 min(s)
1917 Telephone	4/15/2016	\$0.07	Telephone Ext 3224 called 12128947282# at 12:13 PM for 2 min(s)
1917 Telephone	4/18/2016	\$0.03	Telephone Ext 3152 called 12128716834# at 09:45 AM for 1 min(s)
1917 Telephone	4/18/2016	\$0.34	Telephone Ext 3152 called 19197249271# at 01:06 PM for 10 min(s)
1917 Telephone	4/18/2016	\$0.03	Telephone Ext 3152 called 19177054458# at 10:00 AM for 1 min(s)
1917 Telephone	4/20/2016	\$0.03	Telephone Ext 3224 called 13147279479# at 10:06 AM for 1 min(s)
1917 Telephone	4/21/2016	\$0.03	Telephone Ext 3246 called 18604082748 at 09:15 AM for 1 m in(s)
1917 Telephone	4/21/2016	\$0.61	Telephone Ext 3224 called 12128947282# at 10:01 AM for 18 min(s)
1917 Telephone	4/27/2016	\$0.03	Telephone Ext 3224 called 13147279479# at 12:47 PM for 1 min(s)
1917 Telephone	4/28/2016	\$0.27	Telephone Ext 3152 called 12025388226# at 04:18 PM for 8 min(s)
1917 Telephone	5/4/2016	\$0.34	Telephone Ext 3271 called 1619232123401 at 10:55 AM for 1 0 min(s)

1917 Telephone	5/11/2016	\$0.07	Telephone Ext 3653 called 17027923773 at 04:49 PM for 2 m in(s)
1917 Telephone	5/11/2016	\$0.03	Telephone Ext 3152 called 17135981932# at 04:54 PM for 1 min(s)
1917 Telephone	5/11/2016	\$0.51	Telephone Ext 3152 called 19197249271# at 03:04 PM for 15 min(s)
1917 Telephone	5/19/2016	\$0.03	Telephone Ext 3653 called 17136537875 at 10:07 AM for 1 m in(s)
1917 Telephone	5/23/2016	\$0.04	Telephone Ext 3272 called 3102556124XXXXXX at 11:58 AM for 4 min(s)
1917 Telephone	5/25/2016	\$0.03	Telephone Ext 3152 called 19197249271# at 05:03 PM for 1 min(s)
1917 Telephone	6/1/2016	\$0.30	Telephone Ext 3152 called 16269755724# at 03:19 PM for 30 min(s)
1917 Telephone	6/3/2016	\$0.07	Telephone Ext 3653 called 14157813060 at 02:58 PM for 2 m in(s)
1917 Telephone	6/3/2016	\$0.03	Telephone Ext 3271 called 18188513850 at 02:29 PM for 1 m in(s)
1917 Telephone	6/7/2016	\$0.03	Telephone Ext 3271 called 17029498335 at 11:21 AM for 1 m in(s)
1917 Telephone	6/8/2016	\$0.10	Telephone Ext 3271 called 141578812340 at 11:14 AM for 3 min(s)
1917 Telephone	6/8/2016	\$0.20	Telephone Ext 3271 called 14157881234 at 10:56 AM for 6 m in(s)
1917 Telephone	6/13/2016	\$0.17	Telephone Ext 3271 called 141578812340 at 12:19 PM for 5 min(s)
1917 Telephone	6/13/2016	\$0.07	Telephone Ext 3271 called 14157881234 at 12:18 PM for 2 m in(s)
1917 Telephone	6/13/2016	\$0.07	Telephone Ext 3272 called 1415788123401 at 11:55 AM for 2 min(s)
1917 Telephone	6/13/2016	\$0.07	Telephone Ext 3271 called 141578812340 at 12:16 PM for 2 min(s)
1917 Telephone	6/22/2016	\$0.07	Telephone Ext 3271 called 16192341500 at 10:12 AM for 2 m in(s)
1917 Telephone	6/24/2016	\$0.14	Telephone Ext 3271 called 121288312342 at 02:51 PM for 4 min(s)
1917 Telephone	6/24/2016	\$0.07	Telephone Ext 3271 called 1212883123420 at 02:49 PM for 2 min(s)
1917 Telephone	6/27/2016	\$0.20	Telephone Ext 3152 called 17028123335# at 12:55 PM for 6 min(s)
1917 Telephone	6/27/2016	\$0.07	Telephone Ext 3152 called 17028123335# at 02:59 PM for 2 min(s)
1917 Telephone	6/29/2016	\$0.03	Telephone Ext 3152 called 16572049037# at 10:02 AM for 1 min(s)
1917 Telephone	6/30/2016	\$0.03	Telephone Ext 3653 called 161793900241508257#1 at 02:37 P M for 1 min(s)
1917 Telephone	7/1/2016	\$0.03	Telephone Ext 3653 called 16022625773 at 10:15 AM for 1 m in(s)
1917 Telephone	7/1/2016	\$0.17	Telephone Ext 3152 called 12128497141# at 10:14 AM for 5 min(s)
1917 Telephone	7/5/2016	\$0.44	Telephone Ext 3152 called 19197249271# at 02:54 PM for 13 min(s)
1917 Telephone	7/11/2016	\$0.07	Telephone Ext 3152 called 17028233500#326436#1 at 03:32 P M for 2 min(s)
1917 Telephone	7/12/2016	\$0.31	Telephone Ext 3653 called 17028123335 at 06:20 PM for 9 m in(s)
1917 Telephone	7/13/2016	\$0.05	Telephone Ext 3152 called 13105568557# at 03:00 PM for 5 min(s)
1917 Telephone	7/15/2016	\$0.16	Telephone Ext 3152 called 13107395697# at 02:03 PM for 16 min(s)
1917 Telephone	7/19/2016	\$0.44	Telephone Ext 3152 called 17027923773# at 01:08 PM for 13 min(s)
1917 Telephone	7/27/2016	\$0.07	Telephone Ext 3152 called 14243569158# at 12:56 PM for 2 min(s)
1917 Telephone	7/27/2016	\$0.03	Telephone Ext 3063 called 16163988504 at 02:59 PM for 1 m in(s)
1917 Telephone	7/28/2016	\$0.07	Telephone Ext 3271 called 17023857111 at 11:27 AM for 2 m in(s)
1917 Telephone	7/28/2016	\$0.27	Telephone Ext 3271 called 170238571112 at 10:02 AM for 8 min(s)
1917 Telephone	7/28/2016	\$0.31	Telephone Ext 3271 called 170238571112 at 10:10 AM for 9 min(s)
1917 Telephone	8/26/2016	\$0.03	Telephone Ext 3653 called 17027923773 at 10:42 AM for 1 m in(s)
1917 Telephone	8/29/2016	\$0.27	Telephone Ext 3152 called 12128497165# at 10:41 AM for 8 min(s)
1917 Telephone	8/30/2016	\$0.51	Telephone Ext 3653 called 17029386856 at 02:24 PM for 15 min(s)
1917 Telephone	8/31/2016	\$0.03	Telephone Ext 3152 called 17027923773# at 01:02 PM for 1 min(s)
1917 Telephone	8/31/2016	\$2.01	Telephone Ext 3653 called 121833978002115301## at 02:46 P M for 59 min(s)
1917 Telephone	9/1/2016	\$0.51	Telephone Ext 3152 called 17029386856# at 02:41 PM for 15 min(s)
1917 Telephone	9/14/2016	\$0.07	Telephone Ext 3152 called 12128497000# at 11:03 AM for 2 min(s)
1917 Telephone	9/19/2016	\$0.11	Telephone Ext 3152 called 13104803229# at 03:29 PM for 11 min(s)
1917 Telephone	9/19/2016	\$0.10	Telephone Ext 3152 called 16508015022# at 03:23 PM for 3 min(s)
1917 Telephone	9/20/2016	\$0.03	Telephone Ext 3170 called 12132352240# at 03:46 PM for 3 min(s)
1917 Telephone	9/22/2016	\$0.14	Telephone Ext 3030 called 170282335000 at 01:56 PM for 4 min(s)
1917 Telephone	9/22/2016	\$0.44	Telephone Ext 3152 called 17024937007# at 05:50 PM for 13 min(s)
1917 Telephone	9/22/2016	\$0.04	Telephone Ext 3272 called 43090402 at 11:48 AM for 4 min(s)
1917 Telephone	9/22/2016	\$0.17	Telephone Ext 3152 called 17027923773# at 01:32 PM for 5 min(s)
1917 Telephone	9/23/2016	\$0.03	Telephone Ext 3152 called 19197249271# at 03:03 PM for 1 min(s)
1917 Telephone	9/23/2016	\$0.07	Telephone Ext 3152 called 17027923773# at 11:15 AM for 2 min(s)
1917 Telephone	9/23/2016	\$0.02	Telephone Ext 3152 called 12132352240# at 10:56 AM for 2 min(s)
1917 Telephone	9/28/2016	\$0.03	Telephone Ext 3653 called 16508015001 at 11:49 AM for 1 m in(s)

1917 Telephone	9/30/2016	\$0.99	Telephone Ext 3653 called 19732718726 at 01:14 PM for 29 min(s)
1917 Telephone	10/3/2016	\$0.31	Telephone Ext 3653 called 17029386856 at 10:12 AM for 9 m in(s)
1917 Telephone	10/13/2016	\$0.09	Telephone Ext 3152 called 12139555576# at 04:26 PM for 9 min(s)
1917 Telephone	10/13/2016	\$0.03	Telephone Ext 3184 called 17024308597# at 04:08 PM for 1 min(s)
1917 Telephone	10/13/2016	\$0.14	Telephone Ext 3063 called 17024308597 at 04:38 PM for 4 m in(s)
1917 Telephone	10/16/2016	\$0.58	Telephone Ext 3617 called 15628227859 at 05:10 PM for 17 min(s)
1917 Telephone	10/17/2016	\$0.07	Telephone Ext 3271 called 12155469000 at 08:48 AM for 2 m in(s)
1917 Telephone	10/18/2016	\$0.10	Telephone Ext 3278 called 17027923773 at 04:06 PM for 3 m in(s)
1917 Telephone	10/18/2016	\$0.07	Telephone Ext 3272 called 12159887800 at 03:13 PM for 2 m in(s)
1917 Telephone	10/18/2016	\$0.03	Telephone Ext 3063 called 12159887800 at 09:27 AM for 1 m in(s)
1917 Telephone	10/18/2016	\$0.03	Telephone Ext 3272 called 12159887800 at 03:01 PM for 1 m in(s)
1917 Telephone	10/20/2016	\$0.17	Telephone Ext 3617 called 15628227859 at 06:40 PM for 5 m in(s)
1917 Telephone	10/20/2016	\$0.10	Telephone Ext 3617 called 1702671311623232 at 01:36 PM for 3 min(s)
1917 Telephone	10/20/2016	\$0.10	Telephone Ext 3617 called 15628227859 at 06:20 PM for 3 m in(s)
1917 Telephone	10/20/2016	\$0.10	Telephone Ext 3617 called 15628227859 at 07:49 PM for 3 m in(s)
1917 Telephone	10/20/2016	\$0.17	Telephone Ext 3617 called 170267145281578 at 02:26 PM for 5 min(s)
1917 Telephone	10/27/2016	\$0.07	Telephone Ext 3271 called 12155469000 at 12:10 PM for 2 m in(s)
1917 Telephone	10/27/2016	\$0.10	Telephone Ext 3271 called 12125324100 at 12:18 PM for 3 m in(s)
1917 Telephone	10/27/2016	\$0.10	Telephone Ext 3271 called 12123172900* at 12:12 PM for 3 min(s)
1917 Telephone	10/27/2016	\$0.10	Telephone Ext 3271 called 17025908888 at 01:16 PM for 3 m in(s)
1917 Telephone	11/8/2016	\$0.07	Telephone Ext 3271 called 12155469000 at 09:08 AM for 2 m in(s)
1917 Telephone	11/8/2016	\$0.14	Telephone Ext 3271 called 121253241003 at 09:57 AM for 4 min(s)
1917 Telephone	11/8/2016	\$0.07	Telephone Ext 3271 called 12125324100 at 09:11 AM for 2 m in(s)
1917 Telephone	11/18/2016	\$0.10	Telephone Ext 3272 called 17075791120 at 10:36 AM for 3 m in(s)
1917 Telephone	12/7/2016	\$0.10	Telephone Ext 3271 called 180140122223 at 11:39 AM for 3 min(s)
1917 Telephone	12/9/2016	\$0.17	Telephone Ext 3271 called 17023857111 at 11:16 AM for 5 m in(s)
1917 Telephone	12/14/2016	\$0.54	Telephone Ext 3152 called 19197249271# at 11:46 AM for 16 min(s)
1917 Telephone	12/15/2016	\$0.58	Telephone Ext 3152 called 19197249271# at 03:56 PM for 17 min(s)
1917 Telephone	12/15/2016	\$0.03	Telephone Ext 3152 called 19197249271# at 12:47 PM for 1 min(s)
1917 Telephone	12/15/2016	\$0.10	Telephone Ext 3152 called 13104023872# at 04:18 PM for 10 min(s)
1917 Telephone	12/19/2016	\$0.06	Telephone Ext 3152 called 12132352240# at 10:57 AM for 6 min(s)
1917 Telephone	1/4/2017	\$0.05	Telephone Ext 3152 called 13234484103# at 12:48 PM for 5 min(s)
1917 Telephone	1/17/2017	\$0.10	Telephone Ext 3271 called 17023857111 at 11:27 AM for 3 m in(s)
1917 Telephone	1/17/2017	\$0.03	Telephone Ext 3278 called 1702823350032276#1 at 11:03 AM for 1 min(s)
1917 Telephone	1/17/2017	\$0.07	Telephone Ext 3278 called 1702823350032276#1 at 10:02 AM for 2 min(s)
1917 Telephone	1/24/2017	\$0.13	Telephone Ext 3152 called 13109189635# at 04:46 PM for 13 min(s)
1917 Telephone	1/26/2017	\$0.07	Telephone Ext 3278 called 1702823350032276#1 at 04:36 PM for 2 min(s)
1917 Telephone	1/26/2017	\$0.20	Telephone Ext 3617 called 15628227859 at 07:09 PM for 6 m in(s)
1917 Telephone	1/31/2017	\$0.03	Telephone Ext 3278 called 170282335000 at 01:44 PM for 1 min(s)
1917 Telephone	1/31/2017	\$0.07	Telephone Ext 3278 called 1702823350034663#1 at 01:45 PM for 2 min(s)
1917 Telephone	1/31/2017	\$0.03	Telephone Ext 3278 called 170282335000 at 01:34 PM for 1 min(s)
1917 Telephone	2/8/2017	\$0.34	Telephone Ext 3152 called 17135981932# at 10:55 AM for 10 min(s)
1917 Telephone	2/8/2017	\$0.03	Telephone Ext 3152 called 17136537875# at 10:54 AM for 1 min(s)
1917 Telephone	2/13/2017	\$0.03	Telephone Ext 3152 called 12132352240# at 04:11 PM for 3 min(s)
1917 Telephone	2/16/2017	\$0.41	Telephone Ext 3152 called 19197249271# at 09:39 AM for 12 min(s)
1917 Telephone	2/16/2017	\$0.37	Telephone Ext 3152 called 19197249271# at 04:04 PM for 11 min(s)
1917 Telephone	2/16/2017	\$0.10	Telephone Ext 3152 called 19197249271# at 10:28 AM for 3 min(s)
1917 Telephone	2/22/2017	\$0.10	Telephone Ext 3152 called 19197249271# at 05:40 PM for 3 min(s)
1917 Telephone	2/28/2017	\$0.27	Telephone Ext 3152 called 17028123335# at 05:04 PM for 8 min(s)
1917 Telephone	2/28/2017	\$0.05	Telephone Ext 3152 called 13106069436# at 03:50 PM for 5 min(s)
1917 Telephone	3/7/2017	\$0.07	Telephone Ext 3152 called 14155544700# at 01:52 PM for 2 min(s)
1917 Telephone	3/8/2017	\$0.03	Telephone Ext 3152 called 14155543944# at 10:17 AM for 1 min(s)
1917 Telephone	3/13/2017	\$0.03	Telephone Ext 3152 called 17029386856# at 02:57 PM for 1 min(s)
1917 Telephone	3/13/2017	\$0.07	Telephone Ext 3660 called 1702590888800#0#0# at 12:40 P M for 2 min(s)

1917 Telephone	3/13/2017	\$0.07	Telephone Ext 3660 called 17025908888 at 12:42 PM for 2 m in(s)
1917 Telephone	3/15/2017	\$0.17	Telephone Ext 3152 called 17029386856# at 03:21 PM for 5 min(s)
1917 Telephone	3/15/2017	\$0.03	Telephone Ext 3152 called 14153513987# at 03:26 PM for 1 min(s)
1917 Telephone	3/15/2017	\$0.03	Telephone Ext 3152 called 14155513987# at 03:27 PM for 1 min(s)
1917 Telephone	3/28/2017	\$0.02	Telephone Ext 3152 called 13109413478# at 05:09 PM for 2 min(s)
1917 Telephone	4/4/2017	\$0.10	Telephone Ext 3152 called 19197249271# at 06:14 PM for 3 min(s)
1917 Telephone	4/4/2017	\$0.11	Telephone Ext 3152 called 16263183230# at 05:22 PM for 11 min(s)
1917 Telephone	4/5/2017	\$0.41	Telephone Ext 3152 called 17029386856# at 11:41 AM for 12 min(s)
1917 Telephone	4/10/2017	\$0.37	Telephone Ext 3152 called 19197249271# at 12:19 PM for 11 min(s)
1917 Telephone	4/11/2017	\$0.34	Telephone Ext 3152 called 19197249271# at 12:22 PM for 10 min(s)
1917 Telephone	4/11/2017	\$0.04	Telephone Ext 3170 called 16263183230# at 03:57 PM for 4 min(s)
1917 Telephone	4/12/2017	\$0.03	Telephone Ext 3152 called 17028123335# at 02:22 PM for 1 min(s)
1917 Telephone	4/12/2017	\$0.03	Telephone Ext 3152 called 17028123335# at 02:17 PM for 1 min(s)
1917 Telephone	4/14/2017	\$0.07	Telephone Ext 3152 called 17029386856# at 12:18 PM for 2 min(s)
1917 Telephone	5/1/2017	\$0.03	Telephone Ext 3152 called 18584592950# at 12:15 PM for 1 min(s)
1917 Telephone	5/3/2017	\$0.24	Telephone Ext 3152 called 19197249271# at 02:53 PM for 7 min(s)
1917 Telephone	5/3/2017	\$0.14	Telephone Ext 3152 called 6172049# at 12:03 PM for 14 min (s)
1917 Telephone	5/5/2017	\$0.02	Telephone Ext 3152 called 13107891238#0 at 02:16 PM for 2 min(s)
1917 Telephone	5/8/2017	\$0.83	Telephone Ext 3152 called 13107031414#87202886 at 12:03 P M for 84 min(s)
1917 Telephone	5/9/2017	\$0.10	Telephone Ext 3152 called 19197249271# at 04:43 PM for 3 min(s)
1917 Telephone	5/11/2017	\$0.17	Telephone Ext 3152 called 17024937007# at 01:31 PM for 5 min(s)
1917 Telephone	5/11/2017	\$0.03	Telephone Ext 3152 called 17027923773# at 10:35 AM for 1 min(s)
1917 Telephone	5/12/2017	\$0.27	Telephone Ext 3152 called 17029386856# at 09:38 AM for 8 min(s)
1917 Telephone	5/12/2017	\$0.27	Telephone Ext 3152 called 19197249271# at 11:13 AM for 8 min(s)
1917 Telephone	5/16/2017	\$0.24	Telephone Ext 3152 called 19197249271# at 04:14 PM for 7 min(s)
1917 Telephone	5/18/2017	\$0.03	Telephone Ext 3152 called 19197249271# at 10:56 AM for 1 min(s)
1917 Telephone	5/30/2017	\$0.48	Telephone Ext 3152 called 18587711531# at 03:49 PM for 14 min(s)
1917 Telephone	5/30/2017	\$0.03	Telephone Ext 3152 called 19176891923# at 04:43 PM for 1 min(s)
1917 Telephone	5/30/2017	\$0.03	Telephone Ext 3152 called 19176891923# at 04:32 PM for 1 min(s)
1917 Telephone	5/31/2017	\$0.14	Telephone Ext 3152 called 17028123335# at 10:24 AM for 4 min(s)
1917 Telephone	6/1/2017	\$0.03	Telephone Ext 3152 called 17029386856# at 02:48 PM for 1 min(s)
1917 Telephone	6/6/2017	\$0.27	Telephone Ext 3660 called 17023857111 at 08:46 AM for 8 m in(s)
1917 Telephone	6/13/2017	\$0.03	Telephone Ext 3152 called 12025388102# at 12:01 PM for 1 min(s)
1917 Telephone	7/5/2017	\$0.03	Telephone Ext 3152 called 19197249271# at 05:51 PM for 1 min(s)
1917 Telephone	7/6/2017	\$0.03	Telephone Ext 3152 called 17027923773# at 02:01 PM for 1 min(s)
1917 Telephone	7/6/2017	\$0.20	Telephone Ext 3152 called 19197249271# at 11:51 AM for 6 min(s)
1917 Telephone	7/7/2017	\$0.34	Telephone Ext 3152 called 18584592950 at 05:33 PM for 10 min(s)
1917 Telephone	7/12/2017	\$0.03	Telephone Ext 3152 called 18584992950# at 04:01 PM for 1 min(s)
1917 Telephone	7/12/2017	\$0.20	Telephone Ext 3660 called 17023857111 at 09:47 AM for 6 m in(s)
1917 Telephone	7/12/2017	\$0.03	Telephone Ext 3660 called 17023857111 at 09:54 AM for 1 m in(s)
1917 Telephone	7/12/2017	\$0.10	Telephone Ext 3152 called 18584592950# at 04:02 PM for 3 min(s)
1917 Telephone	7/12/2017	\$0.14	Telephone Ext 3152 called 17029386856# at 04:06 PM for 4 min(s)
1917 Telephone	7/13/2017	\$0.99	Telephone Ext 3152 called 16572049037# at 11:06 AM for 29 min(s)
1917 Telephone	7/14/2017	\$0.27	Telephone Ext 3152 called 19197249271# at 10:55 AM for 8 min(s)
1917 Telephone	7/17/2017	\$0.27	Telephone Ext 3152 called 13107031414#87202886 at 04:29 P M for 27 min(s)
1917 Telephone	7/24/2017	\$0.10	Telephone Ext 3660 called 17023857111 at 02:28 PM for 3 m in(s)
1917 Telephone	7/31/2017	\$0.27	Telephone Ext 3660 called 17023857111 at 11:12 AM for 8 m in(s)
1917 Telephone	8/2/2017	\$0.03	Telephone Ext 3152 called 17029386856# at 11:54 AM for 1 min(s)
1917 Telephone	8/10/2017	\$0.17	Telephone Ext 3152 called 19197249271# at 03:20 PM for 5 min(s)
1917 Telephone	8/10/2017	\$0.03	Telephone Ext 3152 called 19197249271# at 01:29 PM for 1 min(s)
1917 Telephone	8/16/2017	\$0.07	Telephone Ext 3152 called 17024575267# at 09:51 AM for 2 min(s)
1917 Telephone	8/17/2017	\$0.37	Telephone Ext 3152 called 17022574591# at 04:40 PM for 11 min(s)
1917 Telephone	9/8/2017	\$0.17	Telephone Ext 3152 called 17027923773# at 12:56 PM for 5 min(s)
1917 Telephone	9/11/2017	\$0.31	Telephone Ext 3660 called 17026937405 at 12:32 PM for 9 m in(s)

1917 Telephone	9/11/2017	\$0.48	Telephone Ext 3660 called 1702693711110# at 12:18 PM for 14 min(s)
1917 Telephone	9/11/2017	\$0.03	Telephone Ext 3660 called 17027917444 at 12:17 PM for 1 m in(s)
1917 Telephone	9/11/2017	\$0.03	Telephone Ext 3660 called 17206937405 at 12:32 PM for 1 m in(s)
1917 Telephone	9/11/2017	\$0.14	Telephone Ext 3660 called 170269371110 at 02:25 PM for 4 min(s)
1917 Telephone	9/21/2017	\$0.14	Telephone Ext 3660 called 17023857111 at 01:19 PM for 4 m in(s)
1917 Telephone	10/4/2017	\$0.10	Telephone Ext 3152 called 19197249271# at 05:02 PM for 3. 0000 min(s)
1917 Telephone	10/13/2017	\$0.27	Telephone Ext 3617 called 19496608228 at 11:47 AM for 8 m in(s)
1917 Telephone	10/13/2017	\$0.07	Telephone Ext 3617 called 19496608228 at 03:03 PM for 2 m in(s)
1917 Telephone	10/16/2017	\$0.17	Telephone Ext 3617 called 19496608228 at 12:01 PM for 5 m in(s)
1917 Telephone	11/6/2017	\$0.05	Telephone Ext 3152 called 15623095686# at 03:19 PM for 5 min(s)
1917 Telephone	11/7/2017	\$1.60	Telephone Ext 3027 called 19703270224 at 01:31 PM for 47 min(s)
1917 Telephone	11/7/2017	\$0.03	Telephone Ext 3994 called 19703270224 at 02:46 PM for 1 m in(s)
1917 Telephone	11/8/2017	\$0.51	Telephone Ext 3994 called 17026140001 at 12:16 PM for 15 min(s)
1917 Telephone	11/8/2017	\$0.07	Telephone Ext 3994 called 13014819242 at 09:34 AM for 2 m in(s)
1917 Telephone	11/15/2017	\$0.61	Telephone Ext 3653 called 17029386856 at 03:51 PM for 18 min(s)
1917 Telephone	11/20/2017	\$0.58	Telephone Ext 3653 called 17029386856 at 02:31 PM for 17 min(s)
1917 Telephone	11/20/2017	\$0.61	Telephone Ext 3653 called 19732718726 at 02:13 PM for 18. 0000 min(s)
1917 Telephone	11/21/2017	\$0.03	Telephone Ext 3152 called 17022574591# at 01:56 PM for 1 min(s)
1917 Telephone	11/21/2017	\$0.95	Telephone Ext 3653 called 18312247287 at 01:31 PM for 28. 0000 min(s)
1917 Telephone	11/22/2017	\$0.14	Telephone Ext 3152 called 17757721822# at 11:42 AM for 4. 0000 min(s)
1917 Telephone	11/27/2017	\$0.48	Telephone Ext 3152 called 17022574591# at 02:25 PM for 14 min(s)
1917 Telephone	11/28/2017	\$0.06	Telephone Ext 3152 called 13109682229# at 11:46 AM for 6 min(s)
1917 Telephone	11/28/2017	\$0.14	Telephone Ext 3152 called 17029386856# at 03:59 PM for 4 min(s)
1917 Telephone	11/28/2017	\$0.10	Telephone Ext 3152 called 17028734100# at 04:06 PM for 3 min(s)
1917 Telephone	12/4/2017	\$0.31	Telephone Ext 3058 called 16266652669# at 07:00 PM for 9 min(s)
1917 Telephone	12/5/2017	\$0.27	Telephone Ext 3653 called 19732718726 at 12:11 PM for 8 m in(s)
1917 Telephone	12/6/2017	\$0.05	Telephone Ext 3272 called 121343090402 at 03:58 PM for 5 min(s)
1917 Telephone	12/6/2017	\$0.13	Telephone Ext 3272 called 121343090402 at 04:05 PM for 13 min(s)
1917 Telephone	12/7/2017	\$0.03	Telephone Ext 3272 called 121343090402 at 10:52 AM for 3 min(s)
1917 Telephone	12/8/2017	\$0.10	Telephone Ext 3272 called 120634003400 at 08:19 AM for 3 min(s)
1917 Telephone	12/8/2017	\$0.10	Telephone Ext 3063 called 17024308597 at 10:46 AM for 3 m in(s)
1917 Telephone	12/10/2017	\$0.17	Telephone Ext 3800 called 19177054458# at 11:44 AM for 5 min(s)
1917 Telephone	12/10/2017	\$0.03	Telephone Ext 3800 called 19177054458# at 11:53 AM for 1. 0000 min(s)
1917 Telephone	12/10/2017	\$0.03	Telephone Ext 3800 called 12128719094# at 11:24 AM for 1 min(s)
1917 Telephone	12/12/2017	\$0.09	Telephone Ext 3058 called 13103427170# at 10:48 AM for 9 min(s)
1917 Telephone	12/12/2017	\$0.58	Telephone Ext 3063 called 12128016701 at 11:05 AM for 17 min(s)
1917 Telephone	12/13/2017	\$0.31	Telephone Ext 3653 called 17029386856 at 12:51 PM for 9 m in(s)
1917 Telephone	12/13/2017	\$0.03	Telephone Ext 3152 called 17135981932# at 10:51 AM for 1 min(s)
1917 Telephone	12/13/2017	\$0.03	Telephone Ext 3152 called 17136537875# at 10:50 AM for 1 min(s)
1917 Telephone	12/14/2017	\$0.20	Telephone Ext 3152 called 19197249271# at 03:43 PM for 6 min(s)
1917 Telephone	12/14/2017	\$0.08	Telephone Ext 3152 called 13104527600# at 11:59 AM for 8 min(s)
1917 Telephone	12/14/2017	\$0.03	Telephone Ext 3152 called 17028123335# at 04:47 PM for 1 min(s)
1917 Telephone	12/15/2017	\$0.07	Telephone Ext 3660 called 17025908888 at 10:42 AM for 2 m in(s)
1917 Telephone	12/18/2017	\$0.07	Telephone Ext 3289 called 12132632535 at 03:07 PM for 2 m in(s)
1917 Telephone	12/18/2017	\$0.06	Telephone Ext 3289 called 12134380200 at 02:10 PM for 6 m in(s)
1917 Telephone	12/18/2017	\$0.03	Telephone Ext 3289 called 12132632535 at 01:50 PM for 1 m in(s)
1917 Telephone	12/18/2017	\$0.34	Telephone Ext 3289 called 12132632535 at 02:34 PM for 10 min(s)
1917 Telephone	12/19/2017	\$0.03	Telephone Ext 3152 called 13236625105#10 at 06:20 PM for 3 min(s)
1917 Telephone	12/19/2017	\$0.03	Telephone Ext 3289 called 12132632535 at 04:20 PM for 1.0 000 min(s)
1917 Telephone	12/19/2017	\$0.03	Telephone Ext 3152 called 17029386856# at 03:28 PM for 1 min(s)
1917 Telephone	12/19/2017	\$0.24	Telephone Ext 3063 called 19703270224 at 03:57 PM for 7 m in(s)
1917 Telephone	12/19/2017	\$0.54	Telephone Ext 3063 called 19703270224 at 03:08 PM for 16 min(s)
1917 Telephone	12/19/2017	\$0.44	Telephone Ext 3063 called 19703270224 at 05:22 PM for 13 min(s)
1917 Telephone	12/19/2017	\$0.88	Telephone Ext 3063 called 19703270224 at 04:28 PM for 26 min(s)

1917 Telephone	12/20/2017	\$1.19	Telephone Ext 3063 called 19703270224 at 06:15 PM for 35 min(s)
1917 Telephone	12/20/2017	\$0.34	Telephone Ext 3063 called 19703270224 at 09:50 AM for 10 min(s)
1917 Telephone	12/20/2017	\$0.07	Telephone Ext 3617 called 170282335000 at 04:51 PM for 2 min(s)
1917 Telephone	12/21/2017	\$0.14	Telephone Ext 3063 called 19703270224 at 10:10 AM for 4 m in(s)
1917 Telephone	12/21/2017	\$1.02	Telephone Ext 3152 called 18587711531# at 05:36 PM for 30 min(s)
1917 Telephone	12/21/2017	\$0.68	Telephone Ext 3152 called 18584592950# at 02:00 PM for 20 min(s)
1917 Telephone	12/21/2017	\$0.03	Telephone Ext 3152 called 17136537875# at 11:09 AM for 1 min(s)
1917 Telephone	12/22/2017	\$0.14	Telephone Ext 3152 called 19197249271# at 11:01 AM for 4 min(s)
1917 Telephone	12/22/2017	\$0.07	Telephone Ext 3660 called 17025908888 at 07:27 AM for 2 m in(s)
1917 Telephone	12/29/2017	\$0.34	Telephone Ext 3152 called 17029386856# at 11:39 AM for 10 min(s)
1917 Telephone	12/30/2017	\$3.09	Telephone Ext 3152 called 18584592950# at 11:03 AM for 91 min(s)
1917 Telephone	1/2/2018	\$0.27	Telephone Ext 3278 called 17029386874 at 11:02 AM for 8 m in(s)
1917 Telephone	1/2/2018	\$0.03	Telephone Ext 3289 called 121343090402 at 02:20 PM for 3 min(s)
1917 Telephone	1/2/2018	\$0.13	Telephone Ext 3063 called 13232530444 at 11:08 AM for 13 min(s)
1917 Telephone	1/3/2018	\$0.17	Telephone Ext 3278 called 170282335000 at 02:11 PM for 5 min(s)
1917 Telephone	1/3/2018	\$0.03	Telephone Ext 3278 called 17029386874 at 02:29 PM for 1 m in(s)
1917 Telephone	1/3/2018	\$0.27	Telephone Ext 3278 called 17029386874 at 01:01 PM for 8 m in(s)
1917 Telephone	1/4/2018	\$0.07	Telephone Ext 3660 called 17758879900 at 02:23 PM for 2 m in(s)
1917 Telephone	1/4/2018	\$0.10	Telephone Ext 3660 called 17023857111 at 10:08 AM for 3 m in(s)
1917 Telephone	1/4/2018	\$0.10	Telephone Ext 3660 called 17758879900 at 10:21 AM for 3 m in(s)
1917 Telephone	1/9/2018	\$0.03	Telephone Ext 3272 called 17027404545 at 12:16 PM for 1 m in(s)
1917 Telephone	1/9/2018	\$0.03	Telephone Ext 3272 called 17257773333 at 11:48 AM for 1 m in(s)
1917 Telephone	1/9/2018	\$0.07	Telephone Ext 3272 called 170248990191# at 12:17 PM for 2 min(s)
1917 Telephone	1/9/2018	\$0.07	Telephone Ext 3272 called 17026495466 at 12:13 PM for 2 m in(s)
1917 Telephone	1/9/2018	\$0.20	Telephone Ext 3272 called 1702438546612 at 11:52 AM for 6 min(s)
1917 Telephone	1/9/2018	\$0.07	Telephone Ext 3272 called 17022487706 at 11:42 AM for 2 m in(s)
1917 Telephone	1/9/2018	\$0.03	Telephone Ext 3272 called 17028007006 at 12:19 PM for 1 m in(s)
1917 Telephone	1/9/2018	\$0.24	Telephone Ext 3272 called 170267577751 at 12:20 PM for 7 min(s)
1917 Telephone	1/11/2018	\$0.03	Telephone Ext 3660 called 17023857111 at 11:18 AM for 1 m in(s)
1917 Telephone	1/11/2018	\$0.14	Telephone Ext 3660 called 17023857111 at 11:18 AM for 4 m in(s)
1917 Telephone	1/16/2018	\$0.10	Telephone Ext 3152 called 19197249271# at 03:47 PM for 3 min(s)
1917 Telephone	1/16/2018	\$0.07	Telephone Ext 3272 called 17023857111 at 09:56 AM for 2 m in(s)
1917 Telephone	1/18/2018	\$0.07	Telephone Ext 3152 called 19197249271# at 10:53 AM for 2 min(s)
1917 Telephone	1/19/2018	\$0.07	Telephone Ext 3994 called 17026856111 at 02:46 PM for 2 m in(s)
1917 Telephone	1/22/2018	\$0.34	Telephone Ext 3152 called 19197249271# at 02:51 PM for 10 min(s)
1917 Telephone	1/23/2018	\$0.24	Telephone Ext 3152 called 14013787452# at 05:04 PM for 7 min(s)
1917 Telephone	1/23/2018	\$0.54	Telephone Ext 3152 called 17029386870# at 03:24 PM for 16 min(s)
1917 Telephone	1/25/2018	\$0.34	Telephone Ext 3653 called 17029386856 at 12:52 PM for 10 min(s)
1917 Telephone	1/25/2018	\$0.03	Telephone Ext 3653 called 17029386756 at 12:52 PM for 1 m in(s)
1917 Telephone	1/31/2018	\$0.02	Telephone Ext 3272 called 13233508807 at 12:01 PM for 2 m in(s)
1917 Telephone	2/2/2018	\$0.03	Telephone Ext 3152 called 12147494212# at 11:11 AM for 1 min(s)
1917 Telephone	2/6/2018	\$0.03	Telephone Ext 3278 called 17029386874 at 03:42 PM for 1 m in(s)
1917 Telephone	2/7/2018	\$0.17	Telephone Ext 3617 called 170282335000 at 03:07 PM for 5 min(s)
1917 Telephone	2/8/2018	\$0.03	Telephone Ext 3278 called 17756841600 at 10:06 AM for 1 m in(s)
1917 Telephone	2/9/2018	\$0.24	Telephone Ext 3653 called 19732718726 at 11:33 AM for 7 m in(s)
1917 Telephone	2/9/2018	\$0.17	Telephone Ext 3152 called 16572049037# at 03:10 PM for 5 min(s)
1917 Telephone	2/9/2018	\$0.41	Telephone Ext 3152 called 19143203626# at 11:44 AM for 12 min(s)
1917 Telephone	2/9/2018	\$0.10	Telephone Ext 3152 called 19197249271# at 03:16 PM for 3 min(s)
1917 Telephone	2/13/2018	\$0.07	Telephone Ext 3170 called 13104761854# at 04:07 PM for 7 min(s)
1917 Telephone	2/13/2018	\$0.03	Telephone Ext 3224 called 16264290932# at 06:28 PM for 3 min(s)
1917 Telephone	2/14/2018	\$0.37	Telephone Ext 3224 called 17029386856# at 05:08 PM for 11 min(s)
1917 Telephone	2/14/2018	\$0.03	Telephone Ext 3224 called 17029386856# at 04:37 PM for 1 min(s)
1917 Telephone	2/14/2018	\$0.05	Telephone Ext 3224 called 16269755724# at 03:07 PM for 5 min(s)
1917 Telephone	2/20/2018	\$0.17	Telephone Ext 3617 called 170282335000 at 10:30 AM for 5 min(s)

1917 Telephone	2/26/2018	\$0.03	Telephone Ext 3152 called 19199494400# at 10:17 AM for 1 min(s)
Total		\$887.10	

Exhibit 7

Summarize To	Work Date	Ref Amt	Narrative
1904 Express mail	7/31/2015	\$17.01	FEDERAL EXPRESS CORPORATION - Invoice No: 511285324 Paid to: Fedex per 000027 Ship To: C J Barnabi Ship Dt: 07/28/15 Airbill: 781054738750 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	8/14/2015	\$11.36	FEDERAL EXPRESS CORPORATION - Invoice No: 512727294 Paid to: Fedex per 000028 Ship To: CJ Barnabi Ship Dt: 08/05/15 Airbill: 781104742897 02686 00002 000028: Most cost efficient method of proof of delivery.
1904 Express mail	9/4/2015	\$20.90	FEDERAL EXPRESS CORPORATION - Invoice No: 514945576 Paid to: Fedex per 000027 Ship To: Edward Kane Ship Dt: 08/28/15 Airbill: 781239193097 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	9/11/2015	\$30.71	FEDERAL EXPRESS CORPORATION - Invoice No: 515628456 Paid to: Fedex per 099999 Ship To: Marshall Searcy Ship Dt: 09/04/15 Airbill: 781280126270 02686 00002 099999: Most cost efficient method of proof of delivery.
1904 Express mail	9/25/2015	\$15.22	FEDERAL EXPRESS CORPORATION - Invoice No: 517136910 Paid to: Fedex per 000027 Ship To: Edward Kane Ship Dt: 09/17/15 Airbill: 781351924611 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	10/2/2015	\$15.22	FEDERAL EXPRESS CORPORATION - Invoice No: 517841024 Paid to: Fedex per 000027 Ship To: Edward Kane Ship Dt: 09/29/15 Airbill: 781421526418 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	10/16/2015	\$11.17	FEDERAL EXPRESS CORPORATION - Invoice No: 519334064 Paid to: Fedex per 002116 Ship To: Mark G Krum Ship Dt: 10/12/15 Airbill: 781500405032 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	10/16/2015	\$11.17	FEDERAL EXPRESS CORPORATION - Invoice No: 519334064 Paid to: Fedex per 002116 Ship To: Lance Coburn Ship Dt: 10/12/15 Airbill: 781500222636 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	10/16/2015	\$25.04	FEDERAL EXPRESS CORPORATION - Invoice No: 519334064 Paid to: Fedex per 002116 Ship To: Bonita D Moore Ship Dt: 10/12/15 Airbill: 781500377039 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	10/16/2015	\$11.17	FEDERAL EXPRESS CORPORATION - Invoice No: 519334064 Paid to: Fedex per 002116 Ship To: Alexander Robertson Ship Dt: 10/12/15 Airbill: 781500348959 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	10/30/2015	\$15.09	FEDERAL EXPRESS CORPORATION - Invoice No: 520812637 Paid to: Fedex per 000027 Ship To: Edward Kane Ship Dt: 10/23/15 Airbill: 781576545310 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	3/25/2016	\$18.47	FEDERAL EXPRESS CORPORATION - Invoice No: 536412164 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 03/18/16 Airbill: 782629321343 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	4/1/2016	\$19.38	FEDERAL EXPRESS CORPORATION - Invoice No: 537114608 Paid to: Fedex per 003750 Ship To: David M Goldman Ship Dt: 03/22/16 Airbill: 782652708584 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	4/22/2016	\$18.83	FEDERAL EXPRESS CORPORATION - Invoice No: 539396958 Paid to: Fedex per 003750 Ship To: Tom Eidelman Ship Dt: 04/19/16 Airbill: 782873811484 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	4/29/2016	\$60.74	FEDERAL EXPRESS CORPORATION - Invoice No: 540142029 Paid to: Fedex per 000096 Ship To: Doug McEachern Ship Dt: 04/21/16 Airbill: 782891698608 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	4/29/2016	\$83.25	FEDERAL EXPRESS CORPORATION - Invoice No: 540142029 Paid to: Fedex per 000096 Ship To: Guy Adams Ship Dt: 04/22/16 Airbill: 782900993896 02686 00002 000096: Most cost efficient method of proof of delivery.

1904 Express mail	4/29/2016	\$66.55	FEDERAL EXPRESS CORPORATION - Invoice No: 540142029 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 04/20/16 Airbill: 782883265651 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	4/29/2016	\$67.25	FEDERAL EXPRESS CORPORATION - Invoice No: 540142029 Paid to: Fedex per 000096 Ship To: Guy Adams Ship Dt: 04/20/16 Airbill: 782883358940 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	4/29/2016	\$21.81	FEDERAL EXPRESS CORPORATION - Invoice No: 540142029 Paid to: Fedex per 003750 Ship To: Doug McEachern Ship Dt: 04/19/16 Airbill: 782872099131 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	5/6/2016	\$16.00	FEDERAL EXPRESS CORPORATION - Invoice No: 540888324 Paid to: Fedex per 000027 Ship To: Ekwon Rhow Ship Dt: 04/29/16 Airbill: 782953739062 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	5/13/2016	\$16.64	FEDERAL EXPRESS CORPORATION - Invoice No: 541653506 Paid to: Fedex per 003750 Ship To: Margaret Cotter Ship Dt: 05/04/16 Airbill: 782987750179 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	6/3/2016	\$18.38	FEDERAL EXPRESS CORPORATION - Invoice No: 543845026 Paid to: Fedex per 000096 Ship To: Professor Michael Klausner Ship Dt: 05/27/16 Airbill: 783228683441 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	6/10/2016	\$64.85	FEDERAL EXPRESS CORPORATION - Invoice No: 544580773 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 06/07/16 Airbill: 783304175401 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	6/17/2016	\$144.15	FEDERAL EXPRESS CORPORATION - Invoice No: 545322461 Paid to: Fedex per 000027 Ship To: HOTEL GUEST Marshall Searc Ship Dt: 06/13/16 Airbill: 783344247831 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	6/17/2016	\$35.35	FEDERAL EXPRESS CORPORATION - Invoice No: 545322461 Paid to: Fedex per 000028 Ship To: Chris Tayback (GUEST) Ship Dt: 06/10/16 Airbill: 783332071686 02686 00002 000028: Most cost efficient method of proof of delivery.
1904 Express mail	6/17/2016	\$121.18	FEDERAL EXPRESS CORPORATION - Invoice No: 545322461 Paid to: Fedex per 000027 Ship To: HOTEL GUEST Marshall Searcy Ship Dt: 06/14/16 Airbill: 783358064560 02686 00002 000027: Most cost efficient method of proof of delivery.
1904 Express mail	6/17/2016	\$118.93	FEDERAL EXPRESS CORPORATION - Invoice No: 545322461 Paid to: Fedex per 000096 Ship To: Megan Sheffield Ship Dt: 06/08/16 Airbill: 783313508204 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	6/17/2016	\$113.20	FEDERAL EXPRESS CORPORATION - Invoice No: 545322461 Paid to: Fedex per 000096 Ship To: Ellen Cotter Ship Dt: 06/08/16 Airbill: 783313243057 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	7/1/2016	\$17.74	FEDERAL EXPRESS CORPORATION - Invoice No: 546791941 Paid to: Fedex per 000096 Ship To: Professor Michael Klausner Ship Dt: 06/24/16 Airbill: 783441759876 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	7/13/2016	\$10.89	MARSHALL M. SEARCY III - Express mail Miscellaneous - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter Received FedEx 06/14/16
1904 Express mail	7/13/2016	\$10.89	MARSHALL M. SEARCY III - Express mail Miscellaneous - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter Received FedEx 06/14/16
1904 Express mail	9/23/2016	\$16.69	FEDERAL EXPRESS CORPORATION - Invoice No: 555547133 Paid to: Fedex per 000027 Ship To: Marshall Searcy Ship Dt: 09/15/16 Airbill: 795189382163 02686 00002 000027: Most cost efficient method of proof of delivery.

1904 Express mail	9/30/2016	\$99.40	FEDERAL EXPRESS CORPORATION - Invoice No: 556320060 Paid to: Fedex per 000096 Ship To: CJ Barnabi Ship Dt: 09/22/16 Airbill: 784161243818 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	10/7/2016	\$17.28	FEDERAL EXPRESS CORPORATION - Invoice No: 557003270 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 09/30/16 Airbill: 784229472989 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	10/21/2016	\$59.17	FEDERAL EXPRESS CORPORATION - Invoice No: 558610292 Paid to: Fedex per 000096 Ship To: ATTN Reception Ship Dt: 10/17/16 Airbill: 784375806502 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	10/21/2016	\$89.24	FEDERAL EXPRESS CORPORATION - Invoice No: 558610292 Paid to: Fedex per 000096 Ship To: Ashley Wall Ship Dt: 10/14/16 Airbill: 784358959583 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	10/21/2016	\$67.76	FEDERAL EXPRESS CORPORATION - Invoice No: 558610292 Paid to: Fedex per 000096 Ship To: ATTN Reception Ship Dt: 10/17/16 Airbill: 784375793884 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	10/21/2016	\$68.46	FEDERAL EXPRESS CORPORATION - Invoice No: 558610292 Paid to: Fedex per 002116 Ship To: Marshall Searcy, Esq Ship Dt: 10/18/16 Airbill: 784391372686 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	10/28/2016	\$114.30	FEDERAL EXPRESS CORPORATION - Invoice No: 559368733 Paid to: Fedex per 000096 Ship To: Kara B Hendricks Ship Dt: 10/25/16 Airbill: 784457684836 02686 00002 000096:
1904 Express mail	10/28/2016	\$120.07	FEDERAL EXPRESS CORPORATION - Invoice No: 559368733 Paid to: Fedex per 000096 Ship To: Kara B Hendricks Ship Dt: 10/25/16 Airbill: 784457680120 02686 00002 000096:
1904 Express mail	4/21/2017	\$21.51	FEDERAL EXPRESS CORPORATION - Invoice No: 577789874 Paid to: Fedex per 000096 Ship To: Doug McEachern Ship Dt: 04/17/17 Airbill: 786268157796 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	7/21/2017	\$20.93	FEDERAL EXPRESS CORPORATION - Invoice No: 587310209 Paid to: Fedex per 000027 Ship To: Ed Kane Ship Dt: 07/13/17 Airbill: 787181871594 02686 00002 000027 Decl/Ex 2: Most cost efficient method of proof of delivery.
1904 Express mail	10/27/2017	\$11.73	FEDERAL EXPRESS CORPORATION - Invoice No: 597559861 Paid to: Fedex per 002116 Ship To: C J Barnabi Ship Dt: 10/19/17 Airbill: 788143502710 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	12/8/2017	\$19.92	FEDERAL EXPRESS CORPORATION - Invoice No: 601945197 Paid to: Fedex per 000096 Ship To: Guy Adams Ship Dt: 11/30/17 Airbill: 788701010699 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/8/2017	\$22.88	FEDERAL EXPRESS CORPORATION - Invoice No: 601945197 Paid to: Fedex per 000096 Ship To: Ellen Cotter Ship Dt: 12/01/17 Airbill: 788723615544 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/8/2017	\$19.92	FEDERAL EXPRESS CORPORATION - Invoice No: 601945197 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 11/30/17 Airbill: 788699728972 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/8/2017	\$54.12	FEDERAL EXPRESS CORPORATION - Invoice No: 601945197 Paid to: Fedex per 000096 Ship To: Margaret Cotter Ship Dt: 11/30/17 Airbill: 788701127631 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/8/2017	\$20.78	FEDERAL EXPRESS CORPORATION - Invoice No: 601945197 Paid to: Fedex per 000096 Ship To: Doug McEachern Ship Dt: 11/30/17 Airbill: 788700022799 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/8/2017	\$19.18	FEDERAL EXPRESS CORPORATION - Invoice No: 601945197 Paid to: Fedex per 003750 Ship To: Attn CJ Barnabi Ship Dt: 11/29/17 Airbill: 788682414104 02686 00002 003750: Most cost efficient method of proof of delivery.

1904 Express mail	12/15/2017	\$23.34	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Margaret Cotter Ship Dt: 12/08/17 Airbill: 788837713820 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$18.84	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Guy Adams Ship Dt: 12/08/17 Airbill: 788837615359 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$60.92	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Sarah Gondek Ship Dt: 12/08/17 Airbill: 788837001768 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$14.80	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Ellen Cotter Ship Dt: 12/08/17 Airbill: 788837665136 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$35.64	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 12/08/17 Airbill: 788837551192 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$35.64	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Doug McEachern Ship Dt: 12/08/17 Airbill: 788837582684 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$63.89	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Sarah Gondek Ship Dt: 12/08/17 Airbill: 788837013691 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$32.64	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 003750 Ship To: Ellen Cotter Ship Dt: 12/08/17 Airbill: 788828403480 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$51.14	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 003750 Ship To: Margaret Cotter Ship Dt: 12/08/17 Airbill: 788828485620 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	12/15/2017	\$35.64	FEDERAL EXPRESS CORPORATION - Invoice No: 602640815 Paid to: Fedex per 000096 Ship To: Judy Coddling Ship Dt: 12/08/17 Airbill: 788837442276 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/22/2017	\$17.75	FEDERAL EXPRESS CORPORATION - Invoice No: 603460964 Paid to: Fedex per 006319 Ship To: Mr Ed Kane Ship Dt: 12/19/17 Airbill: 789040029095 02686 00002 006319: Most cost efficient method of proof of delivery.
1904 Express mail	12/22/2017	\$17.75	FEDERAL EXPRESS CORPORATION - Invoice No: 603460964 Paid to: Fedex per 006319 Ship To: Mr Douglas McEachern Ship Dt: 12/19/17 Airbill: 789036275189 02686 00002 006319: Most cost efficient method of proof of delivery.
1904 Express mail	12/22/2017	\$23.34	FEDERAL EXPRESS CORPORATION - Invoice No: 603460964 Paid to: Fedex per 000096 Ship To: Margaret Cotter Ship Dt: 12/15/17 Airbill: 788966348487 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/22/2017	\$15.84	FEDERAL EXPRESS CORPORATION - Invoice No: 603460964 Paid to: Fedex per 000028 Ship To: Ellen Cotter Ship Dt: 12/14/17 Airbill: 788936827641 02686 00002 000028: Most cost efficient method of proof of delivery.
1904 Express mail	12/22/2017	\$14.80	FEDERAL EXPRESS CORPORATION - Invoice No: 603460964 Paid to: Fedex per 000096 Ship To: Ellen Cotter Ship Dt: 12/15/17 Airbill: 788966358981 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/22/2017	\$38.14	FEDERAL EXPRESS CORPORATION - Invoice No: 603460964 Paid to: Fedex per 006319 Ship To: Douglas McEachern Ship Dt: 12/15/17 Airbill: 788965566430 02686 00002 006319: Most cost efficient method of proof of delivery.
1904 Express mail	12/29/2017	\$16.30	FEDERAL EXPRESS CORPORATION - Invoice No: 604136325 Paid to: Fedex per 006319 Ship To: Ms Sarah Gondek Ship Dt: 12/20/17 Airbill: 789064044346 02686 00002 006319: Most cost efficient method of proof of delivery.

1904 Express mail	12/29/2017	\$20.84	FEDERAL EXPRESS CORPORATION - Invoice No: 604136325 Paid to: Fedex per 000096 Ship To: Ellen Cotter Ship Dt: 12/21/17 Airbill: 789081325180 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	12/29/2017	\$36.75	FEDERAL EXPRESS CORPORATION - Invoice No: 604136325 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 12/22/17 Airbill: 789095224588 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	1/3/2018	\$12.13	NOAH HELPERN - Overnight Delivery - Noah Helpern - FedEx documents to LAO- Travel to Las Vegas for court trial. 01/03/18
1904 Express mail	1/5/2018	\$33.90	FEDERAL EXPRESS CORPORATION - Invoice No: 604802769 Paid to: Fedex per 002116 Ship To: Noah Helpern Ship Dt: 01/02/18 Airbill: 789186295020 02686 00002 002116: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$34.54	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 000028 Ship To: Chris Tayback of Quinn Emanuel Ship Dt: 01/04/18 Airbill: 789226612786 02686 00002 000028: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$30.30	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 003336 Ship To: David Armillei (GUEST) Ship Dt: 01/04/18 Airbill: 789217734241 02686 00002 003336: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$29.99	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 003750 Ship To: Lauren Lindsay Ship Dt: 01/03/18 Airbill: 789211528908 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$24.24	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 003750 Ship To: Lauren Lindsay Ship Dt: 01/04/18 Airbill: 789221835736 02686 00002 003750: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$35.33	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 003336 Ship To: David Armillei (GUEST) Ship Dt: 01/05/18 Airbill: 789241436700 02686 00002 003336: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$15.63	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 000028 Ship To: Christopher Tayback Ship Dt: 01/08/18 Airbill: 795406427131 02686 00002 000028: Most cost efficient method of proof of delivery.
1904 Express mail	1/12/2018	\$34.54	FEDERAL EXPRESS CORPORATION - Invoice No: 605518014 Paid to: Fedex per 000028 Ship To: Chris Tayback of Quinn Emanuel Ship Dt: 01/04/18 Airbill: 789220709214 02686 00002 000028: Most cost efficient method of proof of delivery.
1904 Express mail	1/19/2018	\$25.11	FEDERAL EXPRESS CORPORATION - Invoice No: 606123839 Paid to: Fedex per 005724 Ship To: Marco Perez Ship Dt: 01/10/18 Airbill: 795410074183 02686 00002 005724: Most cost efficient method of proof of delivery.
1904 Express mail	3/30/2018	\$26.26	FEDERAL EXPRESS CORPORATION - Invoice No: 613556989 Paid to: Fedex per 000096 Ship To: Michael Wrotniak Ship Dt: 03/27/18 Airbill: 780274413807 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	3/30/2018	\$20.11	FEDERAL EXPRESS CORPORATION - Invoice No: 613556989 Paid to: Fedex per 000096 Ship To: Doug McEachern Ship Dt: 03/27/18 Airbill: 780274467370 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	3/30/2018	\$20.11	FEDERAL EXPRESS CORPORATION - Invoice No: 613556989 Paid to: Fedex per 000096 Ship To: Judy Codding Ship Dt: 03/27/18 Airbill: 780274480929 02686 00002 000096: Most cost efficient method of proof of delivery.
1904 Express mail	4/20/2018	\$20.22	FEDERAL EXPRESS CORPORATION - Invoice No: 615768199 Paid to: Fedex per 000096 Ship To: Edward Kane Ship Dt: 04/17/18 Airbill: 780565220645 02686 00002 000096: Most cost efficient method of proof of delivery.

