

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

RELIGIOUS TECHNOLOGY CENTER
a California corporation,

Plaintiff,

vs.

DELL LIEBREICH, Individually and as
Personal Representative of the Estate of
Lisa McPherson,

Defendant.

Civil Action No. 6:OOCV503
Judge Hannah

**DECLARATION OF
SAMUEL D. ROSEN IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES AND
EXPENSES**

I, SAMUEL D. ROSEN, hereby declare the following to be true and accurate under pain and penalty of perjury:

1. I am a partner in the law firm of Paul Hastings Janofsky & Walker, LLP ("Paul Hastings"). I have personal knowledge of the facts set forth below, and if called upon to do so, could and would competently testify thereto.

2. I received a Bachelor of Arts degree in Philosophy from Boston University in 1966, a J.D. degree, *cum laude*, from Suffolk University Law School in 1969 (where I was graduated first in my class), and an L.L.M. degree from New York University Law School in 1971. From 1977 to 1992, I was a partner in the firm of Milgrim, Thomajan & Lee. In 1992, I and approximately 24 other attorneys from that firm, including name partners Roger Milgrim and Alfred Lee, joined Paul Hastings. I have served as Vice-Chair of the Paul, Hastings Litigation Department and have served as the senior partner in our firm's New York-based litigation practice group.

3. In the 33 years I have been privileged to practice law, first as a trial attorney for the federal government (1969-1971) and in private practice, I have been lead counsel in hundreds of cases.

4. I was admitted to the Bar of the State of New York in 1969 and have been a member thereof in good standing continuously. I was admitted to the Southern and Eastern Districts of New York in 1971, and the Second Circuit Court of Appeals in 1975. I am also admitted to, and have had the privilege of representing clients before, the Courts of Appeal for the First, Third, Fourth, Fifth, Seventh, Eighth, Ninth, Eleventh, and the Federal Circuits. I have been a member of the bar of the Fifth Circuit Court of Appeals for 20 years and have argued several cases there.

5. By virtue of *pro hac vice* admissions, I have represented clients in over fifty (50) U.S. District Courts and Divisions, including every District Court in the State of Texas. I have argued cases in the Northern, Southern, and Western Districts of Texas. I am and have long been a member of various bar associations including the ABA and the New York State Bar Association. I have long served as a member of the Editorial Board of the law review-style publication, *The Trademark Reporter*®. I have also served as a member of the Suffolk Law School Dean's Committee on Curriculum. I have been written up in several magazines – legal and general circulation – on several of my cases. I have published several articles. An article of mine was cited as authoritative in a decision by the U.S. Supreme Court.

6. Reflective of my experience as a litigator, I was selected ten (10) years ago by the Board of Judges of the Eastern District of New York federal court as one of the charter *pro bono* arbitrators in that Court's mandatory arbitration program. Similarly, in 1995, I was selected by the Board of Judges of the Southern District of New York federal court as one of the charter

mediators in that Court's mandatory mediation program. Further, in a trademark/antitrust case styled, "Lloyd's of London v. Lloyd's U.S.," former Attorney General of Texas, Waggoner Carr, was appointed special master by the Western District of Texas to oversee pretrial proceedings. At the end of the case, Attorney General Carr told the Court (Judge Nowlin) in my presence that he had never before seen the quality of briefing that he received from me.

7. My firm was engaged to assist plaintiff Religious Technology Center ("RTC") prior to the commencement of this litigation, and counsel from my firm have participated extensively in every phase of this litigation.

8. The expertise of the associates from my firm who worked on this case are comparable, albeit given their lesser years of experience.

9. The attorneys and paralegals of my firm who worked on this case and their applicable hourly rates are below. The hours each expended in this case are shown in our firm's billing statements annexed hereto as Exhibit A (in order to avoid any question on this motion, I have also attached here the underlying time records as Exhibit B), with certain charges eliminated that are not properly recoverable as a fee in this case. Each attorney kept contemporaneous records of hours, which were then input into a computer:

Samuel D. Rosen, hourly rate of \$550 in 2000, \$575 in 2001 and 2002.
Kimberly J. Koerner, hourly rate of \$390.00 in 2001 and \$400.00 in 2002.
Romy E. Berk, hourly rate of \$320.
Timothy D. Lynch, hourly rate of \$205.

10. On this application, RTC seeks counsel fees for services performed by my firm through March 13, 2002 in the amount of \$174,652.75, as of 2/28/02. This amount does not include time I spent as a trial witness both in preparation of my testimony on January 23, 2002 and at trial on January 24, 2002 and January 25, 2002. Specifically, one-third of my time for

those three days has been allocated towards counsel time and two-thirds of my time for those three days has been allocated to witness time. This adjustment has been made because during certain periods of time on those days, I acted as trial counsel and during other periods as a trial witness. Accordingly, RTC has adjusted the fee part of its application to seek only those attorneys' fees incurred for time I spent as trial counsel as opposed to a trial witness, and consequently has subtracted \$3,067.00, \$3,450.00, and \$6,133.00 from the fee portion of our request for January 23, January 24, and January 25, respectively. The total amount thus subtracted from the fee portion of the application is \$12,650.00 (- \$80 for two days of witness fees being included in cost bill), but this amount appears in the witness cost portion of the application.

