

UNITED STATES DISTRICT COURT

Eastern District of California

PLANS, Inc.

BILL OF COSTS

V.

Case Number: CIV.S-98-0266 FCD PAN

SACRAMENTO CITY UNIFIED SCHOOL DISTRICT, TWIN RIDGES ELEMENTARY SCHOOL DISTRICT, DOES 1-100

Judgment having been entered in the above entitled action on 10-4-05 against Plaintiff Plans, Inc.,
Date
the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ _____
Fees for service of summons and subpoena	_____
Fees of the court reporter for all or any part of the transcript necessarily obtained for use in the case . . .	_____ 4,465
Fees and disbursements for printing \$2009.24 (thru 11-04) + \$1361.76	=+ _____ 3,371
SEE APPENDIX "B"	
Fees for witnesses (itemize on reverse side)	_____
Fees for exemplification and copies of papers necessarily obtained for use in the case	_____
Docket fees under 28 U.S.C. 1923	_____
Costs as shown on Mandate of Court of Appeals	_____
Compensation of court-appointed experts	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	_____
Other costs (please itemize)	_____ 3,158
Defense Expert Witness Fees and Expenses (One-Half) -- SEE APPENDIX "A"	TOTAL \$ _____ 10,994

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

DECLARATION

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill was mailed today with postage prepaid to: Scott M. Kendall, Counsel for Plaintiff, 9401 E. Stockton Blvd., Suite 210, Elk Grove, California 95624

Signature of Attorney: *Susan R. Denious*

Name of Attorney: Susan R. Denious, KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD

For: Defendant Sacramento City Unified School District Date: 10-19-05
Name of Claiming Party

Please take notice that I will appear before the clerk who will tax said costs on _____ at _____
Costs are taxed in the amount of _____ and included in the judgment.

Clerk of Court By: _____ Deputy Clerk Date _____

APPENDIX A

ITEMIZATION

FEEES AND COSTS OF DR. DOUGLAS SLOAN, *DEFENSE EXPERT WITNESS*, WHICH WERE SPLIT -- WITH EACH DEFENDANT DISTRICT PAYING ONE-HALF

Expert Witness fees for Dr. Douglas Sloan

Total Fee	\$ 5,000.00 x 1/2 =	\$ 2,500.00
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Expenses for Dr. Douglas Sloan

1. Mileage: Chatham, NY - New York City Round Trip 240 miles @ \$.40/ mile, Sept. 2005	\$ 96.00 x 1/2 =	\$ 48.00
2. Airline Ticket - Round Trip NYC- Sacramento Original Ticket \$ 478.29 Change to return fee \$50.00, Sept. 2005	\$ 528.29 x 1/2 =	\$ 264.14
3. Holiday Inn Sacramento - 3 nights Accommodations & Food \$544.34 Maid tip \$10.00, Sept. 2005	\$ 554.34 x 1/2 =	\$ 277.17
4. Taxi Cabs -- All in Sept. 2005 NYC-La Guardia \$28.00 Sacramento Airport to Holiday Inn \$36.00 Holiday Inn to Sacramento Airport \$40.00 La Guardia to NYC \$28.00	\$ 132.00 x 1/2 =	\$ 66.00
5. Lunch -- Atlanta Airport, 9/10/05	\$ 6.35 x 1/2 =	\$ 3.18

Subtotal: Expenses	\$1,316.98 x 1/2 =	\$ 658.49
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TOTAL EXPERT WITNESS COSTS DR. DOUGLAS SLOAN	\$6,316.98 x 1/2 =	\$3,158.49
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APPENDIX B

SACRAMENTO CITY UNIFIED SCHOOL DISTRICT'S

Itemization of Copying Costs during period December 1, 2004 through October 4, 2005

<u>Date</u>	<u>Document Name</u>	<u># of Pages</u>	<u>Cost Per Page</u>	<u>Total</u>
3-25-05	Defendants' Joint Reply to Plaintiff's Opposition to Motion in Limine No. Eleven (11) to Exclude Testimony By Witnesses Not Previously Disclosed Served by Mail on Frederick J. Dennehy ONLY	1 Set x 5 pages each = 5	\$ 0.12	\$ 0.60
3-25-05	Defendants' Joint Reply to Plaintiff's Opposition to Motion in Limine No. Twelve (12) to Exclude Exhibits Not Previously Produced Served by Mail on Frederick J. Dennehy ONLY	1 Set x 5 pages each = 5	\$ 0.12	\$ 0.60
3-25-05	Defendants' Joint Reply to Plaintiff's Opposition to Motion in Limine No. Thirteen (13) to Exclude Experts Not Properly Disclosed by Plaintiff Served by Mail on Frederick J. Dennehy ONLY	1 Set x 7 pages = 7	\$ 0.12	\$ 0.84
8-22-05	Defendants' Joint Trial Exhibits, lettered A through T (1,368 pages) with distribution as follows 1 set -- Court (to accompany originals) per pretrial conference order 1 set -- Scott M. Kendall 1 set -- Jonathan Paul Huber 1 set -- Frederick J. Dennehy	7 Sets x 1,368 pages = 9,576	\$ 0.12	\$ 1,149.12

	<p>1 set – Girard & Vinson</p> <p>1 set – Katherine L. Thivierge</p> <p>1 set – Robert J. Sullivan</p>			
8-22-05	<p>Sacramento City Unified School District's Trial Exhibits, Exhibits Lettered U through AA (230 pages) with distribution as follows:</p> <p>1 set -- Court (to accompany originals) per pre-trial conference order</p> <p>1 set – Scott M. Kendall</p> <p>1 set – Jonathan Paul Huber</p> <p>1 set – Frederick J. Dennehy</p> <p>1 set – Girard & Vinson</p> <p>1 set – Katherine L. Thivierge</p> <p>1 set – Robert J. Sullivan</p>	<p>7 Sets x 230 pages = 1,610 pages</p>	\$ 0.12	\$ 193.20
8-29-05	<p>Trial Brief of Sacramento City Unified School District</p>	<p>1 Set x 15 pages = 15</p>	\$ 0.12	\$ 1.80
9-01-05	<p>Defendants' Joint Objections to Plaintiff's Exhibits</p> <p>Served by Mail on Frederick J. Dennehy ONLY</p>	<p>1 Set x 45 pages = 45</p>	\$ 0.12	\$ 5.40
9-06-05	<p>Defendants' Joint Designation of Plaintiff's Responses to Interrogatories and to Request for Admission to be Offered into Evidence</p> <p>Served by Mail on Frederick J. Dennehy ONLY</p>	<p>1 Set x 73 pages = 69</p>	\$ 0.12	\$ 8.28
9-16-05	<p>Defendants' Joint Objections to Plaintiff's Exhibit 89; Defendants' Joint Motion for Judgment Under Federal Rule of Civil Procedure 52© With Proposed Findings</p>	<p>1 Set x 16 pages = 16</p>	\$ 0.12	\$ 1.92

	of Fact and Conclusions of Law Served by Mail on Frederick J. Dennehy ONLY			
	TOTAL PAGES FOR THE 12-1-04 THROUGH 10-04-05 TIME PERIOD	11,348 pages	\$ 0.12	\$ 1,361.76