1904 Express mail	6/22/2018	\$26.73	FEDERAL EXPRESS CORPORATION - Invoice No: 622307431 Paid to: Fedex per 000096 Ship To: Kevin Johnson Ship Dt: 06/14/18 Airbill: 781431195808 02686 00002 000096: Most cost efficient method of proof of delivery.
1013 Postage	8/4/2015	\$0.50	Postage
1013 Postage	8/4/2015	\$0.48	Postage
1013 Postage	8/18/2015	\$0.48	Postage
1013 Postage	8/21/2015	\$1.64	Postage
1013 Postage	10/30/2015	\$2.84	Postage
1013 Postage	12/1/2015	\$2.52	Postage
1013 Postage	12/2/2015	\$0.48	Postage
1013 Postage	7/21/2016	\$0.47	Postage
1013 Postage	10/11/2016	\$1.99	Postage
1013 Postage	7/21/2017	\$0.46	Postage
1013 Postage	8/9/2017	\$0.46	Postage
Total		\$3,067.34	

Exhibit 8

Summarize To	Work Date	Ref Amt	Narrative
2010 Air travel	5/31/2016	\$115.00	UNITED AIRLINES - Air travel-#02686-00002/Airfare for Lauren Lindsay 4/22/16
2010 Air travel	6/2/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-06-02 Passenger: SEARCY/MARSHALL Tkt #: 8900676863286
2010 Air travel	6/10/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-06-10 Passenger: SEARCY/MARSHALL Tkt #: 8900677223375
2010 Air travel	6/13/2016	\$1,540.20	AMERICAN EXPRESS - Date: 2016-06-13 Itinerary: LAXJFKLAX Passenger: SEARCY/MARSHALL Tkt #: 0017836834675
2010 Air travel	6/14/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-06-14 Passenger: SEARCY/MARSHALL Tkt #: 8900677345737
2010 Air travel	10/15/2016	\$66.65	AMERICAN EXPRESS - Date: 2016-10-15 Itinerary: LAXJFK Passenger: SEARCY/MARSHALL Tkt #: 0014572052817
2010 Air travel	10/15/2016	\$66.65	AMERICAN EXPRESS - Date: 2016-10-15 Itinerary: JFKLAX Passenger: SEARCY/MARSHALL Tkt #: 0014572052818
2010 Air travel	10/16/2016	\$1,560.20	AMERICAN EXPRESS - Date: 2016-10-16 Itinerary: LAXJFKLAX Passenger: SEARCY/MARSHALL Tkt #: 0017869697965
2010 Air travel	10/17/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-10-17 Passenger: SEARCY/MARSHALL Tkt #: 8900696258044
2010 Air travel	10/18/2016	\$593.10	AMERICAN EXPRESS - Date: 2016-10-18 Itinerary: JFKPHL Passenger: SEARCY/MARSHALL Tkt #: 0067869697945
2010 Air travel	10/19/2016	\$616.10	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Boston/LAX Travel to Boston to take deposition of Duarte Silva 10/19/16
2010 Air travel	10/19/2016	\$671.10	AMERICAN EXPRESS - Date: 2016-10-19 Itinerary: PHLLGA Passenger: SEARCY/MARSHALL Tkt #: 0017869697947
2010 Air travel	10/20/2016	\$769.10	AMERICAN EXPRESS - Date: 2016-10-20 Itinerary: JFKLAS Passenger: SEARCY/MARSHALL Tkt #: 0067870821419
2010 Air travel	10/20/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-10-20 Passenger: SEARCY/MARSHALL Tkt #: 8900696464359
2010 Air travel	10/31/2016	\$370.96	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - La Guardia/Boston Fly to New York and train to Boston to prepare for and take depositions of Finnerty and Duarte Silva. 10/05/16
2010 Air travel	10/31/2016	\$780.10	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - LAX/JFK Fly to New York and train to Boston to prepare for and take depositions of Finnerty and Duarte Silva. 10/04/16
2010 Air travel	11/23/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-11-23 Passenger: SEARCY/MARSHALL Tkt #: 8900697762455
2010 Air travel	11/23/2016	\$36.00	AMERICAN EXPRESS - Date: 2016-11-23 Itinerary: BURSFO Passenger: SEARCY/M /ECONOMY P Tkt #: 0162921750962
2010 Air travel	11/23/2016	\$50.00	AMERICAN EXPRESS - Date: 2016-11-23 Passenger: SEARCY/MARSHALL Tkt #: 8900697762456
2010 Air travel	11/30/2016	\$575.97	AMERICAN EXPRESS - Date: 2016-11-30 Itinerary: SJCLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262466444685
2010 Air travel	12/1/2016	\$251.98	AMERICAN EXPRESS - Air travel Date: 2016-11-29 Itinerary: BURSFO Passenger: SEARCY/MARSHALL Tkt #: 5262467337468

Total		\$8,363.11	
-------	--	------------	--

Summarize To	Work Date	Ref Amt	Narrative
1918 Travel	5/1/2016	\$62.44	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - LaJolla to Hotel Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/01/16
1918 Travel	5/2/2016	\$19.09	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Hotel to Deposition Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/02/16
1918 Travel	5/3/2016	\$56.00	MARSHALL M. SEARCY III - Train - Marshall M. Searcy - San Diego to Union Square Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/03/16
1918 Travel	5/3/2016	\$17.25	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Deposition to Train Station Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/03/16
1918 Travel	6/15/2016	\$89.50	CHRISTOPHER TAYBACK - Train - Christopher Tayback - NY to Phl Travel to New York re conferences; deposition prep. 06/15/16
1918 Travel	6/28/2016	\$56.00	MARSHALL M. SEARCY III - Train - Marshall M. Searcy - San Diego to Los Angeles Travel to San Diego for Deposition of Ed Kane 06/10/16
1918 Travel	6/28/2016	\$71.79	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Ed Kane's prep to Hotel Travel to San Diego for Deposition of Ed Kane 06/08/16
1918 Travel	6/28/2016	\$19.46	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Hotel to Ed Kane Deposition Travel to San Diego for Deposition of Ed Kane 06/10/16
1918 Travel	6/28/2016	\$64.38	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - San Diego Train Station to Ed Kane for Prep Travel to San Diego for Deposition of Ed Kane 06/08/16
1918 Travel	6/28/2016	\$56.00	MARSHALL M. SEARCY III - Train - Marshall M. Searcy - San Diego to Los Angeles Travel to San Diego for Deposition of Ed Kane 06/10/16
1918 Travel	6/28/2016	\$42.98	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home to Union Station Travel to San Diego for Deposition of Ed Kane 06/08/16
1918 Travel	6/28/2016	\$56.00	MARSHALL M. SEARCY III - Train - Marshall M. Searcy - Los Angeles to San Diego Travel to San Diego for Deposition of Ed Kane 06/08/16
1918 Travel	7/18/2016	\$102.00	CHRISTOPHER TAYBACK - Travel Laundry - Christopher Tayback - Trip to New York re depos of E. and M. Cotter. Grant/Hyatt Hotel. 06/14/16
1918 Travel	8/31/2016	\$63.11	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Deposition to Home Travel to and from Deposition of Robert Mayes 8-18-16 08/18/16
1918 Travel	8/31/2016	\$70.23	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home to Deposition Travel to and from Deposition of Robert Mayes 8-18-16 08/18/16
1918 Travel	8/31/2016	\$64.33	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - From Home to Deposition Travel to Deposition of Tim Storey 08/03/16
1918 Travel	8/31/2016	\$62.26	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Deposition to Home Travel to Deposition of Tim Storey 08/03/16
1918 Travel	10/18/2016	\$8.50	CHRISTOPHER TAYBACK - Laundry - Christopher Tayback - Travel to Boston to take deposition of Duarte Silva, XV Beacon 10/18/16
1918 Travel	10/18/2016	\$32.00	CHRISTOPHER TAYBACK - Laundry - Christopher Tayback - Travel to Boston to take deposition of Duarte Silva, XV Beacon 10/18/16
1918 Travel	10/18/2016	\$362.00	MARSHALL M. SEARCY III - Train - Marshall M. Searcy - NYC to Philadelphia to NYC Travel to New York for Foster Prep and Depo 10/18/16
1918 Travel	10/18/2016	\$9.00	MARSHALL M. SEARCY III - Train - Marshall M. Searcy - NYC to Philadelphia to NYC Travel to New York for Foster Prep and Depo 10/18/16
1918 Travel	12/14/2016	\$35.77	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Deposition to Hotel Travel to San Francisco and Las Vegas for Deposition and Hearing 12/01/16
1918 Travel	12/14/2016	\$103.79	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Travel to San Jose Airport Travel to San Francisco and Las Vegas for Deposition and Hearing 11/30/16

1918 Travel	12/14/2016	\$129.14	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - SFO to Hotel for Deposition Travel to San Francisco and Las Vegas for Deposition and Hearing 11/29/16
1918 Travel	12/14/2016	\$18.21	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Hotel to meeting with Klauser depo prep Travel to San Francisco and Las Vegas for Deposition and Hearing 11/29/16
1918 Travel	12/14/2016	\$19.85	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Meeting with Klausner to Hotel Travel to San Francisco and Las Vegas for Deposition and Hearing 11/29/16
1918 Travel	3/1/2018	\$75.79	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home/Depo Uber 03/01/18
1918 Travel	3/1/2018	\$65.72	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Depo/Home Uber 03/01/18
1918 Travel	3/4/2018	\$140.15	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home/LAX Uber 03/04/18
1918 Travel	4/29/2018	\$71.48	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home>BUR Uber 04/29/18
1918 Travel	5/1/2018	\$81.28	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - BUR>Home Uber 05/01/18
1918 Travel	5/20/2018	\$74.14	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - BUR>Home Uber 05/20/18
1918 Travel	5/20/2018	\$43.98	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home>BUR Uber 05/20/18
1918 Travel	7/13/2016	\$59.95	MARSHALL M. SEARCY III - Travel-Internet Internet - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/13/16
1992 Out-of-Town Travel	5/1/2016	\$16.80	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Train to Hotel Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/01/16
1992 Out-of-Town Travel	5/2/2016	\$13.90	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel to Deposition Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/02/16
1992 Out-of-Town Travel	5/3/2016	\$32.81	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Train Station to Home Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/03/16
1992 Out-of-Town Travel	5/5/2016	\$102.50	LAUREN LAIOLO - Taxi - Lauren Laiolo - Newark Airport to Gansvoort Hotel, NY Cab from Newark Airport to Gansvoort Hotel for Cotter deposition. 05/05/16
1992 Out-of-Town Travel	5/5/2016	\$19.04	LAUREN LAIOLO - Taxi - Lauren Laiolo - Ogden Dr. Los Angeles / LAX Home to LAX for Cotter depo in NY. 05/05/16
1992 Out-of-Town Travel	5/6/2016	\$9.95	LAUREN LAIOLO - Taxi - Lauren Laiolo - NYO / Gansvoort Hotel Taxi cab from NYO to Hotel - for Cotter deposition 05/06/16
1992 Out-of-Town Travel	5/6/2016	\$14.76	LAUREN LAIOLO - Taxi - Lauren Laiolo - Hotel / NYO Taxi cab from Hotel to NYO - for Cotter deposition 05/06/16
1992 Out-of-Town Travel	5/8/2016	\$33.26	LAUREN LAIOLO - Taxi - Lauren Laiolo - St. Louis Airport / Sheraton Hotel Cab from St. Louis Airport to Sheraton Hotel for Cotter deposition. 05/08/16
1992 Out-of-Town Travel	5/8/2016	\$109.56	LAUREN LAIOLO - Taxi - Lauren Laiolo - Gansvoort hotel NY / Newark airport Taxi cab from Hotel to Newark Airport - for Cotter deposition 05/08/16
1992 Out-of-Town Travel	5/9/2016	\$17.56	LAUREN LAIOLO - Taxi - Lauren Laiolo - Clayton, MO / St. Louis airport Uber cab from Depo location in Clayton, MO to St. Louis airport - for Cotter deposition 05/09/16
1992 Out-of-Town Travel	5/9/2016	\$53.22	LAUREN LAIOLO - Taxi - Lauren Laiolo - LAX / Gardena, CA Taxi cab from LAX to Gardena, CA - for Cotter deposition 05/09/16
1992 Out-of-Town Travel	6/13/2016	\$11.40	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - hotel/meeting Travel to New York re conferences; deposition prep. 06/13/16
1992 Out-of-Town Travel	6/28/2016	\$42.18	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Ed Kane Depo Prep Travel to San Diego for Deposition of Ed Kane 06/07/16
1992 Out-of-Town Travel	6/28/2016	\$23.81	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Ed Kane Deposition to San Diego Train Station Travel to San Diego for Deposition of Ed Kane 06/10/16
1992 Out-of-Town Travel	7/13/2016	\$72.89	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - JFK to Hotel Travel to New York for the deposition of Margaret Cotter 06/13/16
1992 Out-of-Town Travel	7/13/2016	\$75.84	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hotel to JFK Travel to New York for the deposition of Margaret Cotter 06/16/16
1992 Out-of-Town Travel	7/13/2016	\$102.69	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - LAX to Home Travel to New York for the deposition of Margaret Cotter 06/16/16

1992 Out-of-Town Travel	10/17/2016	\$28.63	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - airport to hotel Travel to Boston to take deposition of Duarte Silva, taxi 10/17/16
1992 Out-of-Town Travel	10/17/2016	\$44.79	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - airport/hotel Travel to Boston to take deposition of Duarte Silva, taxi 10/17/16
1992 Out-of-Town Travel	10/17/2016	\$72.92	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - from depo to airport Travel to Boston to take deposition of Duarte Silva, taxi 10/17/16
1992 Out-of-Town Travel	10/17/2016	\$97.44	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home to LAX Travel to New York for Foster Prep and Depo 10/17/16
1992 Out-of-Town Travel	10/20/2016	\$90.00	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - NYC to JFK Travel to New York for Foster Prep and Depo 10/20/16
1992 Out-of-Town Travel	10/21/2016	\$45.97	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel to Hearing Travel to New York for Foster Prep and Depo 10/21/16
1992 Out-of-Town Travel	10/21/2016	\$98.56	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAX to Home Travel to New York for Foster Prep and Depo 10/21/16
1992 Out-of-Town Travel	12/14/2016	\$43.98	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hotel to Hearing Travel to San Francisco and Las Vegas for Deposition and Hearing 12/01/16
1992 Out-of-Town Travel	12/14/2016	\$59.73	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to San Francisco and Las Vegas for Deposition and Hearing 11/30/16
1992 Out-of-Town Travel	12/14/2016	\$48.44	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to San Francisco and Las Vegas for Deposition and Hearing 12/01/16
1992 Out-of-Town Travel	4/19/2018	\$36.23	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - San Diego, CA Uber 04/19/18
1992 Out-of-Town Travel	4/19/2018	\$33.32	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - San Diego, CA Uber 04/19/18
1992 Out-of-Town Travel	4/19/2018	\$29.55	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - San Diego, CA Uber 04/19/18
1909 Local business travel	2/12/2016	\$11.22	LAUREN LAIOLO - Mileage - Lauren Laiolo - 6260 W. 3rd St. 90036 / 1453 Third Street Promenade 90401 Round trip mileage for Cotter deposition. 02/12/16
1909 Local business travel	2/26/2016	\$127.50	NOAH HELPERN - Mileage - Noah Helpern - LA/San Diego Travel to and from San Diego for document collection. 02/26/16
1909 Local business travel	4/30/2016	\$59.93	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Century City Car Service for Deposition Preparation for Edward Kane 04/30/16
1909 Local business travel	5/5/2016	\$94.61	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Depo Prep to Home Deposition Prep and Deposition of Douglas McEachern 05/05/16
1909 Local business travel	5/5/2016	\$105.69	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Depo Prep Deposition Prep and Deposition of Douglas McEachern 05/05/16
1909 Local business travel	5/6/2016	\$135.67	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Deposition to Home Deposition Prep and Deposition of Douglas McEachern 05/06/16
1909 Local business travel	5/6/2016	\$128.87	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Deposition Deposition Prep and Deposition of Douglas McEachern 05/06/16
1909 Local business travel	5/12/2016	\$70.74	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Deposition to Home Prepare for and take deposition of Margaret Cotter 05/12/16
1909 Local business travel	5/12/2016	\$71.62	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Deposition Prepare for and take deposition of Margaret Cotter 05/12/16
1909 Local business travel	5/13/2016	\$68.03	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Deposition to Home Prepare for and take deposition of Margaret Cotter 05/13/16
1909 Local business travel	5/13/2016	\$60.72	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Deposition Prepare for and take deposition of Margaret Cotter 05/13/16
1909 Local business travel	5/18/2016	\$145.15	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Deposition to Home Prepare and Deposition of Ellen Cotter 05/18/16
1909 Local business travel	5/18/2016	\$99.76	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Deposition Prepare and Deposition of Ellen Cotter 05/18/16

1909 Local business travel	5/19/2016	\$138.91	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Deposition to Home Prepare and Deposition of Ellen Cotter 05/19/16
1909 Local business travel	5/19/2016	\$121.22	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home to Deposition Prepare and Deposition of Ellen Cotter 05/19/16
1909 Local business travel	5/23/2016	\$21.84	NOAH HELPERN - Car Service - Noah Helpen - LAO/Union Station Uber - for depo prep with Douglas McEachern. 05/23/16
1909 Local business travel	6/28/2016	\$18.91	MARSHALL M. SEARCY III - Local business travel Car Service - Marshall M. Searcy - Hotel to Ed Kane Deposition Travel to San Diego for Deposition of Ed Kane 06/09/16
1909 Local business travel	7/13/2016	\$66.00	MARSHALL M. SEARCY III - Local business travel Car Service - Marshall M. Searcy - Home to Deposition Travel to and from Deposition of Guy Adams (Postponed due to witness illness) 06/30/16
1909 Local business travel	7/13/2016	\$61.27	MARSHALL M. SEARCY III - Local business travel Car Service - Marshall M. Searcy - Deposition to Home Travel to and from Deposition of Guy Adams (Postponed due to witness illness) 06/30/16
1909 Local business travel	7/13/2016	\$131.76	MARSHALL M. SEARCY III - Local business travel Car Service - Marshall M. Searcy - Home to LAX Travel to New York for the deposition of Margaret Cotter 06/13/16
1909 Local business travel	7/13/2016	\$58.88	MARSHALL M. SEARCY III - Local business travel Car Service - Marshall M. Searcy - Home to Deposition Travel to and from deposition of Doug McEachern 07/07/16
1909 Local business travel	7/13/2016	\$71.09	MARSHALL M. SEARCY III - Local business travel Car Service - Marshall M. Searcy - Deposition to Home Travel to and from deposition of Doug McEachern 07/07/16
1909 Local business travel	8/18/2016	\$10.76	Lauren Lindsay - Taxi - Lauren Lindsay - 384 S. Ogden Dr. Los Angeles / 1900 Ave. of the Stars Los Angeles Lyft ride for deposition re: Cotter v. Reading International 08/18/16
1909 Local business travel	8/18/2016	\$5.04	Lauren Lindsay - Taxi - Lauren Lindsay - 1937 S. Ave. of the Stars Los Angeles / 328 S. Grenesee Ave. Los Angeles Lyft ride for deposition re: Cotter v. Reading International 08/18/16
1909 Local business travel	8/24/2016	\$16.06	Lauren Lindsay - Taxi - Lauren Lindsay - 6100 Center Dr. Los Angeles / 399 S. Genesee Ave. Los Angeles Uber ride for witness meeting re: Cotter v. Reading International 08/24/16
1909 Local business travel	8/24/2016	\$26.52	Lauren Lindsay - Taxi - Lauren Lindsay - 390 S. Ogden Dr. Los Angeles / 6801 Park Terrace Dr. Los Angeles Uber ride for witness meeting re: Cotter v. Reading International 08/24/16
1909 Local business travel	12/14/2016	\$45.90	NOAH HELPERN - Local business travel Mileage - Noah Helpen - LA/Irvine Travel for Nagy deposition. 11/29/16
1909 Local business travel	3/1/2017	\$69.64	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - LAO/Depo Uber 03/01/17
		\$5,828.61	

Summarize To	Work Date	Ref Amt	Narrative
1929 Parking	4/29/2016	\$64.00	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Deposition of Guy Adams 04/29/16
1929 Parking	5/1/2016	\$47.00	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Travel to New York re meeting 04/05/16
1929 Parking	5/1/2016	\$16.00	MARSHALL M. SEARCY III - Parking - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/01/16
1929 Parking	6/8/2016	\$34.00	NOAH HELPERN - Parking - Noah Helpen - AMPCo parking- Gould depo in LA, CA. 06/08/16
1929 Parking	6/18/2016	\$90.00	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Travel to New York re conferences; deposition prep. LAX parking. 06/18/16
1929 Parking	6/29/2016	\$34.00	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Parking at Deposition of William Gould 06/29/16
1929 Parking	7/18/2016	\$3.00	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Trip to New York re depositions of E. and M. Cotter. Grant/Hyatt Hotel. Valet delivery charge. 06/14/16
1929 Parking	10/19/2016	\$90.00	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Travel to Boston to take deposition of Duarte Silva, taxi 10/19/16
1929 Parking	10/24/2016	\$42.00	NOAH HELPERN - Parking - Noah Helpen - Wells Fargo parking for Roll depo. 10/24/16
1929 Parking	10/26/2016	\$21.60	NOAH HELPERN - Parking - Noah Helpen - ABM - parking for Roll depo. 10/26/16
1929 Parking	10/31/2016	\$34.80	NOAH HELPERN - Parking - Noah Helpen - ABM - parking for Storey depo. 08/03/16
1929 Parking	11/15/2016	\$41.00	NOAH HELPERN - Parking - Noah Helpen - BofA Bldg Parking for Strombom depo prep. 11/15/16
1929 Parking	11/16/2016	\$34.80	NOAH HELPERN - Parking - Noah Helpen - ABM Parking for Strombom depo prep. 11/16/16
1929 Parking	11/17/2016	\$34.80	NOAH HELPERN - Parking - Noah Helpen - ABM Parking for Osborne depo. 11/17/16
1929 Parking	6/5/2017	\$15.00	NOAH HELPERN - Parking - Noah Helpen - Parking - prepare and attend deposition. 06/05/17
1929 Parking	6/8/2017	\$15.00	NOAH HELPERN - Parking - Noah Helpen - Parking - prepare and attend deposition. 06/08/17
1929 Parking	10/17/2017	\$35.60	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Parking for depo 10/17/17
1929 Parking	10/18/2017	\$35.60	CHRISTOPHER TAYBACK - Parking - Christopher Tayback - Parking for depo 10/18/17
1929 Parking	4/5/2018	\$36.40	NOAH HELPERN - Parking - Noah Helpen - Parking for W. Gould deposition. 04/05/18
		\$724.60	

Summarize To	Work Date	Ref Amt	Narrative
1928 Hotel	5/1/2016	\$201.49	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/01/16
1928 Hotel	5/2/2016	\$203.09	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/02/16
1928 Hotel	5/5/2016	\$1,097.19	LAUREN LAIOLO - Lodging - Lauren Laiolo - Hotel accommodations for Cotter deposition in New York. 05/05/16
1928 Hotel	6/28/2016	\$309.02	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to San Diego for Deposition of Ed Kane 06/09/16
1928 Hotel	6/28/2016	\$271.99	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to San Diego for Deposition of Ed Kane 06/08/16
1928 Hotel	7/13/2016	\$662.16	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/16/16
1928 Hotel	7/13/2016	\$662.16	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/15/16
1928 Hotel	7/13/2016	\$662.16	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/14/16
1928 Hotel	7/18/2016	\$1,900.77	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Trip to New York re depos of E. and M. Cotter. Grant/Hyatt Hotel. 06/14/16
1928 Hotel	10/16/2016	\$311.04	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/16/16
1928 Hotel	10/17/2016	\$535.94	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/17/16
1928 Hotel	10/18/2016	\$1,288.70	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Travel to Boston to take deposition of Duarte Silva, XV Beacon 10/18/16
1928 Hotel	10/18/2016	\$472.40	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/18/16
1928 Hotel	10/19/2016	\$643.21	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/19/16
1928 Hotel	10/20/2016	\$197.68	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/20/16
1928 Hotel	10/31/2016	\$571.51	CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Fly to New York and train to Boston to prepare for and take depositions of Finnerty and Duarte Silva. 10/17/16
1928 Hotel	12/14/2016	\$770.78	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to San Francisco for Deposition 11/30/16
		\$10,761.29	

Summarize To	Work Date	Ref Amt	Narrative
2056 Local meals	4/28/2016	\$11.45	CHRISTOPHER TAYBACK - Lunch - Christopher Tayback - Deposition of Guy Adams, Piknic 04/28/16
2056 Local meals	4/29/2016	\$22.78	CHRISTOPHER TAYBACK - Lunch - Christopher Tayback - Deposition of Guy Adams, Piknic 04/29/16
2056 Local meals	5/10/2016	\$6 95	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Prepare for and take deposition of Margaret Cotter 05/10/16
2056 Local meals	5/10/2016	\$37.26	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Prepare for and take deposition of Margaret Cotter 05/10/16
2056 Local meals	5/16/2016	\$87.20	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Prepare and Deposition of Ellen Cotter 05/16/16
2056 Local meals	5/16/2016	\$11.25	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Prepare and Deposition of Ellen Cotter 05/16/16
2056 Local meals	5/17/2016	\$152.60	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Prepare and Deposition of Ellen Cotter 05/17/16
2056 Local meals	5/18/2016	\$80.10	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Prepare and Deposition of Ellen Cotter 05/18/16
2056 Local meals	5/23/2016	\$59 35	NOAH HELPERN - Lunch - Noah Helpern - Mendocino Farms - lunch for depo prep with Douglas McEachern. 05/23/16
2056 Local meals	6/8/2016	\$34 33	NOAH HELPERN - Lunch - Noah Helpern - Hinoki the Bird - Gould depo in LA, CA. 06/08/16
2056 Local meals	7/13/2016	\$81.48	MARSHALL M. SEARCY III - Local meals Lunch - Marshall M. Searcy - Lunch for Deposition of James Cotter 07/06/16
2056 Local meals	7/13/2016	\$22 91	MARSHALL M. SEARCY III - Local meals Lunch - Marshall M. Searcy - Lunch for Deposition of Bill Ellis 06/28/16
2056 Local meals	11/28/2016	\$53.13	ARAMARK - Local meals/#02686-00002/Megan Janczewski 10/17/16; depo - Chris Tayback
2056 Local meals	12/14/2016	\$68 35	NOAH HELPERN - Local meals Lunch - Noah Helpern - Case Nostra re Spitz deposition. 12/07/16
2056 Local meals	7/11/2017	\$88.40	Shawna Allison - Local meals Do Not Pay From This Vendor ID - Lunch - Shawna Allison - Deposition of Cotter Jr. 07/11/17 Marshall M. Searcy, Lauren Lindsay
1019 Meals during travel	5/1/2016	\$99 92	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/01/16
1019 Meals during travel	5/1/2016	\$17 00	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/01/16
1019 Meals during travel	5/2/2016	\$34 51	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/02/16
1019 Meals during travel	5/2/2016	\$45.41	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Travel to San Diego for Deposition Prep and Deposition of Edward Kane 05/02/16 Kane Edward
1019 Meals during travel	5/5/2016	\$30 00	LAUREN LAIOLO - Dinner - Lauren Laiolo - Travel meal dinner - for Cotter deposition in New York. 05/05/16
1019 Meals during travel	5/5/2016	\$11 25	LAUREN LAIOLO - Breakfast - Lauren Laiolo - Travel - Bottled water/coffee for Cotter deposition in New York. 05/05/16
1019 Meals during travel	5/6/2016	\$10.47	LAUREN LAIOLO - Lunch - Lauren Laiolo - Travel meal Lunch - for Cotter deposition in New York. 05/06/16
1019 Meals during travel	5/6/2016	\$24 90	LAUREN LAIOLO - Breakfast - Lauren Laiolo - Travel meal breakfast - for Cotter deposition in New York. 05/06/16
1019 Meals during travel	5/8/2016	\$3.95	LAUREN LAIOLO - Breakfast - Lauren Laiolo - Travel meal coffee - at airport for Cotter deposition in New York. 05/08/16
1019 Meals during travel	5/9/2016	\$4.07	LAUREN LAIOLO - Lunch - Lauren Laiolo - Travel meal coffee at airport for Cotter deposition in New York. 05/09/16
1019 Meals during travel	6/28/2016	\$95 33	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to San Diego for Deposition of Ed Kane 06/09/16
1019 Meals during travel	7/13/2016	\$161.20	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/14/16
1019 Meals during travel	7/13/2016	\$14.15	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/14/16
1019 Meals during travel	7/13/2016	\$56.73	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/15/16
1019 Meals during travel	7/13/2016	\$44.20	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/13/16
1019 Meals during travel	7/13/2016	\$14.16	MARSHALL M. SEARCY III - Meals during travel Meals Other - Marshall M. Searcy - Travel to New York for the deposition of Margaret Cotter 06/13/16
1019 Meals during travel	10/16/2016	\$4.36	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/16/16
1019 Meals during travel	10/17/2016	\$165.00	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/17/16
1019 Meals during travel	10/18/2016	\$120.52	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/18/16
1019 Meals during travel	10/18/2016	\$16.24	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/18/16

1019 Meals during travel	10/18/2016	\$4.32	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/18/16
1019 Meals during travel	10/18/2016	\$11.80	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/18/16
1019 Meals during travel	10/19/2016	\$32.00	CHRISTOPHER TAYBACK - Dinner - Christopher Tayback - Travel to Boston to take deposition of Duarte Silva, XV Beacon, Moo Restaurant 10/19/16
1019 Meals during travel	10/19/2016	\$172.62	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/19/16
1019 Meals during travel	10/19/2016	\$35.00	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/19/16
1019 Meals during travel	10/21/2016	\$16.56	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/21/16
1019 Meals during travel	10/21/2016	\$18.38	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/21/16
1019 Meals during travel	10/21/2016	\$49.48	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/21/16
1019 Meals during travel	10/21/2016	\$25.23	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/21/16
1019 Meals during travel	10/21/2016	\$19.03	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Travel to New York for Foster Prep and Depo 10/21/16
1019 Meals during travel	10/26/2016	\$86.54	NOAH HELPERN - Lunch - Noah Helpen - Water Grill - lunch with R. Roll and N. Helpen for depo prep. 10/26/16
1019 Meals during travel	10/27/2016	\$25.63	NOAH HELPERN - Lunch - Noah Helpen - Le Phol - lunch during Roll depo. 10/27/16
1019 Meals during travel	12/14/2016	\$14.00	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to San Francisco and Las Vegas for Deposition and Hearing 11/30/16
1019 Meals during travel	12/14/2016	\$8 93	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to San Francisco and Las Vegas for Deposition and Hearing 12/01/16
1019 Meals during travel	12/14/2016	\$77.60	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to San Francisco and Las Vegas for Deposition and Hearing 11/30/16
1019 Meals during travel	12/14/2016	\$12.34	MARSHALL M. SEARCY III - Meals during travel Lunch - Marshall M. Searcy - Travel to San Francisco and Las Vegas for Deposition and Hearing 12/01/16
1019 Meals during travel	12/14/2016	\$9 22	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to San Francisco and Las Vegas for Deposition and Hearing 11/29/16
1019 Meals during travel	6/8/2017	\$23.98	NOAH HELPERN - Lunch - Noah Helpen - Frankland's Crab & Co. - prepare and attend deposition. 06/08/17
		\$2,433.57	

Exhibit 9

Summarize To	Work Date	Ref Amt	Narrative
1908 Online Research	6/30/2015	\$420.00	Online Research - Off Contract
1908 Online Research	8/31/2015	\$35.00	Online Research - Off Contract
1908 Online Research	9/30/2015	\$35.00	Online Research - Off Contract
1908 Online Research	2/29/2016	\$132.00	Online Research - Off Contract
1908 Online Research	4/30/2016	\$57.00	Online Research - Off Contract
1908 Online Research	5/31/2016	\$57.00	Online Research - Off Contract
1908 Online Research	6/30/2016	\$4.00	Online Research - Off Contract
1908 Online Research	6/30/2016	\$4.00	Online Research - Off Contract
1908 Online Research	10/31/2016	\$48.00	Online Research - Off Contract
1908 Online Research	12/31/2016	\$202.00	Online Research - Off Contract
1908 Online Research	4/30/2018	\$53.00	Online Research - Off Contract
1908 Online Research	11/30/2015	\$49.00	Online Research - Off Contract
1908 Online Research	10/31/2016	\$59.00	Online Research - Off Contract
1908 Online Research	12/31/2017	\$69.00	Online Research - Off Contract
1908 Online Research	6/30/2015	\$5,322.00	Online Research
1908 Online Research	6/30/2015	\$66.00	Online Research
		\$6,612.00	

Exhibit 10

Summarize To	Work Date	Amount	Invoice Number	Narrative
1019 Meals during travel	8/10/2015	20.69	101-0000033591	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Trip to Las Vegas for Hearing 08/10/15
1019 Meals during travel	8/10/2015	10.00	101-0000033591	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Trip to Las Vegas for Hearing 08/10/15
1019 Meals during travel	9/10/2015	9.72	101-0000034469	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Trip to Las Vegas for 9/10/15 Hearing 09/10/15
1019 Meals during travel	10/29/2015	4.68	101-0000036075	CHRISTOPHER TAYBACK - Breakfast - Christopher Tayback - Travel to Las Vegas for hearing 10/29/15
1019 Meals during travel	10/29/2015	4.68	101-0000036075	CHRISTOPHER TAYBACK - Breakfast - Christopher Tayback - Hearing in Las Vegas, Mandarin Oriental 10/29/15
1019 Meals during travel	12/1/2015	37.16	101-0000038935	CHRISTOPHER TAYBACK - Meals during travel Dinner - Christopher Tayback - Travel to Las Vegas for hearing, Mandarin Oriental dinner 10/29/15
1019 Meals during travel	12/21/2015	62.02	101-0000037551	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for 12/22/15 Hearing 12/21/15
1019 Meals during travel	1/28/2016	170.84	101-0000038935	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for 3/19/16 Hearing 01/28/16
1019 Meals during travel	3/2/2016	116.52	101-0000041134	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for 3/3/16 Hearing 03/02/16
1019 Meals during travel	4/13/2016	13.42	101-0000042785	MARSHALL M. SEARCY III - Meals Other - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/13/16
1019 Meals during travel	4/13/2016	68.07	101-0000042785	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/13/16
1019 Meals during travel	4/14/2016	11.99	101-0000042785	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/14/16
1019 Meals during travel	4/14/2016	7.02	101-0000042785	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/14/16
1019 Meals during travel	4/18/2016	92.46	101-0000043419	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/18/16
1019 Meals during travel	7/13/2016	75.00	101-0000046064	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to Las Vegas for 6/21/16 Hearing. 06/20/16
1019 Meals during travel	7/18/2016	10.00	101-0000046064	CHRISTOPHER TAYBACK - Meals during travel Meals Other - Christopher Tayback - Trip to Las Vegas for motion to compel hearing and status conference. Coffee. 05/05/16
1019 Meals during travel	8/31/2016	17.29	101-0000047704	MARSHALL M. SEARCY III - Meals during travel Lunch - Marshall M. Searcy - Travel to and from Las Vegas for 8-9-16 Hearing 08/09/16
1019 Meals during travel	8/31/2016	11.03	101-0000047704	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to and from Las Vegas for 8-9-16 Hearing 08/09/16
1019 Meals during travel	8/31/2016	113.28	101-0000047704	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to and from Las Vegas for 8-9-16 Hearing 08/08/16
1019 Meals during travel	8/31/2016	128.42	101-0000047704	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to Las Vegas for 8-12-16 Hearing 08/30/16
1019 Meals during travel	8/31/2016	51.23	101-0000047704	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to and from Las Vegas for Hearing 07/27/16
1019 Meals during travel	8/31/2016	35.96	101-0000047704	MARSHALL M. SEARCY III - Meals during travel Meals Other - Marshall M. Searcy - Travel to and from Las Vegas for Hearing 07/27/16
1019 Meals during travel	9/7/2016	181.84	101-0000049182	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for Hearing 9/8/16 09/07/16
1019 Meals during travel	9/7/2016	127.88	101-0000049182	MARSHALL M. SEARCY III - Meals during travel Dinner - Marshall M. Searcy - Travel to Las Vegas for 8/30/16 Hearing 08/29/16
1019 Meals during travel	9/8/2016	13.23	101-0000049182	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to Las Vegas for Hearing 9/8/16 09/08/16
1019 Meals during travel	10/26/2016	45.87	101-0000051437	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for 10/27 Hearing 10/26/16
1019 Meals during travel	10/27/2016	8.00	101-0000051437	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to Las Vegas for 10/27 Hearing 10/27/16
1019 Meals during travel	12/14/2016	16.80	101-0000052666	MARSHALL M. SEARCY III - Meals during travel Breakfast - Marshall M. Searcy - Travel to Las Vegas for Hearing 12/08/16
1019 Meals during travel	12/14/2016	26.46	101-0000052666	MARSHALL M. SEARCY III - Meals during travel Lunch - Marshall M. Searcy - Travel to Las Vegas for Hearing 12/08/16
1019 Meals during travel	12/21/2016	105.71	101-0000054328	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Travel to Las Vegas for 12-22-16 Hearing 12/21/16
1019 Meals during travel	12/22/2016	17.67	101-0000054328	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Travel to Las Vegas for 12-22-16 Hearing 12/22/16
1019 Meals during travel	2/26/2017	75.00	101-0000055126	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Jaleo 02/26/17
1019 Meals during travel	2/27/2017	11.89	101-0000055126	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Cadillac Bar - Las Vegas 02/27/17
1019 Meals during travel	6/4/2017	34.30	101-0000060146	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Pizza Rock 06/04/17
1019 Meals during travel	7/9/2017	119.72	101-0000061027	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Chart House 07/09/17
1019 Meals during travel	7/10/2017	12.04	101-0000061027	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 07/10/17
1019 Meals during travel	7/23/2017	109.03	101-0000061027	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Vic & Anthony's 07/23/17
1019 Meals during travel	8/28/2017	18.08	101-0000062159	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Meals 08/28/17
1019 Meals during travel	11/19/2017	32.46	101-0000066432	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Vic & Anthony's 11/19/17

1019 Meals during travel	11/19/2017	25.57	101-0000066432	CHRISTOPHER TAYBACK - Dinner - Christopher Tayback - Trip to Las Vegas for hearing (Mandarin Bar Dining) 11/19/17
1019 Meals during travel	11/20/2017	11.01	101-0000066432	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 11/20/17
1019 Meals during travel	12/10/2017	68.16	101-0000067177	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Cadillac Bar 12/10/17
1019 Meals during travel	12/17/2017	11.64	101-0000068416	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 12/17/17
1019 Meals during travel	12/17/2017	4.00	101-0000068416	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 12/17/17
1019 Meals during travel	12/27/2017	116.06	101-0000068416	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Chart House 12/27/17
1019 Meals during travel	12/27/2017	48.20	101-0000068416	YLLLEN CRUZ - Dinner - Yllen Cruz - Trial 12/27/17
1019 Meals during travel	12/27/2017	44.31	101-0000068416	YLLLEN CRUZ - Lunch - Yllen Cruz - Trial 12/27/17 Marco Perez
1019 Meals during travel	12/27/2017	45.01	101-0000068416	Marco Perez - Dinner - Marco Perez - meal during trial prep 12/27/17
1019 Meals during travel	12/28/2017	24.63	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 12/28/17 Yllen Cruz
1019 Meals during travel	12/28/2017	50.58	101-0000068416	Marco Perez - Dinner - Marco Perez - travel meal 12/28/17
1019 Meals during travel	12/28/2017	5.60	101-0000068416	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 12/28/17
1019 Meals during travel	12/28/2017	15.07	101-0000068416	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - The Grille 12/28/17
1019 Meals during travel	12/28/2017	27.56	101-0000068416	YLLLEN CRUZ - Lunch - Yllen Cruz - Trial 12/28/17
1019 Meals during travel	12/28/2017	175.47	101-0000068416	YLLLEN CRUZ - Dinner - Yllen Cruz - Trial 12/28/17 Chris Grant, Marco Perez
1019 Meals during travel	12/28/2017	33.10	101-0000068416	Marco Perez - Lunch - Marco Perez - meal during trial prep 12/28/17
1019 Meals during travel	12/29/2017	38.67	101-0000068416	Marco Perez - Lunch - Marco Perez - travel meal 12/29/17 Chris Grant
1019 Meals during travel	12/29/2017	13.26	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 12/29/17
1019 Meals during travel	12/29/2017	43.27	101-0000068416	Marco Perez - Dinner - Marco Perez - travel meal 12/29/17
1019 Meals during travel	12/29/2017	33.68	101-0000068416	YLLLEN CRUZ - Lunch - Yllen Cruz - Trial 12/29/17
1019 Meals during travel	12/29/2017	9.20	101-0000068416	Marco Perez - Breakfast - Marco Perez - meal during trial prep 12/29/17
1019 Meals during travel	12/30/2017	17.94	101-0000068416	YLLLEN CRUZ - Lunch - Yllen Cruz - Trial 12/30/17
1019 Meals during travel	1/2/2018	43.36	101-0000068416	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Ti Amo Casino 01/02/18
1019 Meals during travel	1/2/2018	12.78	101-0000068416	NOAH HELPERN - Breakfast - Noah Helpen - Breakfast - Travel to Las Vegas for court trial. 01/02/18
1019 Meals during travel	1/2/2018	58.71	101-0000068416	NOAH HELPERN - Dinner - Noah Helpen - Dinner- Travel to Las Vegas for court trial. 01/02/18
1019 Meals during travel	1/2/2018	13.70	101-0000068416	Marco Perez - Breakfast - Marco Perez - meal during trial prep 01/02/18
1019 Meals during travel	1/2/2018	13.52	101-0000068416	Marco Perez - Lunch - Marco Perez - meal during trial prep 01/02/18
1019 Meals during travel	1/3/2018	84.53	101-0000068416	Marco Perez - Dinner - Marco Perez - travel meal 01/03/18 Chris Grant, Ali Moghaddas, Noah Helpen
1019 Meals during travel	1/3/2018	48.42	101-0000068416	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - El Charro 01/03/18
1019 Meals during travel	1/3/2018	48.17	101-0000068416	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Chart House 01/03/18
1019 Meals during travel	1/3/2018	20.00	101-0000068416	MARSHALL M. SEARCY III - Lunch - Marshall M. Searcy - Chart House 01/03/18
1019 Meals during travel	1/3/2018	11.31	101-0000068416	NOAH HELPERN - Breakfast - Noah Helpen - Starbucks - Travel to Las Vegas for court trial. 01/03/18
1019 Meals during travel	1/3/2018	17.19	101-0000068416	NOAH HELPERN - Lunch - Noah Helpen - Lunch - Travel to Las Vegas for court trial. 01/03/18
1019 Meals during travel	1/3/2018	9.29	101-0000068416	Ali Moghaddas - Meals Other - Ali Moghaddas - Travel to Las Vegas for trial [Starbucks Coffee] 01/03/18
1019 Meals during travel	1/3/2018	11.64	101-0000068416	Marco Perez - Breakfast - Marco Perez - meal during trial prep 01/03/18
1019 Meals during travel	1/3/2018	15.16	101-0000068416	Marco Perez - Lunch - Marco Perez - meal during trial prep 01/03/18
1019 Meals during travel	1/4/2018	5.92	101-0000068416	MARIO GUTIERREZ - Breakfast - Mario Gutierrez - Trial 01/04/18
1019 Meals during travel	1/4/2018	15.44	101-0000068416	Lauren Lindsay - Breakfast - Lauren Lindsay - Travel meal at Burbank airport for Cotter trial. 01/04/18
1019 Meals during travel	1/4/2018	71.39	101-0000068416	Marco Perez - Lunch - Marco Perez - travel meal 01/04/18 Mike Lyons, Marshall M. Searcy, Mario Gutierrez, Ali Moghaddas
1019 Meals during travel	1/4/2018	81.82	101-0000068416	Marco Perez - Dinner - Marco Perez - travel meal 01/04/18
1019 Meals during travel	1/4/2018	5.90	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 01/04/18
1019 Meals during travel	1/4/2018	41.44	101-0000068416	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Reno Tahoe Tap 01/04/18
1019 Meals during travel	1/4/2018	8.34	101-0000068416	NOAH HELPERN - Breakfast - Noah Helpen - Starbucks - Travel to Las Vegas for court trial. 01/04/18
1019 Meals during travel	1/4/2018	76.55	101-0000068416	Ali Moghaddas - Lunch - Ali Moghaddas - Travel to Las Vegas for trial [Claim Jumper] 01/04/18 Christopher Tayback, Noah Helpen
1019 Meals during travel	1/4/2018	177.45	101-0000068416	Ali Moghaddas - Dinner - Ali Moghaddas - Travel to Las Vegas for trial [Chart House] 01/04/18 Lauren Lindsay, Noah Helpen, David Armillei
1019 Meals during travel	1/4/2018	5.30	101-0000068416	Ali Moghaddas - Breakfast - Ali Moghaddas - Travel to Las Vegas for trial [Starbucks] 01/04/18
1019 Meals during travel	1/4/2018	11.63	101-0000068416	David Armillei - Lunch - David Armillei - Travel meal. 01/04/18

1019 Meals during travel	1/4/2018	6.46	101-0000068416	David Armillei - Meals Other - David Armillei - Travel drink. 01/04/18
1019 Meals during travel	1/5/2018	114.40	101-0000068416	Ali Moghaddas - Lunch - Ali Moghaddas - Travel to Las Vegas for trial [Green and Proteins] 01/05/18 Mike Lyons, Christopher Tayback, Marshall M. Searcy, Noah Helpern, Lauren Lindsay, David Armillei, Mario Gutierrez
1019 Meals during travel	1/5/2018	15.97	101-0000068416	David Armillei - Lunch - David Armillei - Travel meal. 01/05/18
1019 Meals during travel	1/6/2018	1,519.18	101-0000070080	CHRISTOPHER TAYBACK - Meals Other - Christopher Tayback - Trip to Las Vegas re trial prep and trial, Renaissance Catering, meals for team during trial and trial prep 01/06/18
1019 Meals during travel	1/6/2018	29.35	101-0000070080	CHRISTOPHER TAYBACK - Dinner - Christopher Tayback - Trip to Las Vegas re trial prep and trial 01/06/18
1019 Meals during travel	1/6/2018	6.71	101-0000068416	Lauren Lindsay - Breakfast - Lauren Lindsay - Travel meal beverage starbucks for Cotter trial. 01/06/18
1019 Meals during travel	1/6/2018	7.58	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 01/06/18
1019 Meals during travel	1/6/2018	12.37	101-0000068416	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 01/06/18
1019 Meals during travel	1/6/2018	115.00	101-0000068416	Ali Moghaddas - Lunch - Ali Moghaddas - Travel to Las Vegas for trial [The Goodwich] 01/06/18 Chris Grant, Mike Lyons, Lauren Lindsay, Noah Helpern, David Armillei, Mario Gutierrez, Christopher Tayback, Marco Perez, Mabel Tsui
1019 Meals during travel	1/6/2018	156.81	101-0000068416	Ali Moghaddas - Dinner - Ali Moghaddas - Travel to Las Vegas for trial [Le Thai LLC] 01/06/18 Mike Lyons, Chris Grant, Lauren Lindsay, Noah Helpern, David Armillei, Mario Gutierrez, Mabel Tsui, Marco Perez
1019 Meals during travel	1/6/2018	15.69	101-0000068416	David Armillei - Breakfast - David Armillei - Travel meal. 01/06/18
1019 Meals during travel	1/7/2018	100.65	101-0000070080	CHRISTOPHER TAYBACK - Dinner - Christopher Tayback - Trip to Las Vegas re trial prep and trial, Grotto Italian Restaurant 01/07/18
1019 Meals during travel	1/7/2018	5.85	101-0000068416	MARIO GUTIERREZ - Meals Other - Mario Gutierrez - Trial 01/07/18
1019 Meals during travel	1/7/2018	9.74	101-0000068416	Lauren Lindsay - Breakfast - Lauren Lindsay - Travel meal beverage starbucks for Cotter trial. 01/07/18
1019 Meals during travel	1/7/2018	22.46	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 01/07/18 Chris Grant
1019 Meals during travel	1/7/2018	56.80	101-0000068416	Marco Perez - Lunch - Marco Perez - travel meal 01/07/18 Mike Lyons, Mario Gutierrez
1019 Meals during travel	1/7/2018	144.08	101-0000068416	NOAH HELPERN - Dinner - Noah Helpern - Travel to Las Vegas for court trial - dinner w/Ali Moghaddas, Lauren Lindsay, Mabel Tsui, and Noah Helpern. 01/07/18
1019 Meals during travel	1/7/2018	12.90	101-0000068416	David Armillei - Lunch - David Armillei - Travel meal. 01/07/18
1019 Meals during travel	1/7/2018	15.60	101-0000068416	David Armillei - Breakfast - David Armillei - Travel meal. 01/07/18
1019 Meals during travel	1/8/2018	445.57	101-0000070080	CHRISTOPHER TAYBACK - Dinner - Christopher Tayback - Trip to Las Vegas re trial prep and trial, Pizza Rock, team dinner 01/08/18
1019 Meals during travel	1/8/2018	69.36	101-0000068416	Marco Perez - Meals Other - Marco Perez - coffee for team and client at office space. 01/08/18
1019 Meals during travel	1/8/2018	12.34	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 01/08/18
1019 Meals during travel	1/8/2018	2.65	101-0000068416	David Armillei - Meals Other - David Armillei - Travel drink. 01/08/18
1019 Meals during travel	1/8/2018	5.36	101-0000068416	David Armillei - Breakfast - David Armillei - Travel meal. 01/08/18
1019 Meals during travel	1/9/2018	26.30	101-0000070080	NOAH HELPERN - Lunch - Noah Helpern - Tequileria - travel to Las Vegas for court trial. 01/09/18
1019 Meals during travel	1/9/2018	14.99	101-0000068416	MARIO GUTIERREZ - Lunch - Mario Gutierrez - Trial 01/09/18
1019 Meals during travel	1/9/2018	16.52	101-0000068416	MARIO GUTIERREZ - Lunch - Mario Gutierrez - Trial 01/09/18
1019 Meals during travel	1/9/2018	8.00	101-0000068416	Lauren Lindsay - Lunch - Lauren Lindsay - Travel meal beverage starbucks for Cotter trial. 01/09/18
1019 Meals during travel	1/9/2018	9.74	101-0000068416	Lauren Lindsay - Lunch - Lauren Lindsay - Travel meal beverage starbucks for Cotter trial. 01/09/18
1019 Meals during travel	1/9/2018	22.46	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal while at trial 01/09/18 Chris Grant
1019 Meals during travel	1/9/2018	283.69	101-0000068416	Marco Perez - Dinner - Marco Perez - travel meal 01/09/18 Chris Grant, Mario Gutierrez
1019 Meals during travel	1/9/2018	5.60	101-0000068416	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 01/09/18
1019 Meals during travel	1/9/2018	3.34	101-0000068416	David Armillei - Meals Other - David Armillei - Travel drink. 01/09/18
1019 Meals during travel	1/9/2018	13.95	101-0000068416	David Armillei - Lunch - David Armillei - Travel meal. 01/09/18
1019 Meals during travel	1/9/2018	13.71	101-0000068416	David Armillei - Breakfast - David Armillei - Travel meal. 01/09/18
1019 Meals during travel	1/9/2018	12.85	101-0000068416	David Armillei - Meals Other - David Armillei - Travel meal. 01/09/18
1019 Meals during travel	1/10/2018	6.24	101-0000068416	MARIO GUTIERREZ - Breakfast - Mario Gutierrez - Trial 01/10/18
1019 Meals during travel	1/10/2018	10.23	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 01/10/18
1019 Meals during travel	1/10/2018	10.66	101-0000068416	Marco Perez - Lunch - Marco Perez - travel meal 01/10/18
1019 Meals during travel	1/10/2018	133.66	101-0000068416	Marco Perez - Dinner - Marco Perez - travel meal 01/10/18 Chris Grant
1019 Meals during travel	1/11/2018	9.20	101-0000068416	Marco Perez - Breakfast - Marco Perez - travel meal 01/11/18
1019 Meals during travel	1/11/2018	23.20	101-0000068416	Marco Perez - Lunch - Marco Perez - travel meal 01/11/18
1019 Meals during travel	4/29/2018	82.28	101-0000073740	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Golden Nugget - Chart House 04/29/18
1019 Meals during travel	4/30/2018	5.60	101-0000073740	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - Starbucks 04/30/18

1019 Meals during travel	4/30/2018	30.00	101-0000073740	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - Golden Nugget - Chart House 04/30/18
1019 Meals during travel	5/1/2018	145.17	101-0000073740	MARSHALL M. SEARCY III - Dinner - Marshall M. Searcy - The Golden Nugget Hotel - Vic & Anthony's 05/01/18
1019 Meals during travel	5/2/2018	12.64	101-0000073740	MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - The Golden Nugget Hotel - Starbucks 05/02/18
1019 Meals during travel	5/20/2018	47.23		MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - BUR Airport 05/20/18
1019 Meals during travel	5/21/2018	5.60		MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - The Golden Nugget Hotel Starbucks 05/21/18
1019 Meals during travel	5/22/2018	36.58		MARSHALL M. SEARCY III - Breakfast - Marshall M. Searcy - The Golden Nugget Hotel 05/22/18
1909 Local business travel	8/9/2015	77.59	101-0000033591	MARSHALL M. SEARCY III - Mileage - Marshall M. Searcy - Lake Havasu to Hotel Trip to Las Vegas for Hearing 08/09/15
1909 Local business travel	8/11/2015	139.55	101-0000033591	MARSHALL M. SEARCY III - Mileage - Marshall M. Searcy - Hotel to Home Trip to Las Vegas for Hearing 08/11/15
1909 Local business travel	9/9/2015	4.87	101-0000036075	MARSHALL M. SEARCY III - Mileage - Marshall M. Searcy - Home to Burbank Airport Trip to Las Vegas for 9/10/15 Hearing 09/09/15
1909 Local business travel	9/10/2015	4.87	101-0000036075	MARSHALL M. SEARCY III - Mileage - Marshall M. Searcy - Burbank Airport to Home Trip to Las Vegas for 9/10/15 Hearing 09/10/15
1909 Local business travel	9/10/2015	60.00	101-0000033591	CHRISTOPHER TAYBACK - Car Service - Christopher Tayback - hotel/courthouse Trip to Las Vegas for court hearing, transportation 09/10/15
1909 Local business travel	1/4/2018	124.95	101-0000068416	MARIO GUTIERREZ - Mileage - Mario Gutierrez - Los Angeles to Las Vegas Trial 01/04/18
1909 Local business travel	1/10/2018	124.95	101-0000068416	MARIO GUTIERREZ - Mileage - Mario Gutierrez - Las Vegas to Los Angeles Trial 01/10/18
1909 Local business travel	4/26/2018	21.30	101-0000073740	MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Las Vegas Uber 04/26/18
1909 Local business travel	4/30/2018	25.42	101-0000073740	CHRISTOPHER TAYBACK - Car Service - Christopher Tayback - GT office/airport Travel to Las Vegas for hearing. 04/30/18
1918 Travel	3/8/2016	55.15	101-0000042785	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - LAX/home Trip to Las Vegas for court hearing, Uber 03/08/16
1918 Travel	4/13/2016	68.43	101-0000042785	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home to Airport Travel to Las Vegas for Hearing 04/13/16
1918 Travel	4/18/2016	54.13	101-0000043419	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home to Airport Travel to Las Vegas for Hearing 04/18/16
1918 Travel	6/28/2016	110.57	101-0000044897	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Burbank Airport Travel to Las Vegas for Hearing 5/27 05/26/16
1918 Travel	10/7/2016	25.00	101-0000051437	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Travel to Las Vegas for hearing re motions for summary judgment 10/07/16
1918 Travel	10/7/2016	25.00	101-0000051437	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Travel to Las Vegas for hearing re motions for summary judgment 10/07/16
1918 Travel	10/10/2016	49.65	101-0000050242	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - court/airport Trip to Las Vegas for hearing. Trip from court to airport. 10/10/16
1918 Travel	10/21/2016	25.00	101-0000051437	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Travel to Las Vegas for hearing re motions for summary judgment 10/21/16
1918 Travel	10/26/2016	18.00	101-0000051437	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Travel to Las Vegas for hearing re motions for summary judgment 10/26/16
1918 Travel	12/14/2016	49.65	101-0000052666	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Hearing to LAS Travel to Las Vegas for Hearing 12/08/16
1918 Travel	12/14/2016	109.75	101-0000052666	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home to LAX Travel to Las Vegas for Hearing 12/08/16
1918 Travel	12/14/2016	59.95	101-0000052666	MARSHALL M. SEARCY III - Change Ticket / Cancellation Fee - Marshall M. Searcy - Travel to Las Vegas for Hearing 12/08/16
1918 Travel	12/14/2016	56.69	101-0000052666	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home to Burbank Airport Travel to Las Vegas for Cotter Hearing 11/29/16
1918 Travel	7/23/2017	54.38	101-0000061027	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home/BUR Uber Black 07/23/17
1918 Travel	8/28/2017	17.50	101-0000062159	MARSHALL M. SEARCY III - Business Center Charges - Marshall M. Searcy - Golden Nugget 08/28/17
1918 Travel	9/18/2017	35.00	101-0000064804	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Trip to Las Vegas for hearing and status conference. 09/18/17