11. On its application, RTC also seeks reimbursement of \$32,100.50 for expenses and disbursements made by my firm while acting as trial counsel in the instant action and posted in my firm's books as of February 28, 2002.

12. The Paul Hasting's billing statements and time sheets attached as Exhibits A & B reflect only those fees and expenses incurred by my firm which were posted through February 28, 2002.

13. Although no bill has yet been generated or tendered to RTC for my firm's post-February 28, 2002 services, the records of my firm reflect the following time billed to this matter after that date, all of which will, in due course, be billed to RTC:

March 1, 2002	-	\$ 8,675.00
March 2, 2002	-	\$ 0
March 3, 2002	-	\$ 0
March 4, 2002	-	\$ 243.75
March 5, 2002	-	\$ 1,150.00
March 6, 2002	-	\$ 143.75
March 7, 2002	-	\$ 0

March 8, 2002	-	\$ 0
March 10, 2002	-	\$ 575.00
March 11, 2002	-	\$ 1,437.50
March 12, 2002	-	\$ 2,975.00
March 13, 2002	-	\$ 575.00
Total:	-	\$15,775.00

Copies of these time sheets are attached as Exhibit C.

In addition, disbursements posted post-February 28 to RTC for this matter, all of which will be billed in due course, are:

Airline tickets	-	\$ 0
Hotel	-	\$ 459.91
Telephone	-	\$ 78.00
Other Expenses (food, car services, etc.)	-	\$ 213.18
Total:	-	\$ 751.09

14. The fees being requested are at reasonable rates for attorneys having the level of experience and professionalism of the members of our litigation team and are the usual and customary fees billed to all of our firm's clients for our comparable services. Respecting the expenses and disbursements incurred by my firm and billed to RTC, they are all reasonable, necessary and consistent in both kind and amount with those my firm regularly and customarily bills to our clients.

15. Respecting the reasonableness of our firm's hourly rates for the services of myself and the other attorneys who worked on this case, once a year we review and adjust hourly rates based upon what similarly experienced and credentialed attorneys charge in New York and elsewhere. Thus, while our New York rates are somewhat higher than those of our counterparts in other areas, excluding the New York geographic component which reflects a higher cost of living and of doing business, I believe that the hourly rates of myself and the others from my firm

Law Offices Of
PAUL, HASTINGS, JANOFSKY & WALKER LLP
A Limited Liability Partnership Including Professional Corporations
Thirty-First Floor
399 Park Avenue
New York, New York 10022-4697
Telephone (212) 318-6000

(Revised 11/28/00)
September 30, 2000

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Invoice No. 72270

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered
in June and July (not heretofore billed)
and August, 2000 relating to conferring
with client regarding background facts;
reviewing data pertinent to possible
insurance coverage; considering motion
for summary judgments and initially
engaging work thereon and miscellaneous
related activities.

Partner

SDR ~~14.40~~ hrs @ \$550
13.90

Associate

TDL 20.60 hrs @ \$205

~~\$12,143.00~~
11,868.00

A

Page 2
Religious Technology Center
Invoice No. 72270

Disbursements

Photocopying	\$ 3.80	
Facsimiles	63.75	
West Law	<u>5,580.96</u>	

\$ 5,648.51

~~\$17,791.51~~

\$17,516.51



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October 20, 2000

Mr. Warren McShane
 Religious Technology Center
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

Barbara Griffin
 Religious Technology Center
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

Invoice No. 72292

RTC - v. Liebreich
 Our File No. 24437.02700

For professional services rendered
 September 2000 including conferring
 with client and reviewing client materials;
 reviewing Liebreich's Rule 11 motion;
 reviewing draft opposition papers with
 respect to Liebreich's motion to dismiss;
 reviewing cases accumulated for summary
 judgment motion and miscellaneous related
 matters.