1918 Travel	11/20/2017	25.00	101-0000066432	CHRISTOPHER TAYBACK - Travel Miscellaneous - Christopher Tayback - Trip to Las Vegas for hearing Taxi/Car Hire 11/20/17
1918 Travel	11/28/2017	76.26	101-0000066432	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Las Vegas Uber 11/28/17
1918 Travel	12/1/2017	139.37	101-0000068416	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - airport/home Fly to Las Vegas for trial 01/09/18
1918 Travel	12/1/2017	14.99	101-0000068416	CHRISTOPHER TAYBACK - Other related Travel expense - Christopher Tayback - Conference with RDI counsel; attend court hearing airflight insurance premium 12/08/17
1918 Travel	12/1/2017	23.51	101-0000068416	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - courthouse/hotel Conference with RDI counsel; attend court hearing 12/11/17
1918 Travel	12/1/2017	35.00	101-0000068416	CHRISTOPHER TAYBACK - Travel Change Ticket / Cancellation Fee - Christopher Tayback - Conference with RDI counsel; attend court hearing 11/20/17
1918 Travel	12/1/2017	35.00	101-0000068416	CHRISTOPHER TAYBACK - Travel Change Ticket / Cancellation Fee - Christopher Tayback - Conference with RDI counsel; attend court hearing 12/11/17
1918 Travel	12/1/2017	92.88	101-0000068416	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - home/airport Fly to Las Vegas for trial 01/04/18
1918 Travel	12/10/2017	68.78	101-0000067177	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home>BUR Uber 12/10/17
1918 Travel	12/11/2017	47.24	101-0000067177	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Las Vegas Uber 12/11/17
1918 Travel	12/11/2017	45.74	101-0000067177	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Las Vegas Uber 12/11/17
1918 Travel	12/15/2017	2,888.51	101-0000067177	CHRISTOPHER GRANT - Travel-#02686-00002/Travel expenses for 12/05/17-12/14/17
1918 Travel	12/17/2017	63.96	101-0000068416	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home>BUR Uber 12/17/17
1918 Travel	12/27/2017	64.19	101-0000068416	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home>BUR Uber 12/27/17
1918 Travel	12/28/2017	71.87	101-0000068416	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Las Vegas Uber 12/28/17
1918 Travel	12/30/2017	20.00	101-0000068416	YLLEN CRUZ - Tips - Yllen Cruz - Trial 12/30/17
1918 Travel	1/2/2018	26.53	101-0000068416	NOAH HELPERN - Travel Car Service - Noah Helpern - home / airport Uber from home to airport for travel to Las Vegas for trial 01/02/18
1918 Travel	1/3/2018	25.00	101-0000070080	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Trip to Las Vegas re trial prep and trial, change order 01/03/18
1918 Travel	1/3/2018	25.00	101-0000068416	Ali Moghaddas - Baggage Fee - Ali Moghaddas - Travel to Las Vegas for Trial [American Airlines] 01/03/18
1918 Travel	1/3/2018	525.47	101-0000068416	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Hotel>RNO BSL Limo 01/03/18
1918 Travel	1/3/2018	40.56	101-0000068416	Ali Moghaddas - Change Ticket / Cancellation Fee - Ali Moghaddas - Travel to Las Vegas for trial [American Airlines] 01/03/18
1918 Travel	1/4/2018	35.89	101-0000070080	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - hotel/meetings Trip to Las Vegas re trial prep and trial 01/04/18
1918 Travel	1/4/2018	53.71	101-0000070080	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - meetings/hotel Trip to Las Vegas re trial prep and trial 01/04/18
1918 Travel	1/4/2018	92.88	101-0000070080	CHRISTOPHER TAYBACK - Travel Car Service - Christopher Tayback - airport/hotel Trip to Las Vegas re trial prep and trial 01/04/18
1918 Travel	1/4/2018	75.00	101-0000068416	Lauren Lindsay - Baggage Fee - Lauren Lindsay - Baggage fee for SW Flight from Burbank to Las Vegas for Cotter trial. 01/04/18
1918 Travel	1/5/2018	50.50	101-0000070080	CHRISTOPHER TAYBACK - Laundry - Christopher Tayback - Trip to Las Vegas re trial prep and trial, in Las Vegas Jan 4-10, 2018 01/05/18
1918 Travel	1/5/2018	23.00	101-0000068416	MARSHALL M. SEARCY III - Laundry - Marshall M. Searcy - Golden Nugget 01/05/18
1918 Travel	1/7/2018	55.50	101-0000070080	CHRISTOPHER TAYBACK - Laundry - Christopher Tayback - Trip to Las Vegas re trial prep and trial 01/07/18
1918 Travel	1/9/2018	53.85	101-0000068416	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Las Vegas Uber 01/09/18
1918 Travel	1/9/2018	5.00	101-0000068416	David Armillei - Business Center Charges - David Armillei - Package handling fee 01/09/18
1918 Travel	1/12/2018	22.00	101-0000070080	CHRISTOPHER TAYBACK - Change Ticket / Cancellation Fee - Christopher Tayback - Trip to Las Vegas re court hearings 01/12/18
1918 Travel	1/17/2018	836.49	101-0000068416	CHRISTOPHER GRANT - Travel-#02686-00002/Travel expenses 12/28/16-1/11/17
1918 Travel	3/4/2018	140.15	101-0000071051	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home>LAX Uber 03/04/18
1918 Travel	4/29/2018	71.48	101-0000073740	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - Home>BUR Uber 04/29/18
1918 Travel	5/1/2018	81.28	101-0000073740	MARSHALL M. SEARCY III - Travel Car Service - Marshall M. Searcy - BUR>Home Uber 05/01/18
1918 Travel	5/20/2018	74.14		MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - BUR>Home Uber 05/20/18
1918 Travel	5/20/2018	43.98		MARSHALL M. SEARCY III - Car Service - Marshall M. Searcy - Home>BUR Uber 05/20/18

1918 Travel	6/19/2018	48.54		CHRISTOPHER TAYBACK - Car Service - Christopher Tayback - hotel/court Travel to Las Vegas for argument on summary judgment and related motions 06/19/18
1918 Travel	6/19/2018	50.01		CHRISTOPHER TAYBACK - Car Service - Christopher Tayback - court/airport Travel to Las Vegas for argument on summary judgment and related motions 06/19/18
1928 Hotel	7/14/2015	113.12	101-0000031773	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for hearing. 07/14/15
1928 Hotel	8/10/2015	278.88	101-0000033591	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Trip to Las Vegas for Hearing 08/10/15
1928 Hotel	8/31/2015	112.11	101-0000033591	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Trip to Las Vegas for 9-1-15 Hearing 08/31/15
1928 Hotel	9/9/2015	132.27	101-0000034469	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Trip to Las Vegas for 9/10/15 Hearing 09/09/15
1928 Hotel	10/28/2015	153.44	101-0000036075	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Trip to Las Vegas to attend 10/29/15 hearing. 10/28/15
1928 Hotel	10/29/2015	307.47	101-0000036075	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Travel to Las Vegas for hearing 10/29/15
1928 Hotel	12/21/2015	118.72	101-0000037551	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for 12/22/15 Hearing 12/21/15
1928 Hotel	1/1/2016	474.93	101-0000040001	CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Trip to Las Vegas for hearing 12/22/15
1928 Hotel	1/28/2016	148.96	101-0000038935	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for 3/19/16 Hearing 01/28/16
1928 Hotel	2/17/2016	440.26	101-0000040001	NOAH HELPERN - Lodging - Noah Helpern - Mandarin Oriental Hotel Las Vegas - Travel for motion to compel hearing in court. 02/17/16
1928 Hotel	2/18/2016	499.20	101-0000041134	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Travel to Las Vegas for hearing, Mandarin Oriental 02/18/16
1928 Hotel	3/1/2016	499.20	101-0000042785	CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Trip to Las Vegas for court hearing, Mandarin Oriental 02/18/16
1928 Hotel	3/3/2016	122.08	101-0000041134	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for 3/3/16 Hearing 03/03/16
1928 Hotel	3/16/2016	688.85	101-0000042785	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for Hearing 03/16/16
1928 Hotel	4/13/2016	118.72	101-0000042785	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/13/16
1928 Hotel	4/18/2016	229.60	101-0000043419	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for Hearing 04/18/16
1928 Hotel	5/5/2016	148.96	101-0000043419	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Travel to Las Vegas for hearing/meeting, Golden Nugget, coffee 05/05/16
1928 Hotel	7/13/2016	430.08	101-0000046064	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to Las Vegas for 6/21/16 Hearing. 06/20/16
1928 Hotel	7/18/2016	118.72	101-0000046064	CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Trip to Las Vegas re preliminary injunction hearing. 05/26/16
1928 Hotel	7/18/2016	148.96	101-0000046064	CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Trip to Las Vegas for motion to compel hearing and status conference. Coffee. 05/05/16
1928 Hotel	8/31/2016	127.68	101-0000047704	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to and from Las Vegas for 8-9-16 Hearing 08/09/16
1928 Hotel	8/31/2016	127.68	101-0000047704	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to Las Vegas for 8-12-16 Hearing 08/30/16
1928 Hotel	8/31/2016	183.68	101-0000047704	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to and from Las Vegas for Hearing 07/27/16
1928 Hotel	9/7/2016	119.28	101-0000049182	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to Las Vegas for 8/30/16 Hearing 08/30/16
1928 Hotel	9/8/2016	141.68	101-0000049182	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for Hearing 9/8/16 09/08/16
1928 Hotel	9/15/2016	175.28	101-0000050242	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for Hearing 09/15/16
1928 Hotel	10/27/2016	304.20	101-0000051437	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for 10/27 Hearing 10/27/16
1928 Hotel	10/27/2016	290.22	101-0000051437	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Trip to Las Vegas for hearing 10/27/16
1928 Hotel	12/14/2016	141.68	101-0000052666	MARSHALL M. SEARCY III - Hotel Lodging - Marshall M. Searcy - Travel to Las Vegas for Cotter Hearing 12/01/16
1928 Hotel	12/21/2016	155.68	101-0000054328	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Travel to Las Vegas for 12-22-16 Hearing 12/21/16
1928 Hotel	2/27/2017	232.32	101-0000055126	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget Hotel - Las Vegas 02/27/17
1928 Hotel	3/15/2017	536.06	101-0000056295	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Mandarin Hotel 03/15/17
1928 Hotel	6/4/2017	244.65	101-0000060146	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget Hotel 06/04/17
1928 Hotel	7/10/2017	165.55	101-0000061027	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Chart House 07/10/17
1928 Hotel	7/24/2017	165.55	101-0000061027	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget 07/24/17
1928 Hotel	8/28/2017	131.65	101-0000062159	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Golden Nugget 08/28/17
1928 Hotel	10/1/2017	324.19	101-0000066432	CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Trip to Las Vegas for hearing and status conference. 09/18/17
1928 Hotel	11/19/2017	120.35	101-0000066432	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Golden Nugget Hotel 11/19/17

1928 Hotel	11/20/2017	342.69	101-0000070080	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Conference with RDI counsel; attend court hearing, Mandarin Oriental 11/20/17
1928 Hotel	11/20/2017	292.12	101-0000066432	CHRISTOPHER TAYBACK - Lodging - Christopher Tayback - Trip to Las Vegas for hearing 11/20/17
1928 Hotel	12/11/2017	233.24	101-0000067177	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Golden Nugget Hotel 12/11/17
1928 Hotel	12/17/2017	120.35	101-0000068416	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget 12/17/17
1928 Hotel	12/28/2017	145.21	101-0000068416	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget Hotel 12/28/17
1928 Hotel	4/30/2018	167.81	101-0000073740	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Golden Nugget 04/30/18
1928 Hotel	5/1/2018	33.34		CHRISTOPHER TAYBACK - Hotel Lodging - Christopher Tayback - Flight to Las Vegas for court hearing, mandatory resort fee 04/30/18
1928 Hotel	5/2/2018	122.61	101-0000073740	MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget Hotel - Starbucks 05/02/18
1928 Hotel	5/21/2018	430.95		MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - The Golden Nugget Hotel 05/21/18
1928 Hotel	6/19/2018	313.02		MARSHALL M. SEARCY III - Lodging - Marshall M. Searcy - Golden Nugget 06/19/18
1992 Out-of-Town Travel	7/13/2015	54.85	101-0000031773	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home to Burbank Airport Travel to Las Vegas for hearing. 07/13/15
1992 Out-of-Town Travel	7/13/2015	20.00	101-0000031773	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Airport to Hotel Travel to Las Vegas for hearing. 07/13/15
1992 Out-of-Town Travel	7/14/2015	40.00	101-0000031773	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Airport Travel to Las Vegas for hearing. 07/14/15
1992 Out-of-Town Travel	7/14/2015	88.61	101-0000031773	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAX to home Travel to Las Vegas for hearing. 07/14/15
1992 Out-of-Town Travel	8/10/2015	32.06	101-0000033591	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel to Hearing Trip to Las Vegas for Hearing 08/10/15
1992 Out-of-Town Travel	8/10/2015	35.28	101-0000033591	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Hotel Trip to Las Vegas for Hearing 08/10/15
1992 Out-of-Town Travel	8/31/2015	58.87	101-0000033591	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home to Burbank Airport Trip to Las Vegas for 9-1-15 Hearing 08/31/15
1992 Out-of-Town Travel	8/31/2015	59.44	101-0000033591	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Trip to Las Vegas for 9-1-15 Hearing 08/31/15
1992 Out-of-Town Travel	9/1/2015	40.77	101-0000033591	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Trip to Las Vegas for 9-1-15 Hearing 09/01/15
1992 Out-of-Town Travel	9/1/2015	40.00	101-0000033591	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Trip to Las Vegas for 9-1-15 Hearing 09/01/15
1992 Out-of-Town Travel	9/9/2015	54.42	101-0000034469	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Trip to Las Vegas for 9/10/15 Hearing 09/09/15
1992 Out-of-Town Travel	9/10/2015	45.47	101-0000036075	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Courthouse to Las Vegas Airport Trip to Las Vegas for 9/10/15 Hearing 09/10/15
1992 Out-of-Town Travel	9/10/2015	50.00	101-0000033591	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - courthouse/airport Trip to Las Vegas for court hearing 09/10/15
1992 Out-of-Town Travel	10/28/2015	55.01	101-0000036075	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Trip to Las Vegas to attend 10/29/15 hearing. 10/28/15
1992 Out-of-Town Travel	10/28/2015	54.37	101-0000036075	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home to Burbank Airport Trip to Las Vegas to attend 10/29/15 hearing. 10/28/15
1992 Out-of-Town Travel	10/29/2015	41.11	101-0000036075	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Trip to Las Vegas to attend 10/29/15 hearing. 10/29/15
1992 Out-of-Town Travel	10/29/2015	51.13	101-0000036075	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - From Hearing to Las Vegas Airport Trip to Las Vegas to attend 10/29/15 hearing. 10/29/15
1992 Out-of-Town Travel	12/1/2015	35.19	101-0000038935	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - airport/hotel Travel to Las Vegas for hearing, taxi 10/29/15
1992 Out-of-Town Travel	12/1/2015	50.15	101-0000038935	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - hotel/courthouse Travel to Las Vegas for hearing, taxi 10/29/15
1992 Out-of-Town Travel	12/1/2015	23.86	101-0000038935	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - hotel/airport Travel to Las Vegas for hearing, taxi 10/29/15
1992 Out-of-Town Travel	12/21/2015	53.71	101-0000037551	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for 12/22/15 Hearing 12/21/15
1992 Out-of-Town Travel	12/28/2015	60.67	101-0000037551	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - home to Burbank Airport Travel to Las Vegas for 12/22/15 Hearing 12/28/15

1992 Out-of-Town Travel	1/1/2016	34.27	101-0000040001	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - courthouse/airport Trip to Las Vegas for hearing, taxi 12/22/15
1992 Out-of-Town Travel	1/1/2016	61.49	101-0000040001	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - Home/LAX Trip to Las Vegas for hearing, Uber to the airport 12/21/15
1992 Out-of-Town Travel	1/18/2016	36.57	101-0000040001	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home to Burbank Airport Travel to Las Vegas for 1/19 Hearing 01/18/16
1992 Out-of-Town Travel	1/18/2016	33.20	101-0000040001	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas travel Travel to Las Vegas for 1/19 Hearing 01/18/16
1992 Out-of-Town Travel	1/18/2016	54.00	101-0000038935	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Airport to Hotel Travel to Las Vegas for 3/19/16 Hearing 01/18/16
1992 Out-of-Town Travel	1/19/2016	59.73	101-0000040001	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Travel to Las Vegas for 1/19 Hearing 01/19/16
1992 Out-of-Town Travel	1/19/2016	40.42	101-0000038935	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Courthouse to Airport Travel to Las Vegas for 3/19/16 Hearing 01/19/16
1992 Out-of-Town Travel	2/17/2016	34.67	101-0000041134	NOAH HELPERN - Taxi - Noah Helpern - airport/hotel Taxi - travel to LAS for motion to compel hearing. 02/17/16
1992 Out-of-Town Travel	2/18/2016	22.25	101-0000041134	NOAH HELPERN - Taxi - Noah Helpern - hotel/airport Taxi - travel to LAS for motion to compel hearing. 02/18/16
1992 Out-of-Town Travel	2/18/2016	27.01	101-0000040001	NOAH HELPERN - Taxi - Noah Helpern - court/airport Uber taxi - Travel for motion to compel hearing in court. 02/18/16
1992 Out-of-Town Travel	3/1/2016	29.18	101-0000042785	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - airport/hotel Trip to Las Vegas for court hearing 02/17/16
1992 Out-of-Town Travel	3/2/2016	57.66	101-0000041134	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for 3/3/16 Hearing 03/02/16
1992 Out-of-Town Travel	3/3/2016	25.97	101-0000041134	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to Las Vegas for 3/3/16 Hearing 03/03/16
1992 Out-of-Town Travel	3/16/2016	29.55	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for Hearing 03/16/16
1992 Out-of-Town Travel	3/17/2016	42.18	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Travel to Las Vegas for Hearing 03/17/16
1992 Out-of-Town Travel	3/17/2016	36.81	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to Las Vegas for Hearing 03/17/16
1992 Out-of-Town Travel	3/17/2016	33.34	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel to Hearing Travel to Las Vegas for Hearing 03/17/16
1992 Out-of-Town Travel	4/13/2016	56.65	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vgas Airport to Hotel Travel to Las Vegas for Hearing 04/13/16
1992 Out-of-Town Travel	4/14/2016	60.00	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Travel to Las Vegas for Hearing 04/14/16
1992 Out-of-Town Travel	4/14/2016	62.91	101-0000042785	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Airport Travel to Las Vegas for Hearing 04/14/16
1992 Out-of-Town Travel	4/18/2016	57.88	101-0000043419	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for Hearing 04/18/16
1992 Out-of-Town Travel	4/19/2016	43.94	101-0000043419	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Burbank Airport to Home Travel to Las Vegas for Hearing 04/19/16
1992 Out-of-Town Travel	4/19/2016	47.50	101-0000043419	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to Las Vegas for Hearing 04/19/16
1992 Out-of-Town Travel	6/28/2016	55.11	101-0000044897	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for Hearing 5/27 05/26/16
1992 Out-of-Town Travel	6/28/2016	44.69	101-0000044897	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hotel to Las Vegas Airport Travel to Las Vegas for Hearing 5/27 05/26/16
1992 Out-of-Town Travel	6/28/2016	47.81	101-0000044897	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Burbank Airport to home Travel to Las Vegas for Hearing 5/27 05/26/16
1992 Out-of-Town Travel	7/13/2016	56.65	101-0000046064	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for 6/21/16 Hearing. 06/20/16
1992 Out-of-Town Travel	7/13/2016	47.20	101-0000046064	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Courthouse to Las Vegas Airport Travel to Las Vegas for 6/21/16 Hearing. 06/21/16

1992 Out-of-Town Travel	8/31/2016	50.00	101-0000047704	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to and from Las Vegas for 8-9-16 Hearing 08/09/16
1992 Out-of-Town Travel	8/31/2016	57.89	101-0000047704	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to and from Las Vegas for 8-9-16 Hearing 08/08/16
1992 Out-of-Town Travel	8/31/2016	56.97	101-0000047704	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for 8-12-16 Hearing 08/11/16
1992 Out-of-Town Travel	8/31/2016	43.00	101-0000047704	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to Las Vegas for 8-12-16 Hearing 08/12/16
1992 Out-of-Town Travel	8/31/2016	45.97	101-0000047704	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hearing to Las Vegas Hotel Travel to and from Las Vegas for Hearing 07/28/16
1992 Out-of-Town Travel	8/31/2016	57.89	101-0000047704	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to and from Las Vegas for Hearing 07/27/16
1992 Out-of-Town Travel	9/7/2016	59.42	101-0000049182	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for Hearing 9/8/16 09/07/16
1992 Out-of-Town Travel	9/7/2016	58.19	101-0000049182	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for 8/30/16 Hearing 08/29/16
1992 Out-of-Town Travel	9/7/2016	47.81	101-0000049182	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to Las Vegas for 8/30/16 Hearing 08/30/16
1992 Out-of-Town Travel	9/8/2016	46.89	101-0000049182	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Las Vegas Airport Travel to Las Vegas for Hearing 9/8/16 09/08/16
1992 Out-of-Town Travel	9/14/2016	60.00	101-0000050242	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Airport to Hotel Travel to Las Vegas for Hearing 09/14/16
1992 Out-of-Town Travel	9/15/2016	47.20	101-0000050242	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Airport Travel to Las Vegas for Hearing 09/15/16
1992 Out-of-Town Travel	10/26/2016	27.09	101-0000051437	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - court to hotel Travel to Las Vegas for hearing re motions for summary judgment 10/26/16
1992 Out-of-Town Travel	10/27/2016	35.80	101-0000051437	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - hotel to airport Travel to Las Vegas for hearing re motions for summary judgment 10/27/16
1992 Out-of-Town Travel	10/27/2016	50.00	101-0000050242	NOAH HELPERN - Taxi - Noah Helpen - airport/court Taxi to courthouse for court hearing. 10/27/16
1992 Out-of-Town Travel	12/14/2016	42.90	101-0000052666	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - LAS to Hotel Travel to Las Vegas for Hearing 12/08/16
1992 Out-of-Town Travel	12/14/2016	40.78	101-0000052666	MARSHALL M. SEARCY III - Taxi (Out-of-Town) Taxi - Marshall M. Searcy - Burbank Airport to Home Travel to Las Vegas for Hearing 12/08/16
1992 Out-of-Town Travel	12/22/2016	42.87	101-0000054328	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hearing to Hotel Travel to Las Vegas for 12-22-16 Hearing 12/22/16
1992 Out-of-Town Travel	2/26/2017	44.53	101-0000055126	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS/HOTEL Taxi 02/26/17
1992 Out-of-Town Travel	2/26/2017	37.04	101-0000055126	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - HOTEL/MEETING Taxi 02/26/17
1992 Out-of-Town Travel	2/26/2017	37.04	101-0000055126	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - MEETING/HOTEL Taxi 02/26/17
1992 Out-of-Town Travel	2/27/2017	50.89	101-0000055126	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel/LAS Taxi 02/27/17
1992 Out-of-Town Travel	3/5/2017	27.70	101-0000056295	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home/BUR Taxi 03/05/17
1992 Out-of-Town Travel	3/6/2017	44.69	101-0000056295	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - BUR/Home Taxi 03/06/17
1992 Out-of-Town Travel	6/4/2017	54.00	101-0000060146	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS/Hotel Checker Cab 06/04/17
1992 Out-of-Town Travel	6/5/2017	44.31	101-0000060146	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - BUR/Home Burbank Airport Cab 06/05/17
1992 Out-of-Town Travel	7/9/2017	57.89	101-0000061027	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LVS/Hotel YCS Taxi 07/09/17
1992 Out-of-Town Travel	7/10/2017	48.13	101-0000061027	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel/LVS Desert Cab 07/10/17
1992 Out-of-Town Travel	7/23/2017	1.00	101-0000061027	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home/BUR Uber 07/23/17
1992 Out-of-Town Travel	7/23/2017	54.59	101-0000061027	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS>Hotel Deluxe Taxicab Service 07/23/17
1992 Out-of-Town Travel	7/24/2017	47.50	101-0000061027	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home>BUR VTS Taxi 07/24/17
1992 Out-of-Town Travel	7/24/2017	44.31	101-0000061027	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - BUR>Home VTS Taxi 07/24/17
1992 Out-of-Town Travel	8/28/2017	38.83	101-0000062159	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - BUR/Home Uber 08/28/17
1992 Out-of-Town Travel	8/28/2017	66.32	101-0000062159	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS/HOTEL YCS Taxi 08/28/17
1992 Out-of-Town Travel	8/29/2017	42.90	101-0000062159	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - BUR/Home VTS Taxi 08/29/17

1992 Out-of-Town Travel	9/18/2017	47.50	101-0000064804	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - courthouse/airport Trip to Las Vegas for hearing and status conference. 09/18/17
1992 Out-of-Town Travel	9/18/2017	27.00	101-0000064804	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - hotel/courthouse Trip to Las Vegas for hearing and status conference. 09/18/17
1992 Out-of-Town Travel	11/19/2017	58.81	101-0000066432	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS>Hotel Taxi Las Vegas 11/19/17
1992 Out-of-Town Travel	11/20/2017	61.67	101-0000066432	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Hotel>LAS Taxi Las Vegas 11/20/17
1992 Out-of-Town Travel	11/20/2017	44.34	101-0000066432	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Home>BUR Taxi Sun Valley 11/20/17
1992 Out-of-Town Travel	12/1/2017	52.30	101-0000068416	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - hotel/courthouse Conference with RDI counsel; attend court hearing 12/11/17
1992 Out-of-Town Travel	12/1/2017	19.40	101-0000068416	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - hotel/courthouse Conference with RDI counsel; attend court hearing 11/20/17
1992 Out-of-Town Travel	12/1/2017	23.87	101-0000068416	CHRISTOPHER TAYBACK - Taxi (Out-of-Town) Taxi - Christopher Tayback - courthouse/airport Conference with RDI counsel; attend court hearing 11/20/17
1992 Out-of-Town Travel	12/10/2017	58.19	101-0000067177	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Desert Cab 12/10/17
1992 Out-of-Town Travel	12/11/2017	40.54	101-0000067177	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi 12/11/17
1992 Out-of-Town Travel	12/17/2017	57.58	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi 12/17/17
1992 Out-of-Town Travel	12/18/2017	62.91	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi 12/18/17
1992 Out-of-Town Travel	12/18/2017	41.82	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAs Vegas Taxi 12/18/17
1992 Out-of-Town Travel	12/27/2017	62.34	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi 12/27/17
1992 Out-of-Town Travel	12/27/2017	85.00	101-0000068416	YLLEN CRUZ - Taxi - Yllen Cruz - Home/JFK Trial 12/27/17
1992 Out-of-Town Travel	12/27/2017	53.71	101-0000068416	YLLEN CRUZ - Taxi - Yllen Cruz - Airport/Hotel Trial 12/27/17
1992 Out-of-Town Travel	12/28/2017	41.94	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Sun Valley Taxi 12/28/17
1992 Out-of-Town Travel	12/30/2017	85.00	101-0000068416	YLLEN CRUZ - Taxi - Yllen Cruz - JFK/Home Trial 12/30/17
1992 Out-of-Town Travel	12/30/2017	47.46	101-0000068416	YLLEN CRUZ - Taxi - Yllen Cruz - Hotel/Airport Trial 12/30/17
1992 Out-of-Town Travel	1/2/2018	11.93	101-0000068416	Marco Perez - Taxi - Marco Perez - HOME/LGB lyft from home to the airport for trial prep 01/02/18
1992 Out-of-Town Travel	1/2/2018	53.71	101-0000068416	NOAH HELPERN - Taxi - Noah Helpern - airport/hotel Taxi to hotel - Travel to Las Vegas for court trial. 01/02/18
1992 Out-of-Town Travel	1/3/2018	14.33	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS>Court Uber 01/03/18
1992 Out-of-Town Travel	1/3/2018	48.03	101-0000068416	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi Las Vegas 01/03/18
1992 Out-of-Town Travel	1/3/2018	15.94	101-0000068416	Ali Moghaddas - Taxi - Ali Moghaddas - Las Vegas Airport to Hotel Travel to Las Vegas for trial [Lyft] 01/03/18
1992 Out-of-Town Travel	1/4/2018	20.31	101-0000068416	Lauren Lindsay - Taxi - Lauren Lindsay - Los Angeles / Burbank Airport Uber X for SW Flight from Burbank to Las Vegas for Cotter trial. 01/04/18
1992 Out-of-Town Travel	1/4/2018	26.09	101-0000068416	David Armillei - Taxi - David Armillei - Pasadena/Burbank Airport Taxi from Pasadena to Burbank Airport to attend trial in Las Vegas. 01/04/18
1992 Out-of-Town Travel	1/4/2018	40.33	101-0000068416	David Armillei - Taxi - David Armillei - Las Vegas Airport/hotel Taxi from Las Vegas Airport to hotel to attend trial in Las Vegas. 01/04/18
1992 Out-of-Town Travel	1/5/2018	19.40	101-0000068416	Ali Moghaddas - Taxi - Ali Moghaddas - Courthouse to Hotel Travel to Las Vegas for trial [Henderson Taxi] 01/05/18
1992 Out-of-Town Travel	1/6/2018	18.55	101-0000070080	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - meetings/meetings Trip to Las Vegas re trial prep and trial 01/06/18
1992 Out-of-Town Travel	1/7/2018	100.00	101-0000068416	NOAH HELPERN - Taxi - Noah Helpern - hotel/dinner Taxi to dinner for 11 people (M. Searcy approved) - Travel to Las Vegas for court trial. 01/07/18
1992 Out-of-Town Travel	1/8/2018	29.64	101-0000070080	CHRISTOPHER TAYBACK - Taxi - Christopher Tayback - restaurant/hotel Trip to Las Vegas re trial prep and trial 01/08/18
1992 Out-of-Town Travel	1/8/2018	44.42	101-0000068416	Ali Moghaddas - Taxi - Ali Moghaddas - Hotel to Las Vegas Airport Travel to Las Vegas for trial 01/08/18
1992 Out-of-Town Travel	1/8/2018	22.20	101-0000068416	Ali Moghaddas - Taxi - Ali Moghaddas - LAX to Home Travel to Las Vegas for trial [Lyft] 01/08/18
1992 Out-of-Town Travel	1/9/2018	46.42	101-0000070080	NOAH HELPERN - Taxi - Noah Helpern - hotel/airport Taxi - travel to Las Vegas for court trial. 01/09/18
1992 Out-of-Town Travel	1/9/2018	30.00	101-0000068416	Lauren Lindsay - Taxi - Lauren Lindsay - Hotel / Airport in Las Vegas Taxi from Hotel to Airport for Cotter trial. (return home. Cotter trial was postponed) 01/09/18
1992 Out-of-Town Travel	1/9/2018	22.03	101-0000068416	NOAH HELPERN - Taxi - Noah Helpern - airport/home Taxi- Travel to Las Vegas for court trial. Back in LA. 01/09/18
1992 Out-of-Town Travel	1/9/2018	50.57	101-0000068416	David Armillei - Taxi - David Armillei - Golden Nugget Hotel/Las Vegas Airport Travel from hotel to Las Vegas Airport. 01/09/18
1992 Out-of-Town Travel	1/11/2018	11.07	101-0000068416	Marco Perez - Taxi - Marco Perez - LGB/HOME lyft from long beach airport to home at the end of trial prep 01/11/18

1992 Out-of-Town Travel	4/29/2018	57.58	101-0000073740	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi 04/29/18
1992 Out-of-Town Travel	4/30/2018	43.56	101-0000073740	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Sun Valley Taxi 04/30/18
1992 Out-of-Town Travel	5/2/2018	17.07	101-0000073740	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Uber 05/02/18
1992 Out-of-Town Travel	5/2/2018	56.56	101-0000073740	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas Taxi 05/02/18
1992 Out-of-Town Travel	5/2/2018	18.23	101-0000073740	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas, NV Uber 05/02/18
1992 Out-of-Town Travel	5/2/2018	42.54	101-0000073740	MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Sun Valley Taxi 05/02/18
1992 Out-of-Town Travel	5/20/2018	57.58		MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Las Vegas, NV Taxi 05/20/18
1992 Out-of-Town Travel	5/21/2018	42.90		MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - Sun Valley, CA Taxi 05/21/18
1992 Out-of-Town Travel	5/21/2018	30.22		MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS Uber 05/21/18
1992 Out-of-Town Travel	6/18/2018	18.52		MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS Uber 06/18/18
1992 Out-of-Town Travel	6/19/2018	25.67		MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS Uber 06/19/18
1992 Out-of-Town Travel	6/19/2018	43.34		MARSHALL M. SEARCY III - Taxi - Marshall M. Searcy - LAS Uber 06/19/18
2010 Air travel	7/9/2015	35.00	101-0000032784	AMERICAN EXPRESS - Date: 2015-07-09 Passenger: SEARCY/MARSHALL Tkt #: 8900649556861
2010 Air travel	7/9/2015	50.00	101-0000032784	AMERICAN EXPRESS - Date: 2015-07-09 Passenger: SEARCY/MARSHALL Tkt #: 8900649556860
2010 Air travel	7/13/2015	259.00	101-0000032784	AMERICAN EXPRESS - Date: 2015-07-13 Itinerary: BURLAS Passenger: SEARCY/MARSHALL Tkt #: 5262125792896
2010 Air travel	7/13/2015	50.00	101-0000032784	AMERICAN EXPRESS - Date: 2015-07-13 Passenger: SEARCY/MARSHALL Tkt #: 8900649647400
2010 Air travel	7/13/2015	50.00	101-0000032784	AMERICAN EXPRESS - Date: 2015-07-13 Passenger: SEARCY/MARSHALL Tkt #: 8900649647420
2010 Air travel	7/14/2015	234.10	101-0000032784	AMERICAN EXPRESS - Date: 2015-07-14 Itinerary: LASLAX Passenger: SEARCY/MARSHALL Tkt #: 0067663942022
2010 Air travel	9/1/2015	50.00	101-0000034469	AMERICAN EXPRESS - Air travel Date: 2015-08-28 Passenger: SEARCY/MARSHALL Tkt #: 8900651460476
2010 Air travel	9/1/2015	504.00	101-0000034469	AMERICAN EXPRESS - Date: 2015-09-01 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262138701386
2010 Air travel	9/1/2015	15.00	101-0000033591	AMERICAN EXPRESS - Itinerary: DL Passenger: SEARCY/MARSHALL Tkt #: 0060154213545
2010 Air travel	9/8/2015	50.00	101-0000034469	AMERICAN EXPRESS - Date: 2015-09-08 Passenger: SEARCY/MARSHALL Tkt #: 8900651793869
2010 Air travel	9/9/2015	504.00	101-0000034469	AMERICAN EXPRESS - Date: 2015-09-09 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262141274256
2010 Air travel	9/10/2015	50.00	101-0000034469	AMERICAN EXPRESS - Date: 2015-09-10 Passenger: SEARCY/MARSHALL Tkt #: 8900651910878
2010 Air travel	9/10/2015	131.09	101-0000034469	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - LAX/Las Vegas Trip to Las Vegas for court hearing 09/10/15
2010 Air travel	10/7/2015	50.00	101-0000036075	AMERICAN EXPRESS - Date: 2015-10-07 Passenger: SEARCY/MARSHALL Tkt #: 8900653069800
2010 Air travel	10/21/2015	246.00	101-0000034469	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Las Vegas/LAX Trip to Las Vegas for court hearing 10/21/15
2010 Air travel	10/27/2015	503.96	101-0000036075	AMERICAN EXPRESS - Date: 2015-10-27 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262154614412
2010 Air travel	10/27/2015	50.00	101-0000036075	AMERICAN EXPRESS - Date: 2015-10-27 Passenger: SEARCY/MARSHALL Tkt #: 8900668391072
2010 Air travel	12/1/2015	491.96	101-0000038935	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - LAX/Las Vegas/LAX Travel to Las Vegas for hearing 10/28/15
2010 Air travel	12/18/2015	50.00	101-0000038935	AMERICAN EXPRESS - Date: 2015-12-18 Passenger: SEARCY/MARSHALL Tkt #: 8900670216788
2010 Air travel	12/21/2015	503.96	101-0000038935	AMERICAN EXPRESS - Date: 2015-12-21 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262167125279
2010 Air travel	1/1/2016	732.60	101-0000040001	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Las Vegas/Jackson WY Trip to Las Vegas for hearing 12/22/15
2010 Air travel	1/1/2016	251.98	101-0000040001	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - LAX/Las Vegas Trip to Las Vegas for hearing 12/21/15
2010 Air travel	1/18/2016	509.96	101-0000040001	AMERICAN EXPRESS - Date: 2016-01-18 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262174300378
2010 Air travel	2/17/2016	509.96	101-0000040001	NOAH HELPERN - Airfare - Noah Helpern - Burbank/Las Vegas Southwest Airlines - Travel for motion to compel hearing in court. 02/17/16
2010 Air travel	3/1/2016	509.96	101-0000042785	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Burbank/Las Vegas Trip to Las Vegas for court hearing 02/17/16
2010 Air travel	3/2/2016	50.00	101-0000042785	AMERICAN EXPRESS - Date: 2016-03-02 Passenger: SEARCY/MARSHALL Tkt #: 8.90067E+12
2010 Air travel	3/2/2016	519.96	101-0000042785	AMERICAN EXPRESS - Date: 2016-03-02 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5.26219E+12
2010 Air travel	3/15/2016	50.00	101-0000042785	AMERICAN EXPRESS - Date: 2016-03-15 Passenger: SEARCY/MARSHALL Tkt #: 8.90067E+12

2010 Air travel	3/16/2016	50.00	101-0000042785	AMERICAN EXPRESS - Date: 2016-03-16 Passenger: SEARCY/MARSHALL Tkt #: 8.90067E+12
2010 Air travel	3/16/2016	549.96	101-0000042785	AMERICAN EXPRESS - Date: 2016-03-16 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5.26219E+12
2010 Air travel	3/16/2016	50.00	101-0000042785	AMERICAN EXPRESS - Date: 2016-03-16 Passenger: SEARCY/MARSHALL Tkt #: 8.90067E+12
2010 Air travel	3/16/2016	549.96	101-0000042785	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Burbank/Las Vegas Trip to Las Vegas for court hearing 03/16/16
2010 Air travel	5/18/2016	50.00	101-0000043419	AMERICAN EXPRESS - Passenger: SEARCY/MARSHALL Tkt #: 8.90067E+12
2010 Air travel	5/18/2016	50.00	101-0000043419	AMERICAN EXPRESS - Passenger: SEARCY/MARSHALL Tkt #: 8.90067E+12
2010 Air travel	5/18/2016	519.96	101-0000043419	AMERICAN EXPRESS - Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5.2624E+12
2010 Air travel	5/18/2016	519.96	101-0000043419	AMERICAN EXPRESS - Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5.2624E+12
2010 Air travel	5/25/2016	50.00	101-0000044897	AMERICAN EXPRESS - Date: 2016-05-25 Passenger: SEARCY/MARSHALL Tkt #: 8900676577565
2010 Air travel	5/25/2016	58.09	101-0000044897	AMERICAN EXPRESS - Date: 2016-05-25 Itinerary: LAXLAS Passenger: SEARCY/MARSHALL Tkt #: 0000000005809
2010 Air travel	5/25/2016	50.00	101-0000044897	AMERICAN EXPRESS - Date: 2016-05-25 Passenger: SEARCY/MARSHALL Tkt #: 8900676601107
2010 Air travel	5/26/2016	50.00	101-0000044897	AMERICAN EXPRESS - Date: 2016-05-26 Passenger: SEARCY/MARSHALL Tkt #: 8900676629808
2010 Air travel	5/26/2016	515.98	101-0000044897	AMERICAN EXPRESS - Date: 2016-05-26 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262413388305
2010 Air travel	7/18/2016	509.96	101-0000046064	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Burbank/Las Vegas Trip to Las Vegas for motion to compel hearing and status conference. 05/04/16
2010 Air travel	7/25/2016	535.97	101-0000047704	AMERICAN EXPRESS - Date: 2016-07-25 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262431828676
2010 Air travel	7/25/2016	50.00	101-0000047704	AMERICAN EXPRESS - Date: 2016-07-25 Passenger: SEARCY/MARSHALL Tkt #: 8900678807872
2010 Air travel	8/5/2016	50.00	101-0000049182	AMERICAN EXPRESS - Date: 2016-08-05 Passenger: SEARCY/MARSHALL Tkt #: 8900679283819
2010 Air travel	8/5/2016	541.96	101-0000049182	AMERICAN EXPRESS - Date: 2016-08-05 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262435352646
2010 Air travel	8/5/2016	561.96	101-0000049182	AMERICAN EXPRESS - Date: 2016-08-05 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262436800387
2010 Air travel	8/10/2016	50.00	101-0000049182	AMERICAN EXPRESS - Date: 2016-08-10 Passenger: SEARCY/MARSHALL Tkt #: 8900679485626
2010 Air travel	8/26/2016	50.00	101-0000049182	AMERICAN EXPRESS - Date: 2016-08-26 Passenger: SEARCY/MARSHALL Tkt #: 8900680125724
2010 Air travel	8/29/2016	521.96	101-0000049182	AMERICAN EXPRESS - Date: 2016-08-29 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262441615367
2010 Air travel	9/2/2016	50.00	101-0000050242	AMERICAN EXPRESS - Date: 2016-09-02 Passenger: SEARCY/MARSHALL Tkt #: 8900680416790
2010 Air travel	9/7/2016	521.96	101-0000050242	AMERICAN EXPRESS - Date: 2016-09-07 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262443596340
2010 Air travel	9/12/2016	50.00	101-0000050242	AMERICAN EXPRESS - Date: 2016-09-12 Passenger: SEARCY/MARSHALL Tkt #: 8900680763330
2010 Air travel	9/14/2016	521.96	101-0000050242	AMERICAN EXPRESS - Date: 2016-09-14 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262446287179
2010 Air travel	10/5/2016	521.96	101-0000050242	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Burbank/Las Vegas/Burbank Trip to Las Vegas to attend court hearing re T2 settlement approval 10/05/16
2010 Air travel	10/20/2016	769.10	101-0000051437	AMERICAN EXPRESS - Date: 2016-10-20 Itinerary: JFKLAS Passenger: SEARCY/MARSHALL Tkt #: 0067870821419
2010 Air travel	10/20/2016	50.00	101-0000051437	AMERICAN EXPRESS - Date: 2016-10-20 Passenger: SEARCY/MARSHALL Tkt #: 8900696464359
2010 Air travel	10/21/2016	251.98	101-0000051437	AMERICAN EXPRESS - Date: 2016-10-21 Itinerary: LASLAX Passenger: SEARCY/MARSHALL Tkt #: 5262456732701
2010 Air travel	10/25/2016	50.00	101-0000051437	AMERICAN EXPRESS - Date: 2016-10-25 Passenger: SEARCY/MARSHALL Tkt #: 8900696643563
2010 Air travel	10/25/2016	521.96	101-0000051437	AMERICAN EXPRESS - Date: 2016-10-25 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262459043368
2010 Air travel	10/27/2016	499.96	101-0000050242	NOAH HELPERN - Airfare - Noah Helpern - LAX/LAS Southwest Airlines - travel to Las Vegas for Summary Judgment court hearing. 10/27/16
2010 Air travel	11/30/2016	575.97	101-0000052666	AMERICAN EXPRESS - Date: 2016-11-30 Itinerary: SJCLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262466444685
2010 Air travel	12/7/2016	265.84	101-0000054328	AMERICAN EXPRESS - Date: 2016-12-07 Itinerary: LASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262469885221
2010 Air travel	12/7/2016	50.00	101-0000054328	AMERICAN EXPRESS - Date: 2016-12-07 Passenger: SEARCY/MARSHALL Tkt #: 8900698211659

2010 Air travel	12/14/2016	121.99	101-0000052666	MARSHALL M. SEARCY III - Air travel Airfare - Marshall M. Searcy - LAX to LAS Travel to Las Vegas for Hearing 12/08/16
2010 Air travel	12/20/2016	50.00	101-0000054328	AMERICAN EXPRESS - Date: 2016-12-20 Passenger: SEARCY/MARSHALL Tkt #: 8900698587341
2010 Air travel	12/20/2016	571.68	101-0000054328	AMERICAN EXPRESS - Date: 2016-12-20 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262472759529
2010 Air travel	2/1/2017	503.96	101-0000056295	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - LAX/Las Vegas Travel to Las Vegas for hearing re motions for summary judgment 10/21/16
2010 Air travel	2/16/2017	50.00	101-0000056295	AMERICAN EXPRESS - Date: 2017-02-16 Passenger: SEARCY/MARSHALL Tkt #: 8900700833774
2010 Air travel	2/16/2017	531.88	101-0000056295	AMERICAN EXPRESS - Date: 2017-02-16 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262488297379
2010 Air travel	3/1/2017	531.88	101-0000057498	AMERICAN EXPRESS - Air travel Date: 2017-02-26 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262491845452
2010 Air travel	3/2/2017	50.00	101-0000057498	AMERICAN EXPRESS - Date: 2017-03-02 Passenger: SEARCY/MARSHALL Tkt #: 8900701490302
2010 Air travel	3/5/2017	531.88	101-0000057498	AMERICAN EXPRESS - Date: 2017-03-05 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5262493017974
2010 Air travel	3/7/2017	50.00	101-0000057498	AMERICAN EXPRESS - Date: 2017-03-07 Passenger: SEARCY/MARSHALL Tkt #: 8900701660292
2010 Air travel	6/1/2017	531.95	101-0000061027	AMERICAN EXPRESS - Air travel Date: 2017-05-31 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268527842919
2010 Air travel	6/1/2017	50.00	101-0000061027	AMERICAN EXPRESS - Air travel Date: 2017-05-31 Passenger: SEARCY/MARSHALL M Tkt #: 8900705390704
2010 Air travel	7/9/2017	571.96	101-0000062159	AMERICAN EXPRESS - Date: 2017-07-09 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268540555464
2010 Air travel	7/23/2017	571.96	101-0000062159	AMERICAN EXPRESS - Date: 2017-07-23 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268545533269
2010 Air travel	8/27/2017	530.45	101-0000063512	AMERICAN EXPRESS - Date: 2017-08-27 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268757844893
2010 Air travel	9/7/2017	50.00	101-0000064804	AMERICAN EXPRESS - Date: 2017-09-07 Passenger: SEARCY/MARSHALL M Tkt #: 8900709449399
2010 Air travel	9/8/2017	50.00	101-0000064804	AMERICAN EXPRESS - Date: 2017-09-08 Passenger: SEARCY/MARSHALL M Tkt #: 8900709581528
2010 Air travel	9/8/2017	530.45	101-0000064804	AMERICAN EXPRESS - Date: 2017-09-08 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268762276151
2010 Air travel	9/11/2017	50.00	101-0000064804	AMERICAN EXPRESS - Date: 2017-09-11 Passenger: SEARCY/MARSHALL M Tkt #: 8900709596299
2010 Air travel	11/16/2017	50.00	101-0000067177	AMERICAN EXPRESS - Date: 2017-11-16 Passenger: SEARCY/MARSHALL M Tkt #: 8900727005658
2010 Air travel	11/16/2017	50.00	101-0000067177	AMERICAN EXPRESS - Date: 2017-11-16 Passenger: SEARCY/MARSHALL M Tkt #: 8900727005652
2010 Air travel	11/19/2017	534.46	101-0000067177	AMERICAN EXPRESS - Date: 2017-11-19 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268785346020
2010 Air travel	11/19/2017	534.45	101-0000066432	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Burbank/Las Vegas Travel to Las Vegas for court hearing 11/19/17
2010 Air travel	12/1/2017	535.96	101-0000068416	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Burbank/Las Vegas Conference with RDI counsel; attend court hearing 12/06/17
2010 Air travel	12/1/2017	267.98	101-0000068416	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Las Vegas/Burbank Conference with RDI counsel; attend court hearing 12/04/17
2010 Air travel	12/1/2017	535.96	101-0000068416	CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Burbank/Las Vegas Conference with RDI counsel; attend court hearing 12/06/17
2010 Air travel	12/7/2017	50.00	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-07 Passenger: SEARCY/MARSHALL M Tkt #: 8900727788267
2010 Air travel	12/10/2017	535.96	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-10 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268791472215
2010 Air travel	12/15/2017	50.00	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-15 Passenger: SEARCY/MARSHALL M Tkt #: 8900728051044
2010 Air travel	12/17/2017	535.96	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-17 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268793498612
2010 Air travel	12/21/2017	50.00	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-21 Passenger: SEARCY/MARSHALL M Tkt #: 8900728280531
2010 Air travel	12/21/2017	566.96	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-21 Itinerary: LAXRNOLAS Passenger: SEARCY/MARSHALL M Tkt #: 5268795198479

2010 Air travel	12/21/2017	50.00	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-21 Passenger: SEARCY/MARSHALL M Tkt #: 8900728280526
2010 Air travel	12/22/2017	339.39	101-0000068416	Marco Perez - Airfare - Marco Perez - LGB/LAS travel to Las Vegas for trial prep 12/22/17
2010 Air travel	12/26/2017	148.20	101-0000068416	Marco Perez - Airfare - Marco Perez - LGB/LAS travel to Las Vegas for trial prep 12/26/17
2010 Air travel	12/27/2017	535.96	101-0000068416	AMERICAN EXPRESS - Date: 2017-12-27 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5268795198176
2010 Air travel	12/27/2017	681.20	101-0000068416	YLLen CRUZ - Airfare - Yllen Cruz - JFK/Vegas Trial 12/27/17
2010 Air travel	12/29/2017	292.88	101-0000068416	JOHN B. QUINN - Altour - SOUTHWEST AIRLINES - ARMILLEI/DAVID, Travel to BUR/LAS on 1/4/2018
2010 Air travel	12/30/2017	681.20	101-0000068416	YLLen CRUZ - Airfare - Yllen Cruz - Vegas/JFK Trial 12/30/17
2010 Air travel	1/2/2018	267.88	101-0000068416	NOAH HELPERN - Airfare - Noah Helpern - Burbank / Las Vegas Southwest flight for travel to Las Vegas for trial 01/02/18
2010 Air travel	1/3/2018	134.30	101-0000068416	Ali Moghaddas - Airfare - Ali Moghaddas - LAX to Las Vegas Travel to Las Vegas for Trial [American Airlines] 01/03/18
2010 Air travel	1/4/2018	267.98	101-0000070080	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Burbank/Las Vegas Trip to Las Vegas re trial prep and trial 01/04/18
2010 Air travel	1/4/2018	245.88	101-0000068416	Lauren Lindsay - Airfare - Lauren Lindsay - BUR/LAS VEGAS Outbound Airfare for SW Flight from Burbank to Las Vegas for Cotter trial. 01/04/18
2010 Air travel	1/8/2018	292.98	101-0000070080	JOHN B. QUINN - Altour - SOUTHWEST AIRLINES - ARMILLEI/DAVID, Travel to LAS/BUR on 1/9/2018
2010 Air travel	1/8/2018	253.98	101-0000070080	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Las Vegas/LAX Trip to Las Vegas re trial prep and trial 01/08/18
2010 Air travel	1/8/2018	303.97	101-0000068416	Marco Perez - Airfare - Marco Perez - LAS/LGB travel back to LA at the end of trial 01/08/18
2010 Air travel	1/8/2018	253.98	101-0000068416	Ali Moghaddas - Airfare - Ali Moghaddas - Las Vegas to LAX Travel to Las Vegas for trial [Southwest Airlines] 01/08/18
2010 Air travel	1/9/2018	50.00	101-0000070080	AMERICAN EXPRESS - Date: 2018-01-09 Passenger: SEARCY/MARSHALL M Tkt #: 8900728832376
2010 Air travel	1/9/2018	267.98	101-0000070080	AMERICAN EXPRESS - Date: 2018-01-09 Itinerary: LASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5261400673290
2010 Air travel	1/9/2018	267.98	101-0000068416	NOAH HELPERN - Airfare - Noah Helpern - Las Vegas/Burbank Southwest Airline- Travel to Las Vegas for court trial. Back in LA. 01/09/18
2010 Air travel	1/12/2018	538.96	101-0000070080	CHRISTOPHER TAYBACK - Airfare - Christopher Tayback - Burbank/Las Vegas Trip to Las Vegas re court hearings 01/12/18
2010 Air travel	2/26/2018	50.00	101-0000071051	AMERICAN EXPRESS - Date: 2018-02-26 Passenger: SEARCY/MARSHALL M Tkt #: 8900731214497
2010 Air travel	3/1/2018	535.96	101-0000071051	AMERICAN EXPRESS - Date: 2018-03-01 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5261418276139
2010 Air travel	3/1/2018	50.00	101-0000071051	AMERICAN EXPRESS - Date: 2018-03-01 Passenger: SEARCY/MARSHALL M Tkt #: 8900731294962
2010 Air travel	4/17/2018	109.30	101-0000073740	AMERICAN EXPRESS - Date: 2018-04-17 Passenger: SEARCY/MARSHALL M Tkt #: 1070609576485
2010 Air travel	4/17/2018	50.00	101-0000073740	AMERICAN EXPRESS - Date: 2018-04-17 Passenger: SEARCY/MARSHALL M Tkt #: 8900733864301
2010 Air travel	4/25/2018	50.00	101-0000073740	AMERICAN EXPRESS - Date: 2018-04-25 Passenger: SEARCY/MARSHALL M Tkt #: 8900734270651
2010 Air travel	4/25/2018	539.94	101-0000073740	AMERICAN EXPRESS - Date: 2018-04-25 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5261439244932
2010 Air travel	5/1/2018	50.00		AMERICAN EXPRESS - Air travel Date: 2018-04-30 Passenger: SEARCY/MARSHALL M Tkt #: 8900734468824
2010 Air travel	5/1/2018	50.00		AMERICAN EXPRESS - Date: 2018-05-01 Passenger: SEARCY/MARSHALL M Tkt #: 8900734501991
2010 Air travel	5/1/2018	539.94		AMERICAN EXPRESS - Air travel Date: 2018-04-30 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL M Tkt #: 5261440754233
2010 Air travel	5/1/2018	539.94		CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Burbank/Las Vegas Flight to Las Vegas for court hearing 04/29/18
2010 Air travel	5/2/2018	539.94		CHRISTOPHER TAYBACK - Air travel Airfare - Christopher Tayback - Burbank/Las Vegas Flight to Las Vegas for court hearing 05/02/18
2010 Air travel	5/17/2018	50.00		AMERICAN EXPRESS - Date: 2018-05-17 Passenger: SEARCY/MARSHALL M Tkt #: 8900735367796
2010 Air travel	5/17/2018	539.94		AMERICAN EXPRESS - Date: 2018-05-17 Itinerary: BURLASBUR Passenger: SEARCY/MARSHALL Tkt #: 5261447149058
2011 Car rental	12/30/2017	295.35	101-0000068416	Marco Perez - Car Rental/Fuel - Marco Perez - rental car during trial prep 12/30/17
2011 Car rental	1/2/2018	1,263.26	101-0000068416	Marco Perez - Car Rental/Fuel - Marco Perez - rental car during trial for transporting trial team from office to hotel, and back. 01/02/18
2011 Car rental	1/9/2018	263.83	101-0000068416	David Armillei - Car Rental/Fuel - David Armillei - Travel from Las Vegas Airport to Pasadena, CA. 01/09/18

2011 Car rental	1/10/2018	42.80	101-0000068416	David Armillei - Car Rental/Fuel - David Armillei - Fuel charge. 01/10/18
Total		71,687.19		

EXHIBIT D

1 **DEC**

Donald A. Lattin (NSBN 693)

2 dlattin@mclrenolaw.com

Carolyn K. Renner (NSBN 9164)

3 crenner@mclrenolaw.com

MAUPIN, COX & LEGOY

4 4785 Caughlin Parkway

Reno, Nevada 89519

5 Telephone: (775) 827-2000

Facsimile: (775) 827-2185

6 Ekwan E. Rhow (admitted *pro hac vice*)

7 erhow@birdmarella.com

Shoshana E. Barnett (admitted *pro hac vice*)

8 sbarnett@birdmarella.com

BIRD, MARELLA, BOXER, WOLPERT, NESSIM,

9 DROOKS, LINCENBERG & RHOW, P.C.

1875 Century Park East, 23rd Floor

10 Los Angeles, California 90067-2561

Telephone: (310) 201-2100

11 Facsimile: (310) 201-2110

12 Attorneys for Defendant William Gould

13
14 **EIGHTH JUDICIAL DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16
17 JAMES J. COTTER, JR., individually
and derivatively on behalf of Reading
18 International, Inc.,

19 Plaintiff,

20 v.

21 MARGARET COTTER, et al,

22 Defendants.

Case No. A-15-719860-B

Dept. No. XI

DECLARATION OF COUNSEL
SHOSHANA E. BANNETT IN
SUPPORT OF MEMORANDUM
OF COSTS SUBMITTED BY
READING INTERNATIONAL,
INC.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. I am an active member of the Bar of the State of California and an Associate with Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, A Professional Corporation, attorneys of record for Defendant William Gould in this action. I was admitted pro hac vice to for this matter. I make this declaration in support of Defendant Reading International, Inc's ("Reading") Memorandum of Costs, as to the costs incurred by Reading on behalf of Mr. Gould. Except for those matters stated on information and belief, I make this declaration based upon personal knowledge and, if called upon to do so, I could and would so testify.

12
13
14
15

16
17
18
19

20
21
22
23
24
25
26
27
28

1 summary judgment, and also, for preparation of trial testimony. Additionally,
2 transcripts of the testimony of my client was necessary, as it was likely that Plaintiff
3 hoped to use such testimony for purposes of impeachment at trial. The depositions
4 were also necessary to flesh out the specific claims made by Plaintiff, which
5 changed over time, and to determine the details of Plaintiff's experts' anticipated
6 trial testimony, to determine flaws in the analysis, or underlying information upon
7 which the experts relied, and for use for impeachment during trial. On this basis, Mr.
8 Gould requests all \$47,303.00 of the clerks' fees set forth in Exhibit 2.

9 5. On behalf of Mr. Gould, Reading incurred \$176,655 for expert witness
10 fees. Mr. Gould engaged one expert witness separate from the other defendants,
11 because he did not vote to terminate Plaintiff and needed an expert on corporate
12 governance who would not offer an opinion on the propriety of Plaintiff's
13 termination.

14 6. Mr. Gould engaged Alfred E. Osborne, who is the interim dean of
15 UCLA Anderson School of Management. He is also a Professor of Global
16 Economics, Management and Entrepreneurship. He teaches courses in family
17 business, governance, technology commercialization and business plan
18 development. He is also the founder and Faculty Director of the Anderson School's
19 highly ranked Harold and Pauline Price Center for Entrepreneurship and Innovation.
20 The Center organizes faculty research, curricula and student activities related to the
21 study of entrepreneurship and new business development at UCLA Anderson. He
22 also established and teach in the Director Education and Certification Program at the
23 Anderson School, which is designed to help officers and directors of public, private
24 and not-for-profit organizations prepare for the fiduciary duties and legal
25 responsibilities of governance. This program also addresses best practices and
26 topical issues confronting directors. Dr. Osborne also established and teaches in the
27 Steinbeck Family Business Seminar at the Anderson School, which is designed to
28 help families with significant ownership or control positions in business enterprises

1 understand and manage family and relationships in the governance of the business.
2 This program also addresses best practices and topical issues confronting directors
3 of family-controlled businesses. He has also served as a consultant and advisor to
4 public and private corporations on matters of corporate governance. He has served
5 as a director of more than a dozen public corporations and many private companies,
6 including family-controlled enterprises and entrepreneurial ventures, and in that
7 capacity helped to hire CEOs.

8 7. Dr. Osborne's testimony and opinion on matters of corporate
9 governance was necessary to address the broad array of allegedly improper actions
10 that Plaintiff alleged the Reading Board of Directors took, including Plaintiff's
11 claim that Mr. Gould breached his fiduciary duty as chair of the CEO search
12 committee by recommending Ellen Cotter for the position of CEO, among other
13 issues. Dr. Osborne prepared an initial expert report and two rebuttal reports – a
14 rebuttal to Plaintiff's expert, former Chief Justice Myron T. Steele and to Plaintiff's
15 expert Richard Spitz, who worked at an executive search firm.

16 8. According to Chief Justice Steele's expert report, he charged Plaintiff
17 \$1,075 per hour. According to Mr. Spitz's report, he charged Plaintiff \$850 per
18 hour. Dr. Osborne charged Mr. Gould \$1500 per hour. In total, the charge for Dr.
19 Osborne's expert services including all support staff services, administrative
20 expenses and preparing for and appearing at two depositions, was \$176,655.

21 9. Here, Mr. Gould's engagement of his expert was critical in securing his
22 dismissal. Dr. Osborne responded to Plaintiff's numerous alleged breaches of
23 fiduciary duty and his opinion that Mr. Gould was independent and disinterested and
24 did not breach any fiduciary duties by his actions on Reading's Board formed the
25 basis of Mr. Gould's successful motion for summary judgment.

26 10. In addition, the reasonableness of Dr. Osborne's hourly rates and total
27 compensation is supported by the hourly rates and amounts charged by Plaintiff's
28 own experts, which are the same or higher: Chief Justice Steele charged \$1,075 per

1 and Richard Spitz charged \$850 per hour. At the time of their depositions, these
2 experts combined for up to approximately \$100,000 in billings (not including
3 preparing for or sitting for deposition). Here, while Dr. Osborne commands a high
4 hourly rate, he is very efficient. He wrote three expert reports and his total billings
5 include preparing for and sitting for two depositions and he billed only \$176,655.

6 11. Here, the amount billed by Dr. Osborne was reasonable in light of the
7 number of alleged breaches of fiduciary duty, his impressive background and
8 resume, and his unique skillset as both an academic expert in corporate governance,
9 and someone who has sat on numerous public and private boards. Moreover, Dr.
10 Osborne's experience was uniquely applicable to this case involving a family-
11 controlled business because he both teaches about family-controlled businesses and
12 has served on the board of family-controlled businesses. On this basis, Mr. Gould
13 requests all \$176,655 of expert fees, including administrative expenses, and
14 depositions, as set forth in Exhibit 3.

15 12. On behalf of Mr. Gould, Reading incurred \$877.52 for payment to the
16 official reporter for transcripts of court proceedings, as set forth in Exhibit 4. Such
17 transcripts were necessary to permit Defendants to prepare draft orders in
18 accordance with court rulings, and to otherwise assure an accurate record of the
19 Court's directives made in hearings. On this basis, Mr. Gould requests all \$877.52
20 for payment to the official reporter for transcripts of court proceedings.

21 13. On behalf of Mr. Gould, Reading incurred \$4,782.06, as set forth in
22 Exhibit 5, for photocopies. Over the course of nearly four years of litigation in this
23 action, defense counsel received documents that needed to be distributed to
24 Defendants, Plaintiff, expert witnesses, and other. The copies were also necessary
25 for firm's attorneys and support staff to undertake the basic tasks of litigation.
26 Physical or electronic copies of pleadings, briefs and exhibits were also made when
27 needed to take to Court for use during hearings, for use during strategy meetings
28 among counsel, and for the exhibit binders prepared in anticipated of the aborted

1 January 2018 trial. On this basis, Mr. Gould requests all \$4,782.06 incurred for
2 photocopies.

3 14. On behalf of Mr. Gould, Reading incurred \$442.95 in reasonable and
4 necessary postage and shipping charges as shown in Exhibit 6. As noted above,
5 several Defendants and other witnesses live across the country (and abroad).
6 Accordingly, in order to keep the other Defendants and witnesses apprised of filings
7 and other developments in the case, defense counsel must ship documents via U.S.
8 Post and Federal Express. Additionally, copies of documents were used by the
9 respective firms' attorneys and support staff during the course of preparing queries
10 and responses for written discovery, and for briefing during the extensive motion
11 practice involved in this matter *Id.* On this basis, Mr. Gould requests all \$442.95
12 incurred for reasonable and necessary postage and shipping charges.

13 15. On behalf of Mr. Gould, Reading incurred \$15,932.59, as shown in
14 Exhibit 7, for reasonable costs for travel and lodging, including taxi/Uber, parking
15 and meals, incurred taking depositions and conducting discovery. Given the 49 total
16 depositions conducted for the sake of Plaintiff's claims in this case all over the
17 United States, substantial costs for travel and lodging were incurred for Mr. Gould.
18 As noted in Paragraph 4, above, it was necessary for Mr. Gould's counsel to
19 participate in these depositions. Wherever possible, Mr. Gould's attorneys appeared
20 by telephone to keep costs down. On this basis, Mr. Gould requests all 15,932.59
21 incurred for reasonable costs for travel and lodging, including taxi/Uber, parking
22 and meals, incurred taking depositions and conducting discovery.

23 16. On behalf of Mr. Gould, Reading incurred \$11784.79 for reasonable
24 and necessary expenses for computerized services for legal research, as shown in
25 Exhibit 8 and Exhibit 1 (10/20/15 entry), which consists of legal research by Bird
26 Marella and local counsel Maupin, Cox & Legoy. Mr. Gould's expenses incurred in
27 legal research, which are expressly authorized in NRS 18.005(17), are reasonable
28 and necessary in light of the complexity of this action.

17. On behalf of Mr. Gould, Reading incurred \$7,424 for reasonable and necessary expenses for electronic discovery costs, as shown in Exhibit 9. These costs primarily consist of data hosting charges for Relativity, and reflect the number of documents that were exchanged in discovery. Such expenses were necessary in order for Mr. Gould to comply with his discovery obligations, particularly in light of Plaintiff's extensive discovery requests, and to be able to review and easily access the large number of documents produced in this matter.

18. On behalf of Mr. Gould, Reading incurred \$11,069.38 for reasonable costs for travel and lodging, including taxi/Uber, parking and meals, incurred for participating in Court proceedings, and for witness preparation, as shown in Exhibit

10. Mr. Gould is not a Nevada resident, and did not choose the venue of this litigation. This firm's offices are located in California, directly next door to Mr. Gould's office. Having counsel in California, next door to Mr. Gould's office allowed Mr. Gould to easily meet in-person with his lawyers. Travel to court proceedings was necessary in order to engage in meaningful participation in such proceedings.

19. This Affidavit is made in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on August 23, 2018, in Los Angeles, California.

/s/ Shoshana E. Bannett

Shashana E. Bannett

EXHIBIT 1

08/20/2018

BILLED COSTS FOR BILLED COSTS FOR [REDACTED]

Page 1

#	Type	Date	Atty	Description	Amount
640903	C	07/16/15		TC TELEPHONE CALLS	1.25
640909	C	07/16/15		TC TELEPHONE CALLS	1.25
643877	C	08/04/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR NOTICE OF MOTION FOR AN EXTENSION	3.50
643878	C	08/04/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR MOTION FOR EXTENSION OF TIME (FIRST APPEARANCE)	233.19
643879	C	08/05/15		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILE AND E-SERVE TWO NOTICES OF MOTIONS TO ASSOCIATE COUNSEL	7.00
643880	C	08/05/15		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILING MOTIONS TO ASSOCIATE COUNSEL FOR BONITA MOORE AND EKWAN RHOW	11.00
643881	C	08/10/15		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILE AND E-SERVE JOINDER TO MOTION TO COMPEL ARBITRATION	3.50
643886	C	08/12/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR JOINDER TO OPP. TO PL MOTION EXP. DISC.	3.50
645500	C	08/27/15		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILE FEES	14.00
645501	C	08/27/15		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILE FEES	14.00
646665	C	09/14/15		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILE AND SERVE	7.00
646965	C	09/17/15		FE FEDERAL EXPRESS: EXPRESS DELIVERIES	25.39
646656	C	09/17/15		LEGAL WINGS - COURIER SERVICES (Check # 104064)	40.00
647343	C	09/23/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILE NOTICE OF MOTION AND MOTION TO DISMISS COMPLAINT	1561.89
647344	C	09/24/15		8TH EIGHTH JUDICIAL DISTRICT COURT: INITIAL APPEARANCE FEE DISCLOSURE	3.50
647345	C	09/24/15		8TH EIGHTH JUDICIAL DISTRICT COURT: NOTICE OF HEARING - MOTION TO DISMISS	3.50
647613	C	10/01/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR JOINDER	3.50
649590	C	10/20/15		COMPUTER LEGAL RESEARCH - SEPTEMBER 2015	1106.79
651060	C	11/03/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR E-FILE	3.50
652029	C	11/12/15		JOINDER IN DEMAND FOR JURY TRIAL 8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR MOTION TO DISMISS FIRST AMENDED COMPLAINT	3.50

JA8866

08/20/2018

BILLED COSTS FOR BILLED COSTS FOR

Page 2

#	Type	Date	Atty	Description	Amount
652030	C	11/12/15		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR NOTICE OF HEARING - MTD FAC	3.50
660469	C	02/24/16		8TH EIGHTH JUDICIAL DISTRICT COURT: NOTICE OF HEARING	3.50
661637	C	03/07/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR GOULD'S MOTION TO DISMISS T2 PL/S FAC (E112)	3.50
661639	C	03/08/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR NOTICE OF HEARING (E112)	3.50
663177	C	03/18/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE FOR STIPULATION TO TAKE HEARING OFF CALENDAR (e112)	3.50
665202	C	04/06/16		8TH EIGHTH JUDICIAL DISTRICT COURT: REPLY TO ISO GOULD'S MTD (E112)	3.50
665255	C	04/15/16		CAROLYN RENNER - TRAVEL EXPENSES FOR TRAVEL TO LAS VEGAS TO ATTEND HEARING ON MOTION TO DISMISS AND EARLY CASE CONFERENCE ON APRIL 14, 2016 (E110) (Check # 105299)	423.82
665604	C	04/20/16		LEGAL WINGS - RUNNER SERVICES AND FILING FEE (E107) (Check # 105327)	53.50
666077	C	04/25/16		STATE BAR OF NEVADA - SCR 42 APPLICATION (E124) (Check # 105361)	550.00
666078	C	04/25/16		STATE BAR OF NEVADA - SCR 42 APPLICATION (E124) (Check # 105362)	550.00
667612	C	05/06/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
670143	C	05/16/16		8th JUDICIAL DISTRICT COURT - FILE MOTIONS TO ASSOCIATE COUNSEL	7.00
672003	C	06/27/16		8TH EIGHTH JUDICIAL DISTRICT COURT: E-FILING OF TWO NOTICES OF ENTRY OF ORDER	7.00
671950	C	06/30/16		LEGAL WINGS - COURIER SERVICES AND FILING FEE (Check # 105701)	67.00
673102	C	07/11/16		FE FEDERAL EXPRESS: EXPRESS DELIVERIES JUNE 2016	26.37
673505	C	07/19/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING NOTICE OF WITHDRAWAL OF ATTORNEY - BONITA D. MOORE	3.50
675203	C	08/09/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
677639	C	08/26/16		8TH EIGHTH JUDICIAL DISTRICT COURT: EXPERT WITNESS DISCLOSURE FILING FEE	7.00
679933	C	09/23/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
678896	C	09/23/16		8TH JUDICIAL DISTRICT COURT - FILING FEE (Check # ONLINE)	419.00

JA8867

08/20/2018

BILLED COSTS FOR BILLED COSTS FOR [REDACTED]

Page 3

#	Type	Date	Atty	Description	Amount
680987	C	10/13/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	14.00
680988	C	10/21/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	7.00
681263	C	10/25/16		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING JOINDERS FEE	7.00
681260	C	10/26/16		CAROLYN RENNER - TRAVEL EXPENSES FOR HEARING ON MOTIONS IN LAS VEGAS ON OCTOBER 27, 2016 (Check # 106318)	507.96
682223	C	11/02/16		CAROLYN RENNER - TRAVEL EXPENSES: TRAVEL TO LAS VEGAS FOR HEARING ON MOTION (Check # 106359)	128.43
696394	C	04/07/17		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
714685	C	10/17/17		8TH EIGHTH JUDICIAL DISTRICT COURT: FILE JOINDER	3.50
714693	C	11/09/17		8TH EIGHTH JUDICIAL DISTRICT COURT: FILE MOTINO IN LIMINE	3.50
716347	C	12/01/17		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
716346	C	12/04/17		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING CHARGE	3.50
719949	C	12/05/17		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
717981	C	12/06/17		E112 EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
719946	C	12/27/17		2ND JU SECOND JUDICIAL DISTRICT COURT: FILING FEE	10.50
719915	C	01/03/18		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
722417	C	02/15/18		8TH EIGHTH JUDICIAL DISTRICT COURT: FILE CASE APPEAL	28.22
723916	C	03/01/18		SUPREME COURT CLERK'S OFFICE - FILING FEE (Check # 108878)	250.00
729048	C	04/25/18		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
729049	C	04/25/18		JUNES LEGAL SERVICE: COPIES TO JUDGES CHAMBERS IN LAS VEGAS	51.00
728498	C	04/25/18		CAROLYN RENNER - TRAVEL EXPENSES: TRAVEL TO LAS VEGAS FOR HEARING (Check # 109095)	531.96
729131	C	05/02/18		CAROLYN RENNER - TRAVEL EXPENSES: MEALS, PARKING, AND TAXI FARE (Check # 109142)	78.76
729659	C	05/07/18		CAROLYN RENNER - TRAVEL EXPENSES: TRAVEL TO LAS VEGAS FOR HEARING (Check # 109156)	640.21
734899	C	06/18/18		8TH EIGHTH JUDICIAL DISTRICT COURT: FILING FEE	3.50
733601	C	06/20/18		CAROLYN RENNER - TRAVEL EXPENSES: TRAVEL TO LAS VEGAS FOR HEARING	714.90

JA8868

08/20/2018

BILLED COSTS FOR BILLED COSTS FOR

Page 4

#	Type	Date	Atty	Description	Amount
---	------	------	------	-------------	--------

(Check # 109373)

GRAND TOTAL

8201.39
=====

JA8869

EXHIBIT 2

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		52164			3/31/2016	1,277.25	Litigation Services>.Cert. copy of video of T. Storey's depo., 2/12 //LitigationServic LL000 LitigationServices//
4284	2		52767			5/31/2016	1,188.60	Litigation Service>.Video of G. Adams, V.1, 4/28 //Litigation Servi LL000 Litigation Service//
4284	2		52767			5/31/2016	1,456.70	Litigation Service>.Video of G. Adams, V.2, 4/29 //Litigation Servi LL000 Litigation Service//
4284	2		52767			5/31/2016	972.20	Litigation Service>.Video of E. Kane, V.1, 5/2 //Litigation Servi LL000 Litigation Service//
4284	2		52767			5/31/2016	1,557.60	Litigation Service>.Video of D. McEachern, 5/6 //Litigation Servi LL000 Litigation Service//
4284	2		52767			5/31/2016	869.05	Litigation Service>.Video of E. Kane, V.2, 5/3 //Litigation Servi LL000 Litigation Service//
4284	2		52767			5/31/2016	1,376.65	Litigation Services>.Cert. copy of M. Cotter, V.1, transcript, 5/12 //LitigationServic LL000 LitigationServices//
4284	2		52767			5/31/2016	914.60	Litigation Servivces>.Cert. copy of M. Cotter transcript, V.2, 5/13 //LitigationServic LL000 LitigationServices//
4284	2		52996			6/30/2016	980.10	Litigation Services>.Cert. copy of E. Cotter, V2, transcript, 5/19 //LitigationServic LL000 LitigationServices//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		52996			6/30/2016	1,835.75	Veritext>.Cert. transcript of J. Cotter, V.1, 5/16 //Veritext VE100 Veritext//
4284	2		52996			6/30/2016	1,754.05	Veritext>.Cert. transcript of J. Cotter, V.2, 5/17 //Veritext VE100 Veritext//
4284	2		52996			6/30/2016	406.15	Veritext>.Cert. transcript of J. Viran, 5/9 //Veritext VE100 Veritext//
4284	2		52996			6/30/2016	1,637.25	Veritext>.Cert. transcript of A. Shapiro, 6/6 //Veritext VE100 Veritext//
4284	2		52996			6/30/2016	778.00	Veritext>.Video of J. Cotter, Jr., 5/16 //Veritext VE100 Veritext//
4284	2		52996			6/30/2016	715.50	Veritext>.Video of J. Cotter, Jr., V.2, 5/17 //Veritext VE100 Veritext//
4284	2		53286			7/31/2016	1,138.70	Litigation Services>.Cert. copy of E. Kane,V.3 depo., 6/9 //LitigationServic LL000 LitigationServices//
4284	2		53286			7/31/2016	1,242.50	Litigation Services>.Cert. copy of E. Cotter, V.1, transcript, 5/18 //LitigationServic LL000 LitigationServices//
4284	2		53286			7/31/2016	338.75	Litigation Services>.Cert. copy of video of E. Kane, V.4, 6/10 //LitigationServic LL000 LitigationServices//
4284	2		53286			7/31/2016	926.75	Litigation Services>.Cert. copy of video of M. Cotter, 6/15 //LitigationService LL000 LitigationServices&//
4284	2		53286			7/31/2016	1,154.35	Litigation Services>.Cert. copy of video of E. Cotter, 6/16 //LitigationServic LL000 LitigationServices//
4284	2		53286			7/31/2016	1,011.00	Litigation Services>.Cert. copy of video of W. Ellis, 6/28 //LitigationServic LL000 LitigationServices//
4284	2		53286			7/31/2016	1,329.80	Litigation Services>.Cert. copy of Wm. Gould,V2 video, 6/29 //LitigationServic LL000 LitigationServices//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		53286			7/31/2016	853.25	Litigation Services>.1 cert. copy of video depo. of D. McEachern,V2, 7/7 //LitigationServic LL000 LitigationServices//
4284	2	MEM	53286			7/31/2016	1,100.95	Litigation Services>.Video of W. Gould, 6/8 //LitigationServic LL000 LitigationServices//
4284	2		53539			8/31/2016	1,316.85	Veritext>.Cert. transcript of J. Cotter, Jr., V.3, 7/6 //Veritext VE100 Veritext//
4284	2		53539			8/31/2016	505.00	Litigation Services>.Cert. copy of Video, T. Storey, 8/3 //Litigation Services and Technologies of Nevada, LLC//
4284	2		53539			8/31/2016	626.85	Litigation Services>.Cert. copy of video depo. of R. Mayes, 8/18 //LitigationServic LL000 LitigationServices//
4284	2		54252			11/30/2016	721.15	Litigation Services>.Cert. copy of video depo of J. Foster, 10/20 //LitigationService LL000 LitigationServices&//
4284	2		54252			11/30/2016	1,844.45	Veritext>.Cert. transcript of T. Duarte-Silva, 10/18 //Veritext VE100 Veritext//
4284	2		54252			11/30/2016	1,354.35	Veritext>.Cert. transc. of M. Steele, 10/19 //Veritext VE100 Veritext//
4284	2		54252			11/30/2016	1,132.50	Veritext>.Cert. transcript of J. Finnerty, 10/17 //Veritext VE100 Veritext//
4284	2		54252			11/30/2016	567.50	Litigation Services>.1 cert. copy & video of B. Strombom depo., 11/16 //LitigationServic LL000 LitigationServices//
4284	2		54555			12/31/2016	829.75	Cert. transc. J. Finnerty - revised //Veritext VE100 Veritext//
4284	2		54555			12/31/2016	-302.75	Veritext>.Credit for Portion of Cert. transcript of J. Finnerty, 10/17 //\$1,132.50 originally billed, actual charges were \$829.75//
4284	2		54555			12/31/2016	757.20	Litigation Services>.Cert. copy of video depo of M. Klausner, 11/30 //LitigationServic LI401 LitigationServices//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		54555			12/31/2016	729.70	Veritext>.Cert. transcript of A. Nagy, 11/29 //Veritext VE100 Veritext//
4284	2		54555			12/31/2016	1,863.50	Litigation Services>.1 cert. copy of video dpo of A. Osborne, Jr., 11/17 //LitigationServic LI401 LitigationServices//
4284	2		54555			12/31/2016	576.40	Litigation Services>.1 cert. copy of video depo of R. Roll, 10/26 //LitigationServic LI401 LitigationServices//
4284	2		54805			1/31/2017	1,187.70	Veritext>.Cert. transcript of R. Spitz, 12/7 //Veritext VE100 Veritext//
4284	2		55207			3/31/2017	1,222.30	Litigation Services>.Cert. copy of J. Coddington deposition, 3/1 //LitigationServic LI401 LitigationServices//
4284	2		55752			5/31/2017	698.35	Litigation Services>.1 cert. copy of video of E. Cotter (confidential) //LitigationServic LI401 LitigationServices//
4284	2		55752			5/31/2017	466.25	Litigation Services>.1 cert. copy of video-D.McEachern V.3 (confidential) //LitigationServic LI401 LitigationServices//
4284	2		56432			7/31/2017	1,991.15	Veritext>.Cert. transcript of J. Cotter, V.4, 7/11 //Veritext VE100 Veritext//
4284	2		56432			7/31/2017	934.25	Veritext>.Video of J. Cotter, 7/11 //Veritext VE100 Veritext//
4284	2		57112			10/31/2017	874.00	Litigation Services>.1 cert. copy of video depo. of A. Osborne, V2, 9/19 //LitigationServic LI401 LitigationServices//
4284	2		57351			11/30/2017	591.05	Litigation Services>.Cert. copy of G. Adams transcript, V.3, 10/17 //LitigationServic LI401 LitigationServices//
							TOTAL	
							47,303.00	

EXHIBIT 3

A.E. OSBORNE ASSOCIATES, INC.

INVOICE DETAIL FOR PROFESSIONAL SERVICES RENDERED

INVOICE # COTTER003
Sunday October 16, 2016

Dr. Alfred E. Osborne, Jr.
Schedule of Expert Consultation Hours
September 1-28, 2016

date	day	time*	hours	work performed
9/1/2016	Thursday	05:00-07:00	2.00	review documents
9/2/2016	Friday	06:00-08:30	2.50	conference with counsel
9/3/2016	Saturday	07:00-09:30	2.50	start rebuttal report
9/4/2016	Sunday	05:00-08:00	3.00	write rebuttal
9/5/2016	Monday	03:00-04:30	1.50	write rebuttal
9/6/2016	Tuesday	21:15 -22:00	0.75	review documents
9/23/2016	Friday	17:00-18:25	1.25	write rebuttal
9/24/2016	Saturday	06:00-08:30	2.50	review documents
9/25/2016	Sunday	21:00-01:30	4.50	write rebuttal
9/26/2016	Monday	06:15-07:30	1.25	write rebuttal
9/27/2016	Tuesday	18:10-18:40	0.50	conference with counsel
9/28/2016	Wednesday	17:45-18:30	0.75	review documents
9/28/2016	Wednesday	18:30-19:15	0.75	conference with counsel
Total Project Hours			23.75	

Professional Services provided @ \$1500/hour \$ 35,625.00

Total Amount Now Due \$ 35,625.00

ELECTRONIC REMITTANCE INFORMATION

BENEFICIARY: A. E. Osborne Associates, Inc. FEIN# 95-3435654
Account Number: 20619011682
Bank Name: UNION BANK
Bank Address: CENTURY CITY, 1901 AVE. OF THE STARS, Los Angeles, CA 90067
Swift Code: BOFCUS33MP
ABA No.: 122000496

JA8876

A.E. OSBORNE ASSOCIATES, INC.

INVOICE DETAIL FOR PROFESSIONAL SERVICES RENDERED

INVOICE # COTTER002
Saturday 9/25/2016

Dr. Alfred E. Osborne, Jr.
Schedule of Expert Consultation Hours
August 10-August 31, 2016

date	day	time*	hours	work performed
8/11/2016	Thursday	05:00-07:00	2.00	review documents
8/12/2016	Friday	06:00-08:30	2.50	review documents
8/13/2016	Saturday	07:00-09:30	2.50	review documents
8/15/2016	Sunday	05:00-08:00	3.00	start report draft
8/17/2016	Wednesday	04:00-04:30	0.50	conference with counsel
8/18/2016	Thursday	21:15 -22:00	0.75	review documents
8/19/2016	Friday	21:00-23:30	2.50	draft report
8/20/2016	Saturday	05:00-07:00	2.00	review documents
8/21/2016	Sunday	07:00-10:00	3.00	draft report
8/21/2016	Sunday	20:30-24:00	3.50	draft report
8/22/2016	Monday	06:00-13:30	7.50	draft report
8/22/2016	Monday	19:00-20:00	1.00	conference with counsel
8/22/2016	Monday	20:30-21:30	1.00	review documents
8/22/2016	Monday	22:00-01:30	3.50	conference with counsel
8/23/2016	Tuesday	06:30-08:30	2.00	draft report
8/24/2016	Wednesday	04:00-06:00	2.00	draft report
8/25/2016	Thursday	10:15-12:15	2.00	review documents
8/25/2016	Thursday	02:30-06:30	4.00	conference with counsel
8/29/2016	Monday	11:30-12:00	0.50	review reports
8/29/2016	Monday	01:45-02:15	0.50	conference with counsel
8/29/2016	Monday	06:15-06:45	0.50	review reports
8/31/2016	Tuesday	02:50-03:35	0.75	conference with counsel
8/31/2016	Tuesday	05:10-05:40	0.50	review reports
8/31/2016	Tuesday	06:15-06:30	0.25	review reports

Total Project Hours 48.25

*8/11-25 are EST, 8/29 is CST, 8/31 is PST

Professional Services provided @ \$1500/hour \$ 72,375.00
LESS; COTTER001, INITIAL RETAINER \$ 10,000.00

Total Amount Now Due \$ 62,375.00

JA8877

A.E. OSBORNE ASSOCIATES, INC.

INVOICE DETAIL FOR PROFESSIONAL SERVICES RENDERED

INVOICE # COTTER004
Sunday Nov 22, 2016

Dr. Alfred E. Osborne, Jr.
Schedule of Expert Consultation Hours
October 1-October 31, 2016

date	day	time*	hours	work performed
10/1/2016	Thursday	05:00-06:00	1.00	review documents
10/2/2016	Sunday	06:00-08:30	2.50	conference with counsel
10/5/2016	Wednesday	03:00-05:00	2.00	conference with counsel
10/5/2016	Wednesday	21:00-22:00	1.00	review documents
10/6/2016	Thursday	21:15 -22:00	0.75	review documents
10/6/2016	Friday	09:00-11:00	2.00	review documents
10/7/2016	Friday	02:00-04:00	2.00	review documents
10/7/2016	Friday	05:15-06:30	1.25	review documents
10/8/2016	Saturday	06:00-07:15	1.25	review documents
10/8/2016	Saturday	08:30-12:00	3.50	meeting with counsel
10/8/2016	Saturday	21:00-22:30	1.50	review documents
10/10/2016	Monday	03:45-05:45	2.00	review documents
10/11/2016	Tuesday	06:00-08:00	2.00	review documents

Total Project Hours 22.75

Professional Services provided @ \$1500/hour \$ 34,125.00

Previous Unpaid Balance - Cotter003 \$ 35,625.00

Total Amount Now Due **\$ 69,750.00**

ELECTRONIC REMITTANCE INFORMATION

BENEFICIARY: A. E. Osborne Associates, Inc. FEIN# 95-3435654

Account Number: 20619011682

Bank Name: UNION BANK

Bank Address: CENTURY CITY, 1901 AVE. OF THE STARS, Los Angeles, CA 90067

Swift Code: BOFCUS33MP

ABA No.: 122000496

JA8878

A.E. OSBORNE ASSOCIATES, INC.

INVOICE DETAIL FOR PROFESSIONAL SERVICES RENDERED

INVOICE # COTTER005
Saturday December 3, 2016

Dr. Alfred E. Osborne, Jr.
Schedule of Expert Consultation Hours
November 1-17, 2016

date	day	time*	hours	work performed
11/13/2016	Sunday	09:00-10:00	1.00	review reports
11/14/2016	Monday	05:30-06:15	0.75	review documents
11/16/2016	Wednesday	10:45-12:15	1.50	conference with counsel
11/16/2016	Wednesday	08:30-11:30	3.00	review documents
11/17/2016	Thursday	08:45-05:30	8.00	deposition (less 45 min for lunch)

Total Project Hours 14.25

Professional Services provided @ \$1500/hour \$ 21,375.00

Other Expenses: parking 11/17 \$ 30.00

Total Amount Now Due **\$ 21,405.00**

ELECTRONIC REMITTANCE INFORMATION

BENEFICIARY: A. E. Osborne Associates, Inc. FEIN# 95-3435654

Account Number: 20619011682

Bank Name: UNION BANK

Bank Address: CENTURY CITY, 1901 AVE. OF THE STARS, Los Angeles, CA 90067

Swift Code: BOFCUS33MP

ABA No.: 122000496

JA8879

A.E.Osborne Associates, Inc.

DATE: October 25, 2017

INVOICE # Cotter006

Accounting Department
Reading International, Inc.
6100 Center Drive, Suite 900,
Los Angeles, CA 90045

RE: Cotter vs Cotter

September 17-19, 2017 Professional Services Preparation for Deposition volume 2.	\$7,500.00
---	------------

Deposition Services volume 2	\$5,625.00
------------------------------	------------

Balance Now Due	\$ 13,125.00
------------------------	---------------------

Please make your remittance for the above amount payable to **A. E. Osborne Associates, Inc.** and transfer funds into my bank account at Union Bank of California in accordance with the electronic remittance information noted below or, if you prefer, forward your check to my attention at the letterhead address.

Tax Identification Number 95-3435654. Thank you

ELECTRONIC REMITTANCE INFORMATION

BENEFICIARY: A. E. Osborne Associates, Inc. FEIN# 95-3435654

Account Number: 2061901682

Bank Name: UNION BANK

Bank Address: CENTURY CITY-PRIORITY, 1901 AVE. OF THE STARS, Los Angeles, CA 90067

Swift Code: BOFCUS33MP

ABA No.: 122000496

3533 Beverly Ridge Drive • Sherman Oaks, California 91423
Telephone (818) 789-3915 • E-mail: aeosborne@yahoo.com

JA8880

A.E. OSBORNE ASSOCIATES, INC.

INVOICE DETAIL FOR PROFESSIONAL SERVICES RENDERED

INVOICE # COTTER006
Wednesday October 25, 2017

Dr. Alfred E. Osborne, Jr.
Schedule of Expert Consultation Hours
November 1-17, 2016

date	day	time*	hours	work performed
9/17/2017	Sunday	09:00-10:00 PM	1.00	review earlier deposition
9/18/2017	Monday	05:30-06:15 AM	0.75	review expert reports
9/18/2017	Monday	01:30-2:15 PM	0.75	conference with counsel
9/18/2017	Monday	08:30-11:00 PM	1.50	deposition preparation
9/19/2017	Tuesday	06:00-07:00 AM	1.00	deposition preparation
9/19/2017	Tuesday	09:30-01:15 PM	3.75	deposition
Total Project Hours			8.75	

Professional Services provided @ \$1500/hour **\$ 13,125.00**

Allocation to Mark Krum @ Lewis Roca \$ 5,625.00

Allocation to BirdMarella \$ 7,500.00

ELECTRONIC REMITTANCE INFORMATION

BENEFICIARY: A. E. Osborne Associates, Inc. FEIN# 95-3435654

Account Number: 2061901682

Bank Name: UNION BANK

Bank Address: CENTURY CITY, 1901 AVE. OF THE STARS, Los Angeles, CA 90067

Swift Code: BOFCUS33MP

ABA No.: 122000496

JA8881

EXHIBIT 4

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		51913			2/29/2016	112.42	Florence Hoyt>.Transcript 1-16-16 //Florence M. Hoyt HH000 Florence M. Hoyt//
4284	2		53909			10/31/2016	561.10	Florence Hoyt>.Transcript 10-27-16 hearing //Florence M. Hoyt HH000 Florence M. Hoyt//
4284	2		57577			12/31/2017	204.00	Florence Hoyt>.Transcript, 12/11 //Florence M. Hoyt HH000 Florence M. Hoyt//
							TOTAL	
							877.52	

EXHIBIT 5

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		52164			3/31/2016	148.15	Advanced Discovery>.Litigation copying //Advanced Discove AD300 Advanced Discovery//
4284	2		52164			3/31/2016	56.07	Advanced Discovery>.Litigation copying //Advanced Discove AD300 Advanced Discovery//
4284	2		50138	PC	Reproduction Costs	7/15/2015	1.26	Reproduction Costs - 18 Pages @ .07/pp
4284	2		50708	PC	Reproduction Costs	9/29/2015	55.37	Reproduction Costs - 791 Pages @ .07/pp
4284	2		50827	PC	Reproduction Costs	10/8/2015	5.60	Reproduction Costs - 80 Pages @ .07/pp
4284	2		51913	PC	Reproduction Costs	2/29/2016	171.01	Reproduction Costs - 2,443 Pages @ .07/pp
4284	2		52164	PC	Reproduction Costs	3/31/2016	86.10	Reproduction Costs - 1,230 Pages @ .07/pp
4284	2		52493	PC	Reproduction Costs	4/29/2016	98.84	Reproduction Costs - 1,412 Pages @ .07/pp
4284	2		52767	PC	Reproduction Costs	5/31/2016	96.18	Reproduction Costs - 1,374 Pages @ .07/pp
4284	2		52996	PC	Reproduction Costs	6/30/2016	125.86	Reproduction Costs - 1,798 Pages @ .07/pp
4284	2		53286	PC	Reproduction Costs	7/29/2016	112.42	Reproduction Costs - 1,606 Pages @ .07/pp
4284	2		53539	PC	Reproduction Costs	8/29/2016	540.40	E101 - Copying Reproduction Costs - 7,720 Pages @ .07/pp
4284	2		53770	PC	Reproduction Costs	9/30/2016	126.28	Reproduction Costs - 1,804 Pages @ .07/pp

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		53909	PC	Reproduction Costs	10/31/2016	232.05	Reproduction Costs - 3,315 Pages @ .07/pp
4284	2		54252	PC	Reproduction Costs	11/30/2016	150.71	Reproduction Costs - 2,153 Pages @ .07/pp
4284	2		54252	pc	Reproduction Costs	11/1/2016	266.25	
4284	2		54252	pc	Reproduction Costs	11/4/2016	5.85	
4284	2		54252	pc	Reproduction Costs	11/21/2016	0.30	
4284	2		54555	pc	Reproduction Costs	12/1/2016	216.30	
4284	2		54555	pc	Reproduction Costs	12/5/2016	0.30	
4284	2		54555	pc	Reproduction Costs	12/14/2016	6.75	
4284	2		54555	pc	Reproduction Costs	12/19/2016	14.10	
4284	2		54805	pc	Reproduction Costs	1/6/2017	52.80	
4284	2		54805	pc	Reproduction Costs	1/24/2017	20.10	
4284	2		54980	pc	Reproduction Costs	2/14/2017	378.15	
4284	2		56054	pc	Reproduction Costs	6/5/2017	26.10	
4284	2		57112	pc	Reproduction Costs	10/12/2017	18.00	
4284	2		57112	pc	Reproduction Costs	10/30/2017	9.30	
4284	2		57351	pc	Reproduction Costs	11/14/2017	129.75	

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		57351	pc	Reproduction Costs	11/17/2017	7.95	
4284	2		57577	pc	Reproduction Costs	12/1/2017	74.85	
4284	2		57577	pc	Reproduction Costs	12/6/2017	426.15	
4284	2		57577	pc	Reproduction Costs	12/20/2017	0.60	
4284	2		57577	pc	Reproduction Costs	12/26/2017	28.35	
4284	2		57846	pc	Reproduction Costs	1/3/2018	29.70	
4284	2		58611	pc	Reproduction Costs	4/2/2018	0.30	
4284	2		58611	pc	Reproduction Costs	4/4/2018	25.80	
4284	2		58611	pc	Reproduction Costs	4/27/2018	167.55	
4284	2		58864	pc	Reproduction Costs	5/15/2018	61.05	
4284	2		59045	pc	Reproduction Costs	6/15/2018	87.45	
4284	2		59045	pc	Reproduction Costs	6/20/2018	251.85	
4284	2		53909	sr	Summitt Reprographics>.Litiga tion Copies	10/31/2016	258.04	4284.2 //Summitt Reprogra SU050 Summitt Reprograph//
4284	2		58864	sr	Summitt Reprographics>.Litiga tion Copies	5/31/2018	212.07	4284.2 //Summitt Reprogra SU050 Summitt Reprograph//
						TOTAL:	4782.06	

EXHIBIT 6

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	SEB	59045			6/30/2018	20.00	FedEx charges //First Bankcard (MC747 First Bankcard (SE//
4284	2		50138	fx	FedEx	7/31/2015	13.12	//510554434// //Federal Express FX100 Federal Express Co//
4284	2		50138	fx	FedEx	7/31/2015	13.12	//510554434// //Federal Express FX100 Federal Express Co//
4284	2		50827	fx	FedEx	10/31/2015	10.31	//520047256// //Federal Express FX100 Federal Express Co//
4284	2		52164	fx	FedEx	3/31/2016	14.66	//534772754// //Federal Express FX100 Federal Express Co//
4284	2		53539	fx	FedEx	8/31/2016	111.51	//551055235// //Federal Express FX100 Federal Express Co//
4284	2		53539	fx	FedEx	8/31/2016	149.87	//552644884// //Federal Express FX100 Federal Express Co//
4284	2		55207	fx	FedEx	3/31/2017	11.29	//574802462// //Federal Express FX100 Federal Express Co//
4284	2		55490	fx	FedEx	4/30/2017	11.46	//577112164// //Federal Express FX100 Federal Express Co//
4284	2		57351	fx	FedEx	11/30/2017	11.71	//600450057// //FedEx FX100 FedEx//
4284	2		58611	fx	FedEx	4/30/2018	12.53	//615003562// //FedEx FX100 FedEx//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		58611	fx	FedEx	4/30/2018	40.78	//617857328// //FedEx FX100 FedEx//
4284	2		58611	fx	FedEx	4/30/2018	22.59	//617857328// //FedEx FX100 FedEx//
							TOTAL	
							442.95	

EXHIBIT 7

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	HDV	52996			6/30/2016	13.00	Parking, 5/18 //American Express AM110 American Express//
4284	2	HDV	52996			6/30/2016	7.48	Fastrak, 6/11 //American Express AM110 American Express//
4284	2	HDV	52996			6/30/2016	49.50	Parking, 5/25, 6/1 //American Express AM110 American Express//
4284	2	SEB	52996			6/30/2016	525.97	Hotel, San Diego, 5/1-3 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	52996			6/30/2016	16.47	Meals, 5/2-3 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	52996			6/30/2016	7.00	Parking, 5/2 //First Bankcard (MC747 First Bankcard (SE//
4284	2	EER	53286			7/31/2016	1,159.10	Airfares, SFO/JFK/NJ/DC //American Express AM110 American Express//
4284	2	EER	53286			7/31/2016	32.98	Meals, 6/17 //American Express AM110 American Express//
4284	2	EER	53286			7/31/2016	1,312.86	Hotel, NY//American Express AM110 American Express//
4284	2	EER	53286			7/31/2016	505.27	Taxis, 6/15, 17, 19, 22 //American Express AM110 American Express//
4284	2	HDV	53286			7/31/2016	256.04	Hotel, San Diego, 6/9 //American Express AM110 American Express//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	HDV	53286			7/31/2016	34.00	Parking, 6/28 //American Express AM110 American Express//
4284	2	HDV	53909			10/31/2016	311.04	Mileage, 5/25, 6/1, 8, 10 //Hernan Vera VE050 Hernan Vera//
4284	2	SEB	53909			10/31/2016	33.92	Taxi, 10/14 //Shoshana Bannett BB000 Shoshana Bannett//
4284	2	SEB	54252			11/30/2016	25.00	Baggage fee //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	33.95	Inflight WiFi //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	156.09	Meals, 10/15-21 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	87.44	Taxis, 10/17-19 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	628.89	Hotel, NY 10/16-17 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	855.85	Hotel, Boston, 10/17-18 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	94.00	Upgrade airfare //First Bankcard (MC747 First Bankcard (SE//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	SEB	54252			11/30/2016	425.16	Hotel, Philadelphia, 10/18-19 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	1,775.27	Hotel, NY 10/19-22 //First Bankcard (MC747 F rst Bankcard (SE//
4284	2	SEB	54252			11/30/2016	362.00	Amtrak PA/NY //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	2,297.30	Airfares, MA/PA/NJ //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	54252			11/30/2016	46.14	Meal, 10/21
4284	2	SEB	54252			11/30/2016	43.00	Taxi, 10/22
4284	2	SEB	54252			11/30/2016	20.00	Misc. Cash Tips, 10/14, 10/19 & 10/23
4284	2	SEB	54252			11/30/2016	6.00	Meal, 10/14
4284	2	SEB	54252			11/30/2016	11.75	Taxi, 10/19
4284	2	SEB	54252			11/30/2016	70.66	Taxi, 10/23
4284	2	EER	54555			12/31/2016	30.00	Parking, 10/28 //American Express AM110 American Express//
4284	2	EER	54555			12/31/2016	55.70	Taxi, 10/27 //American Express AM110 American Express//
4284	2	EER	54555			12/31/2016	932.60	Hotel, Philadelphia 10/18-20 //American Express AM110 American Express//
4284	2	EER	54555			12/31/2016	82.86	Taxis, 10/20 //American Express AM110 American Express//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	EER	54555			12/31/2016	16.10	Meal, 10/19 //American Express AM110 American Express//
4284	2	EER	54555			12/31/2016	3,612.20	Airfare, Philadelphia //American Express AM110 American Express//
							TOTAL	
							15,932.59	

EXHIBIT 8

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		50708	cl	Computerized legal research	9/30/2015	13.53	
4284	2		57112	cl	Computerized legal research	10/31/2017	84.60	
4284	2		57351	cl	Computerized legal research	11/30/2017	281.71	
4284	2		57577	cl	Computerized legal research	12/31/2017	266.06	
4284	2		57846	cl	Computerized legal research	1/31/2018	19.88	
4284	2		58611	cl	Computerized legal research	4/30/2018	12.22	
							TOTAL	
							678.00	

EXHIBIT 9

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2			RH	Relativity Hosting Fees	7/31/2018	401.26	Relativity Data Hosting
4284	2		54805	RH	Relativity Hosting Fees	1/31/2017	383.10	Relativity Data Hosting
4284	2		54980	RH	Relativity Hosting Fees	2/28/2017	383.10	Relativity Data Hosting
4284	2		55207	RH	Relativity Hosting Fees	3/31/2017	383.10	Relativity Data Hosting
4284	2		55490	RH	Relativity Hosting Fees	4/30/2017	383.10	Relativity Data Hosting
4284	2		55752	RH	Relativity Hosting Fees	5/31/2017	383.10	Relativity Data Hosting
4284	2		56054	RH	Relativity Hosting Fees	6/30/2017	383.10	Relativity Data Hosting
4284	2		56432	RH	Relativity Hosting Fees	7/31/2017	383.10	Relativity Data Hosting
4284	2		56639	RH	Relativity Hosting Fees	8/31/2017	383.10	Relativity Data Hosting
4284	2		56790	RH	Relativity Hosting Fees	9/30/2017	383.10	Relativity Data Hosting
4284	2		57112	RH	Relativity Hosting Fees	10/31/2017	383.10	Relativity Data Hosting
4284	2		57351	RH	Relativity Hosting Fees	11/30/2017	383.10	Relativity Data Hosting
4284	2		57577	RH	Relativity Hosting Fees	12/31/2017	395.08	Relativity Data Hosting
4284	2		57846	RH	Relativity Hosting Fees	1/31/2018	395.08	Relativity Data Hosting
4284	2		58121	RH	Relativity Hosting Fees	2/28/2018	395.08	Relativity Data Hosting
4284	2		58338	RH	Relativity Hosting Fees	3/31/2018	395.11	Relativity Data Hosting

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2		58611	RH	Relativity Hosting Fees	4/30/2018	395.12	Relativity Data Hosting
4284	2		58864	RH	Relativity Hosting Fees	5/31/2018	401.26	Relativity Data Hosting
4284	2		59045	RH	Relativity Hosting Fees	6/30/2018	401.26	Relativity Data Hosting
4284	2		58864	RP	Relativity Processing Fees	5/31/2018	31.07	Data Processing
							TOTAL	
							7,424.42	

EXHIBIT 10

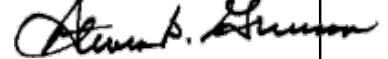
CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	SEB				7/31/2018	574.94	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB				7/31/2018	226.36	Hotel, Las Vegas, 6/18-19 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB				7/31/2018	54.36	Meals, 6/18-19 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB				7/31/2018	174.62	Taxis, 6/18-20 //First Bankcard (MC747 First Bankcard (SE//
4284	2	BDM	51185			11/30/2015	491.96	Airfare, Las Vegas //American Express AM110 American Express//
4284	2	BDM	51185			11/30/2015	131.04	Hotel, Las Vegas, 10/20-21 //American Express AM110 American Express//
4284	2	BDM	51427			12/31/2015	103.01	Taxis, 10/28-29 //First Bankcard (MC570 First Bankcard (BD//
4284	2	BDM	51427			12/31/2015	39.26	Meals, 10/29 //First Bankcard (MC570 First Bankcard (BD//
4284	2	EER	52493			4/30/2016	90.72	Hotel, Las Vegas, 4/7 //American Express AM110 American Express//
4284	2	EER	52493			4/30/2016	542.96	Airfare, Las Vegas //American Express AM110 American Express//
4284	2	SEB	52493			4/30/2016	133.92	Mileage, 5/1, 3 //Shoshana E. Bann BB000 Shoshana E. Bannet//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	EER	52767			5/31/2016	245.21	Taxis, Las Vegas, 4/13-15 //American Express AM110 American Express//
4284	2	EER	52767			5/31/2016	70.16	Hotel, Las Vegas 4/13-14 //American Express AM110 American Express//
4284	2	SEB	52996			6/30/2016	55.19	Taxis, 6/20-21 //Shoshana Bannett BB000 Shoshana Bannett//
4284	2	SEB	53286			7/31/2016	552.96	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	53286			7/31/2016	50.24	Taxi, 6/20 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	53286			7/31/2016	11.72	Meal, 6/21 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	53286			7/31/2016	126.56	Hotel, Las Vegas, 6/20 //First Bankcard (MC747 First Bankcard (SE//
4284	2	EER	54555			12/31/2016	473.94	Airfare, Las Vegas //American Express AM110 American Express//
4284	2	EER	54555			12/31/2016	119.42	Taxis, 12/1 //American Express AM110 American Express//
4284	2	SEB	55490			4/30/2017	131.42	Hotel, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	55490			4/30/2017	51.37	Meals, 3/1, 6 //First Bankcard (MC747 First Bankcard (SE//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	SEB	55490			4/30/2017	537.14	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	55490			4/30/2017	92.26	Taxis, 3/6 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57351			11/30/2017	569.45	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57351			11/30/2017	192.86	Hotel, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	EER	57577			12/31/2017	54.78	Taxi, 12/11 //American Express AM110 American Express//
4284	2	EER	57577			12/31/2017	24.67	Taxi, 12/11 //First Bankcard (MC620 First Bankcard (EE//
4284	2	EER	57577			12/31/2017	30.00	Parking, 12/11 //First Bankcard (MC620 First Bankcard (EE//
4284	2	SEB	57577			12/31/2017	64.05	Taxis, 11/19-20 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57577			12/31/2017	161.76	Meals, 11/19-20 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57577			12/31/2017	48.00	Parking, 11/20 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57577			12/31/2017	563.96	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	SEB	57577			12/31/2017	223.47	Hotel, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57577			12/31/2017	41.38	Meals, 12/27-28 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	57577			12/31/2017	52.03	Taxis, 12/27-28 //First Bankcard (MC747 First Bankcard (SE//
4284	2	EER	57846			1/31/2018	100.33	Taxis, 12/15, 1/8-9 //American Express AM110 American Express//
4284	2	EER	57846			1/31/2018	249.16	Hotel, Las Vegas //American Express AM110 American Express//
4284	2	EER	57846			1/31/2018	1,163.92	Airfare, Las Vegas //American Express AM110 American Express//
4284	2	SEB	58121			2/28/2018	31.00	Parking, 12/28 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58121			2/28/2018	21.90	Airfare, miscellaneous fee //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58121			2/28/2018	136.16	Balance Las Vegas hotel //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58121			2/28/2018	12.41	Taxi, 12/19 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58611			4/30/2018	620.17	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//

CODE	SFX	BIL EMP	INVOICE	GP	GROUPING	TRANS DATE	BILLABLE DOLLARS	TRANSACTION DESCRIPTION
4284	2	SEB	58611			4/30/2018	429.77	Hotel, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58611			4/30/2018	19.99	Inflight internet //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58611			4/30/2018	80.24	Taxi, 4/29 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	58864			5/31/2018	133.92	Mileage, 5/, 3 //Shoshana Bannett BA100 Shoshana Bannett//
4284	2	SEB	59045			6/30/2018	225.38	Taxis, 4/29-5/3 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	59045			6/30/2018	183.95	Meals, 4/30, 5/2 //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	59045			6/30/2018	539.94	Airfare, Las Vegas //First Bankcard (MC747 First Bankcard (SE//
4284	2	SEB	59045			6/30/2018	13.99	Inflight WiFi //First Bankcard (MC747 First Bankcard (SE//
							TOTAL	
							11,069.38	



1 NTSO
2 MARK E. FERRARIO, ESQ.
(NV Bar No. 1625)
3 KARA B. HENDRICKS, ESQ.
(NV Bar No. 7743)
4 TAMI D. COWDEN (NV Bar No. 8994)
GREENBERG TRAURIG, LLP
5 3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
6 Telephone: (702) 792-3773
Facsimile: (702) 792-9002
7 ferrariom@gtlaw.com
hendricksk@gtlaw.com
8 cowdent@gtlaw.com
Counsel for Reading International, Inc.

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 JAMES J. COTTER, JR., individually and
12 derivatively on behalf of Reading International,
Inc.,

13 Plaintiff,

14 v.

15 MARGARET COTTER, et al,
16 Defendants.

Case No. A-15-719860-B
Dept. No. XI

NOTICE OF ENTRY OF
STIPULATION AND ORDER

17
18 TO: All parties and their counsel of record:

19 YOU AND EACH OF YOU will please take notice that the *Stipulation and Order*
20 *Relating to Process for Filing Motion for Attorneys' Fees* was entered on September 4, 2018. A
21 copy of said order is attached hereto.

22 Dated: this 5th day of September 2018.

23 GREENBERG TRAURIG, LLP

24 /s/ Kara B. Hendricks

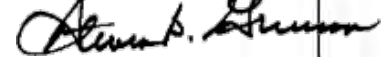
25 MARK E. FERRARIO (NV Bar No. 1625)
26 KARA B. HENDRICKS (NV Bar No. 7743)
TAMI D. COWDEN (NV Bar No. 8994)
3773 Howard Hughes Parkway, Suite 400 N.
Las Vegas, Nevada 89169
27 *Counsel for Reading International, Inc.*

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that on this day, I caused a true and correct copy of the forgoing *Notice of Entry of Stipulation and Order* be filed and served via the Court's Odyssey E-Filing system. The date and time of the electronic proof of service is in place of the date and place of deposit in the mail.

Dated: this 5th day of September 2018.

/s/ Andrea Lee Rosehill
AN EMPLOYEE OF GREENBERG TRAURIG, LLP



1 SAO
2 MARK E. FERRARIO, ESQ.
3 (NV Bar No. 1625)
4 KARA B. HENDRICKS, ESQ.
5 (NV Bar No. 7743)
6 GREENBERG TRAURIG, LLP
7 3773 Howard Hughes Parkway
8 Suite 400 North
9 Las Vegas, Nevada 89169
10 Telephone: (702) 792-3773
11 Facsimile: (702) 792-9002
12 ferrariom@gtlaw.com
13 hendricksk@gtlaw.com

14 *Counsel for Reading International, Inc.*

15
16
17
18
19
20
21
22
23
24
25
26
27
28
DISTRICT COURT
CLARK COUNTY, NEVADA

12 JAMES J. COTTER, JR., individually and
13 derivatively on behalf of Reading
14 International, Inc.,

15 Plaintiff,

16 v.

17 MARGARET COTTER, et al,

18 Defendants.

Case No. A-15-719860-B
Dept. No. XI

**STIPULATION AND ORDER
RELATING TO PROCESS FOR
FILING MOTION FOR ATTORNEY
FEES**

19 Plaintiff JAMES J. COTTER, Defendants MARGARET COTTER, ELLEN COTTER,
20 GUY ADAMS, EDWARD KANE, DOUGLAS McEACHERN, WILLIAM GOULD, JUDY
21 CODDING, MICHAEL WROTONIAK, and Nominal Defendant READING INTERNATIONAL,
22 INC., hereby agree on the following process pertinent to any Motion for Fees filed in this matter.
23 Specifically the parties agree that any Motion for Fees will include an affidavit or declaration
24 supporting: (1) the total amount of fees billed over the life of the case for any firm requesting fees;
25 (2) the firm's fees billed in each month since being retained; and (3) the name and number of
26 timekeepers (attorneys and paralegals) who worked in each firm on this case and their hourly rates.
27

1 In so doing, it is agreed that full billing statements are not required to be submitted to the Court
2 unless and until the Court has ruled that it will entertain a Motion for Fees by the defendants and
3 nominal defendant under NRS 18.010.2(b).