Partner

SDR 10.40 hrs @ \$550
~~RMO 1.90 hrs @ \$445~~

~~\$ 6,565.50~~
 \$ 5,720.00

Disbursements

Meals \$ 10.50
 Facsimile 10.00

\$ 20.50

~~\$ 6,586.00~~
\$ 5,740.00

ok

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November 14, 2000

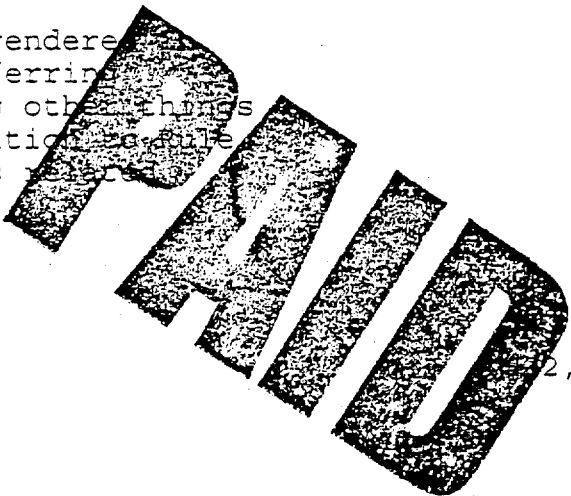
Mr. Warren McShane
 Religious Technology Center
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

Barbara Griffin
 Religious Technology Center
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

Invoice No. 72439

RTC - v. Liebreich
 Our File No. 24437.02700

For professional services rendered
 October 2000 including conferring
 with client regarding among other things
 summary judgment and opposition to file
 11 motion and miscellaneous
 matters.



Partner

SDR 5.00 hrs @ \$550

2,750.00

Disbursements

Telephone Charges	\$ 3.00
Travel Related Expenses	14.55
Courier Service	37.23
Facsimile	<u>15.00</u>

\$ 69.78

\$ 2,819.78

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December 13, 2000

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Invoice No. 72541

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in
July and October (not heretofore billed)
and November 2000 including reviewing
Dandar's motion for reconsideration;
reviewing and revising brief opposing
that motion; conferring with client;
reviewing Dandar's supplemental motion
for rehearing; reviewing Liebreich's
opposition to summary judgment motion
and miscellaneous related matters.

Partner

SDR 3.60 hrs @ \$550

\$ 1,980.00

Disbursements

Telephone Charges \$ 4.00
Facsimile 73.75

\$ 77.75

\$ 2,057.75

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January 11, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Invoice No. 72625

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in
December 2000 including preparation for
conference call with Texas court and
participation in conference call;
reviewing various correspondence and
miscellaneous related matters.

Partner

SDR 6.90 hrs @ \$550

\$ 3,795.00

Disbursements

Travel Related Expenses	\$2,202.04
Telephone Charges	79.54
Facsimile	18.75

\$ 2,300.33

\$ 6,095.33

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February 22, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 72701

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in January 2001, including reviewing communications with Texas counsel; conferring with client; reviewing Dandar correspondence regarding deposition; traveling to Dallas and attending local meeting; rewriting brief opposing Liebreich motion for summary judgment; preparing for completion of preparation of deposition of Liebreich; advising client with respect to highlights of deposition of Dell and possible claims against Minton Dandar etc.; conferring with client; working on motion for argument; miscellaneous related matters.

Partner

SDR 44.85 hrs @ \$575

\$25,788.75

Page 2
Religious Technology Center
Invoice No. 72701

Disbursements

Travel Expenses	\$ (972.29)
Telephone Charges	16.67
Travel Related Expenses	818.38
Courier Services	51.34
Photocopying Charges	8.00
Facsimile Charges	352.50
Westlaw	<u>379.04</u>

\$ 653.64

\$26,442.39

070
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Telephone (212) 318-6000

March 12, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 72779

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in January (not heretofore billed) and February 2001 including conferring with client regarding Dandar's proposed deposition of Mr. McShane and COB; reviewing correspondence with Dandar; reviewing opposition to motion for discovery; considering and revising opposition to motion for transfer of venue and miscellaneous related matters.

Partner

SDR 20.80 hrs @ \$575

\$11,960.00

Page 2
Religious Technology Center
Invoice No. 72779

Disbursements

Telephone Charges	\$ 25.62	
Travel Related Expenses	180.04	
Courier Services	57.72	
Photocopying Charges	137.00	
Facsimile Charges	191.25	
Secretarial Charges	<u>560.00</u>	
		<u>\$ 1,151.63</u>
		<u>\$13,111.63</u>

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(Revised 4/30/01)

April 18, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 72903

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in March 2001, including reviewing counsel memorandum regarding motion to compel document production and oral argument; reviewing Liebreich's opposition to motion to amend complaint; reviewing opposition to motion to compel document production; drafting, reviewing and revising brief and McShane affidavit and miscellaneous related matters.

Partner

SDR ~~12.85~~ hrs @ \$575
12.10

Associate

ADS ~~23.70~~ hrs @ \$185

Paralegal

JVC ~~1.25~~ hrs @ \$100

~~\$11,898.25~~
\$ 6,957.50

Page 2
Religious Technology Center
Invoice No. 72903

Disbursements

Telephone Charges	\$	7.84
Courier Services		58.06
Facsimile Charges		<u>41.25</u>

\$ 107.15

~~\$12,005.40~~

\$ 7,064.65

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May 23, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73019

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in late March (not heretofore billed) and April 2001 including extensively conferring with client regarding identification of trial witness and orders from Texas court; reviewing opposition to defendant's motion for reargument; reviewing and revising submission to court concerning damages; reviewing court orders and miscellaneous related matters.