4 Dated this ____ day of August, 2018.

Dated this ____ day of August, 2018.

5 GREENBERG TRAURIG, LLP

MORRIS LAW GROUP

6
7 MARK E. FERRARIO (Bar No. 1625)
KARA B. HENDRICKS (Bar No. 7743)
8 TAMI D. COWDEN (Bar No. 8994)
3773 Howard Hughes Parkway
Suite 400 North
9 Las Vegas, Nevada 89169
10 FerrarioM@gtlaw.com
HendricksK@gtlaw.com

By: _____
STEVE MORRIS (Bar No. 1543)
AKKE LEVIN (Bar No. 9102)
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101

11 *Counsel for Reading International, Inc.*

YURKO, SALVESEN & REMZ, P.C.
Mark G. Krum (Bar No. 10913)
Noemi Ann Kawamoto
(admitted pro hac vice)
1 Washington Mall, 11th Floor
Boston, MA 02108

Attorneys for Appellant, James J. Cotter, J

14 Dated this 31st day of August, 2018.

15 COHEN-JOHNSON, LLC

16 
17 H. STAN JOHNSON (Bar No. 265)
375 E. Warm Springs Road, Suite 104
18 Las Vegas, Nevada 89119
(702) 823-3500
19 SJohnson@CohenJohnson.com

20 QUINN EMANUEL URQUHART & SULLIVAN,
LLP

21 MARSHALL M. SEARCY III
22 (Admitted pro hac vice)
865 S. Figueroa Street, 10th Floor
23 Los Angeles, California 90017
(213) 443-3000
24 MarshallSearcy@QuinnEmanuel.com

25 *Attorneys for Defendants Margaret Cotter,*
26 *Ellen Cotter, Guy Adams, Edward Kane and*
27 *Douglas McEachern*

1 In so doing, it is agreed that full billing statements are not required to be submitted to the Court
2 unless and until the Court has ruled that it will entertain a Motion for Fees by the defendants and
3 nominal defendant under NRS 18.010.2(b).

4 Dated this ____ day of August, 2018.


5 GREENBERG TRAURIG, LLP

6
7 MARK E. FERRARIO (Bar No. 1625)
8 KARA B. HENDRICKS (Bar No. 7743)
9 TAMI D. COWDEN (Bar No. 8994)
10 3773 Howard Hughes Parkway
11 Suite 400 North
12 Las Vegas, Nevada 89169
13 FerrarioM@gtlaw.com
14 HendricksK@gtlaw.com

15 *Counsel for Reading International, Inc.*

Dated this ____ day of August, 2018.

MORRIS LAW GROUP

By: 
STEVE MORRIS (Bar No. 1543)
AKKE LEVIN (Bar No. 9102)
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101

YURKO, SALVESEN & REMZ, P.C.
Mark G. Krum (Bar No. 10913)
Noemi Ann Kawamoto
(admitted pro hac vice)
1 Washington Mall, 11th Floor
Boston, MA 02108

Attorneys for Appellant, James J. Cotter, J

14 Dated this ____ day of August, 2018.

15 COHEN-JOHNSON, LLC

16
17 H. STAN JOHNSON (Bar No. 265)
18 255 E. Warm Springs Road, Suite 100
19 Las Vegas, Nevada 89119
(702) 823-3500
SJohnson@CohenJohnson.com

20 QUINN EMANUEL URQUHART & SULLIVAN,
21 LLP

22 MARSHALL M. SEARCY III
23 (Admitted pro hac vice)
24 865 S. Figueroa Street, 10th Floor
25 Los Angeles, California 90017
26 (213) 443-3000
MarshallSearcy@QuinnEmanuel.com

27 *Attorneys for Defendants Margaret Cotter,*
28 *Ellen Cotter, Guy Adams, Edward Kane and*
Douglas McEachern

1 In so doing, it is agreed that full billing statements are not required to be submitted to the Court
2 unless and until the Court has ruled that it will entertain a Motion for Fees by the defendants and
3 nominal defendant under NRS 18.010.2(b).

4 Dated this 31 day of August, 2018.

Dated this ____ day of August, 2018.

5 GREENBERG TRAURIG, LLP

MORRIS LAW GROUP

6 

By: _____

7 MARK E. FERRARIO (Bar No. 1625)
8 KARA B. HENDRICKS (Bar No. 7743)
9 TAMI D. COWDEN (Bar No. 8994)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
10 FerrarioM@gtlaw.com
HendricksK@gtlaw.com

STEVE MORRIS (Bar No. 1543)
AKKE LEVIN (Bar No. 9102)
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101

11 *Counsel for Reading International, Inc.*

YURKO, SALVESEN & REMZ, P.C.
Mark G. Krum (Bar No. 10913)
Noemi Ann Kawamoto
(admitted pro hac vice)
1 Washington Mall, 11th Floor
Boston, MA 02108

Attorneys for Appellant, James J. Cotter, J

14 Dated this ____ day of August, 2018.

15 COHEN-JOHNSON, LLC

17 H. STAN JOHNSON (Bar No. 265)
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500
18 SJohnson@CohenJohnson.com

20 QUINN EMANUEL URQUHART & SULLIVAN,
LLP

22 MARSHALL M. SEARCY III
(Admitted pro hac vice)
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000
24 MarshallSearcy@QuinnEmanuel.com

25 *Attorneys for Defendants Margaret Cotter,*
26 *Ellen Cotter, Guy Adams, Edward Kane and*
Douglas McEachern

ORDER

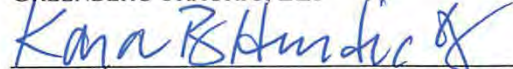
IT IS HEREBY ORDERED that any Motion for Fees will include an affidavit or declaration supporting: (1) the total amount of fees billed over the life of the case for any firm requesting fees; (2) the firm's fees billed in each month since being retained; and (3) the name and number of timekeepers (attorneys and paralegals) who worked in each firm on this case and their hourly rates. In so doing, it is agreed that full billing statements are not required to be submitted to the Court unless ~~and until the Court has ruled that it will entertain a Motion for Fees by the~~ ^{Further ordered by} ~~defendants and nominal defendant under NRS 18.010.2(b).~~ *Ref*

DATED this 4 ^{September} day of ~~August~~ 2018.


DISTRICT COURT JUDGE

Submitted by:

GREENBERG TRAURIG, LLP



MARK E. FERRARIO, ESQ. (NV Bar No. 1625)
KARA B. HENDRICKS, ESQ. (NV Bar No. 7743)
TAMI D. COWDEN, ESQ. (NV Bar No. 8994)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169

Counsel for Reading International, Inc.

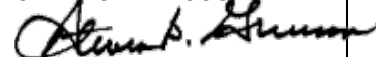
CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that on this day, I caused a true and correct copy of the forgoing **STIPULATION AND ORDER RELATING TO PROCESS FOR FILING MOTION FOR FEES** to be filed and served via the Court's Wiznet E-Filing system. The date and time of the electronic proof of service is in place of the date and place of deposit in the mail.

DATED this 4th day of *September* 2018.

/s/ Andrea Lee Rosehill

AN EMPLOYEE OF GREENBERG TRAURIG, LLP



MORRIS LAW GROUP

411 E. BONNEVILLE AVE., STE. 360 • LAS VEGAS, NEVADA 89101
702/474-9400 • FAX 702/474-9422

MRTX

MORRIS LAW GROUP

Steve Morris, Bar No. 1543

Akke Levin, Bar No. 9102

411 E. Bonneville Ave., Ste. 360

Las Vegas, Nevada 89101

Telephone: (702) 474-9400

Facsimile: (702) 474-9422

Email: sm@morrislawgroup.com

Email: al@morrislawgroup.com

Mark G. Krum, Bar No. 10913

Yurko, Salvesen & Remz, P.C.

1 Washington Mall, 11th Floor

Boston, MA 02108

Telephone: (617) 723-6900

Facsimile: (617) 723-6905

Email: mkrum@bizlit.com

Attorneys for Plaintiff

James J. Cotter, Jr.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

JAMES J. COTTER, JR.,) Case No. A-15-719860-B

derivatively on behalf of Reading) Dept. No. XI

International, Inc.,)

) Coordinated with:

Plaintiff,)

v.) Case No. P-14-0824-42-E

) Dept. No. XI

MARGARET COTTER, ELLEN)

COTTER, GUY ADAMS,) Jointly Administered

EDWARD KANE, DOUGLAS)

McEACHERN, WILLIAM) **PLAINTIFF'S MOTION TO**

GOULD, JUDY CODDING,) **RETAX COSTS**

MICHAEL WROTNIAK,)

) **Date:**

Defendants.) **Time:**

And)

READING INTERNATIONAL,)

INC., a Nevada corporation,)

Nominal Defendant.)

1 Plaintiff James J. Cotter, Jr. ("Cotter") hereby submits his Motion
2 to Retax Costs under NRS 18.111(4) in response to Reading International,
3 Inc. ("RDI")'s Verified Memorandum of Costs ("Cost Memo"). This Motion is
4 based on papers and pleadings on file, the exhibits attached hereto, the
5 following points and authorities, and any oral argument the Court may
6 allow.

7 MORRIS LAW GROUP

8 By: /s/ AKKE LEVIN

9 Steve Morris, Bar No. 1543
10 Akke Levin, Bar No. 9102
11 411 E. Bonneville Ave., Ste. 360
12 Las Vegas, Nevada 89101

13 Attorneys for Plaintiff
14 James J. Cotter, Jr.

15 **NOTICE OF MOTION**

16 TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL:

17 PLEASE TAKE NOTICE that the undersigned will bring
18 PLAINTIFF'S MOTION TO RETAX COSTS on for hearing on the **11** day
19 of **September**, 2018, at the hour of **9:00** o'clock **a**.m., in Department XI
20 of the above-referenced Court, located at 200 Lewis Avenue, Las Vegas, NV
21 89155.

22 MORRIS LAW GROUP

23 By: /s/ AKKE LEVIN

24 Steve Morris, Bar No. 1543
25 Akke Levin, Bar No. 9102
26 411 E. Bonneville Ave., Ste. 360
27 Las Vegas, Nevada 89101

28 Attorneys for Plaintiff James J. Cotter, Jr.

1 I. INTRODUCTION

2 The amount of costs sought by the defendants is staggering,
3 offensive, and patently excessive. In a case described by them as a
4 "meritless" complaint about Plaintiff's "personal disgruntlement over his
5 termination" that cannot be "parallel[led]" to any other derivative case,
6 defendants collectively seek almost **\$3 million** in costs defending it. The
7 claims were supposedly so "meritless," that the defendants spent **\$65,721.20**
8 in Westlaw costs to research them and **\$1.4 million** in expert witness fees to
9 analyze them. The defendants seek **\$902,016.77** for unspecified E-discovery
10 costs despite producing only a small number of documents. Defendants
11 want **\$98,824.24** for their attorneys' travel expenses to attend court
12 proceedings—which includes such items as \$490 rooms at the Mandarin
13 Oriental, six miles away from the courthouse, and \$1,019 in air travel for
14 mundane procedural motion hearings—and **\$68,052.13** in travel expenses to
15 attend depositions, most of which were taken in their counsel's hometown.

16 RDI had the burden of proof to show that the punitive costs it
17 seeks on behalf of itself and the individual defendants were *actually* and
18 *necessarily* incurred. NRS 18.110(1). It failed to meet this burden. With the
19 exception of invoices for deposition transcripts and expert witness fees, RDI
20 and the defendants provided only summary spreadsheets, such as the
21 wholly deficient Exhibits 1 and 2 to RDI's general counsel's declaration,
22 seeking **\$1 million** in unsupported and vaguely described costs. These and
23 many other spreadsheets lack sufficient descriptions to allow the Court and
24 Plaintiff to assess whether such costs were actually, reasonably, and
25 necessarily incurred, as NRS 18.005 requires. Without proof that these
26 unsupported costs were actually and reasonably incurred, it would be an
27 abuse of discretion to award them. NRS 18.005; NRS 18.110. The invoices
28 that *were* attached show exorbitant expert witness fees caused by

1 overstaffing and overbilling, duplication of work, and needless duplication
2 of deposition reporter fees by RDI.

3 For the reasons set out below, the Court should (1) disallow all
4 costs claimed by RDI, which is not a prevailing party and as a mere nominal
5 defendant did not need to defend itself against any claims; (2) disallow all
6 William Gould's costs as untimely submitted; (3) disallow all claimed costs
7 that are unsupported, insufficiently itemized, or insufficiently described;
8 and (4) greatly reduce all categories of costs—including but not limited to
9 those for expert witnesses, computerized legal research, E-discovery,
10 deposition transcripts, travel expenses, temporary office and residential
11 space—because the amounts claimed are utterly excessive and
12 unreasonable.

13 II. ARGUMENT

14 A. RDI is not a prevailing party entitled to costs.

15 RDI is not entitled to any of its \$1,218, 897.91 costs for three
16 independent reasons. *First*, only a "party in whose favor judgment is
17 rendered" is entitled to costs under NRS 18.110(1). Here, the Court did not
18 enter judgment in RDI's favor; it only entered judgment "in favor of
19 Defendants Ellen Cotter, Margaret Cotter, and Guy Adams. . . ." August 8,
20 2018 Findings of Fact and Conclusions of Law, on file, at non-paginated
21 page 10.¹ Thus, under the plain language of NRS 18.020, RDI is not entitled
22 to any costs.

23 *Second*, RDI was a mere *nominal* defendant. No allegations
24 were made against it. A nominal defendant in a derivative case is the "real
25 party in interest" on whose behalf the derivative case is brought. *Ross v.*
26

27
28

¹ Separately, the Court *denied* RDI's June 1, 2018 Motion to Dismiss as well
as several other motions to dismiss RDI filed previously. *See id.*

1 *Bernhard*, 396 U.S. 531, 538-39 (1970). As such, RDI is the *losing* party in this
2 case.

3 *Third*, as a nominal defendant, RDI could not "challenge the
4 merits of [the] derivative claim[s] filed on its behalf and from which it
5 [stood] to profit" except to contest Plaintiff's right to bring the case. *Patrick*
6 *v. Alacer Corp.*, 167 Cal. App. 4th 995, 1005, 84 Cal.Rptr.3d 642, 652 (2008).
7 RDI, however, went far beyond asserting mere standing defenses: It actively
8 defended against this case by joining in most dispositive motions on the
9 merits, attending (and ordering) all court hearings and depositions, and
10 incurring the most amount of travel, legal research, and E-discovery costs of
11 *all* (real) defendants. All of these costs were discretionary—not necessary.

12 For these reasons, RDI is not entitled to a single dollar of its
13 claimed costs.

14 **B. Director Gould is not entitled to any costs because his cost bill is**
15 **untimely.**

16 Under NRS 18.110(1), the party in whose favor judgment was
17 entered must serve a memorandum of costs within five days after the notice
18 of the entry of order or judgment, unless further time is granted by the
19 Court. An untimely memorandum of costs is grounds to grant a motion to
20 retax costs. *See Securities Inv. Co. of St. Louis v. Donnelley*, 89 Nev. 341,
21 349, 513 P.2d 1238, 1243 (1973) (holding that the district court did not err in
22 granting respondents' motion to retax costs where the memorandum of costs
23 and disbursements was filed after the five-day deadline).

24 Here, director Gould prevailed on his summary motion on
25 December 28, 2017 and all Plaintiff's claims were dismissed against him. *See*
26 Order, on file. This portion of the order was certified as final under Nev. R.
27 Civ. P. 54(b) by order dated January 4, 2018, in which the Court "direct[ed]
28 entry of *judgment* as to defendants . . . William Gould . . . on all Plaintiff's
claims against them." Notice of entry of the order was given that same day.

1 See Jan. 4, 2018 Notice of Entry of Order, on file. Gould's memorandum of
2 costs was therefore due within five days of January 4, 2018. NRS 18.110(1).

3 Gould, who passed away on August 6, 2018, never sought an
4 extension from this Court to file his cost bill, and his counsel did not submit
5 his costs until August 24, 2018—seven months after it was due. For this
6 reason alone, the Court should also deny the entirety of costs claimed on
7 Gould's behalf—*i.e.*, \$278,974.09—and award him \$0.00.

8 **C. The applicable standards for allowing costs.**

9 Although the prevailing party is entitled to costs as a matter of
10 right, "[t]he determination of allowable costs is within the sound discretion
11 of the trial court." *Bobby Berosini, Ltd. v. PETA*, 114 Nev. 1348, 1352, 971
12 P.2d 383, 385 (1998) ("*Berosini*"). But the court's discretion is not unlimited.
13 *Cadle Co. v. Woods & Erickson, LLP*, 131 Nev. __, __, 345 P.3d 1049, 1054
14 (2015). Because a cost award is in derogation of common law that the
15 parties bear their own fees and costs, cost statutes like NRS 18.005 should be
16 "strictly construed." *Berosini*, 114 Nev. at 1352, 971 P.2d at 385; *see also, e.g.,*
17 *Albios v. Horizon Communities, Inc.*, 122 Nev. 409, 431, 132 P. 3d 1022, 1036-
18 37 (2006) (holding same).

19 Costs may only be awarded if they satisfy three criteria: the
20 "costs must be [1] reasonable, [2] necessary, and [3] actually incurred."
21 *Cadle Co.* 131 Nev. at __, 345 P.3d at 1054; *see also Waddell v. LvRv Inc.*, 125
22 P. 3d 1160, 1166-67 (Nev. 2006) (holding that "reasonable costs" means costs
23 that are both "actually" incurred and reasonable); *accord* NRS 18.005 (4)-(5),
24 (11)-(15), (17) (requiring costs to be "reasonable and necessary expenses
25 incurred. . ."). This is why NRS 18.110(1) requires the prevailing party to
26 file and serve a verified memorandum of costs "stating that to the best of his
27 or her knowledge and belief the items are *correct*, and that the costs have
28 been *necessarily incurred* in the action or proceeding." (emphasis added).

Moreover, "a district court must have before it *evidence* that the costs were reasonable, necessary, and actually incurred." *Cadle Co.*, 345 P.3d at 1054 (emphasis added). This means that "justifying documentation must be provided to the district court to demonstrate *how* such claimed costs were necessary to and incurred in the present action." *In Re Dish Network Deriv. Litig.*, 133 Nev. ___, 401 P.3d 1081, 1093 (2017) (internal quotations, alterations, and citation omitted) (emphasis added) ("*In Re Dish Network*").

As described in detail below, the memorandum of costs largely fails to comply with these standards and the Court should disallow or substantially reduce the vast majority of costs claimed.

D. The Court should Disallow RDI's unnecessary and unsubstantiated filing fees.²

Courts have held that "a nominal defendant corporation" such as RDI "generally may not defend a derivative action filed on its behalf." *Patrick*, 167 Cal. App. 4th at 1005, 84 Cal.Rptr.3d at 652; *see also, e.g., Apple Inc. v. Sup. Ct.*, 18 Cal. App. 5th 222, 227 Cal. Rptr. 3d 8, 20–21 (Ct. App. 2017); *Sobba v. Elmen*, 462 F.Supp.2d 944, 947-950 (E.D. Ark. 2006) (holding to same effect). The only exceptions are "defenses contesting the plaintiff's right or decision to bring suit, such as asserting the shareholder plaintiff's lack of standing" for failure to make a demand. *Patrick*, 167 Cal.App.4th at 1004-05; *see also Apple Inc.*, 18 Cal. App. 5th at 239.

Here, by contrast, RDI appears to seek filing fees for *every* paper it filed in this Court, including seven unnecessary and improper joinders to the director defendants' summary judgment motions on the merits of Cotter's claims—each filing fee costing \$209.50—and a motion to compel arbitration, which the Court denied—costing \$1,530.99—for a total of

² This argument and those below with respect to RDI's cost items are made strictly in the alternative, should the Court determine that RDI is a prevailing party entitled to costs. As explained above, it is not.

1 \$2,993.99. *See* Ex. 1 to Ferrario Decl., Motion Exhibit Page ("MEP") 09-011.
2 RDI is not entitled to these unnecessary and unwarranted costs.³

3 RDI also seeks a large number of filing fees for which it offers no
4 proof that they were actually or necessarily incurred: RDI did not describe
5 the filing fees incurred between 9/15/2015 and 4/12/2016; 6/23/2016 and
6 9/8/2016; and 10/8/2016 and 5/21/2018. *See id.* MEP 09-012. It is not
7 Cotter's burden to correlate these claimed filing fees with the record. The
8 Court should disallow *all* claimed filing fees of RDI except those related to
9 its motions to dismiss for lack of standing, which it has not itemized.

10 **E. The deposition reporters' fees (\$164,628.25) are unreasonable.**

11 **1. The Court should deny RDI's deposition reporters' fees.**

12 It was not necessary or reasonable for nominal defendant RDI to
13 obtain all deposition copies and incur **\$53,344.70** in reporter and transcript
14 fees. Ex. 2 to Ferrario Decl. and Cost Memo at 5 (chart). RDI admits that it
15 did not notice the deposition of any witness. Ferrario Decl. ¶ 5. Although
16 RDI's counsel "agrees" with Mr. Searcy "with respect to the need to obtain
17 the copies," *id.*, he does explain *why* it was necessary for RDI to order a
18 separate copy of each deposition when its CEO and all of its directors
19 already received copies from their counsel. *See* Ex. 2 to Searcy Decl.; Ex. 2 to
20 Bennett Decl. Unlike Mr. Searcy, RDI's counsel did not have to defend his
21 client against any claims. RDI's position as nominal defendant simply is
22 incomparable to that of the plaintiff in *McInnis v. Town of Weston*, 458
23 F.Supp.2d 7, 21 (D. Conn. 2006), a case on which RDI relies. Moreover, RDI
24 failed to attach the invoices for the deposition transcripts it says it ordered.
25 For these reasons, the Court should disallow all of RDI's claimed \$53,344.70
26 for these costs.

27 _____
28 ³ Notably, the amount of filing fees claimed by nominal defendant RDI—
\$3,770.24—exceeds the filing fees claimed by defendant Gould—\$2,702.80.
See Cost Memo at 5 (chart).

2. The Court should reduce the individual defendants' deposition reporters' fees.⁴

The Court should further use its discretion to reduce the \$63,980.55 and \$47,303.00 deposition reporters' fees sought by the seven director defendants (hereafter "Cotter defendants") and Gould, respectively. Although the individual defendants and their counsel were entitled to copies of all depositions, two sets of counsel ordered video-chron copies and certified copies of *all* deposition transcripts, resulting in a needless duplication of costs. \$111,283.55 for this cost category is unreasonable and unwarranted; half of those costs could have been avoided by sharing copies.

F. Defendants' expert witness fees are prohibitive, unreasonable, largely unnecessary, and should be substantially reduced.

A prevailing party may recover "[r]easonable fees of not more than five expert witnesses in an amount of not more than \$1,500 for each witness, unless the court allows a larger fee after determining that the circumstances surrounding the expert's testimony were of such necessity as to require the larger fee." NRS 18.005(5). Thus, to warrant a larger fee than the presumptive maximum of \$1,500 per expert, the Court must make a determination that the circumstances made it a necessity, "and state the basis for its decision." *Khoury v. Seastrand*, 132 Nev. __, 377 P.3d 81, 95 (2016); *see also Frazier v. Drake*, 357 P.3d 365, 377 (Nev. Ct. of App. 2015) (holding that any award above \$1,500 per expert should be supported by "an express, careful, and preferably written explanation of the court's analysis of factors pertinent to determining the reasonableness of the requested fees and whether the circumstances surrounding the expert's testimony were of

⁴ The arguments with respect to Gould's costs made here and below are made strictly in the alternative, should the Court conclude that Mr. Gould's cost bill is timely.

1 such necessity as to require the larger fee") (internal quotation marks and
2 citations omitted).

3 "In evaluating requests for such awards, district courts should
4 consider" in relevant part:

5 the importance of the expert's testimony to the party's case; the
6 degree to which the expert's opinion aided the trier of fact in
7 deciding the case; whether the expert's reports or testimony were
8 repetitive of other expert witnesses; the extent and nature of the
9 work performed by the expert . . . ; the amount of time the expert
10 spent . . . preparing a report, and preparing for trial; the expert's
11 area of expertise . . . education and training; the fee actually
12 charged . . . ; [and] comparable experts' fees charged in similar
13 cases

14 *Frazier*, 357 P.3d at 377-78.

15 As discussed below, the \$1.4 million defendants seek for expert
16 witness fees is not only patently excessive, but unreasonable under each of
17 the relevant *Frazier* factors, and should be substantially reduced.

18 **1. The \$1.4 million amount incurred for expert witness fees is
19 excessive on its face.**

20 The seven director defendants represented by Quinn Emmanuel
21 seek **\$1,227,096.94** in expert witness fees. Director Gould seeks **\$176,655.00**.
22 Cost Memo at 5 (chart). Especially in this case, which claims the defendants
23 have consistently depicted as unsupported by any evidence and based on
24 speculative damage theories, including in their Cost Memo, a collective
25 amount of \$1.4 million is staggering, punitive, and indefensible.

26 RDI did not cite to a single comparable case in which a Nevada
27 court awarded more than a million dollars in expert witness fees. The only
28 two cases it cited involved expert fee awards that were a fraction of what the
defendants seek here. *See City of No. Las Vegas v. 5th & Centennial, LLC*,
No. 58530, 2014 WL 1226443, at * 1, 7 (Nev. March 21, 2014 (awarding
\$109,140.23 in **total** costs; *not* "over \$200,000.00," as RDI claims); *Scott-Hopp*

1 *v. Bassek*, No. 60501, 2014 WL 859181 (Nev. Feb. 28, 2014) (awarding
2 \$11,934.35 for a defense expert's fees).

3 **2. The expert testimony was of minimal importance to**
4 **defendants' case.**

5 Defendants incredibly argue that, even though: (1) Plaintiff had
6 no evidence to support his claims; (2) damages were an "essential element"
7 of "*Plaintiff's* claims"; and (3) Plaintiff's alleged damages were based on
8 "speculative theories," they "**had** to retain [5] experts" to the tune of **\$1.4**
9 **million** to defend themselves against these "meritless" claims. Defendants'
10 argument does not pass the smell test.

11 As Defendants admit, they did not have the burden on damages,
12 *Plaintiff* did. Nevertheless, the Cotter defendants hired an *initial* damages
13 expert—Richard Roll—who billed hundreds of thousands of dollars to
14 address a single paragraph in Plaintiff's complaint alleging that the stock
15 price dropped and resulted in \$40 million in damages to the company when
16 he was terminated. First Am. Compl. ¶ 162. In addition to Roll, they hired
17 two additional damages rebuttal experts—Jonathan Foster and Dr. Bruce
18 Strombom. Searcy Decl. ¶ 7(b)-(d). But neither the expert reports, nor the
19 deposition transcripts of these three damages experts were used in support
20 of *any* of the six summary judgment papers filed by the Cotter defendants
21 between September 2016 and June 2018. The defendants only cited and
22 attached *Plaintiff's* damages expert's report to one of their partial summary
23 judgment motions. *See* MSJ No. 1, Ex. 45, on file. Notably, defendants'
24 counsel does not say, nor could he, that *any* of these damages experts'
25 reports and testimony was "critical" to defendants' dismissal, let alone
26 warrant Roll's **\$425,165.00** bill, Strombom's **\$152,352.50** bill, and Foster's
27 **\$201,814.53** bill.

28 Defendants also retained **two** *initial* experts on corporate
governance (Dr. Alfred Osborne and Professor Michael Klausner), even

1 though *Plaintiff* had the burden of proof on his fiduciary duty claims, and
2 *Plaintiff* had to overcome the presumption of the business judgment rule
3 that the directors acted in good faith and independently. Once again, the
4 Cotter defendants who retained Klausner did not rely on *his* expert report or
5 testimony for any of their six summary judgment motions. They only relied
6 on Plaintiff's expert Steele's report and deposition transcript. *See* Sept. 23,
7 2016 MSJ No. 2, on file, Ex. 26 thereto; *see also* Dec. 26, 2017 Opp'n to Motion
8 for Reconsideration, Ex. A (attaching entire deposition transcript of Judge
9 Steele). Thus, Klausner's expert testimony was *not* relevant, let alone
10 "critical," to the Cotter defendants' dismissal.

11 And although the Cost Memo argues that Gould's retention of
12 Dr. Osborne was "critical" to him obtaining a dismissal based on Osborne's
13 expert opinion that Gould was independent, this self-serving statement is
14 unsupported by Gould's motion papers. Gould's initial motion for
15 summary judgment was based on *fact* testimony only, even though his
16 expert had already issued his report a month earlier. *See* Gould's Sept. 23,
17 2016 MSJ, on file. Gould's reply brief in support thereof only relied on and
18 attached *three pages* of Osborne's expert report, *none* of which addressed
19 Gould's independence. *See* Oct. 21, 2016 Reply to Gould's MSJ, on file, Ex.
20 47. Gould mainly relied on the testimony of Plaintiff and *Plaintiff's expert*—
21 former Chief Justice Steele—both of whom testified that Gould was
22 independent. *See id.* (Exs. 48, 52); *see also* Gould's Dec. 1, 2017 Request for
23 Hearing, Exs. 2 (Steele depo excerpts); 3 (Cotter depo excerpts); and 8 (Steele
24 report excerpts). Gould only attached his expert's report to his final brief,
25 which by and large relies on fact testimony and the expert testimony of
26 Judge Steele. *See* Dec. 5, 2017 Supplemental Reply, on file, Ex. 1-10.

1 Thus, the first *Frazier* factor—the importance of the expert
2 testimony to a party's case—heavily weighs against awarding more than
3 \$1,500 per expert in this case.

4 **3. The Court did not rely on defendants' expert testimony in**
5 **granting summary judgment.**

6 The second *Frazier* factor—the "degree to which the expert's
7 opinion aided the trier of fact in deciding the case"—also weighs against
8 awarding more than the statutory maximum of \$1,500 per expert. The Court
9 did not rely (expressly or impliedly) on any expert testimony in granting
10 summary judgment in favor of the defendants. The Court based its decision
11 on the law and the absence of evidence showing that any director was not
12 disinterested or independent. *See* Dec. 11, 2017 Hearing Tr. and Dec. 28,
13 2017 Order, on file. Expert testimony was also not cited in, and wholly
14 irrelevant to, the Court's determination of, defendants' June 1, 2018
15 Ratification MSJ.

16 **4. Defendants' experts duplicated each other's work.**

17 The defendants asked **three** experts—Roll, Foster, and
18 Strombom—to generate three rebuttal reports to the damages report of
19 Plaintiff's expert Tiago Duarte-Silva. Searcy Decl. ¶ 7(b)-(d). Roll was
20 already retained as an initial damage expert. *Id.* ¶ 7(b). Foster and
21 Strombom were separately retained for this purpose. *Id.* ¶ 7(c)-(d). In
22 addition, the Cotter defendants and Gould tasked their respective experts
23 Klausner and Osborne with preparing two rebuttal reports to Plaintiff's
24 expert Steele's report—and this despite the fact that: (1) Steele did not offer
25 an expert opinion as to the independence or interestedness of any non-
26 Cotter director; and (2) Steele testified that he did not see anything in the
27 complaint that gave him a reason to doubt the independence of McEachern
28 and Gould. *See* Steele Report, Ex. A to Cotter defendants' Sept. 23, 2017

1 Motion in Limine to Exclude Steele Testimony; Steele Dep. Tr., Ex. A to Dec.
2 26, 2017 Opp'n to Motion for Reconsideration, at, *e.g.*, 57-58; 94-96; 131.
3 Thus, most of these rebuttal expert fees were redundant, which further
4 supports awarding only minimal expert fees.

5 **5. The hourly and total fees charged by each of the five**
6 **experts and their support staff are exorbitant given their**
7 **limited roles.**

8 In determining the reasonableness of an expert fee, courts look at
9 the fee "actually charged" by the expert and "comparable experts' fees
10 charged *in similar cases*." *Frazier*, 357 P.3d at 377-78 (emphasis added).

11 Here, Gould's expert—Osborne—charged an hourly rate that
12 was equivalent to the presumptive maximum amount a single expert can
13 seek under NRS 18.005(5): **\$1,500**. Osborne spent more than one hundred
14 hours on his assignment, Bannett Decl. Ex. 3, even though Gould had voted
15 against Plaintiff's termination and Plaintiff had already testified in May that
16 he deemed Gould independent. *See* Cotter Tr. dated May 16, 2016 **Exhibit 1**
17 hereto at 78-80. Osborne's total bill, \$176,655, is clearly excessive given
18 Gould's limited exposure in this case.

19 Although the hourly rates of the other four experts were lower
20 than Osborne's—(Roll charged \$1,200; Foster \$990; Klausner \$950; and
21 Strombom \$690)—every one of these four experts used a support staff of five
22 or more individuals who charged between \$275 and \$720 per hour and
23 billed hundreds of hours for their work. Searcy Decl. Ex. 3, *e.g.*, MEP 208,
24 250, 273, 291. This over-staffing effectively tripled the hourly rates of these
25 experts and for this reason alone the rates of defendants' experts cannot be
26 compared to those of the Plaintiff's experts. For example, Roll, Klausner,
27 and Strombom each employed **five** staffers, including two vice presidents
28 and three analysts. *See id.* Foster, who was a rebuttal expert tasked with
addressing only those damages allegedly sustained as a result of the

unsolicited offer of Patton Vision LLC, employed **ten** staff members who collectively billed **283.85** hours for vaguely described tasks such as "research"; "analysis for report"; or "making exhibit[s]":

Professional	Title	Hourly rate	Total hours spent
K. Gold	Vice President	\$550	87.2
A. Stichman	Vice president	\$525	9.6
A.Nabi	Vice President	\$495	1.1
T.McClure	Senior Analyst	\$300	4.0
C. Morley	Analyst	\$285	81.95
N.Bergmann	Analyst	\$275	8.1
S. Murphy	Analyst	\$275	10.9
V.Chen	Analyst	\$275	47.1
L.Petruzzi	Research sp.	\$250	7
C.Crant	Unknown	\$390	14
J.Levine	Unknown	\$390	13
		Total hours:	283.85

See MEP 273, 347-352. These **283.85** staff hours are *in addition* to the **91.5** hours Foster himself billed for the rebuttal assignment. See MEP 347-352. Outrageous would be an understatement to describe the total fees of \$201,814.53 incurred by Foster's team for this limited task.

The billing records for Roll and Klausner do not even show what it is each of these two experts did. The statements only identify the number of hours billed by these experts each month. See, Ex. 3 to Searcy Decl., *e.g.*, MEP 196 (10.2 hours for Klausner; no description); MEP 202 (30.9 hours for Klausner; no description); MEP 243 (5.083 hours for Roll; no description); MEP 266 (17.92 hours Roll; no description). This is wholly insufficient; none of these fees can be verified.

1 Moreover, most of the billing statements for Klausner, Roll, and
2 Strombom show significant over-staffing, over-billing, and duplication of
3 work at excessive hourly rates, as shown below.

4 **a) Klausner expert fees (\$447,764.91)**

5 Michael Klausner employed four support staffers for his initial
6 expert report on corporate governance related to Cotter's termination (only):
7 two vice presidents (Gold and Stichman, billing \$550 and \$520 per hour,
8 respectively) and two senior analysts (Overcash and McClure, billing \$300
9 per hour). *See, e.g.*, MEP 201. Stichman, Overcash, and McClure each
10 simultaneously billed numerous hours for reviewing unidentified
11 depositions and documents. For example, in June 2016, Stichman billed 10-
12 12 hours of deposition and document review, MEP 196-97; McClure billed 9
13 hours for deposition and document review, MEP 197; and Overcash billed
14 20 hours reviewing unspecified documents, MEP 198, for a total of **40** hours.
15 In July, 2016, Stichman billed 11 hours for document review, MEP 203;
16 McClure billed 16 hours for deposition and document review, MEP 204; and
17 Overcash billed 20 hours for reviewing deposition testimony, MEP 205, for a
18 total of **47** hours.

19 In addition, these three staffers collectively billed more than **100**
20 hours in July, and more than **200** hours in August for simultaneously
21 "assist[ing] with [the] preparation" of Klausner's expert report, which—it is
22 worth repeating—focused on the single issue of whether Plaintiff's
23 termination comported with principles of proper corporate governance.
24 Searcy Decl ¶ 7(a); MEP 203-205, 208-215. The 300 hours billed for assisting
25 Klausner in writing his initial report are not only extreme given his limited
26 task; they are implausible, considering Mr. Klausner's testimony that "nearly
27 100 percent of the words in the report are [his]" and that "Andy (Stichman)
28 and his team" were tasked with providing citations to documents and
deposition testimony *Klausner* had read and wanted to use to support his

1 opinions. Klausner Tr., **Exhibit 2** hereto, at 14:9-15:5. Such supporting work
2 is typically performed by a paralegal—not a vice president and two senior
3 analysts billing between \$300 and \$520 per hour.

4 Klausner also wrote his own rebuttal report and "started with a
5 more complete draft [than his initial report] since [he] was responding to
6 Justice Steele's report. . . ." Klausner Tr., **Ex. 2**, at 16:10-13. Nevertheless,
7 two vice presidents, (Gold and Stichman), two senior analysts (McClure and
8 Overcash) and one analyst (Chen) of Analysis Group collectively billed
9 **269.95** hours in September 2016 to purportedly assist with the preparation of
10 the rebuttal report. MEP 218.

11 Moreover, most of the billing entries lack sufficient descriptions
12 to assess the necessity of what the Klausner staffers did. The invoices are
13 replete with entries like "Reviewed documents"; "assist with preparation of
14 expert report at Mr. Klausner's direction"; "Reviewed deposition testimony."
15 *See* MEP 197-223. Most of the entries of Stichman are block-billed, so that it
16 is impossible to determine if any amount of time spent for the combined
17 tasks was reasonable. *See, e.g.*, MEP 210-211, 220.

18 **b) Roll expert fees (\$425,165.00)**

19 Roll's total bill came to \$425,165.00. Just for his initial expert
20 report which, despite being a mere 13 pages, manages to be repetitive and
21 needlessly academic and convoluted considering the remarkable simplicity
22 of his task—did the RDI stock go up or down after Plaintiff's termination?—
23 Roll and his many staffers charged more than **\$200,000**. MEP 229-258; *see*
24 Roll Expert Report, **Exhibit 3** hereto ¶¶ 29-34.

25 Moreover, Roll's monthly invoices have the same deficiencies as
26 Klausner's (block billing, vague or no descriptions) and are also padded
27 with countless hours of four to six support staff members who billed
28 between \$260 and \$720 per hour. *E.g.*, MEP 235 (162.4 staff support hours);
MEP 250 (200.8 hours for two V.P.'s and three analysts); MEP 266 (118.6

1 hours for one managing principal, two V.P.'s, two analysts, and one research
2 analyst). The work performed by the two vice presidents and the two
3 analysts was patently duplicative. By way of example (only), all four were
4 simultaneously "oversee[ing]" and "research[ing]" RDI's stock price
5 performance in June, MEP 236-239, and the four collectively spent more than
6 **230** hours in July 2016 "assisting with [the] preparation of [the] expert
7 report" of Roll. MEP 244-247. A research analyst spent 26 hours at \$260 per
8 hour on "back-up binders." MEP 270. This is clerical work that does not
9 warrant a \$260 hourly fee. All of these bills demonstrate fee churning at its
10 worst.

11 **c) Strombom's expert fees (\$152,352.20)**

12 As defendants' counsel admits, Dr. Strombom "**only** prepared a
13 rebuttal expert report in response to Plaintiff's damages expert, Dr. Duarte-
14 Silva," Searcy Decl. ¶ 7(c)(emphasis added). Nevertheless, the expert billed
15 and the Cotter defendants seek more than **100 times** the statutory
16 presumptive maximum amount allowed per expert: \$152,352.20.

17 Dr. Strombom's bills, too, show pervasive bill-padding and
18 overstaffing. For example, two V.P.'s, one senior analyst, and two analysts
19 assisted Strombom in September 2016 and billed more than 200 hours
20 simultaneously assisting with the rebuttal report and analysis, when
21 Strombom billed 18 hours for drafting the report. MEP 291-295. The billing
22 entries are devoid of even a minimum degree of specificity to verify whether
23 any of the costs were necessarily incurred. For example, in September 2016,
24 Gold (a V.P. billing \$550 per hour) billed **36** hours for "Analysis for rebuttal
25 report." MEP 293. Ahmer Nabi, a V.P. billing \$495 per hour billed **79** hours
26 for "assist[ing] with rebuttal report." MEP 293-94. In October, a research
27 analyst charging \$260 per hour billed 11 hours to assemble "backup
28 binders." MEP 288. Strombom twice billed \$500 for unspecified "data

1 purchase." *E.g.*, MEP 299; 303. Three individuals—Strombom, Gold and
2 Nabi—reviewed Strombom's deposition transcript when one (Strombom)
3 would have sufficed. MEP 318. The list goes on and on.

4 Although defendants had the burden to show that their experts'
5 rates and amounts charged were reasonable, they did not cite to any "similar
6 cases" in which experts charged similar fees. They rely only on the hourly
7 fees charged by Plaintiff's experts in *this* case. But none of Plaintiff's experts
8 charged rates as high as Osborne or Roll—not even former Chief Justice
9 Steele, who charged \$1,050. And none of them employed between five and
10 ten analysts to assist them at rates between \$275 and \$720 per hour. Thus,
11 comparing defendants' experts' rates to those charged by plaintiff's experts
12 would be comparing apples to oranges. Moreover, as defendants know,
13 Plaintiff has not paid Finnerty and Tiago Duarte-Silva, in large part because
14 they overbilled him like defendants' experts overbilled them. The fact that
15 Plaintiff's experts also charged excessive expert fees does not make
16 defendants' expert fees reasonable.

17 For all these reasons, the Court should use its discretion to
18 substantially reduce the expert witness fees sought by the defendants.

19 **G. Many of defendants' photocopy charges are not supported or**
20 **shown to be reasonable or necessary.**

21 To support a cost award for photocopies, the prevailing party
22 must show "how" these costs were necessary and provide sufficient
23 itemization or explanation of those costs. *Berosini*, 114 Nev. at 1352, 971 P.2d
24 at 385-86. It is not enough to "simply tell[] the district court that the costs
25 were reasonable and necessary." *In Re Dish Network*, 401 P.3d at 1093.

26 **1. RDI (\$2,930.27)**

27 RDI's counsel did not explain why it was necessary (as opposed
28 to convenient) or reasonable to use outside vendors to make a series of

1 unidentified copies and binders for the representatives of this nominal
2 defendant. Exhibit 4 to Mr. Ferrario's declaration only lists dates and entries
3 of purported invoices—each of which are in the hundreds of dollars—that
4 were not attached or properly described to understand what they were for.
5 Thus, none of these costs should be allowed.

6 **2. The Cotter defendants (\$11,550.84)**

7 It is an abuse of discretion to award photocopy costs if, as here,
8 the defendants "failed to provide sufficient documentation beyond the date
9 of each photocopy and the total photocopying charge." *Berosini*, 114 Nev. at
10 1353, 971 P.2d at 386. Contrary to Mr. Searcy's contention in ¶11 of his
11 declaration, Exhibit 5 thereto does *not* state the cost per page and the
12 number of pages copied on each given date. The only data provided are the
13 dates, the total amount incurred, and a non-descriptive task:

Date	Ref. Amt.	Narrative
7/8/2015	\$19.68	Document reproduction
7/8/2015	\$1.92	Document reproduction

14
15
16
17
18 *See* Searcy Decl., Ex. 5 at MEP 356 (*compare id.* to Exhibit 5 to Bannett Decl.
19 at MEP 437 (listing cost per page reproduced as \$0.07)).

20 It is thus impossible to know the cost per page from these
21 entries. Moreover, a large number of services were sought and provided by
22 outside vendors at a high cost. *See id.* at MEP 356-360. For example, on
23 December 15, 2017, an outside vendor provided unspecified services
24 amounting to \$2,292.62. *Id.* at MEP 360. In addition, a large part of the
25 "distribution" to clients that the Cotter defendants claim justified their
26 \$11,000 copy bill could have been done electronically. Given the inadequate
27 descriptions, the absence of actual invoices or proper descriptions, including
28

1 the cost per page charged by Quinn Emanuel, the Court should disallow or
2 substantially reduce the copy costs.

3 **3. Gould (\$4,782.06).**

4 Gould only provided descriptions for approximately a third of
5 his claimed copy costs. *See* MEP at 437. The rest is not described and
6 should be disallowed. *See* MEP 438-439.

7 **H. There is no evidence that the telephone conference costs were**
8 **necessary or reasonable.**

9 Teleconference costs under NRS 18.005(13) must be supported
10 by sufficient documentation demonstrating the necessity of these costs to the
11 lawsuit. *In Re Dish Network*, 401 P.3d at 1094. Here, by contrast, RDI and
12 the Cotter defendants merely provided spreadsheets with dates, amounts,
13 and minutes. Ferrario Decl. Ex. 5; Searcy Decl. Ex. 6. Unlike the parties in
14 *Dish Network*, defendants provided no invoices identifying the number of
15 participants (and in the Cotter defendants' case, the moderator), and as in
16 *Dish Network*, they did not show why these calls were necessary to and
17 incurred in *this* case. Thus, there is no evidence sufficient to support these
18 costs.

19 **I. The defendants did not show their FedEx costs were necessary.**

20 The Cotter defendants seek \$3,067.34 in Federal Express costs for
21 shipping various unidentified documents to clients, opposing counsel,
22 hotels, and non-parties such as a certain "C J Barnabi." Searcy Decl. Ex. 7.
23 Mr. Searcy did not explain the urgency with respect to *any* of these mailings
24 that would require using FedEx as opposed to regular or electronic mail.
25 The Court should disallow all costs in the absence of a showing of necessity.

26 Mr. Gould's FedEx charges—although substantially less at
27 \$442.95—are not described at all to assess their necessity. Ms. Bannett did
28 not identify a single "Defendant" or other person she claims she FedEx-ed

1 documents to, or the reason for the urgency to spend such costs. Bannett
2 Decl. ¶ 14 and Ex. 6 thereto.

3 **J. Defendants' \$68,000 in deposition travel costs are extreme and**
4 **should be substantially reduced.**

5 **1. RDI (\$24,008.36)**

6 It was not necessary for RDI's counsel, who represented a
7 nominal defendant, to attend each deposition, let alone travel to each
8 deposition. Its counsel could have attended the depositions via telephone
9 conference and avoided the unreasonable and excessive \$24,008.36 in travel
10 fees and meal costs RDI now seeks. RDI's claim that it was necessary for its
11 counsel to attend depositions to make objections and to protect the
12 company's attorney-client privilege, Ferrario Decl. ¶ 11, is ludicrous: RDI's
13 current management—its directors and officers—control the privilege and
14 must exercise it consistent with their fiduciary duty to the corporation or
15 entity. *Las Vegas Sands Corp. v. Dist. Ct.*, 130 Nev. 656, 331 P.3d 905, 912
16 (2014). Each of these officers and directors was already represented by
17 counsel. Moreover, RDI seeks reimbursement for unnecessary travel agency
18 fees at \$30 per ticket and lists a large number of 'travel' expenses that are not
19 described except by the date they were incurred. *See* Ex. 7 to Ferrario Decl.
20 *e.g.*, at MEP 027-032. For all these reasons, none of RDI's \$24,000 in
21 deposition travel costs should be allowed.

22 **2. Cotter defendants (\$28,111).**

23 The Cotter defendants also did not meet their burden of proving
24 that their deposition travel costs were reasonable. First, they did not attach
25 any actual invoices to assess when and for what each cost item was incurred.
26 Second, most depositions took place in California. Searcy Decl. ¶ 14. For
27 the few depositions taken elsewhere, California counsel appears to have
28 traveled first class, including on two trips to New York. *Id.* Ex. 7 thereto at
MEP 381 (*e.g.*, \$1,540.20 and \$1,560.20 entries). The other flight tickets are

1 also high for depositions that were not noticed at the last minute. *See id.*
2 (*e.g.*, \$780.10 ticket; \$769.10 ticket). Further, the spreadsheet also shows
3 seven \$50 charges and two \$66.65 charges that are not described and should
4 not be allowed.

5 The Quinn Emanuel attorneys also charged hundreds of dollars
6 in expensive "car service" to go from their homes to depositions taken in
7 town, *see* MEP 383 ("work date" August 31, 2016) and MEP 386 ("work date"
8 5/19/2016), and charged hundreds of dollars for taxis or Ubers from their
9 homes to the airport. MEP 385 (*e.g.*, 3/1/2016; 3/4/2016; 4/29/2016;
10 5/20/2016). These are not necessary or reasonable taxable costs.

11 Next, the Quinn Emanuel attorneys charged \$10,761.29 for
12 mostly unidentified but high-priced hotels, with accommodations costing as
13 much as \$1,097 and \$1,900.77 per day. *E.g.*, MEP 388 (May 5, 2016 and June
14 14, 2016 for "GrantHyatt"). These costs are not reasonable and should be
15 substantially reduced, if allowed at all, due to their inadequate descriptions
16 and lack of supporting documentation.

17 The "local meals" charged are also excessive. Quinn Emanuel
18 charged for breakfast, lunch, and dinner, with some breakfasts costing
19 \$24.90, several lunches more than \$80, and dinners with price tags of \$120,
20 \$160, \$161 or more. MEP 389-90. Quinn even charged for lunches and
21 breakfasts for depositions taken in their hometown, such as the deposition
22 of Plaintiff and Ellen Cotter. MEP 389 (May 16-18, 2016; July 6, 2016). The
23 Court should disallow all "local" meals and allow only a *per diem* of \$25 per
24 out-of-state deposition that is identified in their spreadsheets.

25 The exorbitance of Quinn Emanuel's costs is demonstrated by
26 the fact that the total amount (\$28,000) is almost twice as much as the
27 amount spent by Gould's counsel (\$15,000), despite both firms being based
28

1 in and travelling out of Los Angeles. But even Gould's travel costs are
2 excessive, as discussed below.

3 **3. Gould (\$15,932.59)**

4 Gould also failed to attach actual invoices and its spreadsheet is
5 even more non-descriptive than the one of Quinn Emanuel: many entries do
6 not say when charges were incurred, where, for how many days, or for
7 what. *See* Ex. 7 to Bannett Decl., *e.g.*, MEP 444 (\$1,312.86 for "Hotel, NY");
8 *id.* ("Taxis" at \$505 for dates lumped together); *id.* at MEP 445 ("Meals" at
9 \$156.09). Many costs sought are "luxury" items that are unreasonable, such
10 as costs for "upgrade airfare" (\$94); a hotel room for \$628.89 in New York; a
11 hotel room for \$855.85 in Boston; and a \$3,612.20 airfare ticket to
12 Philadelphia. MEP 445, 447. The Court should substantially reduce or
13 disallow these excessive and insufficiently described items altogether.

14 **K. Legal research**

15 Only reasonable costs for computerized legal research are
16 recoverable. NRS 18.005(17). If, as here, Westlaw charges are not
17 sufficiently itemized or explained and unsupported by justifying
18 documentation, they are properly denied. *Waddell*, 125 P.3d at 1167
19 (holding that the district court did not abuse its discretion in denying legal
20 research costs that were not sufficiently itemized); *Berosini*, 114 Nev. at
21 1352, 971 P.2d at 385-86 (discussing requirements for Westlaw charges).

22 Here, nominal defendant RDI incurred more legal research costs
23 than any other defendant: **\$47,324**. RDI did not provide any billing
24 statements or justifying documentation to show that these fees were actually
25 incurred and billed to RDI, and that they pertained to *this* case. (Greenberg
26 Traurig also represents RDI in an employment arbitration against Plaintiff).
27 Its spreadsheet only shows that many of its attorneys (mostly attorney
28 Cowden) conducted an inordinate amount of legal research on various

1 dates. Ferrario Decl. Ex. 9 at MEP 040-045. Even assuming RDI had met its
2 burden to prove that all charges were billed to RDI, \$47,000 is unreasonable
3 on its face—especially given the fact that RDI was a nominal defendant that
4 had no obligation to defend itself against Plaintiff's claims. Moreover,
5 Nevada only has a handful of authoritative published derivative cases
6 (*Shoen I and II*, *Wynn*, and *Dish Network*) and most research can be
7 performed for free on FastCase or Google Scholar.⁵

8 By comparison, Gould's legal research bill was a fraction of
9 RDI's: \$1,784.79—(and *not* \$11,784.79, as RDI's chart states and Ms. Bannett's
10 declaration may suggest, which is based on a computing error: Gould's Reno
11 counsel incurred \$1,106.79 in computer legal research. Ex. 1 to Bannett Decl.
12 at MEP 418. Bird Marella incurred just \$678.00. Ex. 8 to Bannett Decl. at
13 MEP 449. Combining those two numbers yields \$1,784.79).

14 The Cotter defendants seek \$6,612.00 in legal research costs.
15 Searcy Decl. Ex. 6. Like RDI's Westlaw costs, there is no supporting
16 documentation showing these costs were actually incurred for, and billed to,
17 the Cotter defendants. Moreover, the research conducted in June 2015 alone
18 is excessive: \$5,808 (\$5,322 + \$66 + \$420). *Id.* None of the entries identifies
19 *who* conducted the research. And the many "off contract" entries suggest
20 they were likely unnecessary. Without proof, explanations or itemization,
21 there is no basis to award any of these \$6,612.00 costs.

22 **L. RDI's electronic discovery costs are unsubstantiated and**
23 **unwarranted.**

24 Electronic discovery costs must qualify as a "reasonable and
25 necessary expense [actually] incurred in connection with the action." NRS
26 18.0005(17).

27
28 ⁵ After arguing repeatedly that the Court could only apply Nevada law and
not Delaware's, the defendants cannot now claim that they "necessarily"
researched the case law throughout the United States.

1 Here, RDI seeks **\$902,000** in E-discovery costs, but failed to
2 attach any supporting invoices. Its spreadsheet is wholly unspecific, listing
3 only dates, amounts, and law firms (including law firms that did not
4 represent any of the prevailing parties), which are insufficient to determine
5 if and for what the cost items were incurred, and whether they are even
6 attributable to *this* case. *See* Thompkins Decl. Ex. 2. Greenberg Traurig also
7 represents RDI in unrelated arbitration. Quinn Emanuel represents the
8 Cotter sisters in separate trust and estate litigation. RDI does not even
9 identify the amount of data in gigabytes or terabytes, or the types of services
10 rendered (*e.g.*, uploading, hosting, de-duping etc) to determine if the costs
11 incurred were necessary or reasonable.

12 Moreover, \$902,000 in E-discovery is an extraordinary amount
13 for a case this size. This case was not CityCenter, or Wynn/Okada. RDI
14 itself produced only 71,599 *pages* of documents. *See* RDI's 37th
15 Supplemental Initial Disclosures, **Exhibit 4** hereto. The Cotter defendants, as
16 of February 18, 2016, had produced only 12,900 pages and Plaintiff himself
17 about 11,500 pages. *See* Feb. 18, 2016 Hearing Tr., **Exhibit 5** hereto at 3:13-
18 4:7. Although RDI is correct that Plaintiff issued many discovery requests,
19 they did not result in the production of many documents to justify the
20 hundreds of thousands of dollars in E-discovery. The staggering \$902,000
21 sought calls into question why defendants' document production was so
22 deficient and why there was such a delay in producing the documents and
23 privilege logs to Plaintiff.

24 Thus, in the absence of proof or need for \$902,000 in E-discovery,
25 the Court should disallow *all* costs. Should the Court allow E-discovery
26 costs at all, the Court should reduce them to no more than \$50,000 total,
27 which amount represents the Relativity charges incurred by Gould (\$7,424)
28 multiplied by the number of Cotter defendants (7).

1 M. RDI's and counsel's expenses to travel to court are by choice; not
2 necessity.

3 As this Court observed during the January 8, 2018 hearing:
4 You know, your client didn't have to hire California counsel. We
5 have licensed lawyers here in Nevada.

6 Replacement Tr. 1-8-18.

7 Nevertheless, *all* directors **chose** California counsel to represent
8 them. Even Gould's "local counsel" was based in Reno, which resulted in
9 two sets of attorneys traveling by plane to every hearing. RDI, a Nevada
10 corporation and a mere nominal defendant represented by Las Vegas-based
11 counsel, did not need to incur travel expenses to meet with RDI's officers in
12 California about a lawsuit pending here. *None* of the **\$98,824.24** "travel"
13 costs should be allowed. Even if the Court were inclined to consider them,
14 the costs are extravagant and should be substantially reduced, for the
15 reasons stated below.

16 1. RDI's unsupported "wish list."

17 RDI seeks \$16,067.67 in (mostly unspecified and wholly
18 unsupported) travel costs incurred by its **Nevada** counsel to travel to
19 **California** to meet with RDI representatives about unspecified "litigation,"
20 "events" and "strategy," and to "prepare witnesses for deposition and trial
21 testimony". Ferrario Decl. ¶ 15, Ex. 11. These costs are unnecessary and
22 unreasonable for a nominal defendant. RDI's counsel could discuss events
23 and strategy over the phone. Moreover, many of the trips appear to have
24 been for meetings with Ellen and Margaret Cotter, who were separately
25 represented by counsel. *See* MEP 052-053 (travel on November 22,
26 December 13, 15, 17, 20). RDI's counsel did not need to attend oral
27 argument in Carson City. *Id.* at MEP 053. Some travel costs labeled "trial
28 preparation" with the client and "Ellen Cotter" were incurred on December
20 and 21, 2017, which dates coincide with the special committee meeting on

1 ratification. *See* MEP 052 (December 20 and 21 travel). RDI is not entitled to
2 recover such business costs in this case.

3 RDI also seeks **\$87,657.20** in wholly unspecified and
4 unsupported travel expenses on behalf of its CEO, general counsel, and a
5 number of non-parties to travel *to Las Vegas*; **\$33,678.52** worth of hotel
6 rooms for the month of January 2018; **\$6,099.27** for an executive office;
7 **\$6,108.30** for temporary "housing" in Las Vegas for its general counsel; and a
8 host of other "trial costs." Thompkins Decl. Ex. 1. The sole basis for these
9 costs is a single spreadsheet with vague descriptions. *See id.* (e.g., \$87,657.20
10 based on "expense reports"; \$11,489.10 in "equipment"; \$33,678.52 in "hotel
11 rooms"). All of these costs should be disallowed, because: (1) the
12 spreadsheet is insufficient to verify the basis and need for *any* of these costs;
13 (2) there is no proof that the \$33,000 in hotel rooms, \$6,000 for leasing of a
14 residence for the entire month of January 2018, or the \$6,000 for a temporary
15 residence for RDI's general counsel were actually incurred, reasonable, or
16 necessary and to what extent these amounts were refunded when trial was
17 continued; and (3) the claimed costs of renting a temporary office, trial
18 equipment, furniture in Las Vegas for Quinn Emanuel were the result only
19 of the directors' *choice* to hire California counsel and not a necessity. *Cf.*
20 *Morris v. Belfor USA Group, Inc.*, 201 P. 3d 1253, 1264 (Colo. Ct. of App.
21 2008) (affirming an award of travel and lodging expenses that the Plaintiffs
22 "would not have incurred 'but for this litigation' "). There are capable trial
23 attorneys in Las Vegas who have offices and equipment here. It is only
24 because defendants chose to over-lawyer and over-staff this case (with a 9-
25 member trial team for the Cotter defendants and three partners for nominal
26 defendant RDI) that they incurred the cost of renting a \$6,000 office suite.

2. Quinn Emanuel's gratuitous luxury accommodations.

The Cotter defendants seek \$71,687.19 in costs for lodging and travel to court proceedings and client and witness meetings, not by necessity, but because they chose California counsel to defend them in a Nevada proceeding. Searcy Decl. ¶ 16 and Ex. 10 thereto. None of these costs is supported by a single invoice to determine whether they were actually and necessarily incurred. Moreover, the cost entries show pervasive over-spending, including for luxury accommodations, travel, and meals. These are just some examples of that:

The three Cotter defendants had a 9-member trial team (with at least one member flying in from New York; the others from Los Angeles) that incurred thousands of dollars for travel, transportation, and meals, even after trial was stayed on January 8. *Id.* at *e.g.*, MEP 395-96, 403 (Yllen Cruz items).

Christopher Crant, expert Foster's assistant, supposedly incurred \$2,288.51 in travel expenses to Las Vegas between December 5 and December 14, when trial was still a month away and the partial summary judgment motion on the Patton Vision offer was filed *without* any reliance on Foster's expert report and decided on December 11.

Two attorneys, Christopher Tayback and Noah Helpern, traveled to Las Vegas on February 17, 2016 to attend a hearing on a (procedural) motion to compel, and stayed at the Mandarin Oriental (in rooms costing \$499 and \$440, respectively)—six miles from the courthouse. *Id.* at MEP 399. Many "lodging" entries are unspecified except by date and price. *Id.* (*e.g.*, \$688.85; \$307.47; \$474.93). Forty-five entries for \$50 charges and many other charges of various dollar amounts are wholly unspecified and appear to be travel extras (such as airport lounges) or Wi-Fi for the short

1 flight from Burbank to Las Vegas. *Id.* MEP 405-407. For all these reasons,
2 *none* of these travel costs should be allowed.

3 **3. Bird Marella's court travel costs should be disallowed.**

4 Gould's Reno attorneys incurred approximately \$3,000 to travel
5 to Las Vegas for hearings. MEP 419-420. His California counsel incurred
6 more than three times this amount (\$11,000), which costs are excessive as a
7 whole and insufficiently supported and described. *See* MEP 454-458 (e.g.,
8 undated "Airfare Las Vegas" at \$1,163.92; unnamed "Hotel" at \$429.77;
9 "Taxis" for \$245.21). If Gould's court travel costs are allowed at all, the Court
10 should only allow the reasonable travel costs of one set of attorneys; not
11 both, and award no more than the \$3,000 his Reno attorneys incurred.

12 **N. Miscellaneous non-taxable costs.**

13 The Court should disallow the following unwarranted costs: (1)
14 \$1,100 for two *pro hac vice* applications for Gould's California attorneys, Ex.
15 1 to Bannett Decl.; (2) \$314.35 for unspecified messenger services in Los
16 Angeles, Ferrario Decl. Ex. 10; and (3) any other cost item not identified,
17 supported or described in defendants' Cost Memo and Exhibits.

18 **III. CONCLUSION**

19 For the reasons set out above, the Court should use its discretion
20 to: (1) disallow all costs claimed by RDI, which is not a prevailing party and
21 as a nominal defendant did not need to defend itself against any claims; (2)
22 disallow all Gould's costs as untimely; (3) disallow all claimed costs that are
23 unsupported, insufficiently itemized, or insufficiently described; and (4)
24 greatly reduce all categories of costs—including but not limited to those for
25 expert witnesses, computerized legal research, E-discovery, deposition
26 transcripts, travel expenses, lodging, temporary office, and residential
27 space—because the amounts claimed are excessive and unreasonable.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MORRIS LAW GROUP

By: /s/ AKKE LEVIN

Steve Morris, Bar No. 1543
Akke Levin, Bar No. 9102
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101

Attorneys for Plaintiff
James J. Cotter, Jr.

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that I am an employee of MORRIS LAW GROUP and that on the date below, I cause the following document(s) to be served via the Court's Odyssey E-Filing System: **MOTION TO RETAX COSTS** to be served on all interested parties, as registered with the Court's E-Filing and E-Service System. The date and time of the electronic proof of service is in place of the date and place of deposit in the mail.

DATED this 5th day of September, 2018.

By: /s/ Judy Estrada

EXHIBIT 1

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

JAMES J. COTTER, JR., derivatively
on behalf of Reading International,
Inc.,
Plaintiff,

vs.

Case No.

MARGARET COTTER, ELLEN COTTER, A-15-719860-B
GUY ADAMS, EDWARD KANE, DOUGLAS
McEACHERN, TIMOTHY STOREY,
WILLIAM GOULD, JUDY CODDING,
MICHAEL WROTONIAK, and DOES 1
through 100, inclusive,
Defendants.

and

READING INTERNATIONAL, INC.,
a Nevada corporation,
Nominal Defendant.

(CAPTION CONTINUED ON NEXT PAGE.)

VIDEOTAPED DEPOSITION OF JAMES COTTER, JR.
Los Angeles, California
Monday, May 16, 2016
Volume I

Reported by:
JANICE SCHUTZMAN, CSR No. 9509
Job No. 2312188
Pages 1 - 297

Page 1

1 T2 PARTNERS MANAGEMENT, LP, a
2 Delaware limited partnership,
3 doing business as KASE CAPITAL
4 MANAGEMENT, et al.,
5 Plaintiffs,
6 vs.
7 MARGARET COTTER, ELLEN COTTER,
8 GUY ADAMS, EDWARD KANE, DOUGLAS
9 McEACHERN, WILLIAM GOULD, JUDY
10 CODDING, MICHAEL WROTONIAK, CRAIG
11 TOMPKINS, and DOES 1 through 100,
12 inclusive,
13 Defendants.
14 and
15 READING INTERNATIONAL, INC., a
16 Nevada corporation,
17 Nominal Defendant.

18 Videotaped Deposition of JAMES COTTER, JR.,
19 Volume I, taken at 865 South Figueroa Street,
20 10th Floor, Los Angeles, California, commencing
21 at 10:09 a.m. and ending at 5:40 p.m., Monday,
22 May 16, 2016, before Janice Schutzman, CSR No. 9509.

23
24
25 PAGES 1 - 297

Page 2

1 experience. The sole reason he was being appointed
2 to the board was because Margaret Cotter wanted him
3 on the board.

4 And so we had a special nominating
5 committee, which is another illustration of the lack 11:26:38
6 of process, where the members of the special
7 nominating committee went out and interviewed
8 directors but, at the end of the day, they made the
9 decision that ultimately the decision that they
10 could make -- had to make was the decision of 11:27:00
11 whatever the controlling stockholder wanted them to
12 make. And so, you know, Michael Wrotniak was
13 appointed to the -- recommended to be appointed to
14 the board.

15 And so on a general level, yes, I feel as 11:27:16
16 though he was not independent.

17 BY MR. TAYBACK:

18 Q. And the lack -- his lack of independence
19 stems from his -- I may not have followed it.

20 His sister's best friend was friends with 11:27:32
21 Margaret Cotter?

22 A. Michael's wife is my sister Margaret
23 Cotter's best friend whom Margaret has known since,
24 I believe, the first year of college.

25 Q. Mr. Gould, is he independent? 11:27:52

Page 78

1 MR. KRUM: Same objections.

2 THE WITNESS: Again, technically, he may be
3 independent. Yes. I mean --

4 BY MR. TAYBACK:

5 Q. Yes, he's independent, in your view? 11:28:22

6 A. I mean, I'm -- again, Mr. Tayback, I'm not
7 a lawyer. I -- so I don't --

8 Q. I'm not asking the legal definition. I'm
9 asking your view. You've stated that some people in
10 your view aren't independent, and so now I'm asking 11:28:33
11 about these other people.

12 Mr. Gould, in your view, is he independent?

13 A. Technically, I believe he's independent.

14 Q. Technically.

15 Are you giving me a legal definition there, 11:28:47
16 or are you telling me --

17 A. I don't --

18 Q. -- what you think?

19 You don't know.

20 So with respect to -- I mean, all the other 11:28:54
21 people we've asked about, Ms. Coddington, Mr. Wrotniak,
22 you said, I'm not giving you the legal definition,
23 I'm telling you what I think.

24 A. Right.

25 Q. Because you expressed a concern that there 11:29:03

1 aren't enough independent directors on the board and
2 on this executive committee, and I'm trying to find
3 out if you have a view as to whether Mr. Gould is
4 independent or not.

5 And you think, in your view, he's 11:29:13
6 independent?

7 A. For a period of time, Bill was independent
8 but has -- yes, I mean, he is independent.

9 Q. Okay. And why do you think he's
10 independent? 11:29:23

11 Does he have no connection to your family?

12 A. At least he doesn't have a relationship
13 going back with me and my two sisters that would be
14 of such that would question his independence.

15 Q. How long have you known Mr. Gould? 11:29:44

16 A. Maybe since -- at least since 2002.

17 Q. Was he a friend of your father's?

18 A. He was.

19 Q. A close friend?

20 A. I don't know. I mean, he was a business 11:30:03
21 associate with my dad's. I wouldn't describe him as
22 a close friend.

23 Q. So he did business with your father?

24 A. He's -- I think he's been on the board for
25 a number years, going back to perhaps 1985. 11:30:16

Page 80

1 Q. And did you feel that that made him an
2 independent board member even when your father was
3 in control of the company?

4 MR. KRUM: Same objections.

5 THE WITNESS: I don't know. 11:30:28

6 BY MR. TAYBACK:

7 Q. Mr. Kane, is he independent, in your view?

8 A. No.

9 Q. Why not?

10 A. Because Mr. Kane has had a relationship 11:30:51
11 going back close to 50 years with -- close to 50
12 years with the three of us, with my dad. I think he
13 went back close to 40 years with my father.

14 And based on that relationship, my sisters
15 call him uncle, Uncle Ed. And based on his behavior 11:31:26
16 and actions that he's taken, I would say he's not
17 independent.

18 Q. Mr. Gould's relationship with your father
19 didn't -- doesn't make him currently independent --
20 does not make him currently not independent, but 11:31:44
21 Mr. Kane's relationship with your father makes him
22 not independent; is that correct?

23 MR. KRUM: Objection, mischaracterizes the
24 testimony.

25 THE WITNESS: Mr. Kane and Mr. Gould had a 11:31:56

1
2 I, JANICE SCHUTZMAN, Certified Shorthand
3 Reporter of the State of California, do hereby
4 certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any witnesses in the foregoing proceedings,
8 prior to testifying, were placed under oath; that
9 the testimony of the witness and all objections made
10 by counsel at the time of the examination were
11 recorded stenographically by me, and were thereafter
12 transcribed under my direction and supervision; and
13 that the foregoing pages contain a full, true and
14 accurate record of all proceedings and testimony to
15 the best of my skill and ability.

16 I further certify that I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any of the parties.

19 IN WITNESS WHEREOF, I have subscribed my name
20 this 19th day of May, 2016.

21
22 
23

24 JANICE SCHUTZMAN

25 CSR No. 9509

EXHIBIT 2

1 EIGHTH JUDICIAL DISTRICT COURT

2 CLARK COUNTY, NEVADA

3

4 JAMES J. COTTER, JR.,
5 individually and derivatively
6 on behalf of Reading
International, Inc.,

7 Plaintiff, Case No. A-15-719860-B

8 vs. Coordinated with:

9 MARGARET COTTER, et al., Case No. P-14-082942-E

10 Defendants,

11 and

12 READING INTERNATIONAL, INC.,
13 a Nevada corporation,

14 Nominal Defendant.
15 _____/

16

17

18 VIDEOTAPED DEPOSITION OF

19 MICHAEL KLAUSNER

20 TAKEN ON NOVEMBER 30, 2016

21 Job No. 356648

22

23

24

25

REPORTED BY:

ANRAE WIMBERLEY, CSR NO. 7778

<p style="text-align: right;">Page 14</p> <p>1 A. Yes, this is my initial report.</p> <p>2 Q. I give you 469. Let me know if you can</p> <p>3 identify that.</p> <p>4 A. Yes, this is my second report.</p> <p>5 Q. Now, directing your attention to Exhibit 468,</p> <p>6 just going to ask you some general questions for the</p> <p>7 moment.</p> <p>8 A. Okay.</p> <p>9 Q. Who participated in drafting Exhibit 468?</p> <p>10 A. Well, I drafted it. I had Andy and his team</p> <p>11 support me in that. So there were citations, certain</p> <p>12 passages they may have initially written in in the</p> <p>13 nature of providing support that I asked for. And</p> <p>14 ultimately I edited it a few times. I think it's fair</p> <p>15 to say that nearly 100 percent of the words in the</p> <p>16 report are mine.</p> <p>17 Q. When you asked them to provide support,</p> <p>18 including perhaps that resulted in them drafting some</p> <p>19 passages, how did you communicate those requests?</p> <p>20 A. We talked on the phone.</p> <p>21 Well, let me add to that. I don't remember</p> <p>22 this specifically, but the way I usually work, and I</p> <p>23 suspect I worked here as well, is, as I was drafting</p> <p>24 and, for instance, I remembered a statement from a</p> <p>25 deposition, I would write in a note, please add the</p>	<p style="text-align: right;">Page 15</p> <p>1 statement from Mr. Kane's deposition regarding</p> <p>2 such-and-such. Or I could ask, please add as much</p> <p>3 support as we have for this particular point, having</p> <p>4 read the documents at some point, knowing it's there,</p> <p>5 and then asking them to fill it in.</p> <p>6 Q. Now, the document itself, when you would have</p> <p>7 added a note of the nature you just described, how was</p> <p>8 that document maintained and who had access to it?</p> <p>9 A. They have a secure server. It was on the</p> <p>10 server. And we each worked on the same document.</p> <p>11 Q. Were there versions or iterations or drafts</p> <p>12 of the document?</p> <p>13 A. There were, but it was within the same</p> <p>14 document.</p> <p>15 Q. Meaning that each successive version</p> <p>16 eliminated the prior version?</p> <p>17 A. Right.</p> <p>18 Q. Now, in terms of your preparation of the</p> <p>19 document, describe for me how you did that</p> <p>20 methodologically.</p> <p>21 A. Well, I began, of course, by reading the</p> <p>22 complaint. I may have then read a couple of</p> <p>23 depositions. But pretty early on, I would have</p> <p>24 written an outline. The outline would have been</p> <p>25 framed in terms of specific opinions.</p>
<p style="text-align: right;">Page 16</p> <p>1 Those opinions got refined over time as I</p> <p>2 read more and as the people at Analysis Group read</p> <p>3 more and gave me additional documents and added</p> <p>4 additional material initially to an outline and then</p> <p>5 to the draft. And it was an iterative process in that</p> <p>6 way. That's how I always work.</p> <p>7 Q. Is the same true for your rebuttal report,</p> <p>8 Exhibit 469?</p> <p>9 A. Yes. Although the rebuttal report, I</p> <p>10 probably started with a more complete draft since I</p> <p>11 was responding to Justice Steele's report, in large</p> <p>12 part. So I would have largely written that out in a</p> <p>13 full draft initially.</p> <p>14 Q. Turn, if you would, please,</p> <p>15 Professor Klausner, to page 3 of Exhibit 468. I</p> <p>16 direct your attention to the bottom and to the two</p> <p>17 bullet points beneath paragraph 12.</p> <p>18 This is the summary of your opinions; is that</p> <p>19 right?</p> <p>20 A. That's right.</p> <p>21 Q. The first bullet point, who drafted that?</p> <p>22 A. I did.</p> <p>23 Q. Did anybody else participate in the drafting?</p> <p>24 A. Not in any significant way.</p> <p>25 Q. What communications did you have with anybody</p>	<p style="text-align: right;">Page 17</p> <p>1 about the substance or the phraseology of that</p> <p>2 particular bullet point, the first one in paragraph 12</p> <p>3 on page 3 of Exhibit 468?</p> <p>4 MR. SEARCY: Objection; vague.</p> <p>5 THE WITNESS: I don't remember specifically. I</p> <p>6 certainly was working closely with the people at</p> <p>7 Analysis Group. So we would discuss it. I would</p> <p>8 value their advice. So I'm sure I asked them, does it</p> <p>9 read well? And it was refined over time, largely by</p> <p>10 me rewriting my own language. But ultimately that's a</p> <p>11 product of my writing over a few different -- a few</p> <p>12 drafts.</p> <p>13 BY MR. KRUM:</p> <p>14 Q. What communications, if any, did you have</p> <p>15 with Mr. Helpern or any other lawyer about the</p> <p>16 substance or the phraseology of the first bullet point</p> <p>17 in paragraph 12 of Exhibit 468?</p> <p>18 A. I had very few conversations with</p> <p>19 Mr. Helpern. We -- I could be wrong, but I don't</p> <p>20 remember talking to him until this draft, that is</p> <p>21 after the beginning, after the initial engagement and</p> <p>22 some conversations early on. I think I had an initial</p> <p>23 draft pretty much completed by the time we spoke. And</p> <p>24 these opinions, or something very close to them, would</p> <p>25 have been there already.</p>

Page 154

1 A. No.

2 Q. Has anyone reported to you about any hearings

3 in this case?

4 A. Not in any detail. There was an issue of

5 when the trial would be. I don't know if there's a

6 hearing that moved the trial date, but I knew there

7 was something going on with respect to that.

8 I know vaguely that there was an issue with

9 respect to Justice Steele's opinion. I didn't read

10 it. Maybe it was in the discussion yesterday, that he

11 would -- I could be wrong. My understanding is he

12 will not be testifying as to Delaware law, but may be

13 testifying as to other issues. I'm not clear on that.

14 I received, but did not read -- I noticed it was

15 there. It looked like it was a set of motions in

16 limine, but I didn't read them. I think that's about

17 it.

18 Q. Have you ever met or spoken with any of the

19 defendants?

20 A. No.

21 Q. Did you undertake to reach any conclusions

22 about the independence of any of the board members

23 beyond anything that's set out in Exhibit 468 or 469

24 or what you've already said today?

25 A. No. I made -- I was never asked to make a

Page 156

1 CERTIFICATE OF DEPOSITION OFFICER

2 I, ANRAE WIMBERLEY, CSR NO. 7778, duly authorized

3 to administer oaths pursuant to Section 8211 of the

4 California Code of Civil Procedure, hereby certify

5 that the witness in the foregoing deposition was by me

6 sworn to testify to the truth, the whole truth and

7 nothing but the truth in the within-entitled cause;

8 that said deposition was taken at the time and place

9 therein stated; that the testimony of said witness was

10 reported by me and was thereafter transcribed by me or

11 under my direction by means of computer-aided

12 transcription; that the foregoing is a full, complete

13 and true record of said testimony; and that the

14 witness was given an opportunity to read and correct

15 said deposition and to subscribe same.

16 I further certify that I am not of counsel or

17 attorney for either or any of the parties in the

18 foregoing deposition and caption named, nor in any way

19 interested in the outcome of the cause named in said

20 caption.

21 IN WITNESS WHEREOF, I have hereunto subscribed by

22 my hand this 13th day of December, 2016.

23

24

25

ANRAE WIMBERLEY, CSR NO. 7778

Page 155

1 judgment on the independence of the board members.

2 MR. KRUM: Okay. I don't have any further

3 questions.

4 Marshall, I reserve my rights because I don't

5 know what we missed in our expedited review of the

6 documents.

7 Professor Klausner, I can assure you that I

8 hope I'm done. Hope I don't have any reason to ask

9 you to come back. I appreciate your time.

10 MR. SEARCY: All right. Thanks. You've reserved

11 your rights and I've reserved mine. I think that's

12 it.

13 Anybody on the phone have anything?

14 MS. BANNETT: No.

15 MS. HENDRICKS: I'll reserve my rights too, just

16 for fun.

17 MR. KRUM: Very good.

18 Okay. We can go off the record.

19 THE VIDEOGRAPHER: This concludes today's

20 deposition of Michael Klausner on November 30th, 2016.

21 We're going off the record at 3:24 p.m.

22 (Whereupon, the deposition was adjourned at

23 3:24 p.m.)

24 ---ooo---

25

Page 157

1 ERRATA SHEET

2

3

4

5 I declare under penalty of perjury that I have read the

6 foregoing _____ pages of my testimony, taken

7 on _____ (date) at

8 _____ (city), _____ (state),

9

10 and that the same is a true record of the testimony given

11 by me at the time and place herein

12 above set forth, with the following exceptions:

13

14 Page Line Should read: Reason for Change:

15

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

25

EXHIBIT 3

Confidential

DISTRICT COURT
CLARK COUNTY, NEVADA

James J. Cotter, Jr., individually and derivatively on
behalf of Reading International, Inc., and

Plaintiff

Case No. A-15-719860-B

v.

Margaret Cotter et al.,

Defendants

Reading International, Inc.

Nominal Defendant

EXPERT REPORT OF RICHARD W. ROLL, PH.D.

August 25, 2016

451
EXH 10-26-16
DATE
WIT Roll
PATRICIA HUBBARD

ROLL00000067

JA8960

I. QUALIFICATIONS	1
II. ASSIGNMENT.....	2
III. SUMMARY OF OPINIONS.....	3
IV. BACKGROUND	3
A. Summary of Allegations.....	3
B. Relevant Parties.....	4
V. ANALYSIS	6
A. The news regarding James Cotter, Jr.'s termination did not have an adverse effect on the price of RDI Stock	7
B. The performance of RDI Stock since the termination of James Cotter, Jr. on a risk- adjusted basis does not support Plaintiff's contentions that RDI Stock has underperformed and/or has suffered harm	11
C. The performance of RDI Stock since the termination of James Cotter, Jr. relative to its performance prior to the termination does not support Plaintiff's contentions that RDI Stock has underperformed and/or has suffered harm	12

I. QUALIFICATIONS

1. My name is Richard Roll. I am currently the Linde Institute Professor of Finance at the California Institute of Technology. I am also Professor Emeritus at the Anderson School of Management at the University of California, Los Angeles, where I served on the faculty and held several endowed chairs since 1976. I have served on the faculty at Carnegie-Mellon University, The European Institute for Advanced Studies in Management, and L'École des Hautes Etudes Commerciales in Jouy-en-Josas, France.

2. I am a Fellow of the Econometric Society, the Financial Management Association, and the American Finance Association, where I served as President in 1987. I have received the Graham and Dodd award for financial writing four times, received distinguished scholar awards from the Eastern Finance Association and the Southern Finance Association, and been named Doctor Honoris Causa by Universität Karlsruhe in Germany and Université de Lille in France.

3. I earned a Ph.D. in finance, statistics, and economics from the University of Chicago and my thesis, which examined efficiency in the market for U.S. Treasury bills, won the Irving Fisher award in 1968 for the best American dissertation in economics. I have published two books, authored or co-authored more than 100 publications in peer-reviewed journals, and been an associate editor of a variety of academic journals, including *The Journal of Finance*, the *Journal of Financial Economics*, the *American Economic Review*, and the *Journal of the American Statistical Association*.

4. My research has focused extensively on issues related to the performance of companies' equity securities, including how companies' stock prices respond to new information. In 1969 I co-authored a paper in the *International Economic Review* entitled "The Adjustment of Stock Prices to New Information" with Eugene Fama, Lawrence Fisher, and

Michael C. Jensen, which examined the speed with which the stock market reacted to announcements of stock splits. This paper is widely regarded as a seminal contribution to the academic literature on event studies (*i.e.*, how companies' stock prices respond to new information). I have authored numerous other journal articles on how new information is incorporated into stock prices throughout my career, including a 2005 paper in the *Journal of Financial Economics* entitled "Evidence on the speed of convergence to market efficiency."

5. My complete curriculum vita, which includes a list of my publications, is attached as **Appendix A** to this report. **Appendix B** lists my prior testimony.

II. ASSIGNMENT

6. I have been retained by Quinn Emanuel Urquhart & Sullivan, LLP and Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, P.C., counsel for certain current and former members of the Board of Directors (collectively referred to as "Defendants")¹ of Reading International, Inc., ("RDI"), to analyze potential damages associated with declines in the price of RDI's Class A non-voting common stock ("RDI Stock") due to the alleged inappropriate termination of James Cotter, Jr. as CEO and President of RDI on June 12, 2016 (announced by RDI on June 15, 2015). In particular, I have been asked to evaluate the stock price reaction of RDI Stock immediately following James Cotter, Jr.'s termination and the general performance of RDI Stock subsequent to the termination. I may also review and comment on any reports filed by plaintiffs' experts in this case.

¹ The current and former members of RDI's Board of Directors who are defendants in this case and who are represented by Quinn Emanuel Urquhart & Sullivan, LLP include Ellen Cotter, Margaret Cotter, Guy Adams, Edward Kane, Douglas McEachern, Judy Coddling, and Michael Wrotniak. William Gould, a current member of RDI's Board of Directors, is represented by Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, P.C. I understand that Timothy Storey, a former member of RDI's Board of Directors, was also a defendant in this case but has been dismissed.

7. In performing my research and analyses, I have considered the materials listed in Appendix C and/or cited in this report and exhibits. My work on this matter is ongoing, and I may review additional materials or conduct further analysis. I reserve the right to update, refine, or revise my opinions.

8. I am being compensated at a rate of \$1,200 per hour for my work in this litigation, including any testimony. My compensation is not contingent upon my findings or the outcome of this matter. I have been assisted in the analysis underlying my conclusions by others working under my direction and supervision.

III. SUMMARY OF OPINIONS

9. Based on my research and analysis, I find no empirical evidence that the price of RDI Stock was adversely affected by the alleged inappropriate termination of James Cotter, Jr. on June 12, 2015 (announced by RDI on June 15, 2015), and by extension, RDI Stock has not suffered any irreparable harm as a result of the termination. My conclusion is based on the following analyses that I performed, which I discuss in greater detail below:

- The news regarding James Cotter, Jr.'s termination did not have an adverse effect on the price of RDI Stock.
- The risk-adjusted performance of RDI Stock since the termination of James Cotter, Jr. through June 30, 2016 does not support Plaintiff's contentions that RDI Stock has underperformed and/or has suffered irreparable harm.
- The risk-adjusted performance of RDI Stock since the termination of James Cotter, Jr. through June 30, 2016 is not distinguishable from the performance of RDI Stock while he was CEO.

IV. BACKGROUND

A. Summary of Allegations

10. This case is a shareholder derivative action brought on behalf of RDI against Defendants by plaintiff James Cotter, Jr. ("Plaintiff").

11. Plaintiff alleges that, among other things, Defendants “acted to wrongfully seize control of RDI...and to fundamentally change and dismantle the corporate governance structures of RDI”² in violation of their fiduciary duties to RDI and to RDI shareholders. In particular, Plaintiff alleges that, among other things, Defendants “[U]ndertook a purported boardroom coup, precipitously removing [James Cotter, Jr.] as President and CEO of RDI...without undertaking any semblance of a process....”³

12. Plaintiff contends that as a result of Defendants’ actions, RDI and its shareholders have suffered “irreparable harm,” and that when the “complained of conduct became publicly known and disseminated, the price at which RDI stock traded dropped, resulting in monetary damages to RDI and to RDI shareholders...in excess of \$40 million.”⁴

B. Relevant Parties

1. RDI

13. RDI is a publicly-traded entertainment and real estate company incorporated in 1999 that is engaged in the ownership and operation of multiplex cinemas and retail and commercial real estate in the United States, Australia, and New Zealand.⁵ RDI has two business segments: “Cinema Exhibition,” which involves the operation of 58 cinemas (as of December 2015), and “Real Estate,” which involves real estate development and the rental or licensing of

² James Cotter, Jr. First Amended Verified Complaint, filed October 22, 2015 (“Complaint”), ¶ 1. I understand that James Cotter, Jr. has submitted a second amended complaint in this case, which I have not reviewed. I reserve the right to update and/or supplement my analyses and report after reviewing the second amended complaint.

³ Complaint, ¶ 3.

⁴ Complaint, ¶¶ 162, 192.

⁵ RDI Form 10-K for the year ended December 31, 2015, filed April 29, 2016, p. 3.

retail, commercial and live theater assets.⁶ James Cotter, Sr. became RDI's first Chairman and CEO and served in this capacity until health reasons caused him to resign on August 7, 2014.⁷

14. RDI has two classes of common stock: Class A shares, which do not have voting rights; and Class B shares, which have voting rights.⁸ Both classes of common stock trade on the NASDAQ under the tickers RDI and RDIB, respectively. My analysis focuses on the Class A non-voting shares ("RDI Stock," as defined above) as these represent the vast majority of RDI's total shares outstanding as well as trading volume. For example, as of April 25, 2016, there were 21.7 million shares of Class A non-voting common stock outstanding and 1.7 million shares of Class B voting common stock outstanding.⁹ In addition, between June 2014 and June 2016, the Class B shares traded on only 99 of 526 total trading days in the period (*i.e.*, 19 percent) with an average trading volume of approximately 1,700 shares on days with trades, whereas the Class A shares traded on all 526 trading days with an average trading volume of approximately 54,000 shares.¹⁰

2. *James Cotter, Jr.*

15. James Cotter, Jr. joined the Board of Directors of RDI in 2002, became Vice Chairman of the Board of Directors of RDI in 2007, and was appointed President of RDI in 2013.¹¹ Following his father's resignation on August 7, 2014 due to health reasons, James

⁶ RDI Form 10-K for the year ended December 31, 2015, filed April 29, 2016, p. 3.

⁷ Reading International, Our Story, available at <http://www.readingrdi.com/group-about-us/our-story/>; Reading International, "Reading International Announces 2nd Quarter 2014 Results, Resignation of James J. Cotter, Sr. as Chairman and CEO, and the Election of His Successors," August 8, 2014.

⁸ Class A shares receive zero votes per share, while Class B shares receive one vote per share. RDI's SEC filings state that RDI has never declared a dividend on its common stock and has no current plans to declare any dividends in the future (RDI Form DEF 14A, filed May 18, 2016, p. 3; RDI Form 10-K for the year ended December 31, 2015, filed April 29, 2016, p. 28).

⁹ RDI Form 10-K for the year ended December 31, 2015, filed April 29, 2016, p. 1.

¹⁰ Capital IQ.

¹¹ Reading International, "Reading International Announces 2nd Quarter 2014 Results, Resignation of James Cotter, Sr. as Chairman and CEO, and the Election of His Successors," August 8, 2014.

Cotter, Jr. was named CEO of RDI; RDI disclosed James Cotter, Jr.'s appointment to CEO to the public in a press release on August 8, 2014 at 4:05 PM Eastern.¹²

16. At a meeting of RDI's Board of Directors held on Friday, June 12, 2015, the Board of Directors voted to terminate the employment of James Cotter, Jr. as President and CEO of RDI.¹³ I understand that on that same day, James Cotter, Jr. filed a lawsuit in Nevada that disclosed his termination. RDI disclosed James Cotter's, Jr.'s termination to the public in a press release on Monday, June 15, 2015 at 9:00 AM Eastern.¹⁴

V. ANALYSIS

17. A damages analysis related to the performance of a company's stock should consider company-, market- and industry-specific factors that affect the performance of a company's stock price. In the Complaint, Plaintiff James Cotter, Jr. asserts that RDI Stock has suffered "irreparable harm" as a result of Defendants' actions without providing an analysis of any of the factors that affect RDI Stock's price, rendering his assertions without basis and inaccurate.

18. As I discuss in greater detail below, I used a generally-accepted approach called an event study, which controls for market- and industry-specific factors, to analyze whether the termination of James Cotter, Jr. had a negative effect on the price of RDI Stock. While an event study is a direct method to analyze the impact of James Cotter, Jr.'s termination on the price of RDI Stock on the date the termination was announced, I also analyzed the performance of RDI Stock over a longer time horizon (after controlling for market- and industry-specific factors), to

¹² Reading International, "Reading International Announces 2nd Quarter 2014 Results, Resignation of James J. Cotter, Sr. as Chairman and CEO, and the Election of His Successors," August 8, 2014.

¹³ RDI Form 8-K, filed June 18, 2015.

¹⁴ Reading International, "Reading International Announces Appointment of Ellen Cotter as Interim Chief Executive Officer," June 15, 2015.

assess whether RDI Stock underperformed on a risk-adjusted basis following James Cotter, Jr.'s termination.

19. As I discuss in the sections below, after controlling for market- and industry-specific factors, I find that contrary to Plaintiff's claims:

- The news regarding James Cotter, Jr.'s termination did not have an adverse effect on the price of RDI Stock.
- RDI Stock has not underperformed (on a risk-adjusted basis) since the termination of James Cotter, Jr. through June 30, 2016, which further demonstrates that James Cotter Jr.'s termination did not have an adverse effect on the price of RDI Stock.

20. Thus, there is no empirical evidence that the price of RDI Stock has been adversely affected by the alleged inappropriate termination of James Cotter, Jr. as CEO and President, which supports a conclusion that RDI Stock has not suffered any harm as a result of the termination.

A. The news regarding James Cotter, Jr.'s termination did not have an adverse effect on the price of RDI Stock

21. To evaluate whether the news of the termination of James Cotter, Jr. as CEO and President of RDI affected the price of RDI Stock, I performed an event study. An event study is a commonly-used statistical method of evaluating the price impact of specific information after controlling for market, industry, and/or other factors.¹⁵ Event studies are regularly utilized—and have been since 1969—to measure the change in stock price associated with news announcements. The price movements of a company's stock that are not explained by market, industry, and/or other factors modeled in the event study (*i.e.*, the "excess return") may be

¹⁵ Fama, Eugene, Fisher, Lawrence, Jensen, Michael and Roll, Richard, "The Adjustment of Stock Prices to New Information," *International Economic Review* 10.1 (1969): 1-21.

attributable to the disclosure of the specified information being tested.¹⁶ The presence (or lack thereof) of an excess return that is statistically significantly different than zero¹⁷ when new information is announced may indicate that the information—in this case the announcement of the termination of James Cotter, Jr.—did (or did not) affect the price movement of the security at issue.

22. The general event study approach starts with estimating the typical relation between a stock's return and benchmark returns during a period prior to the disclosure of the information being analyzed.¹⁸ Then, on the dates being examined (here the dates surrounding the announcement of the termination of James Cotter, Jr.) the typical relation with the benchmark returns provides an estimate of what the security's daily price returns would have been absent the events at issue.¹⁹ The difference between the security's actual return on the event date and the benchmark return is the "excess return." As described above, one can then test whether the excess return is statistically significantly different than zero.²⁰ An excess return that is statistically significant indicates that the event is associated with a return that is greater in magnitude (either positive or negative) than expected, given the changes in the market and

¹⁶ Bodie, Zvi, Alex Kane, and Alan Marcus, *Investments*, Seventh Edition, Boston, MA: Irwin McGraw-Hill, 2008, p. 366; MacKinlay, Craig, "Event Studies in Economics and Finance," *Journal of Economic Literature* Vol. XXXV (1997): 18.

¹⁷ In hypothesis or inference testing, statistical significance indicates the likelihood that an observed event occurred due to chance. An event that is statistically significant at the five percent level—a common statistical threshold in the academic literature and the threshold that I use in my analyses below—indicates that there is 95 percent likelihood that the observed effect did not occur by chance. Generally, in a data sample with a normal distribution and large number of observations, a t-statistic with an absolute value of greater than or equal to 1.96 indicates that the result is statistically significant at the five percent level.

¹⁸ A regression model is a well-established statistical technique used to measure the relation between a dependent variable and one or more independent variable(s) (Gujarati, Damodar, *Essentials of Econometrics*, Second Edition, New York, NY: Irwin McGraw-Hill, 1999, p. 123).

¹⁹ Gujarati, Damodar, *Essentials of Econometrics*, Second Edition, New York, NY: Irwin McGraw-Hill, 1999, p. 123; Bodie, Zvi, Alex Kane, and Alan Marcus, *Investments*, Seventh Edition, Boston, MA: Irwin McGraw-Hill, 2008, pp. 366-367.

²⁰ For the remainder of this report, I use the terms "statistically significant" or "not statistically significant" to denote whether the result is statistically significantly different than zero at the five percent level.

industry and the security's sensitivity to the market and industry.²¹ That is, the stock price change, after controlling for market and industry movements, is statistically different than what would be expected as a result of normal day-to-day fluctuations.

23. As I discuss in greater detail below, based on an event study that controls for market and industry effects—both real estate and cinema—I find that news regarding James Cotter, Jr.'s termination was not associated with a statistically significant excess return.

1. Market and industry indices used in the event study models

24. As described above, the event study methodology requires estimating benchmark daily returns. I utilized a regression-based market model to determine the relation between the daily returns of RDI Stock and market and industry factors. In particular, I regressed daily RDI Stock returns (in excess of the risk free rate) against the three Fama-French risk factors (market factor, "SMB," and "HML")²² and returns of industry-specific benchmarks indices representing RDI's cinema²³ and real estate²⁴ business segments (also in excess of the risk free rate) for the one-year period prior to the termination date, or June 12, 2014 to June 11, 2015.

²¹ Confounding news on the same day complicates the analysis and may affect conclusions about the causes of stock price movements, and how much of the stock price change is associated with a particular piece of information.

²² The Fama-French three-factor model is a commonly-used multifactor model used to estimate expected returns of a security. The Fama-French three-factor model expands on the traditional capital asset pricing model ("CAPM") by adding size and value factors in addition to the market risk factor of the CAPM model. The market risk factor, which estimates the return of the overall market above the risk free rate, is based on the value-weighted return of all firms listed on the NYSE, AMEX, or NASDAQ (with available data in CRSP, the Center for Research in Security Prices) (http://mba.tuck.dartmouth.edu/pages/faculty/ken.french/Data_Library/f-f_factors.html). In addition to the market risk factor, the Fama-French three-factor model takes into consideration that two categories of stocks—small caps and value stocks (*i.e.*, stocks with a high book-to-market ratio, or book value of firm divided by market value of firm)—have historically outperformed the market as a whole. These two additional factors of the Fama-French model are known as "SMB" and "HML," respectively. Small Minus Big, or SMB, is the difference in returns between the smallest one third of firms and the largest one third of firms. High Minus Low, or HML, is the difference in returns between high and low book-to-market firms (Bodie, Zvi, Alex Kane, and Alan Marcus, 293, 332-333, 347, 435-436). Data for the Fama-French three-factor model are available on Dr. Kenneth French's website (http://mba.tuck.dartmouth.edu/pages/faculty/ken.french/data_library.html).

²³ I identified RDI's cinema industry peer companies based on reviewing the primary operations of peers identified in RDI's April 25, 2014 Proxy Statement (RDI Form DEF 14A, filed April 25, 2014). The companies in my cinema industry peer index are: Carmike Cinemas Inc., Cinemark Holdings, Inc., Event Hospitality & Entertainment Limited, IMAX Corporation, Regal Entertainment Group, The Marcus Corporation and Village Roadshow Limited.

25. Using the relation from my regression, I estimated RDI Stock's excess returns on the dates surrounding James Cotter, Jr.'s termination: Friday, June 12, 2015 (*i.e.*, the day James Cotter, Jr. was terminated and the day that he filed a lawsuit that disclosed his termination); Monday, June 15, 2015 (*i.e.*, when RDI issued a press release at 9:00 AM Eastern announcing James Cotter's, Jr.'s termination); and Tuesday, June 16, 2015 (*i.e.*, the day after RDI announced the termination).

26. I then tested whether the excess returns on these dates were statistically significant. Specifically, I tested whether the excess returns on June 12, June 15, and June 16, 2015, individually, were statistically significant. In addition, I tested whether the two-day compounded excess returns over the period from June 12 to June 15, 2015, and from June 15 to June 16, 2015 were statistically significant. In addition, I tested the three-day compounded excess return from June 12 to June 16, 2015.

2. Event study results

27. Exhibit 1A presents the results of my event study.²⁵ Although the excess returns on June 12, June 15, and June 16, 2015 were negative, as shown on Exhibit 1A, none of these excess returns were statistically significant. In other words, the excess returns on these days are indistinguishable from normal day-to-day price movements historically experienced by RDI

The daily return of the cinema industry peer index is calculated as an equally-weighted average of the stock-split and dividend-adjusted returns of the companies contained in the index.

²⁴ Similar to the cinema peer index, I identified RDI's real estate peer companies based on reviewing RDI's April 25, 2014 Proxy Statement (RDI Form DEF 14A, filed April 25, 2014). The companies in my real estate peer index are: Acadia Realty Trust, Associated Estates Realty Corporation, Cedar Realty Trust, Inc., EPR Properties, Glimcher Realty Trust, IRC Retail Centers Inc., Kite Realty Group Trust, LTC Properties Inc., Pennsylvania Real Estate Investment Trust, Ramco-Gershenson Properties Trust and Urstadt Biddle Properties Inc. Bluegreen Corporation, a peer listed in RDI's Proxy Statement was not included in the Real Estate Industry Peer Index because it is a private company. Glimcher Realty Trust, Associated Estates Realty Corp. and IRC Retail Centers Inc. were delisted and thus removed from my peer index as of January 16, 2015, August 7, 2015 and March 31, 2016, respectively. The daily return of the real estate industry peer index is calculated as an equally-weighted average of the stock-split and dividend-adjusted returns of the companies contained in the index.

²⁵ Exhibit 1B presents the results of my market model regression.

Stock. In addition, the two-day compounded excess return from June 12 to June 15, 2015, and two-day compounded excess return from June 15 to June 16, 2015 were also not statistically significant. Furthermore, the three-day compounded excess return from June 12 to June 16, 2015 was also not statistically significant.

28. Taken together these results support the conclusion that the news regarding James Cotter, Jr.'s termination did not have an adverse effect on the price of RDI Stock, and thus RDI Stock has not suffered any harm as a result of the termination announcement of James Cotter, Jr.

B. The performance of RDI Stock since the termination of James Cotter, Jr. on a risk-adjusted basis does not support Plaintiff's contentions that RDI Stock has underperformed and/or has suffered harm

29. In addition to measuring the excess return on the day prior, day of, and day after the announcement of the termination of James Cotter, Jr., I also examined the performance of RDI Stock over a longer time horizon. I performed a statistical analysis to evaluate whether RDI Stock underperformed on a risk-adjusted basis since the termination of James Cotter, Jr. I did so by analyzing RDI Stock's "alpha." In finance, "alpha" (formally referred to as "Jensen's Alpha") provides a measure of whether the investment in question earned a return greater than or less than its expected return, given market and/or industry performance, as well as the investment's risk characteristics.²⁶

30. Specifically, alpha is the excess return of a security over the expected return, where the expected return is estimated using a market model or factor model such as the one utilized in my event study described above. Alpha is determined by regressing a security's return relative to the explanatory factors; in such models, the intercept of the regression

²⁶ See, for example, Damodaran, Aswath, *Investment Valuation*, Second Edition, New York, NY: John Wiley & Sons, Inc., 2002, p. 183.

represents alpha.²⁷ A positive alpha that is statistically significant indicates that the security has generated returns greater than what are expected and has thus “outperformed” on a risk-adjusted basis; a negative alpha that is statistically significant indicates that the security has generated returns that are less than what is expected and has thus “underperformed” on a risk-adjusted basis.

31. To evaluate the risk-adjusted performance of RDI Stock (*i.e.*, alpha) since the termination of James Cotter, Jr., I performed a regression of the returns of RDI Stock (in excess of the risk free rate) against the Fama-French factors and the cinema and real estate industry indices (also in excess of the risk free rate) from June 15, 2015 (the day the termination was announced) to June 30, 2016 (the most recent period for which I have data relating to the Fama-French factors). As shown in Exhibit 2, alpha (*i.e.*, the intercept of the regression) is negative, but it is not statistically significant, indicating that RDI Stock has not underperformed (on a risk-adjusted basis) since the termination of James Cotter, Jr.²⁸ This result belies Plaintiff’s theory that the firing of James Cotter Jr. caused harm to RDI through declines in its stock price.

C. The performance of RDI Stock since the termination of James Cotter, Jr. relative to its performance prior to the termination does not support Plaintiff’s contentions that RDI Stock has underperformed and/or has suffered harm

32. In addition to showing that RDI’s alpha after the termination of James Cotter, Jr. was not statistically significant (*i.e.*, that RDI Stock did not underperform), I also compared the risk-adjusted performance of RDI Stock *after* the termination of James Cotter, Jr. relative to the risk-adjusted performance of RDI Stock while he was CEO.

²⁷ Bodie, Zvi, Alex Kane, and Alan Marcus, *Investments*, Seventh Edition, Boston, MA: Irwin McGraw-Hill, 2008, p. 854.

²⁸ I also evaluated RDI’s alpha from June 15, 2015 to the three-, six-, and nine-month periods following James Cotter, Jr.’s termination (*i.e.*, September 14, 2015, December 14, 2015, and March 14, 2016, respectively) and did not find alpha to be statistically significant in any of these periods.

33. To do so, I performed a regression analysis of the returns of RDI Stock (in excess of the risk free rate) against the Fama-French factors and the cinema and real estate industry indices (also in excess of the risk free rate) from August 9, 2014 (the "effective trading day" following the announcement that James Cotter, Jr. was appointed to CEO²⁹) to June 30, 2016 (the most recent period for which I have data relating to the Fama-French factors). My regression analysis included an indicator variable³⁰ for the period after James Cotter, Jr.'s termination was announced (*i.e.*, after June 15, 2015), which allowed for the relation between the returns of RDI Stock and the Fama-French and industry factors to vary between pre- and post-termination periods. In such a model, the coefficient on the post-termination period indicator variable allows me to test whether alpha is statistically different in the post-termination period relative to the period when James Cotter, Jr. was CEO. A statistically significant coefficient on the post-termination indicator variable (either positive or negative) would indicate that RDI Stock performed differently on a risk-adjusted basis after the termination of James Cotter, Jr.

34. However, as shown in **Exhibit 3**, the coefficient on the post-termination indicator variable is negative, but is not statistically significant, indicating that the risk-adjusted performance of RDI following James Cotter, Jr.'s termination was not statistically different than the risk-adjusted performance of RDI during James Cotter, Jr.'s tenure as CEO.³¹ This further

²⁹ The news of James Cotter, Jr.'s appointment as CEO and President of RDI was released to the market late in the day on August 8, 2014 at 4:05 PM Eastern; thus I use August 9, 2014 as the effective trading day to evaluate the performance of RDI Stock during his tenure.

³⁰ An indicator variable (commonly referred to as a "dummy" variable) takes on a value of zero or one to indicate the absence or presence of some "categorical" effect that may be expected to shift the outcome. In this case, the "categorical" effect is whether James Cotter, Jr. is CEO or not.

³¹ I also compared the risk-adjusted performance of RDI Stock before the termination of James Cotter, Jr. relative to the risk-adjusted performance of RDI Stock for the three-, six-, and nine-month periods following James Cotter, Jr.'s termination (*i.e.*, from August 9, 2014 to September 14, 2015, December 14, 2015, and March 14, 2016, respectively) and did not find the coefficients on the post-termination indicator variables to be statistically significant for any of these periods.

Confidential

supports my conclusion that RDI Stock has not underperformed following James Cotter, Jr.'s termination, and that RDI has not incurred any harm.

Confidential

Executed on August 25, 2016

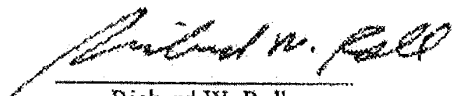

Richard W. Roll

Exhibit 1A
Event Study Analysis of RDI Stock's Excess Returns Related to the Announcement of the Termination of James Cotter, Jr.
June 12, 2015 - June 16, 2015

Event Study Results: Daily Excess Returns								
Date	Time (Eastern)	Event	Closing Price	Price Change	Return	Excess Price Change	Excess Return ⁽¹⁾	Excess Return T-Statistic
June 12, 2015	Unknown	RDI Board of Directors terminates James Cotter, Jr., who subsequently files a lawsuit that discloses his termination.	\$13.88	-\$0.05	-0.36%	-\$0.06	-0.42%	-0.317 ⁽²⁾
June 15, 2015	9:00 AM	RDI announces the termination of James Cotter, Jr.	\$13.57	\$0.31	2.23%	\$0.27	1.92%	-1.444 ⁽³⁾
June 16, 2015	N/A	One day after RDI announced the termination of James Cotter, Jr.	\$13.60	\$0.03	0.22%	-\$0.09	-0.63%	-0.471 ⁽⁴⁾
Event Study Results: Two-Day and Three-Day Compounded Excess Returns								
Two-Day Compounded Excess Return ⁽²⁾ June 12, 2015 - June 15, 2015	N/A	N/A	\$13.57	-\$0.36	-2.58%	-\$0.33	-2.34%	-1.241 ⁽⁴⁾
Two-Day Compounded Excess Return ⁽³⁾ June 15, 2015 - June 16, 2015	N/A	N/A	\$13.60	-\$0.28	-2.02%	-\$0.35	-2.54%	-1.348 ⁽⁵⁾
Three-Day Compounded Excess Return ⁽⁶⁾ June 12, 2015 - June 16, 2015	N/A	N/A	\$13.60	-\$0.33	-2.37%	-\$0.41	-2.95%	-1.279 ⁽⁷⁾

Exhibit 1A
Event Study Analysis of RDI Stock's Excess Returns Related to the Announcement of the Termination of James Cotter, Jr.
June 12, 2015 - June 16, 2015

Notes:

- [1] Excess return calculated as the actual return less the benchmark return based on regression analysis shown on Exhibit 1B.
- [2] T-Statistic calculated as the June 12, 2015, June 15, 2015 or June 16, 2015 excess return divided by the root mean squared error of the regression shown on Exhibit 1B.
- [3] The two-day compounded excess return was calculated from the excess returns on June 12, 2015 and June 13, 2015.
- [4] T-Statistic calculated as the two-day compounded excess return divided by the root mean squared error of the regression shown on Exhibit 1B times the square root of 2.
- [5] The two-day compounded excess return was calculated from the excess returns on June 13, 2015 and June 16, 2015.
- [6] The three-day compounded excess return was calculated from the excess returns on June 12, 2015, June 15, 2015, and June 16, 2015.
- [7] T-Statistic calculated as the three-day compounded excess return divided by the root mean squared error of the regression shown on Exhibit 1B times the square root of 3.

Sources:

- [1] Capital IQ
- [2] Exhibit 1B
- [3] Reading International, "Reading International Announces Appointment of Ellen Cotter as Interim Chief Executive Officer," June 15, 2015 9:00 AM Eastern

Exhibit 1B
Market Model Regression Used to Estimate RDI Stock's Benchmark Returns
June 12, 2014 - June 11, 2015

Independent Variables:	Coefficient ^[1] (T-Statistic)
Intercept	0.0016 (1.847)
Return on the Market ^[2]	0.5499* (3.781)
Small Minus Big	0.9920* (5.494)
High Minus Low	-0.0466 (-0.205)
Return of the Cinema Industry Peer Index ^{[2],[3],[4]}	-0.1130 (-0.981)
Return of the Real Estate Industry Peer Index ^{[2],[3],[4],[5]}	0.2329* (2.253)
Regression Summary:	
Regression Period	June 12, 2014 - June 11, 2015
Number of Observations	252
Adjusted R ²	0.234
Dependent Variable	RDI Stock Returns ^[2]

Notes:

[1] * denotes statistically significant at the 5% level.

[2] Returns are in excess of the risk free rate.

[3] Returns are calculated from prices that are stock-split and dividend-adjusted as reported by Capital IQ.

[4] The Cinema Industry Peer Index and the Real Estate Industry Peer Index are based on the equally-weighted daily returns of their constituent companies that are listed as comparables by RDI in its April 25, 2014 Proxy Statement for the purposes of executive compensation.

[5] Glimcher Realty Trust, Associated Estates Realty Corp. and IRC Retail Centers Inc., members of the Real Estate Industry Peer Index, were delisted and removed from the index as of January 16, 2015, August 7, 2015 and March 31, 2016, respectively.

Sources:

[1] Capital IQ

[2] Kenneth R. French Data Library, available at "http://mba.tuck.dartmouth.edu/pages/faculty/ken.french/data_library.html"

[3] RDI Form DEF 14A, filed April 25, 2014, p. 17

[4] Reading International, "Reading International Announces Appointment of Ellen Cotter as Interim Chief Executive Officer," June 15, 2015 9:00 AM Eastern

Exhibit 2
Analysis of RDI Stock's Performance on a Risk-Adjusted Basis
After the Termination of James Cotter, Jr.

June 15, 2015 - June 30, 2016

Independent Variables	Coefficient ⁽¹⁾ (T-Statistic)
Intercept ("alpha")	-0.0002 (-0.227)
Return on the Market ⁽²⁾	0.2227 (1.472)
Small Minus Big	0.8964* (4.487)
High Minus Low	0.1057 (0.619)
Return of the Cinema Industry Peer Index ⁽²⁾⁽³⁾⁽⁴⁾	0.3623* (3.130)
Return of the Real Estate Industry Peer Index ⁽²⁾⁽³⁾⁽⁴⁾⁽⁵⁾	0.2492* (2.118)
Regression Summary:	
Regression Period	June 15, 2015 - June 30, 2016
Number of Observations	265
Adjusted R ²	0.28
Dependent Variable	RDI Stock Returns ⁽²⁾

Notes:

- [1] * denotes statistically significant at the 5% level.
[2] Returns are in excess of the risk free rate.
[3] Returns are calculated from prices that are stock-split and dividend-adjusted as reported by Capital IQ.
[4] The Cinema Industry Peer Index and the Real Estate Industry Peer Index are based on the equally-weighted daily returns of their constituent companies that are listed as comparables by RDI in its April 25, 2014 Proxy Statement for the purposes of executive compensation.
[5] Glimcher Realty Trust, Associated Estates Realty Corp. and IRC Retail Centers Inc., members of the Real Estate Industry Peer Index, were delisted and removed from the index as of January 16, 2015, August 7, 2015 and March 31, 2016, respectively.

Sources:

- [1] Capital IQ
[2] Kenneth R. French Data Library, available at "http://mba.tuck.dartmouth.edu/pages/faculty/ken_french/data_library.html"
[3] RDI Form DEF 14A, filed April 25, 2014, p. 17
[4] Reading International, "Reading International Announces Appointment of Ellen Cotter as Interim Chief Executive Officer," June 15, 2015 9:00 AM Eastern

ROLL00000087

JA8980

Exhibit 3
Comparison of RDI Stock's Performance (on a Risk-Adjusted Basis) After the Termination of
James Cotter, Jr. as CEO Relative to While He Was CEO

August 9, 2014 - June 30, 2016 ⁽¹⁾

Independent Variables	Coefficient ⁽²⁾ (T-Statistic)
Post Termination Period Indicator (difference in alpha) June 15, 2015 - June 30, 2016 ⁽³⁾	-0.0021 (-1.518)
Intercept ("alpha")	0.0019 (1.814)
Return on the Market ⁽⁴⁾	0.4988* (2.931)
Small Minus Big	0.9793* (4.628)
High Minus Low	-0.1118 (-0.420)
Return of the Cinema Industry Peer Index ⁽⁴⁾⁽⁵⁾⁽⁶⁾	-0.0684 (-0.504)
Return of the Real Estate Industry Peer Index ⁽⁴⁾⁽⁵⁾⁽⁶⁾⁽⁷⁾	0.2258 (1.892)
Return on the Market ⁽⁴⁾ x Post Termination Period Indicator ⁽³⁾	-0.2761 (-1.254)
Small Minus Big x Post Termination Period Indicator ⁽³⁾	-0.0829 (-0.295)
High Minus Low x Post Termination Period Indicator ⁽³⁾	0.2176 (0.703)
Return of the Cinema Industry Peer Index ⁽⁴⁾⁽⁵⁾⁽⁶⁾ x Post Termination Period Indicator ⁽³⁾	0.4307* (2.493)
Return of the Real Estate Industry Peer Index ⁽⁴⁾⁽⁵⁾⁽⁶⁾⁽⁷⁾ x Post Termination Period Indicator ⁽³⁾	0.0234 (0.145)
Regression Summary:	
Regression Period	August 9, 2014 - June 30, 2016 ⁽¹⁾
Number of Observations	477
Adjusted R ²	0.27
Dependent Variable	RDI Stock Returns ⁽⁴⁾

Exhibit 3
Comparison of RDI Stock's Performance (on a Risk-Adjusted Basis) After the Termination of
James Cotter, Jr. as CEO Relative to While He Was CEO

August 9, 2014 - June 30, 2016 ^[1]

Notes:

- [1] While the news of James Cotter, Jr.'s appointment as CEO and President of RDI was released to the market on August 8, 2014, the announcement was made at 4:05 PM EDT; thus, August 9, 2014 is used for this analysis.
- [2] * denotes statistically significant at the 5% level.
- [3] The Post Termination Period Indicator is equal to 1 on and after June 15, 2015.
- [4] Returns are in excess of the risk free rate.
- [5] Returns are calculated from prices that are stock-split and dividend-adjusted as reported by Capital IQ.
- [6] The Cinema Industry Peer Index and the Real Estate Industry Peer Index are based on the equally-weighted daily returns of their constituent companies that are listed as comparables by RDI in its April 25, 2014 Proxy Statement for the purposes of executive compensation.
- [7] Glimcher Realty Trust, Associated Estates Realty Corp. and IRC Retail Centers Inc., members of the Real Estate Industry Peer Index, were delisted and removed from the index as of January 16, 2015, August 7, 2015 and March 31, 2016, respectively.

Sources:

- [1] Capital IQ
- [2] Kenneth R. French Data Library, available at "http://mba.tuck.dartmouth.edu/pages/faculty/ken.french/data_library.html"
- [3] RDI Form DEF 14A, filed April 25, 2014, p. 17
- [4] Reading International, "Reading International Announces 2nd Quarter 2014 Results, Resignation of James J. Cotter, Sr. as Chairman and CEO, and the Election of His Successors," August 8, 2014 4:05 PM Eastern
- [5] Reading International, "Reading International Announces Appointment of Ellen Cotter as Interim Chief Executive Officer," June 15, 2015 9:00 AM Eastern

EXHIBIT 4

GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

DDW
MARK E. FERRARIO, ESQ.
(NV Bar No. 1625)
KARA B. HENDRICKS, ESQ.
(NV Bar No. 7743)
GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
ferrariom@gtlaw.com
hendricksk@gtlaw.com

Counsel for Reading International, Inc.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

JAMES J. COTTER, JR., individually and
derivatively on behalf of Reading
International, Inc.,

Plaintiff,

v.

MARGARET COTTER, et al,

Defendants.

In the Matter of the Estate of

JAMES J. COTTER,

Deceased.

JAMES J. COTTER, JR.,

Plaintiff,

v.

READING INTERNATIONAL, INC., a
Nevada corporation; DOES 1-100, and
ROE ENTITIES, 1-100, inclusive,

Defendants.

Case No. A-15-719860-B
Dept. No. XI

Coordinated with:

Case No. P 14-082942-E
Dept. XI

Case No. A-16-735305-B
Dept. XI

**READING INTERNATIONAL, INC.'S
THIRTY-SEVENTH
SUPPLEMENTAL NRCP 16.1 INITIAL
DISCLOSURES**

1 Reading International, Inc. ("RDI") by and through its attorneys, and pursuant to Rule
2 16.1 of the Nevada Rules of Civil Procedure, hereby provides its Thirty-Seventh Supplement to
3 its Initial Disclosures. **Supplemental information can be found in bold font.**

4 These disclosures are based on information reasonably available to RDI as of this date,
5 recognizing that the investigation continues and that discovery has just begun. RDI reserves the
6 right to supplement or modify this supplemental disclosure statement at any time as additional
7 information becomes available during the course of discovery.

8 In making this disclosure, RDI does not purport to identify every individual, document,
9 data compilation, or tangible thing possibly relevant to this lawsuit. Rather, RDI's disclosure
10 represents a good faith effort to identify discoverable information they currently and reasonably
11 believes may be used to support their claims and defenses as required by NRCP 16.1.
12 Furthermore, RDI makes this disclosure without waiving its right to object to the production of
13 any document, data compilations, or tangible thing disclosed on the basis of any privilege, work
14 product, relevancy, undue burden, or other valid objection. This disclosure does not include
15 information that may be used solely for impeachment purposes. While making this disclosure,
16 RDI reserves, among other rights, (1) its right to object on the grounds of competency, privilege,
17 work product, relevancy and materiality, admissibility, hearsay, or any other proper grounds to
18 the use of any disclosed information, for any purpose in whole or in part in this action or any
19 other action and (2) its right to object on any and all proper grounds, at any time, to any
20 discovery request or motion relating to the subject matter of this disclosure.

21 The following disclosures are made subject to the above objections and qualifications.

22 **INITIAL DISCLOSURES**

23 **A.**

24 **LIST OF WITNESSES PROVIDED BY RDI**

25 Based on the information currently available to RDI, the following individuals are
26 identified:

27 ///

1. James J. Cotter, Jr.
c/o Lewis Roca Rothgerber
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, NV 89169
2. Margaret Cotter
c/o Cohen-Johnson, LLC
255 E. Warm Springs Road, Ste. 100
Las Vegas, NV 89119
And
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
3. Ellen Cotter
c/o Cohen-Johnson, LLC
255 E. Warm Springs Road, Ste. 100
Las Vegas, NV 89119
And
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
4. Guy Adams
c/o Cohen-Johnson, LLC
255 E. Warm Springs Road, Ste. 100
Las Vegas, NV 89119
And
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
5. Edward Kane
c/o Cohen-Johnson, LLC
255 E. Warm Springs Road, Ste. 100
Las Vegas, NV 89119
And
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
6. Douglas McEachern
c/o Cohen-Johnson, LLC
255 E. Warm Springs Road, Ste. 100
Las Vegas, NV 89119
And
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017
7. Tim Storey
c/o Maupin Cox & LeGoy
4785 Caughlin Parkway
Reno, NV 89519

- 1 And
2 c/o Bird, Maraella, Boxer, Wolpert,
3 Nessim, Drooks, Lincenberg & Rhow
4 1875 Century Park East, 23rd Floor
5 Los Angeles, CA 90067
- 6 8. William Gould
7 c/o Maupin Cox & LeGoy
8 4785 Caughlin Parkway
9 Reno, NV 89519
- 10 And
11 c/o Bird, Maraella, Boxer, Wolpert,
12 Nessim, Drooks, Lincenberg & Rhow
13 1875 Century Park East, 23rd Floor
14 Los Angeles, CA 90067
- 15 9. PMK of JMG Capital Management, LLC
16 c/o Robertson & Associates, LLP
17 32121 Lindero Canyon Road, Ste. 200
18 Westlake Village, CA 91361
- 19 And
20 c/o Patti, Sgro, Lewis & Roger
21 720 S. 7th Street, 3rd Floor
22 Las Vegas, NV 89101
- 23 10. PMK of Kase Capital
24 c/o Robertson & Associates, LLP
25 32121 Lindero Canyon Road, Ste. 200
26 Westlake Village, CA 91361
- 27 And
28 c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101
11. PMK of Kase Capital Management
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
- And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101
12. PMK of Kase Fund
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
- And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101

- 1 13. PMK of Kase Group
2 c/o Robertson & Associates, LLP
3 32121 Lindero Canyon Road, Ste. 200
4 Westlake Village, CA 91361
5 And
6 c/o Patti, Sgro, Lewis & Roger
7 720 S. 7th Street, 3rd Floor
8 Las Vegas, NV 89101
9
10 14. PMK of Kase Management
11 c/o Robertson & Associates, LLP
12 32121 Lindero Canyon Road, Ste. 200
13 Westlake Village, CA 91361
14 And
15 c/o Patti, Sgro, Lewis & Roger
16 720 S. 7th Street, 3rd Floor
17 Las Vegas, NV 89101
18
19 15. PMK of Kase Qualified Fund
20 c/o Robertson & Associates, LLP
21 32121 Lindero Canyon Road, Ste. 200
22 Westlake Village, CA 91361
23 And
24 c/o Patti, Sgro, Lewis & Roger
25 720 S. 7th Street, 3rd Floor
26 Las Vegas, NV 89101
27
28 16. PMK of Pacific Capital Management, LLC
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101
17.
PMK of T2 Accredited Fund, LP
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101
18.
PMK of T2 Partners Management Group, LLC
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101

- 1 19. PMK of T2 Partners Management I, LLC
2 c/o Robertson & Associates, LLP
3 32121 Lindero Canyon Road, Ste. 200
4 Westlake Village, CA 91361
5 And
6 c/o Patti, Sgro, Lewis & Roger
7 720 S. 7th Street, 3rd Floor
8 Las Vegas, NV 89101
- 9 20. PMK of T2 Partners Management, LP
10 c/o Robertson & Associates, LLP
11 32121 Lindero Canyon Road, Ste. 200
12 Westlake Village, CA 91361
13 And
14 c/o Patti, Sgro, Lewis & Roger
15 720 S. 7th Street, 3rd Floor
16 Las Vegas, NV 89101
- 17 21. PMK of T2 Qualified Fund, LP
18 c/o Robertson & Associates, LLP
19 32121 Lindero Canyon Road, Ste. 200
20 Westlake Village, CA 91361
21 And
22 c/o Patti, Sgro, Lewis & Roger
23 720 S. 7th Street, 3rd Floor
24 Las Vegas, NV 89101
- 25 22. PMK of Tilson Offshore Fund, Ltd.
26 c/o Robertson & Associates, LLP
27 32121 Lindero Canyon Road, Ste. 200
28 Westlake Village, CA 91361
And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101
23. Whitney Tilson
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101
24. Andrez Matycynski
c/o Greenberg Traurig, LLP
3773 Howard Hughes Pkwy., Ste. 400N
Las Vegas, NV 89169
25. Dev Ghose
c/o Greenberg Traurig, LLP
3773 Howard Hughes Pkwy., Ste. 400N
Las Vegas, NV 89169

26. Susan Villeda
c/o Greenberg Traurig, LLP
3773 Howard Hughes Pkwy., Ste. 400N
Las Vegas, NV 89169

27. PMK of Lawndale Capital
591 Redwood Highway
Suite 2345
Mill Valley, CA 94941

28. Judy Coddling
c/o Reading International
6100 Center Drive
Suite 900
Los Angeles, CA 90045

29. Michael Wrotniak
c/o Reading International
6100 Center Drive
Suite 900
Los Angeles, CA 90045

30. Andrew Shapiro
591 Redwood Highway
Suite 2345
Mill Valley, CA 94941

31. Jon Glaser
c/o Robertson & Associates, LLP
32121 Lindero Canyon Road, Ste. 200
Westlake Village, CA 91361
And
c/o Patti, Sgro, Lewis & Roger
720 S. 7th Street, 3rd Floor
Las Vegas, NV 89101

32. Mark Cuban
c/o Fish & Richardson PC
1717 Main Street, Ste. 500
Dallas, TX 75201
And
c/o Royal & Miles LLP
1522 W. Warm Springs Road
Henderson, NV 89014

33. Derek Alderton
Address Unknown

34. Alfred E. Osborne, Jr., Ph.D.
UCLA Anderson School of Management
110 West Hollywood Plaza, Ste. F405
Los Angeles, CA 90095-1481

- 1 35. Richard Roll
2 California Institute of Technology
3 1200 East California Boulevard
4 Pasadena, CA 91125
- 5 36. Michael Klausner
6 Nancy and Charles Munger Professor of Business
7 Stanford Law School
8 Stanford, CA 94305
- 9 37. Bruce A. Strombon, Ph.D
10 333 S. Hope Street, Ste. 2700
11 Los Angeles, CA 90071
- 12 38. Jonathan F. Foster
13 555 Madison Avenue, 19th Floor
14 New York, NY 10022
- 15 39. Myron T. Steele, Esq.
16 c/o Lewis Roca Rothgerber Christie LLP
17 3993 Howard Hughes Parkway, Ste. 600
18 Las Vegas, NV 89169
- 19 40. Tiago Duarte-Silva, Charles River Associate
20 c/o Lewis Roca Rothgerber Christie LLP
21 3993 Howard Hughes Parkway, Ste. 600
22 Las Vegas, NV 89169
- 23 41. Richard Spitz
24 c/o Lewis Roca Rothgerber Christie LLP
25 3993 Howard Hughes Parkway, Ste. 600
26 Las Vegas, NV 89169
- 27 42. Albert S. Nagy
28 Realty Capital Solutions
32152 Calle Los Elegantes
San Juan Capistrano, CA 72675
43. John D. Finnerty
AlixPartners
909 Third Avenue
New York, NY 10022
44. PMK of Diamond Partners, LP
c/o Laxalt & Nomura, Ltd.
6720 Via Austi Parkway, Ste. 430
Las Vegas, NV 89119
45. PMK of Diamond A Investors, LP
c/o Laxalt & Nomura, Ltd.
6720 Via Austi Parkway, Ste. 430
Las Vegas, NV 89119

//

- 1 46. Sumeet Goel
2 c/o HighPoint Associates
3 100 Nrth Supulveda Blvd.
4 Suite 620
5 Los Angeles, CA 90245
6
7 47. Christine Liang
8 Address Unknown
9
10 48. Roberto Moldes
11 Address Unknown

7 B.

8 **LIST OF DOCUMENTS PROVIDED BY DEFENDANTS**

9 Based on the information reasonably available, the following categories of documents are
10 in RDI's possession, custody or control and may be used by RDI to support their claims or
11 defenses. The following documents will be sent via secure file transfer:

Beg. Bates#	Description
RDI0000001- RDI0000095	RDI's first set of data responsive to expedited discovery requests
RDI0000096- RDI0002467	RDI's second set of data responsive to expedited discovery requests
RDI0002468- RDI0004224	RDI's third set of data responsive to expedited discovery requests
RDI0004225- RDI0011216	RDI's Fourth Supplemental Production
RDI0011217- RDI0016091	RDI's Fifth Supplemental Production
	RDI's Privilege Log of Emails, attached hereto as Exhibit 1
	RDI's Privilege Log of Documents and Loose Files, attached hereto as Exhibit 2
	List of Counsel Identified on Privilege Log, attached hereto as Exhibit 3
RDI0016092- RDI0018198	RDI's Sixth Supplemental Production

	RDI's Supplemental Privilege Log of Craig Tompkins data ¹
	RDI's Redaction Log attached hereto as Exhibit 4
RDI0018199- RDI0022814	RDI's Seventh Supplemental Production
	RDI's Supplemental Privilege Log of Emails, attached hereto as Exhibit 5
	RDI's Supplemental Privilege Log of Documents and Loose Files, attached hereto as Exhibit 6
RDI0022815- RDI0025532	RDI's Eighth Supplemental Production
RDI0025533- RDI0029186	RDI's Ninth Supplemental Production
	RDI's Supplemental Privilege Log of emails and documents, attached hereto as Exhibit 7 ²
RDI0029187- RDI0035423	RDI's Tenth Supplemental Production
RDI0035424- RDI0037096	RDI's Eleventh Supplemental Production
RDI0037097- RDI0043136	RDI's Twelfth Supplemental Production
RDI00430137- RDI0046281	RDI's Thirteenth Supplemental Production
	RDI's Supplemental Privilege Log of emails and documents, attached hereto as Exhibit 8 ³
RDI0046282- RDI0050667	RDI's Fourteenth Supplemental Production
RDI0050668- RDI0054887	RDI's Fifteenth Supplemental Production
RDI0054888- RDI0055808	RDI's Sixteen Supplemental Production

¹ Please be advised that this log contains emails sent to or from Craig Tompkins that did not include any non-retained attorneys or other third-party recipients. This log was created after running the agreed upon search terms on data collected from Mr. Tompkins and using a predicative coding model. Due to the volume of data collected from Mr. Tompkins, a manual review of all emails was not completed and as such this log may include documents not relevant to this litigation, but this data was captured by the predicative coding model which assigned these materials a response score of 70 or higher. All attachments to any privileged communications are included on this log. Due to volume, this document will not be served via Wiznet and will be sent via FTP.

² Due to volume, this document will not be served via Wiznet and will be sent via FTP.

³ Due to volume, this document will not be served via Wiznet and will be sent via FTP.

	RDI's Supplemental Privilege Log of emails and documents, attached hereto as Exhibit 9 ⁴
RDI0055809- RDI0058011	RDI's Seventeenth Supplemental Production
RDI0058012- RDI0058299	RDI's Eighteenth Supplemental Production
RDI0058300- RDI0059676	RDI's Nineteenth Supplemental Production
RDI0059677- RDI0059743	RDI's Twentieth Supplemental Production
RDI0059744- RDI0060025	RDI's Twenty-First Supplemental Production
RDI0060026- RDI0060048	RDI's Twenty-Second Supplemental Production
	RDI's Supplemental Privilege Log of Documents and Loose Files, attached hereto as Exhibit 10
RDI0060049- RDI0060071	RDI's Twenty-Third Supplemental Production
RDI0060072- RDI0063688	RDI's Twenty-Fourth Supplemental Production
RDI0063689- RDI0063803	RDI's Twenty-Fifth Supplemental Production
RDI0063804- RDI0063918	RDI's Twenty-Sixth Supplemental Production
	RDI's Privilege Log of Documents relating to James Cotter Jr.'s Requests for Production dated January 12, 2018
RDI0063919- RDI0063920	RDI's Twenty-Seventh Supplemental Production
RDI0063921- RDI0064969	RDI's Twenty-Eight Supplemental Production
	RDI's Privilege Log of Documents relating to Collection of Materials Ordered at May 2, 2018 Hearing
RDI0064970- RDI0065120	RDI's Twenty-Ninth Supplemental Production
	RDI's Supplemental Privilege Log of Documents relating to Collection of Materials Ordered at May 2, 2018 Hearing
RDI0065121- RDI67406	RDI's Thirtieth Production
RDI0067407- RDI0070364	RDI's Thirty-First Production

⁴ Due to volume, this document will not be served via Wiznet and will be sent via FTP.

RDI0070365- RDI0071543	RDI's Thirty-Second Production
	RDI's Amended Privilege Log of Documents relating to Collection of Materials Ordered at May 2, 2018 Hearing (Amends logs produced on 5/30/2018 & 5/31/2018)
RDI0071544- RDI0071599	RDI's Thirty-Third Production (also includes replacement image for RDI0070450)
	RDI's Second Amended Privilege Log of Documents relating to Collection of Materials Ordered at May 2, 2018 Hearing (Log is amended to reflect bates numbers of documents produced with RDI's 33 rd Production; all amended items are highlighted in yellow)
	RDI'S Amended Privilege Log relating to James Cotter Jr.'s Requests for Production dated January 12, 2018 (amended log served on 2/22/2018; this log is amended to reflect bates numbers of documents produced with RDI's 33 rd Production; all amended items are highlighted in yellow)

RDI reserves its right to submit as an exhibit any document, data compilation or tangible item identified by any other party in this action or obtained from any third party. RDI further reserves its right to amend and/or supplement this first supplemental list of documents, data compilations, or tangible items as discovery proceeds and additional documents are produced by parties and third parties.

Further, RDI will provide its production materials as described below whenever possible and requests that all parties provide their productions utilizing the same guidelines:

All electronically stored information ("ESI") shall be produced electronically in a form that maximizes the ability to search the information by the use of search terms and that maximizes the amount of metadata that accompanies the information. Specifically, when available, please provide all ESI as a .DAT file including metadata for the following fields:

Field Name	Email	Attachment	Loose	Description
BegBates	x	x	x	First Bates number of native file document/email
EndBates	x	x	x	Last Bates number of native file document/email
BegAttach	x	x	x	First Bates number of attachment range
EndAttach	x	x	x	Last Bates number of attachment range
PgCount	x	x	x	Number of pages in native file document/email
Custodian	x	x	x	Custodian of file

CustodianAll	x	x	x	Custodian of file, followed by all other Custodians that have a duplicate of the record. This list is de-duped within the Custodian names. This will be a multi-choice field.
FileType	x	x	x	Application Name field value pulled from metadata of the native file.
FileExt	x	x	x	File extension of native file
FileName	x	x	x	Original filename of native file. Contains subject of e-mail for e-mail records
FilePath	x	x	x	Full path to source files (if e-docs or loose e-mail) or folder path contained with a mail store (if NSF or PST)
Subject	x	x	x	Subject field value extracted from metadata of native file; email subject for email, subject field extracted from metadata for loose efiles.
TO	x			Recipient(s) of the e-mail; email and friendly name if available in metadata
FROM	x			Author of the e-mail
CC	x			Recipient(s) of "Carbon Copies" of the e-mail; email and friendly name if available in metadata
BCC	x			Recipient(s) of "Blind Carbon Copies" of the e-mail; email and friendly name if available in metadata
DATESENT	x			Sent date of an e-mail
TIMESENT	x			Time the e-mail was sent
DATERCVD	x			Received date of an e-mail
TIMERCVD	x			Time the e-mail was received
AUTHOR		x	x	Author metadata from the loose efile
DATECREATE D		x	x	Creation Date from the properties of the native file. When not available the file system date.
TIMECREATE D		x	x	Creation Time of the native file from the properties of the native file. When not available the file system time.
DATELASTM OD		x	x	Last Modified Date from the properties of the native file. When not available the file system date.
TIMELASTMO D		x	x	Last Modified Time from the properties of the native file. When not available the file system time
MD5HASH		x	x	MD5 Hash value of the document.
DOCLINK	x	x	x	Path to Native file in exported data
OCRPATH	x	x	x	Path to Text file corresponding to each document in export

- The .DAT file must use the following Concordance® default delimiters: Comma ASCII character (020) Quote ¢ ASCII character (254)
- Date fields should be provided in the format: mm/dd/yyyy
- Date and time fields must be two separate fields

- Text must be produced as separate text files, not as fields within the .DAT file.
- The full path to the text file (OCRPATH) should be included in the .DAT file.
- Native file documents must be named per the BegBates number.
- The full path of the native file must be provided in the .DAT file for the DocLink field.
- Black and white images must be 300 DPI Group IV single-page TIFF files.
- File names cannot contain embedded spaces or special characters (including the comma).
- All TIFF image files must have a unique file name, i.e. Bates number.
- Images must be endorsed with sequential Bates numbers in the lower right corner of each image.
- Excel spreadsheets should have a placeholder image named by the Bates number of the file.
- Production should include an Opticon or IPRO image cross-reference file

C.

DAMAGES

RDI will seek to recover the full extent of their damages to which they are entitled as a result of Plaintiff filing this action, including all costs, expert fees and attorney's fees incurred as a result of this dispute. The total computation of RDI's damages cannot be completed as amounts continue to accrue.

RDI reserves its right to supplement this disclosure as additional information becomes available.

DATED this 15th day of June, 2018.

GREENBERG TRAURIG, LLP

/s/Mark E. Ferrario

MARK E. FERRARIO, ESQ. (NV Bar No. 1625)
KARA B. HENDRICKS, ESQ. (NV Bar No. 7743)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
Counsel for Reading International, Inc.

GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that on this day, I caused a true and correct copy of the forgoing *Reading International, Inc.'s Thirty-Seventh NRCP 16.1 Disclosures* to be e-served via the Court's Wiznet E-Filing system. The date and time of the electronic proof of service is in place of the date and place of deposit in the mail.

DATED this 15th day of June, 2018.

/s/ Andrea Lee Rosehill

AN EMPLOYEE OF GREENBERG TRAURIG, LLP

EXHIBIT 5


CLERK OF THE COURT

TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA
* * * * *

JAMES COTTER, JR.	.	
	.	
Plaintiff	.	CASE NO. A-719860
	.	
vs.	.	
	.	DEPT. NO. XI
MARGARET COTTER, et al.	.	
	.	
Defendants	.	Transcript of
	.	Proceedings
.....	.	

BEFORE THE HONORABLE ELIZABETH GONZALEZ, DISTRICT COURT JUDGE

**HEARING ON MOTION TO COMPEL AND MOTION TO
FILE DOCUMENT UNDER SEAL**

THURSDAY, FEBRUARY 18, 2016

APPEARANCES:

FOR THE PLAINTIFF: MARK G. KRUM, ESQ.

FOR THE DEFENDANTS: HAROLD S. JOHNSON, ESQ.
CHRISTOPHER TAYBACK, ESQ.
ALEXANDER ROBERTSON IV, ESQ.
KARA HENDRICKS, ESQ.

COURT RECORDER:	TRANSCRIPTION BY:
JILL HAWKINS	FLORENCE HOYT
District Court	Las Vegas, Nevada 89146

Proceedings recorded by audio-visual recording, transcript
produced by transcription service.

1 LAS VEGAS, NEVADA, THURSDAY, FEBRUARY 18, 2016, 9:46 A.M.

2 (Court was called to order)

3 THE COURT: Ms. Hendricks, I'm sorry. I was looking
4 for Mr. Ferrario. I didn't see him, so I didn't call the
5 case. And then Laura says, Ms. Hendricks is here for him.
6 And it's like, darn, I should have got them in the --

7 MS. HENDRICKS: It's a little quieter in the
8 courtroom today. I understand.

9 THE COURT: Okay. Mr. Krum, you're up.

10 MR. KRUM: Thank you, Your Honor. Good morning.
11 Mark Krum for plaintiff, James J. Cotter, Jr.

12 Your Honor, I have a couple --

13 THE COURT: Aren't you glad you aren't on the Jacobs
14 case anymore?

15 MR. KRUM: Well, let me -- I'll answer that in just
16 a moment following what I have, a couple preliminary comments
17 to go to neither motion. First, we had some issues with our
18 exhibit citations and our exhibits in our papers, and I don't
19 know how that happened. Perhaps my team was out to lunch with
20 Mr. Lenhart's team. But, in any event, I apologize.

21 Second, Your Honor, I'm pleased to see and I know
22 that you're pleased to see that the opposition includes no
23 references to the Macau Data Privacy Act.

24 So, anyway, I'm not going to speak to the motion to
25 seal. I don't think anything's confidential. But it's been

1 designated as such, and we've respected that.

2 Here's what we're faced with today. We're faced
3 with something that has indicia of suppression or spoliation
4 of evidence. We ask questions as to why certain critical
5 documents have not been produced, logged, or both, and we
6 receive no answers. In the opposition, remarkably, the Court
7 has received no answers. Instead, the opposition is an
8 exercise in misdirection and obfuscation, talking about
9 plaintiff's discovery responses with respect to which it's
10 almost entirely inaccurate.

11 Let me provide you some information that gives you
12 an accurate sense of the state of document production in this
13 case. As of today the plaintiff has produced -- I'm going to
14 round to the nearest hundred. As of today the plaintiff has
15 produced approximately 11,500 pages of documents, and that
16 includes --

17 THE COURT: And by plaintiffs are you including Mr.
18 Robertson's people, or just yours?

19 MR. KRUM: Just mine.

20 THE COURT: Okay.

21 MR. KRUM: Just mine. And that includes a couple
22 thousand pages last night. By way of comparison, defendant
23 Margaret Cotter has produced approximately 500 pages.
24 Defendant Ellen Cotter has produced approximately a thousand
25 pages. Defendant Ed Kane has produced approximately

1 900 pages. Defendant Doug McEachern has produced
2 approximately 2800 pages, and Defendant Guy Adams has produced
3 approximately 7700 pages. And the reason Mr. Adams has such a
4 substantial production is because he has thousands of pages of
5 documents concerning his involvement in Cotter family
6 businesses that go to issues relating to his financial
7 dependence on those businesses.

8 Now, they're going to reply that, well, the
9 companies produced these documents. That is not correct, Your
10 Honor. Of those five individual defendants only Ellen Cotter
11 is a company officer. And the most telling example is Ed
12 Kane, 900 pages. So, Your Honor, I want to talk about --

13 THE COURT: So let me ask a question. You are in
14 large part saying, Judge, we've gotten an email on which there
15 are six recipients and only two of them produced it, where are
16 the documents from the other four.

17 MR. KRUM: Well, that's an example.

18 THE COURT: Right.

19 MR. KRUM: The way I would describe it, Your Honor,
20 is we have a recurring phenomenon of documents not being
21 produced by each of the parties who are indicated on the
22 documents were authors or recipients, as well as documents
23 being produced by another defendant, in this particular
24 example Mr. Gould, and not produced and not logged by any of
25 these individual defendants.

1 THE COURT: So your concern is that there is a --
2 that's indicative to you that the search for the information
3 has either not been thorough or that documents may have gone
4 missing.

5 MR. KRUM: Correct.

6 THE COURT: Okay. Now can I ask you a question
7 which was the one I had the biggest concern about last night
8 when I read this. With respect to Document Request Number 3
9 that requests gross income of the defendants Adams and Kane
10 you're not really requesting gross income, you're requesting
11 income from the entities related to the defendants.

12 MR. KRUM: Well, the issue, Your Honor, to be clear,
13 is -- are either or both of those gentlemen dependent upon
14 moneys received from Cotter family businesses controlled by
15 Ellen and Margaret Cotter and/or moneys received from RDI.
16 And, of course, the only way we can assess that is to know
17 that information, as well as how much money they make. Now, I
18 don't want their tax returns. We have to have -- by the way,
19 it's phrased as "documents sufficient to show." So I'm
20 perfectly happy to have something less than all their private
21 information. I just want the bottom line. Because how can I
22 say, well, Mr. Adams, you made \$150,000 last year from Cotter
23 family businesses and that's significant, if I don't have his
24 full information? Although that's a bad example, because I do
25 have something from Adams in his sworn testimony from the

1 divorce case. What I do not have, Your Honor, is anything
2 from Mr. Kane, who in one of these exhibits exclaims that he
3 needs cash, cash is king. So that's what that's about.

4 But, Your Honor, I want to talk about the documents,
5 because you've spoke to the critical issue. Exhibit 9 to our
6 papers is a May 15 email from Adams to Kane -- actually, I'm
7 sorry, it's an exchange of emails, first from Adams to Kane
8 and then back and then reply. The subject matter is my
9 client's employment agreement. The middle email says, we
10 give him written notice and he gets one year of severance.
11 The reply says, there's a question about whether options
12 terminate after he's -- continue to vest after he's
13 terminated. The point, of course, Your Honor, is that this
14 email dated May 15th, which is before even the notice of the
15 special meeting about his status goes out, evidences that
16 these two guys had determined to terminate him. And, by the
17 way, we now have other evidence. Mr. Storey testified on
18 Friday that he received a call from Mr. McEachern saying that
19 on March 15th or about March 15 McEachern called Storey and
20 said, I've determined to terminate Cotter. The next day Adams
21 did so. But, Your Honor, this document was produced by Adams
22 and not by Kane.

23 Let's look at Number 6, Your Honor. This one is
24 even more troubling, because the --

25 Oh. I'm sorry. And the explanation for Number 9 in

1 the opposition, well, plaintiff has done it, too, Exhibit I
2 and J to the opposition were produced by defendants, but not
3 plaintiffs, so why can plaintiff complain. Well, one, that's
4 ont responsive. And, two, I have an answer for that. I and J
5 are in a tremendous mass of documents that we've preliminarily
6 withheld on the basis of privilege because both of those
7 documents are to or from an in-house RDI attorney, and RDI has
8 claimed privilege. And we respect that claim. Mr. Cotter
9 remains a director. We have hundreds, if not thousands, of
10 documents on the individual defendants' privilege log and,
11 unless we work out something, on our draft privilege log that
12 are those documents that are privileged as to the intervening
13 plaintiffs, not as to anybody who's here. So --

14 But anyway, Number --

15 THE COURT: No. That's not what the Nevada Supreme
16 Court says. Because, remember, they issued that decision that
17 they're privileged even from you who may have received it.

18 MR. KRUM: Well, no. We have different -- no, no.
19 We have a different circumstance. Mr. Cotter remains a
20 director, Your Honor. He's not a -- he doesn't fit -- the GT
21 people and I worked through this laboriously.

22 THE COURT: Oh. You did? Okay.

23 MR. KRUM: So look at Number 6, Your Honor. The
24 fact that this wasn't produced or logged is very, very
25 troubling. This is a document dated May 28th. That is the

1 day before the reconvened board meeting of May 29th. On
2 May 29th the board met in the morning, and they told Mr.
3 Cotter at the end of that meeting that adjourned at 1:00
4 o'clock, you go settle with your sisters or you're going to be
5 terminated. They reconvened at 6:00 o'clock on Friday, the
6 29th, and Ellen Cotter says, we have a tentative settlement.

7 By the way, those aren't just my words. That's
8 exactly what Mr. Storey's contemporaneous handwritten notes
9 say about what happened on May 29th.

10 So here's what's going on May 28th. Here's a memo
11 -- excuse me, an email from -- exchange between Gould and
12 Kane, copied to the other individual defendants, and in two
13 sentences, two simple, straightforward, declarative sentences
14 on the 28th of May at 4:53 p.m., presumably Pacific Time, Mr.
15 Kane makes clear exactly what we've pleaded, namely, that Mr.
16 Cotter has been told, quote, "Accept the offer to remain CEO
17 under the terms presented by Ellen and Margaret," close quote.
18 Quote, "If Jim declines the conditions presented by Margaret
19 and Ellen," close quote, he's going to be terminated and then
20 they'll talk about the other issue of an interim CEO. This
21 goes to very issue with which we were supposed to have
22 conducted expedited discovery. Was this document produced by
23 Kane or Adams or McEachern? No.

24 Now, they claim, oh, well, we think those two
25 sentences and the balance of it are privileged and it's on Mr.

1 Adams's privilege log. And we fouled up the exhibit, but they
2 included it in theirs, and I hope you had a chance to look at
3 it. The document which they claim logs these May 28th
4 exchange of emails is dated May 29, and it's supposedly from
5 Mr. Brockmeyer, I think they said, who's a local Los Angeles
6 lawyer. Well, Your Honor, in their opposition they say the
7 reason the earlier email postdates the later emails is time
8 difference. Well, Mr. Brockmeyer would have had to have been
9 somewhere around Mumbai for that to be the case. So their
10 explanation doesn't hold true, there's no explain otherwise
11 offered, and the declarations of Kane and McEachern are
12 classic everything and nothing declarations. That's why
13 they're not quoted in the opposition. They just say, well,
14 you know, I didn't destroy everything and everything's
15 copacetic.

16 So this is a critical, critical issue, Your Honor.
17 We have two documents that go to the heart of the issues that
18 we raised and you said could be the subject of expedited
19 discovery. They have not been properly produced, they've not
20 been properly logged. There's something amiss here, Your
21 Honor.

22 On the interrogatories I only had one comment about
23 one of -- excuse me, the document requests. I only had one
24 comment about one of them. Number 38, which is on page 21 of
25 our motion, concerns documents regarding the Class B voting

1 stock held in the name of the Trust or the Estate or the name
2 of the decedent, James J. Cotter, Sr. And they complain that,
3 well, that's going to have all sorts of documents from the
4 Estate proceeding. I've told them that they don't have to
5 produced pleadings, of course. So, in other words, what
6 they're arguing is, Your Honor, these documents are
7 discoverable in this case but because they're also
8 discoverable I guess in the California Estate case or in the
9 probate case before you that's consolidated with this case
10 somehow they're not discoverable here. That doesn't cut it.

11 THE COURT: Okay. Thanks.

12 MR. KRUM: Thanks, Your Honor.

13 THE COURT: Good morning.

14 MR. TAYBACK: Your Honor, by my count this is --
15 maybe I'll wait till the beep. By my count this is maybe the
16 third time we've been in here on something phrased as an
17 urgent matter, an emergency done on shortened time, where with
18 respect to many of these issues, not the substantive issues
19 with which we did meet and confer, but on the speed with which
20 the production is being made, the propriety of logging with
21 which the issue about the privilege log, which, as Mr. Krum I
22 believe now concedes because our opposition points it out,
23 they were looking at the wrong privilege log when they're
24 talking about the discrepancy. These issues could have been
25 and should have been handled, frankly, in ordinary course. If

1 you want to look at the statistics for how and where discovery
2 stands in this matter, which is where Mr. Krum started, the
3 total documents produced in this case, total number of
4 documents, not pages, by all parties is 12,538. RDI has
5 produced 6200 of those, T2 86, Glazer 89, the plaintiff 2700,
6 the other defendants over 3300. That's as of yesterday.

7 The fact is that there were document requests, two
8 sets, propounded by both plaintiffs and the individual
9 defendants that I'm here representing. Those were both
10 propounded initially in August. Our production was complete
11 in November. We produced a privilege log that had 1300
12 entries in October. We've not received a privilege log from
13 plaintiff on anything. We have not received a complete
14 production from the plaintiff with respect to our first set of
15 document requests from August.

16 The seconds sets of document requests by both
17 plaintiff and the individual defendants were propounded around
18 the same time, in November. We started production after
19 meeting and conferring in late January on February 1st. We've
20 received no response from plaintiff as to when, if ever, he's
21 going to respond to the second set of document requests. And
22 there've been two extensions granted to the only set of
23 interrogatories propounded on plaintiff, and as of yet there's
24 no substantive responses to those interrogatories.

25 Discovery is not one sided. With respect to the

1 specific allegations I have to tell you that we take them
2 seriously. The allegations of document spoliation are not
3 something that I think anybody can come in here and say
4 they've taken lightly. We went, we looked. The fact is the
5 three documents that they're pointing to as having not been
6 produced that should have been produced by specific individual
7 defendants all predate the litigation. Mr. Kane explains he
8 didn't keep every email prior to the litigation, as does Mr.
9 McEachern. The fact is those emails were produced when and if
10 they existed.

11 There are questions regarding Margaret Cotter's
12 document production, Margaret and Ellen Cotter's document
13 productions. The fact is, as Mr. Krum also knows, there are
14 two entities that are producing documents on behalf of those
15 individual people. We are producing the documents from their
16 individual computers. But both Margaret and Ellen Cotter do
17 work for Reading, and both of them have voluminous documents
18 on the Reading server. And that has been the subject of
19 ongoing negotiation between Mr. Krum and counsel for Reading
20 separate and apart from counsel for the individual defendants,
21 myself. The fact is we've produced voluminous documents, all
22 the documents I believe that are responsive to the first set
23 of document requests and most of the documents that are
24 responsive to the second set of document requests. I think
25 the questions are if he had picked up the phone and called and

1 asked about, one, why is there a -- why are these documents
2 not present in Mr. Kane's production whereas they're present
3 in Mr. Adams's production, the answer would have been simple.
4 It would have been as Mr. Kane states in his declaration,
5 which is he doesn't have them, they predate the litigation, he
6 had no obligation to hold onto them at that point in time.

7 I think the question with respect to the privilege
8 log would have been very much the same. And there was some
9 back and forth on the privilege log. But the question that he
10 asked today is not the question he asked in that exchange,
11 which is, I'm looking at Privilege Log Entry Number 406. In
12 fact, we would have said, if you look at the correct privilege
13 log you would see it.

14 And, yes, the discrepancy of the date is based on a
15 time zone difference, because, yes, the lawyer who was the
16 sender or recipient on that email was in a different time
17 zone, and therefore it's dated May 29th. Moreover, as we
18 pointed out, the actual original email, that is to say not the
19 chain, is separately logged. And we pointed that out to him,
20 separately logged as Mr. Adams's Number 392.

21 The fact is we've complied with our discovery
22 obligations and then some. We have a privilege log which we
23 would be more than happy to provide to anybody who wants to
24 look at it. I think that Mr. Krum should have called, should
25 have picked up the phone and asked about issues that he had

1 before filing a motion on shortened time making what frankly
2 are very serious allegations that I don't believe are well
3 founded.

4 With that, I think the issue that I would like to
5 address is the substantive document requests. Because, if you
6 ask me, Mr. Krum has phrased -- has set this motion up to
7 start with allegations that I don't think are well founded but
8 are inflammatory as a means of trying to say, you should
9 simply grant the motions to compel the substantive requests,
10 which I don't think should be granted for specific reasons. I
11 really think they fall into a few categories, Documents
12 Requests -- this is using the numbers from the second set of
13 document requests upon which he's moved to compel -- 3 and 4.
14 3 receives all personal financial information of Mr. Kane and
15 Mr. Adams. He says, documents sufficient to show. And he
16 says, I'm not interested in their tax returns, but I need
17 documents sufficient to show all the money that they've made
18 from all sources in each of the last three years. I don't
19 know what documents those would be other than tax documents
20 that would be sufficient to show how much income. He's
21 certainly welcome to ask questions at a deposition, but what
22 documents would exist to show that other than tax documents?

23 We offered to produce documents that would show the
24 amount of income earned by Mr. Kane and Mr. Adams from
25 specific Cotter-related entities identified by the plaintiff.

1 He rejected that. He said he wants -- and the request is
2 phrased as, any entity that is or has ever been claimed to be
3 controlled by any person named Cotter, effectively. And that
4 simply leaves us in a position where we have to guess what Mr.
5 Cotter, Sr., now deceased, every may have contended he had a
6 controlling interest in, let alone Margaret and Ellen Cotter,
7 let alone Reading, which is also contemplated by that. We
8 simply asked for some particularity with respect to this
9 specifics as it relates to income earned from the Cotters'
10 specific entities.

11 Similarly, at Category 4 of the document requests
12 asks for all emails, all communications by Mr. Adams with
13 anybody at Reading or anybody named or on behalf of the
14 Cotters unbridled by time, unbridled by subject matter.
15 That's simply overburdensome -- burdensome and overbroad.

16 38 and 40. 40 we've actually resolved. As we
17 stated and as the letter attached to Mr. Krum's motion
18 reflects, both 38 and 40 were the subject of further review by
19 us. And when we filed our amended responses yesterday those
20 amended responses made clear that we'll produce Category 40.
21 So that's not at issue.

22 THE COURT: Amended responses don't help me.

23 MR. TAYBACK: I understand, although that begs the
24 question as to whether or not he should have picked up the
25 phone, since that was not something which we've said we would

1 stand on our objections, as based on his own meet and confer
2 letter.

3 With respect to 38 we -- it asks for all documents
4 regarding Class B stock. Our objection is simply that's
5 everything contemplated in the litigation, everything
6 referenced in the parallel litigations involving the Trusts
7 and Estates. That's overbroad. We've offered to narrow it,
8 we've offered to produce documents related to the exercise of
9 that option, and we think that it's overbroad as phrased and
10 should be narrowed. He's rejected those requests.

11 The last categories are 47 through 50, and those are
12 generally statements that relate to other statements made in a
13 proxy statement regarding Margaret and Ellen Cotter being
14 trustees, regarding RDI being a controlled company under
15 NASDAQ, and regarding Ellen Cotter's appointment as CEO.
16 Those are objectionable for the reasons we state in the
17 papers; that is to say, we're willing to produce some
18 documents. We frankly think we've probably produced
19 documents, because those -- the documents we think would be
20 responsive are responsive to other requests. We've asked for
21 some clarification as to why it is that he insists on this
22 request if we've produced documents to this other request
23 that's similar.

24 We've gotten no response to that. If he means
25 something else, we'd like to know what it is. But as phrased

1 it's nothing that is either not overly broad or something we
2 don't even know what he's referring to, because it's not clear
3 to us that it's anything more than what's already been
4 produced.

5 THE COURT: Okay.

6 MR. TAYBACK: Thank you.

7 THE COURT: Thank you.

8 Mr. Krum, anything else?

9 MR. KRUM: Yes, Your Honor, very, very briefly.

10 On the documents requests --

11 THE COURT: You have 30 seconds to wrap up.

12 MR. KRUM: On the document requests they're not
13 unbridled lists of time. They're specified to call for
14 documents dated January 1, '14, and after. Second, "predate
15 the litigation" is erroneous and misleading. Exhibit 9 is
16 dated May 15th, 6 May 28th. On May 20 I sent a litigation
17 hold letter to their counsel.

18 Finally, their privilege log is full of derivative
19 litigation privileged documents that predate that, back into
20 March, I think.

21 THE COURT: Okay. 'Bye.

22 MR. KRUM: Thank you.

23 THE COURT: All right. The motion is granted in
24 part. With respect to Request for Production Number 3 the
25 defendants are correct, they do not need to provide any

1 information in the form of documents related to gross income.
2 However, during deposition Mr. Krum may inquire as to the
3 percentage that the Cotter-related income forms of the gross
4 income to make any determination you think is appropriate.

5 With respect to the remaining documents, they are
6 all granted. However, you do not have to produced pleadings
7 that exist in filed cases. You may refer counsel to those.

8 In addition, a certification needs to be provided by
9 any defendant who has deleted information, whether it was pre
10 or post litigation, that they have done a search and what
11 their practice was for deleting information prior to the time.

12 I am not at this point addressing any issues related
13 to spoliation. If something comes from that, we have to have
14 an evidentiary hearing after a motion to compel if we get
15 there.

16 Anything else?

17 MR. KRUM: Nothing else, Your Honor.

18 THE COURT: 'Bye.

19 MR. KRUM: Thank you.

20 THE PROCEEDINGS CONCLUDED AT 10:09 A.M.

21 * * * * *

22

23

24

25

CERTIFICATION

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE AUDIO-VISUAL RECORDING OF THE PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

AFFIRMATION

I AFFIRM THAT THIS TRANSCRIPT DOES NOT CONTAIN THE SOCIAL SECURITY OR TAX IDENTIFICATION NUMBER OF ANY PERSON OR ENTITY.

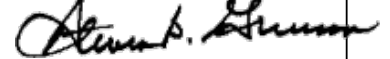
FLORENCE HOYT
Las Vegas, Nevada 89146



FLORENCE M. HOYT, TRANSCRIBER

2/22/16

DATE



1 **MATE**
2 MARK E. FERRARIO, ESQ.
3 Nevada Bar No. 1625
4 KARA B. HENDRICKS, ESQ.
5 Nevada Bar No.
6 TAMI D. COWDEN, ESQ.
7 Nevada Bar No. 8994
8 10845 Griffith Peak Drive, Suite 600
9 Las Vegas, NV 89135
10 Email: ferrariom@gtlaw.com
11 hendricksk@gtlaw.com
12 cowdent@gtlaw.com
13 *Counsel for Defendant Reading International, Inc*

9 **EIGHTH JUDICIAL DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 JAMES J. COTTER, JR., individually and
12 derivatively on behalf of Reading
13 International, Inc.,

14 Plaintiff,

15 v.

16 MARGARET COTTER, et al,

17 Defendants.
18

Case No. A-15-719860-B

Dept. No. XI

BUSINESS COURT

**READING INTERNATIONAL, INC.'S
MOTION FOR ATTORNEYS' FEES**

19 COMES NOW, Reading International, Inc., ("Reading" or the "Company") by and through
20 its counsel of record, the law office of Greenberg Traurig, LLP, and requests that this Court award
21 it reasonably incurred attorneys' fees in this case pursuant to NRS 18.010. This Motion for
22 Attorneys' Fees ("Motion") is made and based on the pleadings and papers on file with this Court,
23 the following Memorandum of Points and Authorities, and any oral argument entertained by this
24 Court at the time of hearing.

25 As set forth in more detail in the declarations of lead and local counsel for each of the
26 defense teams in Exhibits A, B, C, D, E¹ should the Court find that Plaintiff should be liable for

27 _____
28 ¹ Included in the declarations is a list of all timekeepers from each respective firm, and a monthly
total of fees incurred by the various defense teams.

1 attorneys' fees pursuant to NRS 18.010(2)(b), Reading will present evidence to support a claim
2 of attorneys' fees totaling \$15,907,354.61,² which amount includes fees incurred for the defense
3 of Reading, and for the defense of the Individual Defendants, for whom Reading has a statutory
4 duty of indemnity. Separately, the requested fees include \$11,805,288.77 incurred for the
5 Defense of all Individual Defendants, excluding Msrs. Storey and Gould; \$1,206,641.89
6 incurred for the Defense of Mr. Gould; and \$2,895,423.95 for defense of the Company.
7 Reading's D & O insurance paid \$10,000,000 of the total, leaving Reading responsible for
8 \$5,907,354.61.

9 This Motion is directed to the issue of whether attorneys' fees should be awarded. In the
10 event the Court determines that an award of fees is appropriate under NRS 18.010, Reading will
11 then present the documentary support showing that the requested fees were reasonable for this
12 Court's review.

13 Dated this 7th day of September 2018.

14 GREENBERG TRAURIG, LLP

15 By: /s/ Mark E. Ferrario

16 MARK E. FERRARIO, ESQ.

17 Nevada Bar No. 1625

18 KARA B. HENDRICKS, ESQ.

19 Nevada Bar No.

20 TAMI D. COWDEN, ESQ.

21 Nevada Bar No. 8994

22 10845 Griffith Peak Drive, Suite 600

23 Las Vegas, NV 89135

24 *Counsel for Defendant Reading International, Inc.*

25
26
27 ² This amount does not represent the total of all work performed, or even fees incurred in this
28 action, as fees relating to defense against the T2 complaint have been excluded where possible to
separate them, and any amounts written down or off by the respective firms have also been
excluded.

NOTICE OF MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the undersigned will bring this *Motion for Attorneys' Fees* on for hearing in Department XI, Eighth Judicial District Court, Clark County, Nevada on the _____ day of October 22, 2018, at 9:00 am m., or as soon thereafter as counsel may be heard.

Dated this 7th day of September 2018.

GREENBERG TRAURIG, LLP

By /s/ Mark E. Ferrario

MARK E. FERRARIO, ESQ.

Nevada Bar No. 1625

KARA B. HENDRICKS, ESQ.

Nevada Bar No.

TAMI D. COWDEN, ESQ.

Nevada Bar No. 8994

10845 Griffith Peak Drive, Suite 600

Las Vegas, NV 89135

Counsel for Defendant Reading International, Inc

MEMORANDUM OF POINTS AND AUTHORITIES

Reading is entitled to an award of attorneys' fees incurred for the defense of itself, and for the defense the Individual Defendants, against the claims brought by Plaintiff James, J. Cotter, Jr., ("Plaintiff" or "Cotter Jr."). Plaintiff's claims were brought and maintained without *reasonable* grounds, and/or with the intent to harass all the Defendants, including Reading. While a derivative action is supposed to seek to remedy harm done to the company, Plaintiff's motivation was clearly quite different, as his principal goal was in obtaining his own reinstatement as CEO, coupled with a desire for revenge.

As the Court is well aware, Cotter, Jr. was not a typical derivative Plaintiff for many reasons:

- For many years prior to bringing the litigation Cotter, Jr. was an officer and director of Reading;
- Plaintiff had long term prior experience with Directors Adams, Gould, Kane, McEachern and Storey. Prior to bringing this litigation, he specifically voted in favor of

1 the appointment of Director Adams to the Board in 2014. Indeed, he likewise voted in
2 favor of or otherwise supported the nomination of each of these directors without raising
3 any issues regarding their independence;

- 4 • Unlike an outside derivative plaintiff, Cotter, Jr. was already familiar with these
5 directors' history with Reading and with their various relationships with the Company
6 and his father;
- 7 • As a long time director, and as the President for Reading for several years, he was (or
8 should have been) intimately familiar with the Company's business and affairs, and with
9 the internal governance of Reading; and
- 10 • He continued to be a Director of the Company throughout the litigation, and had full
11 access to detailed information about the business and affairs of Reading.

12 Thus, this was not the case of an outside stockholder looking in, who needed discovery to determine
13 if his suspicions were actually warranted. Plaintiff was, or should have been, fully informed of the
14 facts before he even filed his complaint.

15 Despite intimate knowledge of the Company, throughout the litigation, Plaintiff engaged in
16 actions that greatly increased the costs for all the Defendants, including making multiple demands
17 for expedited discovery; excessive, often duplicative, demands for depositions and document
18 production; and repeated amendments to his complaint, adding challenges to virtually every
19 decision made by Reading's Board of Directors. Moreover, his complaint spawned a duplicative
20 complaint filed by other stockholders. Significantly, even after those other stockholders determined
21 that there was no merit to the claims, Plaintiff not only persevered, but increased his barrage,
22 suggesting that these investors were colluding with the Defendants.³ Furthermore, in addition to the
23 proceedings in this Court, four writ proceedings emerged from this matter. As the result of
24 Plaintiff's filing of this action, the Company was required to incur millions of dollars in attorneys'
25 fees, an amount that was well over and above that covered by the Company's D & O Insurance.

26 It is beyond dispute that Plaintiff's claims against his sisters could have been maintained for

27 ³ While the Defendants were ultimately not able to view the correspondence between Plaintiff's
28 counsel and counsel for T2, it is hard to believe that Plaintiff really in good faith believed that
there was any collusion.

1 three years, if at all, *only if he also attacked the motivations of all other board members*. Once this
2 Court determined that Plaintiff's claims against Directors Coddington, Gould, Kane, McEachern, and
3 Wrotniak ("Independent Board Members")⁴ were unsupported by any evidence, the futility of the
4 remaining claims became apparent. Thus, absent such frivolous claims against the Independent
5 Board Members, Cotter, Jr.'s case would from the start have been much narrower, as it would
6 necessarily have been limited to challenging only two specific board member decisions, neither of
7 which involved viable allegations of monetary harm to Reading. His concerns could have been
8 addressed by the disinterested board members revisiting the challenged decisions (as ultimately
9 occurred), or by using a special litigation committee to investigate the claims and determine
10 whether the case was actually in Reading's best interests to pursue.

11 A derivative plaintiff who truly has the best interests of the corporation at heart would desire
12 a speedy resolution of the claims, both to limit the disruption to management posed by the
13 litigation, and to limit the costs to the company, who must not only defend itself, but also has an
14 obligation to bear the cost of defense for the board members defendants. Indeed, a derivative
15 plaintiff bears a fiduciary duty to prosecute the case fairly, and in a manner intended to benefit the
16 corporation. Plaintiff did not fulfill that duty, but instead, persisted in maintaining claims that were
17 groundless, and even prolonged the litigation, seeking constant delays in the trial for assorted
18 reasons. Derivative cases sound in equity. Likewise, as a matter of equity, Reading and its
19 stockholders should not be required to bear the burden of these fees. Plaintiff's actions warrant an
20 award of fees pursuant to NRS 18.010(2)(b).

21 SUMMARY OF RELEVANT FACTS

22 This Court is familiar with the facts involved in this matter, and accordingly, only a
23 summary of the facts, including those most significant to this Motion, is provided.

24
25 ⁴ The use of this shortened term to reference these five directors is solely to offer a shortened means
26 of reference, and does not constitute a concession as to the validity that PLAINTIFF's claims that
27 the actions of the remaining directors, Ellen Cotter, Margaret Cotter, or Guy Adams were
28 motivated by self-interest. To the contrary, Reading is confident that had the trial proceeded,
Cotter, Jr. would not have been able to present evidence to support a conclusion that Ellen and
Margaret Cotter, and Guy Adams did not with a good faith believe that PLAINTIFF's termination
was in the best interests of the corporation.

1 Plaintiff was appointed CEO of Reading in August 2014, after the then-CEO, James J.
2 Cotter, Sr., resigned for medical reasons. While Cotter, Sr. was in the hospital, Plaintiff, Jr. had an
3 amendment to the James J. Cotter, Sr. Living Trust (the “Trust”) drafted what became known as
4 the “Hospital Amendment” to the Trust, and used undue influence to persuade his father to execute
5 the same. Ex. F. Trust Decision. As relevant here, through that amendment Plaintiff attempted to
6 alter the control over the majority of the Reading voting shares that Cotter, Sr. had directly and
7 indirectly owned, by adding Plaintiff as a trustee, in addition to Margaret Cotter, and providing for
8 rotating authority to vote the shares. Shortly after their father’s death in the autumn of 2014, Ellen
9 and Margaret Cotter filed suit to have the Hospital Amendment to the Trust declared invalid.
10 Plaintiff fought that litigation vigorously. Ultimately their position in that lawsuit was vindicated,
11 and Plaintiff’s assertions that he was a trustee of the Cotter, Sr., Living Trust and the Voting Trust,
12 were rejected. Repeatedly during the Trust Litigation, Plaintiff used the allegations in his complaint
13 and the T2 Complaint to attack Ellen and Margaret Cotter.

14 Meanwhile Plaintiff continued in the position as President and CEO, and did an abysmal
15 job. He devoted much of his time to discrediting his sisters, rather than developing any strategic
16 business plans or otherwise furthering the business of Reading. While Plaintiff blamed his sisters
17 for all his troubles, it is undisputed that tensions were high within Reading’s management and on
18 the Board. Things got so bad that one independent board member was charged with the duty of
19 acting as an ombudsman.⁵ Moreover, Plaintiff himself recognized his own inadequacies,
20 surreptitiously hiring, at Company expense, a consultant to coach him. By June 2015, multiple
21 board members had had enough, and Cotter Jr. was terminated.

22 The very same day he was terminated, Cotter, Jr. filed this action, which originally included
23 both his own direct claims related to his termination, as well as a purported derivative claim. That
24 filing was no surprise, Plaintiff’s litigation counsel had attended one of the board meetings where
25 Plaintiff’s termination was discussed, and threatened to sue each board member if Plaintiff were to
26 be terminated. Plaintiff also personally made such threats to individual board members.

27
28 ⁵ As the Court no doubt recalls, that director (Tim Storey) was sued by Plaintiff for his efforts, even
though he voted not to terminate Plaintiff.

1 In August 2015, Plaintiff brought a motion for a preliminary injunction, which sought,
2 among other things, the voiding of the termination decision and Plaintiff's immediate reinstatement
3 as President and CEO. *See* Pl.'s Mot. For Prelim. Inj. at 25-26. He also sought expedited discovery,
4 pursuant to which the Defendants produced documents in September and October of 2015. But
5 Plaintiff, after crying wolf and imposing the costs of expedited discovery on the Defendants and
6 Reading, thereafter proposed waiting until February to hold the hearing on his motion, at which
7 point this Court concluded that Plaintiff's conduct "belies the need for immediate relief" and
8 vacated the request for preliminary injunction. *See* October 29, 2015 Minute Order.

9 Regular discovery then commenced, but it did not proceed on a steady path. Plaintiff made
10 multiple amendments to his complaint, adding newly appointed Reading board members as
11 defendants, and challenging virtually all board decisions that had occurred between complaint
12 iterations. *See* FAC and SAC. This allowed Plaintiff to demand still more discovery from Reading.
13 Indeed, even though on October 29, 2015, Plaintiff's counsel indicated that he "will be surprised if
14 discovery that has been done so far is not a substantial part of the total production in this case," *see*
15 October 29, 2015 Minute Order, Plaintiff made additional documents requests in November 2015,
16 February, June and August 2016, and January 2018. Over the course of three years of litigation,
17 Defendants and Reading produced nearly 27,000 documents to Plaintiff (approximately 128,000
18 pages). Additionally, excluding the witnesses specific to the T2 complaint, 23 witnesses were
19 deposed, with several of the Individual Defendants being deposed over as many as five days.
20 Significantly, more than 28% of Reading's own attorneys' fees were incurred in connection with
21 Plaintiff's relentless discovery.

22 Yet, despite having obtained the wealth of information from the horrendously expensive
23 discovery, Plaintiff was unable to submit evidence sufficient to support his claims that Directors
24 Coddington, Gould, Kane, McEachern or Wrotniak were somehow beholden to Ellen or Margaret
25 Cotter, and therefore unable to exercise independent judgment—the foundational premise upon
26 which his legal house of cards was built. This is a fact that, given his long-held position as a
27 director and tenure as President, he knew or should have known from the beginning.

28 Remarkably, even after this Court granted judgment in favor of the Independent Board

1 Members, and after those Directors ratified the two remaining challenged actions, Plaintiff persisted
2 in pursuing this matter, causing Reading to incur yet more fees and costs.

3 Plaintiff made multiple requests for a continuance of the scheduled January 2018 trial date,
4 which this Court refused. Whether such requests were prompted by the knowledge that his evidence
5 was insufficient to support his claims, or because he knew his expert witnesses would not be
6 appearing will not be known without a hearing. However, what is known is that despite admitted
7 knowledge of a purported medical condition and necessary treatment (the nature of which he
8 refused to disclose) for five or six weeks before the scheduled trial, he forced the Defendants to
9 continue full blown trial preparation right up until the *literal* eve of the scheduled trial date.
10 Moreover, it was only *after* he had obtained the desired continuance that it became known that
11 Plaintiff would not be presenting any damages expert. Significantly, such information was not
12 voluntarily proffered by Plaintiff; Defendants had to engage in motion practice to request the Court
13 to order Plaintiff to disclose documents relating to the experts who would appear.

14 Moreover, even after his abandonment of his claims that the Company had been financially
15 harmed by his termination and/or replacement by Ellen Cotter, Plaintiff still insisted on pursuing
16 still more discovery, this time directed at the ratification process. In so doing, Plaintiff was thus
17 able to drag out the proceedings an additional six months, greatly increasing Reading's e-discovery
18 costs, as well as its attorneys' fees.

19 During the course of this litigation, the various defense teams were required to draft
20 pleadings and briefs, including several rounds of dispositive motions; draft and prepare responses to
21 discovery propounded by Plaintiff; facilitate electronic discovery collection; coordinate and
22 facilitate expert reports; engage in electronic document review and production including production
23 of numerous privilege logs; prepare for and attend depositions of more than 25 witnesses, many of
24 whose depositions continued over multiple days; draft and prepare discovery and review documents
25 produced by Plaintiff and other Defendants; handle discovery motions; and prepare for and attend
26 more than 50 hearings; fully prepare for the aborted January 2018 trial, and engage in renewed trial
27 preparation in anticipation of the scheduled July 2018 trial, including the preparation of defense
28 expert witness at a time that Plaintiff knew, or should have known, that he would not be calling any

1 expert witnesses on damages. This cost of this work, for the attorneys' fees alone, cost Reading
2 more than \$15,907,354.61. Considering that Plaintiff expressed indignation over a \$50,000
3 payment to a director for additional service and \$25,000 in Board approved compensation to Ellen
4 Cotter —and that Plaintiff ultimately proved willing to jettison his claims for financial harm
5 resulting from his termination and Ellen Cotter's appointment entirely while maintaining the claim
6 for reinstatement---his "derivative" lawsuit has been exposed as the sham it was.

7 As a derivative plaintiff, Cotter, Jr. should have weighed the benefits to the Company (the
8 beneficiary of his trust) against the costs. In addition to distraction and loss of executive time,
9 Cotter Jr. cost the Company millions in defense attorneys' fees, and still more in costs. On the
10 potential upside of a suit: a \$50,000 fee paid to a director; \$25,000 in compensation paid to Ellen
11 Cotter; the alleged but undiscernible loss resulting from the acceptance of Class A Stock to pay for
12 the exercise of Class B Stock Options; and, since no expert witness was or would have been
13 produced, the alleged, but unquantifiable purported to have resulted from Plaintiff's replacement as
14 CEO. Simply put, Cotter Jr. caused Reading to spend millions to defend a claim that *at most* could
15 have won \$75,000 for the Company and its stockholders.⁶

LEGAL ARGUMENT

*A major weakness of representative litigation in general is that the agent controlling
the litigation often does not have the same interests as the principal. In the case of*

⁶ The Company also had to defend vigorously, since Cotter Jr. alleged that Reading had made various false and misleading filings with the SEC. This was a matter that, if true, would have exposed the Company itself to potential fines and damages.

1 *stockholder derivative actions, a meritless suit brought by a plaintiff without the*
2 *corporation's best interest in mind can become a significant drain on the*
3 *corporation's and its stockholders' resources. For better or worse, it is extremely*
4 *difficult to win a derivative action because of the procedural hurdles in place. Since*
these barriers make success so unlikely, plaintiffs should be particularly
conscientious of the merits of a case.

5 Amy M. Koopmann, A Necessary Gatekeeper:
6 The Fiduciary Duties of the Lead Plaintiff
7 In Stockholder Derivative Litigation,
34 J. Corp. L. 895, 896 (2009).

8 This Court should find that Reading is entitled to an award of attorneys' fees pursuant to
9 NRS 18.010. The record shows that Plaintiff brought a claim that was unquestionably without merit
10 as to at *least* five, if not all, of the named defendants. He did so to prevent expeditious resolution of
11 this case, when he knew or should have known that such individuals were in fact independent.
12 Moreover, he continued to maintain his claims over the course of three years, despite repeated,
13 objective indications that his claims were fruitless. Despite his fiduciary obligations as a derivative
14 plaintiff, Plaintiff heedlessly persisted in the litigation, with a desperate hope to win back his former
15 position of CEO, regardless of the cost to the corporation, and thus, to the other stockholders. This
16 Court should impose an award of attorneys' fees on Plaintiff, both to remediate the damage done to
17 Reading, and to penalize Plaintiff for his conduct.

18 In Nevada, attorney's fees are recoverable to the prevailing party when authorized by rule,
19 statute, or contract. NRS 18.010; *see also, Flamingo Realty Inc. v. Midwest Development, Inc.*, 110
20 Nev. 984, 991, 897 P.2d 69, 73 (1994). NRS 18.010(2)(b) provides:

21 In addition to the cases where an allowance is authorized by specific statute, the
22 court may make an allowance of attorney's fees to a prevailing party. . . when the
23 court finds that the claim . . . of the opposing party was *brought or maintained*
24 *without reasonable ground or to harass the prevailing party*. The court shall liberally
25 construe the provisions of this paragraph in favor of awarding attorney's fees in all
26 appropriate situations. It is the intent of the Legislature that the court award
27 attorney's fees pursuant to this paragraph and impose sanctions pursuant to Rule 11
of the Nevada Rules of Civil Procedure in all appropriate situations to punish for and
deter frivolous or vexatious claims and defenses because such claims and defenses
overburden limited judicial resources, hinder the timely resolution of meritorious
claims and increase the costs of engaging in business and providing professional
services to the public.

28 NRS 18.010(2)(b)(emphasis added).

1 As can be seen, the Nevada Legislature has indicated that the public policy of Nevada is that
2 frivolous litigation should be thwarted and deterred by the imposition of attorneys' fees. The
3 Nevada Supreme Court has emphasized that the "statutory language is clear" in that "it encourages
4 the district court to award attorney fees" and "reflects the Legislature's intent to liberalize attorney
5 fee awards." *Trustees of Plumbers & Pipefitters Union Local 525 Health & Welfare Tr. Plan v.*
6 *Developers Sur. & Indem. Co.*, 120 Nev. 56, 62-63, 84 P.3d 59, 63 (2004). Thus, while the decision
7 to award attorneys' fees is subject to a district court's sound discretion, *see Semenza v. Caughlin*
8 *Crafted Homes*, 111 Nev. 1089, 1095, 901 P.2d 684, 687 (1995), Nevada courts should liberally
9 award fees where the elements of NRS 18.020(2)(b) are met. The application of this rule in this
10 situation is particularly appropriate given Plaintiff's fiduciary duties to Reading, his intimate
11 knowledge of the relevant facts even before he brought the case, and his personal agenda in
12 bringing and maintaining this case and further given the fact that if fees are not awarded, they will
13 be borne by the Company and, ultimately, by its stockholders.

14 To support such an award, there must be evidence in the record that supports a conclusion
15 that the claims were brought or maintained without reasonable grounds or to harass the other party."
16 *See Chowdhry v. NLVH, Inc.*, 109 Nev. 478, 486, 851 P.2d 459, 464 (1993). Claims are groundless
17 when their proponent is unable to proffer any credible evidence in support of them. *Bergmann v.*
18 *Boyce*, 109 Nev. 670, 856 P.2d 560 (1993); *Allianz Ins. Co. v. Gagnon*, 109 Nev. 990, 996, 860
19 P.2d 721, 724 (1993). Whether a party has reasonable grounds to bring his claims "depends upon
20 the actual circumstances of the case. . . ." *Bergmann*, 109 Nev. at 675, 856 P.2d at 563. The Court
21 is not limited to determining whether the plaintiff had "reasonable grounds" at the commencement
22 of the action, but instead, should consider whether the plaintiff continued to have reasonable
23 grounds to maintain the claims throughout the litigation, as the statutory language expressly
24 provides that the maintenance of a of a groundless action warrants an award of fees. NRS
25 18.010(2)(b).⁷

26
27 ⁷ In *Duff v. Foster*, 110 Nev. 1306, 1309, 885 P.2d 589, 591 (1994), the court noted that "[i]f an
28 action is not frivolous when it is initiated, then the fact that it later becomes frivolous will not
support an award of fees." (internal quotation and citation omitted). However, at the time *Duff*
was decided, the statute referred only to claims that were "brought without reasonable grounds."

1 A Plaintiff cannot avoid an award of fees simply because his claims survived motions to
2 dismiss. *Bergmann*, 109 Nev. at 675, 856 P.2d at 563 (1993) (concluding that “[t]he trial court
3 could not base its refusal to award attorney’s fees upon the 12(b)(5) ruling”); *see also Fountain v.*
4 *Mojo*, 687 P.2d 496, 501 (Colo. Ct. App. 1984) (A claim is groundless if “the complaint contains
5 allegations sufficient to survive a motion to dismiss for failure to state a claim, but which are not
6 supported by any credible evidence at trial.”). A motion to dismiss requires the Court to assume the
7 pleaded facts are true, and thus, the denial of such a motion offers no evidence that the claims had
8 merit.

9 Here, Reading is entitled to fees. The term “prevailing party,” as used in NRS 18.020(2)(b),
10 is “broadly construed so as to encompass plaintiffs, counterclaimants, **and defendants.**” *Valley Elec.*
11 *Ass’n vv. Overfield*, 121 Nev. 7, 10, 106 P.3d 1198, 1200 (2005) (emphasis added). Judgment has
12 been entered in favor of all the Defendants, and they are therefore the prevailing party on all claims

13 **A. Plaintiff Brought and Maintained Groundless Claims.**

14 Here, Plaintiff filed an action, including as defendants all of Reading’s directors, other than
15 himself, and claiming a litany of fiduciary breaches, all of which depended on a theory that his
16 sisters were improperly taking control of Reading. The record and result in this case clearly
17 demonstrate that Plaintiff lacked credible evidentiary support for his claims, and that his lawsuit
18 was brought and maintained primarily to harass Defendants, to avenge his own injured sensibilities,
19 and also so that he could have additional leverage in his larger battle with his sisters, over the
20 control of their father’s estate (and thus RDI). Notably, another court has already concluded that
21 Cotter, Jr. “actively participated” to unduly influence James J. Cotter Sr. through “high pressure
22 ‘sales tactics,’” with the goal of “unduly benefitting” and “increasing his power” in RDI’s
23 operations at the expense of his dying father’s true intentions. See Ex. F, Trust Decision, 1, 8-13).

24 Significantly, Plaintiff has never presented any evidence showing that Reading was being
25 looted or that its assets were being dissipated to satisfy the whims of his sisters. He could not even
26 present evidence of excessive salaries, because Reading’s executives are compensated on the low

27
28 In 2003, the legislature amended NRS 18.010(2)(b) to permit an award of fees where a claim has
been “brought or maintained without reasonable grounds.” 2003 Statutes of Nevada, p. 3478.

1 end of the spectrum for comparable companies. As Plaintiff remained a Director of the Company
2 throughout this litigation, he had access to the information regarding the -performance of the
3 Company. In contrast to the evidence of his own demonstrated failures in the CEO position,
4 Plaintiff could offer nothing to show that either of his sisters failed to perform the duties of their
5 respective employment positions adequately. Instead, he was reduced to pointing to the fact that,
6 after serving as interim CEO for more than six months, Ellen Cotter was appointed to the position,
7 and called it proof of her claimed nefarious purpose. No discovery was needed to produce this
8 evidence. It was timely reported in Reading's public filings. Evidence of Margaret Cotter's
9 supposed intent to the harm Reading consisted of her being appointed to a VP position. Again, no
10 discovery was needed, as her appointment was likewise reported in Reading's public filings

11 Yet, remarkably, this flimsy evidence was actually *more* substantial than any offered to
12 show that any of the Independent Board Members lacked sufficient independence. His "evidence"
13 against Coddington and Kane consisted of them having friendships with Plaintiff's own parents—a fact
14 known to him without discovery. Indeed, Plaintiff freely *admitted* that his suspicions regarding the
15 interestedness of Directors Gould and McEachern were based solely on the fact that the directors
16 had voted contrary to his wishes. Moreover, in his deposition in May 2016, Cotter, Jr. *admitted* that
17 Gould and McEachern were independent, yet he never voluntarily dismissed them. **Ex. G**,
18 Plaintiff's Depo, 79:12-80:8; 84:21-86:4. Similarly even though Reading prospered under the
19 leadership of Ellen Cotter, reaching a stock price well above the average price during Cotter, Jr.'s
20 tenure, he insisted that the company was being harmed. As a director, he knew or should have
21 known that new directors Coddington and Wrotniak were independent and acted independently in the
22 board meetings in which he participated, yet he sued them anyway. Further, as a director, Cotter, Jr.
23 knew that what he continuously mischaracterized as an "offer" from Patton Vision was, in fact,
24 nothing more than a proposal to enter into negotiations, and not the basis for any legal claim against
25 directors (as the Court ultimately ruled). Such actions are demonstrative of the groundless nature of
26 the claims that RDI and the Director Defendants were forced to defend.

27 Plaintiff further pledged to the Court and Defendants that he would bring a barrage of
28 witnesses to trial, many of whom were entirely irrelevant or outside of the jurisdiction of the Court.

1 And, despite guaranteeing to the Court that all his experts were ready to testify at trial within a
2 matter of days, Plaintiff's promise was exposed as a sham, as he had failed to pay those experts, had
3 not prepared them for trial or done any work with them over the preceding year. Ultimately,
4 Plaintiff withdrew his two damages experts due to lack of payment, and thus, could not have put on
5 a damages case at trial. However, Plaintiff did not disclose his true intent, requiring Reading and
6 the Individual Defendants to prepare for the case he had claimed he would bring.

7 In short, Plaintiff continually demonstrated an awareness that he could not prove his claims,
8 yet he failed to call a halt to the litigation. In this regard, it is to be noted that the Company's
9 D&O insurance was exhausted in November 2016. Accordingly, the Company bore the entire brunt
10 of these unnecessary trial preparation costs.

11 **B. Plaintiff's Purpose in Bringing the Actions was Harassment.**

12 This litigation was never motivated by a rational concern for the welfare of Reading, but
13 instead, was motivated by a desire to avenge Plaintiff's personal feelings of rejection and bitterness.
14 As late as June of this year, Plaintiff was asserting as a claim the fact that he was allegedly
15 "threatened" with termination: a claim which the court correctly noted that, if true, would be
16 personal and not derivative in nature.⁸ While Plaintiff styled himself as a champion of corporate
17 governance, claiming he wanted to ensure that Reading was led by a Board that followed
18 appropriate processes, throughout the litigation, the remedy he relentlessly sought was to achieve
19 his own reinstatement as CEO, despite the fact that he clearly did not have the approval or
20 confidence of any Reading Board member. Cotter, Jr.'s sham concern for corporate governance is
21 further shown by simply looking at the improved corporate governance structure Reading's Board
22 adopted subsequent to Plaintiff being removed as CEO. The Reading Board approved: the first ever
23 Compensation Committee Charter which required that all of the members of the Compensation
24 Committee be independent (as such term is defined under NASDAQ Stock Market guidelines)⁹; a

25 ⁸ Furthermore, it is a claim that was dismissed from the employment arbitration proceeding, as such
26 "threats," even if true, do not violate California employment law, and therefore, do not support a
27 claim of wrongful termination.

28 ⁹ Citadel, the company that is today RDI, was at one time a savings and loan holding company and,
at that time, as a regulated financial institution holding company, likely had a Compensation
Committee Charter.

1 Supplemental Insider Trading Policy, significantly limiting the right of insiders to trade in RDI
2 securities; a new state of the art Code of Business Ethics; a new state of the art Audit and Conflicts
3 Committee Charter; a first ever stock ownership policy (obligating officers and directors to achieve
4 and maintain certain minimum levels of stock ownership in RDI); and the first ever strategic
5 business plan for the Company.

6 The very genesis of this action shows that Cotter Jr.'s did not care about corporate
7 governance and that the lawsuit was intended to be harassing. Even prior to his termination,
8 Plaintiff threatened litigation *on behalf of RDI itself* against RDI's Board—*i.e.*, those who
9 controlled his continued employment—if they decided that it was in the best interests of the
10 Company to fire him and threatened that he would use a suit to “ruin them financially.” **Ex. H,**
11 **McEachern Depo. at 78:14-79:2** He announced his intent to bankrupt the other directors, and
12 indeed, as can be seen by the fees incurred here, had the independent directors not been entitled to
13 indemnification, Plaintiff would likely have made good on his threat.

14 In these proceedings, Plaintiff used discovery as both a sword and shield with which to
15 further harass Defendants and RDI. For instance, due to his preliminary injunction motion, Plaintiff
16 gained access to early and expedited discovery. However, thereafter he slow-rolled the case,
17 leading the Court to summarily deny the motion. Plaintiff also cried wolf every time dispositive
18 motions or trial would near, asserting that he still needed even more discovery to prove his ever-
19 elusive claims. It is clear Plaintiff did so in order to postpone an unfavorable judgment and keep
20 alive his leverage in other cases. As a result, RDI's directors sat for multiple days of needlessly
21 duplicative depositions, harming the Company's business operations and forcing Reading to waste
22 resources that could have been used for capital improvements or other needs on the defense against
23 his claims.

24 Significantly, Plaintiff knew that the litigation was itself harming Reading due to its cost.
25 He knew that the D&O insurance had been exhausted. Nearly a year after he commenced the
26 litigation, he frankly acknowledged an inability to cite any purported monetary damages that the
27 Company had suffered after his termination, except for a purported drop in stock after his
28 termination was announced (after which there was an admitted rebound), and the costs incurred by

1 the company to defend against the derivative action. **Ex. G**, Cotter Depo, 67:10- 68:8; 69:21-24.

2 Yet, despite acknowledging his lawsuit was damaging Reading, Plaintiff continued to prosecute
3 claims that he knew could, at best, yield only a comparatively miniscule financial benefit,
4 evidencing an intent to harass Reading.

5 Because Plaintiff brought his claims to harass the Defendants, this Court should award
6 attorneys' fees pursuant to NRS 18.010

7 **C. Cotter, Jr.'s Claims Against the Director Defendants Were Intended to Subvert**
8 **Protections Against Frivolous Derivative Actions.**

9 Derivative actions are an equitable tool that permits stockholders to pursue claims held by
10 the corporation, but which the corporation's management refuses to pursue. *See e.g., Schoon v.*
11 *Smith*, 953 A.2d 196, 200 (Del. 2008) ("To prevent "a failure of justice, courts of equity granted
12 equitable standing to stockholders to sue on behalf of the corporation for managerial abuse in
13 economic units which by their nature deprived some participants of an effective voice in their
14 administration.) (citations and internal quotations omitted). However, a stockholder derivative
15 action contravenes "a cardinal precept" of corporation law, *i.e.*, that directors manage the business
16 and affairs of the corporation. *Aronson v. Lewis*, 473 A.2d 805, 811 (Del. 1984). Because courts
17 have long been aware of the potentially ruinous expense that derivative actions may have on a
18 corporation, certain protections developed, with the intent of insuring that derivative actions have
19 merit. *See Koopmann, supra*, 34 J. Corp. L at 907.

20 One significant protection is the requirement, codified in NRCP 23.1, that a stockholder
21 make demand on the corporation's board of directors to bring the action, or, in the alternative, to
22 show that demand would have been futile. *Id.* at 811-812 (stating that demand requirement insures
23 that stockholders exhaust intra-corporate remedy, and provides a safeguard against strike suits).
24 Another protection is the use of a special litigation committee to investigate the claims raised in the
25 suit, and to determine whether the suit was in the best interests of the corporation. should be
26 continued. *Zapata Corp. v. Maldonado*, 430 A.2d 779, 785 (Del. 1981) (noting that special
27 litigation committee allows a corporation to "rid itself of detrimental litigation" and to avoid the
28 situation where "a single stockholder in an extreme case might control the destiny of the entire

1 corporation”). Both protections require that the directors involved be independent, which generally
2 means that they have no personal interest in any challenged transaction, are not themselves at
3 significant risk of personal liability should the claims proceed, and are not unduly influenced by
4 directors who do have a personal interest. *See Police v. Brokaw (in Re Dish Network Derivative*
5 *Litig.)*, 401 P.3d 1081, 1089 (Nev. 2017) (noting that in both the demand futility and the SLC
6 context, the court should consider whether improper influences would prevent the directors from
7 impartially considered the merits of the claims).

8 To avoid a demand requirement, a plaintiff must *plead* a lack of independence, but is not
9 required to *prove* such lack until much later in the proceedings. *See In Re Amerco Derivative Lit.*,
10 *127 Nev. Adv. Op. No. 17, 51629 (2011)*, 252 P.3d 681, (Nev. 2011) (requiring hearing to determine
11 whether demand was futile before trial). Accordingly, the requirement of demand can easily be
12 avoided by making allegations that all board members to whom demand might be made, without
13 regard to whether the allegations will ultimately be proven. Making such allegations against all
14 directors, including even those who join a board after the originally challenged decisions occurred,
15 imposes an obstacle to the formation of a special litigation committee. As existing defendants, all
16 such board members will automatically have a strike against them in any determination of
17 independence, as they “would be materially affected either to [their] benefit or detriment, by a
18 decision of the board.” *Police v. Brokaw (in Re Dish Network Derivative Litig.)*, 401 P.3d 1081,
19 1090 (Nev. 2017) (noting bases for finding a lack of independence of members of special litigation
20 committees).

21 Here, despite the significant discovery performed, Plaintiff was unable to support his
22 allegations that the Dismissed Director Defendants were so beholden to Ellen or Margaret Cotter
23 that they would disregard their fiduciary obligations. Having insufficient evidence after discovery
24 had been completed, it necessarily follows that Plaintiff did not possess such evidence at the time he
25 made his allegations. Yet, despite such lack, he made the allegations anyway, and thus avoided an
26 earlier conclusion to this litigation. This Court should not countenance such deliberate tactics to
27 avoid the protections against groundless derivative actions.
28

D. As a Derivative Plaintiff, Plaintiff Had a Duty to Prosecute Claims Fairly and For the Furtherance of the Best Interests of the Corporation, Which Duty He Ignored.

Plaintiff's conduct in purposefully extending the litigation, and thereby increasing the fees and costs incurred by Reading, is particularly egregious considering his fiduciary obligations as a derivative plaintiff and the level of his inside knowledge about the Company and its corporate governance. From the date he filed a claim that purported to be derivative, i.e., filed on behalf of Reading, Plaintiff had a fiduciary duty to both Reading and its stockholders, separate from and beyond the fiduciary duty he owed by virtue of his status as a director. *In re Fuqua Indus., Inc. S'holder Litig.*, 752 A.2d 126, 129 (Del.Ch.1999) ("[A] derivative plaintiff serves in a fiduciary capacity as representative of persons whose interests are in plaintiff's hands and the redress of whose injuries is dependent upon her diligence, wisdom and integrity."). "By agreeing to serve as the figurehead for the litigation, the lead plaintiff takes on the duty to be informed about the litigation, the prospects of success, and who is likely to pay the bill." Koopermann, *supra*, 34 J. Corp. L. at 914.

Plaintiff breached his fiduciary obligations as a derivative plaintiff in his prosecution of this case, because he continually failed to make an *objective* assessment of the merits of the case. He ignored his own admitted lack of evidence as to Gould and McEachern. So far from heeding the objective assessment of the claims and evidence produced in discovery made by the T2 Plaintiffs,¹⁰ he actively fought against the settlement. He disregarded the inevitable consequences of this Court's December 2017 ruling. He failed to acknowledge the obviously validity of the ratification. Furthermore, it is now undeniable that the only remedy that Plaintiff was truly interested in was his

¹⁰ Indeed, the truly independent stockholders realized the futility of the litigation as reported in Reading's July 13, 2016 press release, Messrs. Glaser and Tilson advised our Company in connection with the settlement of their Derivative Claims: "We are pleased with the conclusions reached by our investigations as Plaintiff Stockholders and now firmly believe that the Reading Board of Directors has and will continue to protect stockholder interests and will continue to work to maximize stockholder value over the long term. We appreciate the Company's willingness to engage in open dialogue and are excited about the Company's prospects. Our questions about the termination of James Cotter, Jr., and various transactions between Reading and members of the Cotter family - or entities they control - have been definitively addressed and put to rest. We are impressed by measures the Reading Board has made over the past year to further strengthen corporate governance. We fully support the Reading Board and management team and their strategy to create stockholder value."

1 own reinstatement as CEO, showing that at all times, he placed his own personal interests above
2 those of Reading and its stockholders.

3 Given his intimate association with the Company, as a director and former President, the
4 conclusion naturally follows that he knew or should have known from the beginning that he would
5 not be able to prove his case on lack of independence. Plaintiff's conduct in masquerading as a
6 derivative plaintiff constituted both bringing and maintaining claim without reasonable grounds.
7 Accordingly, this Court should hold Plaintiff liable for an award of fees under NRS 18.010(2)(b).

8 **CONCLUSION**

9 In this case, the question is – who bears the expense of this litigation-the Plaintiff or Reading
10 and its stockholders? The Company believes that as a matter of both law and equity, this cost
11 should be borne by the Plaintiff.

12 Despite his fiduciary obligations as a derivative plaintiff, Cotter, Jr. brought a harassing
13 lawsuit without reasonable grounds. Given his pre-existing and ongoing access to information, it is
14 reasonable to hold Cotter, Jr. to a stricter standard or reasonableness than might apply to a
15 derivative plaintiff who is a true outsider, and has no conflicting interests. Plaintiff's insider and
16 conflicted status, while not disqualifying him as derivative plaintiff, should surely be weighed in
17 considering whether or not he acted reasonably and in good faith, and whether, on the balance of the
18 equities, the cost of the litigation should be borne by the Reading's stockholders.

19 Plaintiff maintained this action for three years, despite his own admission that he had no
20 basis to support allegations against two of the defendants, and despite numerous objective
21 indications that his claims lacked merit. Cotter, Jr. acted in the guise of a representative plaintiff,
22 even though he wished to achieve outcomes that benefited only himself, including his own
23 reinstatement to the position of CEO, as well as leverage against his sisters in other litigation.
24 Plaintiff's meritless lawsuit was prosecuted in a manner designed to result in the greatest cost and
25 impose horrendous costs on Reading. Notably, the Company not only incurred substantial fees on
26 its own behalf, but was and is required to indemnify each of the director defendants for the fees they

1 incurred. Under the “actual circumstances” of this case, the factors for awarding attorneys’ fees to
2 Defendants and RDI as the prevailing parties under NRS 18.010(2)(b) are clearly satisfied, and such
3 fees are plainly warranted.

4 Dated this 7th day of September 2018.

5
6 GREENBERG TRAURIG LLP

7 By /s/ Mark E. Ferrario

8 MARK E. FERRARIO, ESQ.

9 Nevada Bar No. 1625

10 KARA B. HENDRICKS, ESQ.

11 Nevada Bar No.

12 TAMI D. COWDEN, ESQ.

13 Nevada Bar No. 8994

14 10845 Griffith Peak Drive, Suite 600

15 Las Vegas, NV 89135

16 *Counsel for Defendant Reading International, Inc*

17
18
19
20
21
22
23
24
25
26
27
28
Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
(702) 792-3773
(702) 792-9002 (fax)

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that on this day, I caused a true and correct copy of the foregoing **READING INTERNATIONAL, INC.’S MOTION FOR ATTORNEYS’ FEES** to be e-filed and served via the Court’s E-Filing system. The date and time of the electronic proof of service is in place of the date and place of deposit in the mail.

Dated this 7th day of September 2018.

/s/ Andrea Lee Rosehill

An employee of Greenberg Traurig, LLP

EXHIBIT A

1 **DECL**
MARK E. FERRARIO, ESQ.
2 (NV Bar No. 1625)
KARA B. HENDRICKS, ESQ.
3 (NV Bar No. 7743)
TAMI D. COWDEN, ESQ.
4 (NV Bar No. 8994)
GREENBERG TRAURIG, LLP
5 10845 Giffith Peak Drive, Suite 600
Las Vegas, NV 89135
6 Email: ferrariom@gtlaw.com
hendricksk@gtlaw.com
7 cowdent@gtlaw.com

8
9 *Counsel for Defendant Reading International, Inc.*

10 **EIGHTH JUDICIAL DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 JAMES J. COTTER, JR., individually and
derivatively on behalf of Reading
13 International, Inc.,

14 Plaintiff,

15 v.

16 MARGARET COTTER, et al,

17 Defendants.

Case No. A-15-719860-B
Dept. No. XI

**READING INTERNATIONAL, INC.'S
MOTION FOR ATTORNEYS' FEES**

18 **DECLARATION OF MARK E. FERRARIO**

19 I, MARK E. FERRARIO, declare as follows:

- 20
- 21 1. I am a duly licensed attorney, authorized to practice law in the State of Nevada. I am a
shareholder with the law firm of Greenberg Traurig, LLP ("GT"), counsel of record for
22 Reading International Inc. ("RDI") in the above-captioned action.
- 23
- 24 2. The facts contained herein are of my personal knowledge, and if called upon, I could and
would competently testify to them.
- 25
- 26 3. This declaration is submitted in support of RDI's Motion for Attorneys' Fees.
- 27
- 28 4. As relevant to the Motion for Attorneys' Fees, the attorneys' fees incurred by Reading
related to GT's representation of the Company in this action total \$2,895,423.95.

1 5. Reading is not requesting that fees incurred for work specific to the defense against the
2 claims filed by the T2 Plaintiffs, or with respect to the settlement of such claims, and
3 therefore such fees, which totaled \$229,386.55, have been excluded from the total in
4 Paragraph 4.

5 6. GT's fees for each month it provided services related to this action are:

Month Time Billed	Total Fees Billed
June 2015	\$3,911.00
July 2015	\$5,001.00
August 2015	\$155,266.20
September 2015	\$171,894.15
October 2015	\$157,475.70
November 2015	\$147,489.75
December 2015	\$110,214.45
January 2016	\$67,493.25
February 2016	\$148,113.00
March 2016	\$152,221.05
April 2016	\$150,315.84
May 2016	\$153,975.15
June 2016	\$86,003.10
July 2016	\$53,579.70
August 2016	\$87,457.50
September 2016	\$100,198.80
October 2016	\$118,873.46
November 2016	\$66,895.89
December 2016	\$48,364.20
January 2017	\$49,546.26
February 2017	\$32,232.60
March 2017	\$10,961.55
April 2017	\$12,357.45
May 2017	\$3,449.35
June 2017	\$18,837.00
July 2017	\$30,035.25
August 2017	\$24,747.75
September 2017	\$24,564.15
October 2017	\$28,842.75
November 2017	\$50,987.70
December 2017	\$153,502.65
January 2018	\$90,888.75
February 2018	\$54,831.15

March 2018	\$55,297.80
April 2018	\$57,034.35
May 2018	\$116,941.50
June 2018	\$64,474.20
July 2018	\$31,148.55
Total Fees	\$2,895,423.95

7. The name of the GT timekeepers for whose work a claim for fees is being made are set forth in Exhibit 1, hereto.

8. The amounts set forth above reflect services rendered by GT include time spent on drafting pleadings, including several rounds of dispositive motions; drafting and preparing responses to discovery propounded by Plaintiff; facilitating electronic discovery collection; electronic document review and production including production of numerous privilege logs; attending depositions of more than 23 witnesses, many on multiple dates (and excluding depositions specifically related to T2 claims); reviewing documents produced by Plaintiff and the Director Defendants; handling discovery motions; and preparing for and attending approximately 50 court hearings, among other related items.

9. GT's attorneys diligently pursued this matter to conclusion, ensuring all tasks were assigned and performed timely and effectively.

10. The amount of attorneys' fees incurred by RDI in this action are reasonable.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on this 7th day of September, 2018.

/s/ Mark E. Ferrario
Mark E. Ferrario, Esq.

Exhibit 1

Time Keeper	Houly Rate/Hourly Rate Range
Askling, Jennifer	\$220.50-\$256.50
Bedker, Stephanie	\$238.50-\$292.50
Bonner, Michael J.	\$675.00-\$725.00
Brewer, John N.	\$360.00-\$585.00
Cappo, Anthony	\$382.50-\$472.50
Chipman, Hannah	\$112.50
Coburn, Lance	\$585.00
Cowden, Tami D.	\$531.00-\$590.00
Ferrario, Mark E.	\$630.00-\$690.00
Godfrey, Leslie S.	\$400.50-\$445.00
Hendricks, Kara B.	\$360.00-\$459.00
Hutcherson, Lee	\$288.00-\$310.10
Miltenberger, Chris	\$436.50
Nicholas, Ann	\$193.50
Noyce, Shayna	\$225.00
Opie, Alayne	\$306.00
Rosehill, Andrea	\$148.50
Sankaran, Annapoorni R.	\$405.00
Sheffield, Megan L.	\$234.00-\$256.50
Sifuentes , Lisa	\$225.00-\$234.00
Swanis, Eric W.	\$369.55-\$481.50
Titus, Jaycee	\$119.00-\$126.00
Welch-Kirmse, Whitney	\$310.50

EXHIBIT B

1 **DECL**
2 **COHENJOHNSONPARKEREDWARDS**

3 H. STAN JOHNSON, ESQ.
Nevada Bar No. 00265
4 sjohnson@cohenjohnson.com
375 East Warm Springs Road, Suite 104
Las Vegas, Nevada 89119
Telephone: (702) 823-3500
5 Facsimile: (702) 823-3400

6 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**
7 **CHRISTOPHER TAYBACK, ESQ.**

8 California Bar No. 145532, *pro hac vice*
christayback@quinnemanuel.com

9 **MARSHALL M. SEARCY, ESQ.**
California Bar No. 169269, *pro hac vice*

10 marshallsearcy@quinnemanuel.com
865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017
Telephone: (213) 443-3000

11 Attorneys for Defendants Margaret Cotter,
12 Ellen Cotter, Douglas McEachern, Guy Adams,
Edward Kane, Judy Coddling, and Michael Wrotniak

13 **EIGHTH JUDICIAL DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15
16 JAMES J. COTTER, JR. individually and
derivatively on behalf of Reading
17 International, Inc.,

18 Plaintiffs,

19 v.

20 MARGARET COTTER, ELLEN COTTER,
GUY ADAMS, EDWARD KANE, DOUGLAS
McEACHERN, WILLIAM GOULD, JUDY
21 CODDLING, MICHAEL WROTONIAK, and
DOES 1 through 100, inclusive,

22 Defendants.

23
24 READING INTERNATIONAL, INC., a Nevada
corporation,

25 Nominal Defendant.
26

Case No.: A-15-719860-B

Dept. No.: XI

Case No.: P-14-082942-E

Dept. No.: XI

Related and Coordinated Cases

BUSINESS COURT

DECLARATION OF COUNSEL
MARSHALL M. SEARCY III

1 **DECLARATION OF COUNSEL MARSHALL M. SEARCY III**

2 I, Marshall M. Searcy III, state and declare as follows:

3 1. I am a member of the bar of the State of California, and am an attorney with Quinn
4 Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), attorneys for Defendants Margaret
5 Cotter, Ellen Cotter, Guy Adams, Edward Kane, Douglas McEachern, Judy Coddington, and Michael
6 Wrotniak. I make this Declaration based upon personal, firsthand knowledge, except where stated
7 to be on information and belief, and as to that information, I believe it to be true. If called upon to
8 testify as to the contents of this Declaration, I am legally competent to testify to its contents in a
9 court of law.

10 2. As permitted by the attorney ethical codes of both California and Nevada, while the
11 above named Defendants are my clients, as indicated under Nevada’s corporate code, Reading
12 International, Inc. is the party responsible for paying all fees and costs incurred on behalf of these
13 Defendants, each of whom prevailed in this litigation.

14 3. This Declaration is submitted in support of Nominal Defendant RDI’s Motion for
15 Attorneys’ Fees and Costs. The information contained in this declaration and the invoices from
16 Quinn Emanuel are not intended to waive the attorney-client or work product privileges, nor
17 should they be construed to waive those privileges.

18 4. Quinn Emanuel has frequently been named the “Business Litigation Law Firm of
19 the Year” by numerous publications, including Benchmark Litigation (2018), Legal 500 USA
20 (2015), ACQ Global Awards (2015), Worldwide Financial Advisor Awards Magazine Continental
21 Award (2013-2015), Vault (2014), Dealmakers (2013-2015), and Lawyer’s World (2013). Quinn
22 Emanuel’s business litigation practice is consistently ranked in virtually every national
23 publication, and in 2012, 2014 and 2016 Legal Business named Quinn Emanuel “US Law Firm of
24 the Year”. The firm has also been voted as one of the four “most feared” firms by General
25 Counsels at Fortune 500 companies. Quinn Emanuel’s partners have tried over 2,645 trials and
26 arbitrations and have won 88% of them.

27 5. As noted above, I am a partner at Quinn Emanuel. I am a graduate of Harvard Law
28 School and have been practicing for over 20 years. I have been recognized as one of Southern

1 California's "Super Lawyers." I specialize in securities litigation and class action litigation. I
2 have worked on this case since its inception in June 2015. In June 2015, my hourly rate was
3 \$845.75, which increased to \$964.75 by July 2018.

4 6. Chris Tayback is a partner at Quinn Emanuel. Mr. Tayback is a graduate of
5 Harvard Law School and a Fellow of the American College of Trial Lawyers. He has been rated
6 "AV Preeminent" by Martindale Hubbell, its highest rating. He is also a member of the Multi-
7 Million Dollar Advocates Forum, the Association of Business Trial Lawyers, and for over 10
8 years has been recognized as one of Southern California's "Super Lawyers." Mr. Tayback has
9 tried or arbitrated over 100 cases, civil and criminal, in multiple states. Mr. Tayback has served as
10 lead counsel in this case from its inception till present. Mr. Tayback's hourly rate in June 2015
11 was \$913.75, which increased to \$1,147.50 by July 2018.

12 7. David Armillei is Of Counsel at Quinn Emanuel. Mr. Armillei is a graduate of
13 Stanford Law School and has been practicing for over 15 years. He specializes in complex
14 securities litigation and has obtained dozens of favorable results for his clients, including
15 settlements worth billions of dollars. Mr. Armillei also served a two-year term as a law clerk for
16 the Honorable Colleen Kollar-Kotelly, United States District Judge for the District of Columbia.
17 Mr. Armillei's hourly rate in April 2016 was \$774.00, which increased to \$805.50 by July 2018.

18 8. Noah Helpern is Of Counsel at Quinn Emanuel. Mr. Helpern is a graduate of
19 Harvard Law School and has been practicing for over 11 years. His practice focuses on
20 commercial litigation, with an emphasis on class actions and shareholder derivative lawsuits.
21 From 2013 to 2017, Mr. Helpern was named a "Rising Star" by Southern California Super
22 Lawyers. Mr. Helpern's hourly rate in June 2015 was \$661.50, which increased to \$796.50 by
23 July 2018.

24 9. Lauren Lindsay (formerly Lauren Laiolo) is an associate at Quinn Emanuel. Mrs.
25 Lindsay is a graduate of UCLA School of Law and has been practicing for over 7 years. Prior to
26 joining Quinn Emanuel, Mrs. Lindsay served as a law clerk for the Honorable Fernando M.
27 Olguin, District Judge for the United States District Court for the Central District of California.

1 Mrs. Lindsay was added to this case in August 2015. Mrs. Lindsay's hourly rate in August 2015
2 was \$549.00, which increased to \$733.50 by July 2018.

3 10. Skyler Cho was an associate at Quinn Emanuel. Mr. Cho is a graduate of Harvard
4 Law School and has been practicing for over five years. Mr. Cho worked on this case from July
5 2015 until April 2017. Mr. Cho's hourly rate in July 2015 was \$513.00, which increased to \$675
6 by April 2017.

7 11. Ali Moghaddas is an associate at Quinn Emanuel. Mr. Moghaddas is a graduate of
8 Loyola Law School and has been practicing for over three years. Prior to joining Quinn Emanuel,
9 Mr. Moghaddas served as a law clerk for the Honorable Manuel L. Real, District Judge for the
10 United States District Court for the Central District of California. Mr. Moghaddas was added to
11 this case in September 2016. Mr. Moghaddas's hourly rate in September 2016 was \$441.00,
12 which increased to \$585.00 by July 2018.

13 12. Rakan Nazer was an attorney at Quinn Emanuel. Mr. Nazer is a graduate of
14 Southern California Institute of Law and has been practicing for over nine years. Mr. Nazer
15 worked on this case from September 2015 until April 2016. Although hourly rates typically
16 increase annually, Mr. Nazer's hourly rate remained fixed at \$365.00 throughout the course of this
17 case.

18 13. Lili Behm was an associate at Quinn Emanuel. Ms. Behm is a graduate of
19 Northwestern Pritzker School of Law and has been practicing for over three years. Ms. Behm
20 served as a law clerk in the Wisconsin Court of Appeals. Ms. Behm worked on this case from
21 September 2015 until February 2016. Ms. Behm's hourly rate in September 2015 was \$365.00,
22 which increased to \$441.00 by February 2016.

23 14. Homa Akram is an attorney at Quinn Emanuel. Ms. Akram is a graduate of Loyola
24 Law School and has been practicing for over 13 years. Ms. Behm worked on this case from
25 February 2016 until April 2016. Ms. Akram's hourly rate remained fixed at \$738.00 throughout
26 the course of this case.

27 15. Mario Gutierrez is a paralegal at Quinn Emanuel with over 20 years of paralegal
28 experience. He has assisted in over 50 cases, 25 of which have gone to trial. Mr. Gutierrez was

1 added to this case in August 2015. Mr. Gutierrez's hourly rate in August 2015 was \$300.00,
2 which increased to \$310.00 by July 2018.

3 16. Chris Grant is a paralegal at Quinn Emanuel with over 20 years of paralegal
4 experience. He has assisted in over 100 cases, 70 of which have gone to trial. Mr. Grant was
5 added to this case in December 2017. Mr. Grant's hourly rate remained fixed at \$305.00
6 throughout the course of this case.

7 17. I am familiar with the billing rates for attorneys and paralegals in the Las Vegas
8 legal market. While Quinn Emanuel's hourly rates may be higher than those in the Las Vegas
9 legal market, as described more thoroughly in the Motion filed herewith, these rates are fair and
10 reasonable in light of the complexity and sophistication of the legal matters involved. Moreover,
11 courts across the country have found Quinn Emanuel's fees to be fair and reasonable. See
12 Transweb, LLC v. 3M Innovative Props. Co., No. 10-cv-04413-FSH (D.N.J. Sept. 24, 2013) (ECF
13 No. 567) (Special Master's ruling finding that Quinn Emanuel was a "premier litigation firm" and
14 that total fees of \$26,146,493.45 were reasonable); DIRECTV, Inc. v. NWS Corp., Am.
15 Arbitration Assoc., Case No. 72 494 Y 00219 09 NOLG (June 15, 2010) (finding Quinn
16 Emanuel's rates and hours reasonable); Lockton v. O'Rourke, Case No. BC361629 (Cal. Super.
17 Ct. Feb. 23, 2011) (attaching Feb. 14 court order finding Quinn Emanuel's rates and total hours
18 reasonable); Monrovia Nursery Co. v. Rosedale, Case No. BC351140 (Cal. Super. Ct. Jan. 12,
19 2009) (finding Quinn Emanuel's rates and total fees reasonable); Riverside Cnty. Dept. of Mental
20 Health v. A.S., Case No. 08-cv-00503-ABC (C.D. Cal. Feb. 22, 2010) (ECF No. 123) (awarding
21 full amount of attorneys' fees sought for work performed by Quinn Emanuel); Academy of
22 Television Arts & Sciences v. National Academy of Television Arts & Sciences, Am. Arbitration
23 Assoc., Case No. 72 140 00247 07 JENF at ¶ 2.2 (May 19, 2008) (finding Quinn Emanuel's
24 billable rates and hourly totals reasonable); In re Am. Home Mortgage Holdings, Inc., Case No.
25 07-11047, Dkt. 3695 (Bankr. D. Del. Apr. 14, 2008) (finding attorneys' fees requested by Quinn
26 Emanuel were reasonable); Packaging Advantage Prop. Assocs., LLC v. Packaging Advantage
27 Corp., Case No. VC045957 (Cal. Super. Ct. Nov. 6, 2007) (granting full amount of Quinn
28 Emanuel's fee request); Bistro Executive, Inc. v. Rewards Network, Inc., Case No. 04-cv-4640-

1 CBM (C.D. Cal. Nov. 19, 2007) (ECF No. 357) (finding Quinn Emanuel's attorney rates and
2 hours were reasonable).

3 18. All the work performed in this case was necessary to obtain the results reflected in
4 this Court's certified Judgment dated January 4, 2018 (granting summary judgment as to
5 Individual Defendants Edward Kane, Douglas McEachern, Judy Coddington, Michael Wrotniak and
6 William Gould) and the Findings of Fact and Conclusions of Law dated August 8, 2018 (granting
7 summary judgment as to the remaining Individual Defendants Ellen Cotter, Margaret Cotter and
8 Guy Adams) (entered on August 16, 2018). Individual Defendants' counsel performed extensive
9 research, conducted dozens of depositions and prepared related motions including numerous
10 motions to dismiss, motions to compel and motions for summary judgment. In addition, counsel
11 prepared for and attended countless hearings on procedural and dispositive motions and performed
12 extensive work in preparation for trial, which never came to pass. All the work done was
13 consistent with civil litigation practice in Las Vegas, Nevada in similar cases. This case presented
14 unique legal issues along with a complex and protracted procedural history. Indeed, the Court and
15 counsel often remark of the lack of any comparable case to this in the country. Additionally, this
16 case was extremely contentious.

17 19. In connection with the foregoing work, each timekeeper's work was billed on an
18 hourly basis and reflected in Quinn Emanuel's monthly invoices, which were required to be made
19 at or about the time of the activity reflected therein.

20 20. Quinn Emanuel's monthly bill totals are as follows: \$121,145.03 billed on July 15,
21 2015; \$159,061.55 billed on August 19, 2015; \$309,147.81 billed on September 16, 2015;
22 \$394,966.02 billed on October 12, 2015; \$482,009.03 billed on November 5, 2015; \$329,085.59
23 billed on December 3, 2015; \$312,637.09 billed on January 15, 2016; \$195,635.50 billed on
24 February 19, 2016; \$384,648.85 billed on March 15, 2016; \$478,375.06 billed on April 14, 2016;
25 \$674,728.93 billed on May 18, 2016; \$592,783.11 billed on June 8, 2016; \$516,177.10 billed on
26 July 12, 2016; \$490,168.18 billed on August 4, 2016; \$655,640.10 billed on September 15, 2016;
27 \$728,171.60 billed on October 17, 2016; \$726,059.70 billed on November 10, 2016; \$312,896.17
28 billed on December 12, 2016; \$281,673.86 billed on January 11, 2017; \$249,377.61 billed on

1 February 15, 2017; \$141,917.04 billed on March 10, 2017; \$51,699.47 billed on April 12, 2017;
2 \$37,116.27 billed on May 8, 2017; \$88,882.64 billed on June 13, 2017; \$42,600.09 billed on July
3 13, 2017; \$63,817.78 billed on August 4, 2017; \$38,447.09 billed on September 7, 2017;
4 \$35,990.90 billed on October 5, 2017; \$99,006.68 billed on November 10, 2017; \$300,431.84
5 billed on December 18, 2017; \$938,134.47 billed on January 10, 2018; \$500,000.92 billed on
6 February 8, 2018; \$132,504.77 billed on March 5, 2018; \$118,075.19 billed on April 12, 2018;
7 \$214,672.00 billed on May 14, 2018; \$314,272.31 billed on June 14, 2018; and \$385,679.75 billed
8 on July 16, 2018.

9 21. In total, Quinn Emanuel billed Individual Defendants \$11,734,276.77 for services
10 performed relating to Individual Defendants' defense of Plaintiff James Cotter, Jr.'s claims.

11 19. This Declaration is made in good faith and not for the purpose of delay.

12 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing
13 is true and correct.

14 Executed on September 7, 2018, in Los Angeles, California.

15
16 /s/ Marshall M. Searcy III
Marshall M. Searcy III
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT C

1 **DECL**
2 **COHEN|JOHNSON|PARKER|EDWARDS**

3 H. STAN JOHNSON, ESQ.
4 Nevada Bar No. 00265
5 sjohnson@cohenjohnson.com
6 375 East Warm Springs Road, Suite 104
7 Las Vegas, Nevada 89119
8 Telephone: (702) 823-3500
9 Facsimile: (702) 823-3400

10 Attorneys for Defendants Margaret Cotter,
11 Ellen Cotter, Douglas McEachern, Guy Adams,
12 Edward Kane, Judy Coddington, and Michael Wrotniak

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 JAMES J. COTTER, JR., individually and
16 derivatively on behalf of Reading
17 International, Inc.,

18 Plaintiff,

19 v.

20 MARGARET COTTER, et al,

21 Defendants.

22 In the Matter of the Estate of

23 JAMES J. COTTER,

24 Deceased.

25 JAMES J. COTTER, JR.,

26 Plaintiff,

27 v.

28 READING INTERNATIONAL, INC., a
Nevada corporation; DOES 1-100, and ROE
ENTITIES, 1-100, inclusive,

Defendants.

Case No. A-15-719860-B
Dept. No. XI

Coordinated with:

Case No. P 14-082942-E
Dept. XI

Case No. A-16-735305-B
Dept. XI

**DECLARATION OF H. STAN
JOHNSON IN SUPPORT OF
MOTION FOR FEES**

DECLARATION OF H. STAN JOHNSON

I, H. STAN JOHNSON, declare as follows:

1. I am a duly licensed attorney, authorized to practice law in the State of Nevada. I am a partner with the law firm of Cohen|Johnson|Parker|Edwards ("CJPE"), local counsel for Defendants Margaret Cotter, Ellen Cotter, Douglas McEachern, Guy Adams, Edward Kane, Judy Coddington, and Michael Wrotniak ("Defendants") in the above-captioned action.
2. The facts contained herein are of my personal knowledge, and if called upon, I could and would competently testify to them.
3. This declaration is submitted in support of RDI's Motion for Attorneys' Fees.
4. The CJPE attorneys' fees incurred by Defendants' representation in this action total \$71,012.00.
5. CJPE's fees for each month it provided services related to this action are:

Invoice Month	Amount Billed
July 2015	\$493.50
August 2015	\$1,519.00
September 2015	\$2,434.50
October 2015	\$4,388.50
November 2015	\$1,666.50
December 2015	\$875.50
January 2016	\$1,125.50
February 2016	\$2,421.00
March 2016	\$4,556.00
April 2016	\$2,886.00
May 2016	\$2,523.50
June 2016	\$1,170.00
July 2016	\$525.00
August 2016	\$4,017.50
September 2016	\$1,890.00
October 2016	\$6,462.50
November 2016	\$310.00
December 2016	\$1,160.00
January 2017	\$1,172.50
February 2017	\$1,042.50
March 2017	\$675.00
April 2017	\$70.00
May 2017	\$0.00
June 2017	\$692.50
July 2017	\$100.00
August 2017	\$62.50
September 2017	\$750.00
October 2017	\$870.00
November 2017	\$2,232.50

December 2017	\$4,815.00
January 2018	\$7,355.00
February 2018	\$1,117.5
March 2018	\$1,062.50
April 2018	\$1,137.50
May 2018	\$1,902.50
June 2018	\$4,090.00
July 2018	\$332.50
August 2018	\$1,025.00
September 2018	\$82.50
Total	\$71,012.00

6. The name and role of the CJPE timekeepers who worked on this action and their hourly rates are as follows:


Name	Title	Hourly Rate
H. Stan Johnson, Esq.	Attorney	\$350.00
C.J. Barnabi	Law Clerk	\$125.00
Jennifer Russell	Legal Assistant	\$95.00
Michael V. Hughes, Esq.	Attorney	\$220.00
Sarah Gondek	Paralegal	\$125.00
James L. Edwards., Esq.	Attorney	\$350.00
C.J. Barnabi, Esq.	Attorney	\$250.00
Kevin M. Johnson, Esq.	Attorney	\$250.00

7. CJPE's attorneys and staff diligently pursued this matter to conclusion, ensuring all tasks were assigned and performed timely and effectively.
8. The amount of CJPE attorneys' fees incurred by Defendants in this action are reasonable for the reasons set forth in RDI's Motion for Attorneys' Fees.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on this 6th day of September, 2018.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


H. Stan Johnson, Esq.