Partner

SDR ~~11.50~~ hrs @ \$575
 11.25

\$ ~~6,612.50~~
\$ 6,468.75

Page 2
Religious Technology Center
Invoice No. 73019

Disbursements

Travel Related Expenses	\$ 143.29
Telephone Charges	31.24
Courier Services	35.36
Facsimile Charges	<u>105.00</u>

\$ 314.89

~~\$ 6,927.39~~

\$ 6,783.64

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June 12, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73070

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in May 2001, including reviewing Dandar's latest motions; reviewing and revising brief opposing Dandar's motion to dismiss on grounds of extortion; reviewing and revising opposition to Dandar's latest motion for attorneys' fees; reviewing and revising draft pretrial order and miscellaneous related matters.

Partner

SDR 9.50 hrs @ \$575

Associate

REB 1.25 hrs @ \$320

\$ 5,862.50

Page 2
Religious Technology Center
Invoice No. 73070

Disbursements

Telephone Charges	\$ 3.00	
Courier Services	17.69	
Facsimile Charges	<u>67.50</u>	
		<u>\$ 88.19</u>
		<u>\$ 5,950.69</u>

OK

86,831.35

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July 19, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73197

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in
June 2001 including reviewing jury
questionnaire, revising request to
charge; reviewing Court's order on
Dandar's motion for continuance,
resetting trial date etc.; revising
jury instructions; reviewing
correspondence and miscellaneous
related matters.

Partner

SDR 5.25 hrs @ \$575

Associate

REB 7.80 hrs @ \$320

\$ 5,514.75

Page 2
Religious Technology Center
Invoice No. 73197

Disbursements

Telephone Charges	\$ 18.51	
Courier Services	12.45	
Facsimile Charges	<u>70.00</u>	
		\$ <u>100.96</u>
		<u>\$ 5,615.71</u>

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October 11, 2001

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73362

RTC - v. Liebreich
Our File No. 24437.02700

For miscellaneous professional services
rendered in September 2001.

Partner

SDR 1.00 hrs @ \$575

\$ 575.00

Disbursements

Telephone Charges

\$ 4.85

\$ 4.85

\$ 579.85

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399 Park Avenue
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January 9, 2002

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73589

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in
December 2001, of a miscellaneous
nature involving reviewing and revising
three in limine motions; extensively
conferring with client reviewing
correspondence and materials supplied
and considering the late filing of
Dandar's trial exhibits and
miscellaneous related matters.

Partner

SDR 5.00 hrs @ \$575

\$ 2,875.00

Disbursements

Telephone Charges \$ 12.00
Facsimile Charges 22.50

\$ 34.50

\$ 2,909.50

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February 14, 2002

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73676

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in January 2002, pertaining to in limine motions in Texas; reviewing correspondence in file; preparing for Dallas trial; preparing for pre-trial conference, jury selection; preparing for trial; trying case; miscellaneous related matters.

Partner

~~RMM 50 hrs @ \$710~~
SDR 74.75 hrs @ \$575

~~\$43,336.25~~
30,331.25

Disbursements

Travel Expenses	\$1,082.00
Travel Related Expenses	50.26
Telephone Charges	15.10
Secretarial Charges	148.75
Postage Charges	.34
Courier Services	173.00
Facsimile Charges	<u>35.00</u>

\$12,650 subtracted from professional services for the time Mr. Rosen spent as a trial witness. This amount is now listed as a Disbursement.

~~\$ 1,504.45~~
14,074.45
\$44,840.70

Also -\$80.00 from Disbursements for witness trial attendance (2 days) being included in bill of costs.

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A Limited Liability Partnership Including Professional Corporations
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399 Park Avenue
New York, New York 10022-4697
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March 13, 2002

Mr. Warren McShane
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Barbara Griffin
Religious Technology Center
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

PHJ&W Tax ID No. 95-2209675

Invoice No. 73682

RTC - v. Liebreich
Our File No. 24437.02700

For professional services rendered in
February 2002.

Partner

SDR 39.50 hrs @ \$575

Associate

KJK 64.75 hrs @ \$400

\$48,612.50

Disbursements

Travel Expenses	\$2,197.00
Travel Related Expenses	3,086.00
Telephone Charges	189.53
Secretarial Charges	140.00
Photocopying Charges	75.40
Westlaw Charges	1,372.08
Facsimile Charges	<u>243.75</u>

\$ 7,303.76

\$55,916.26

DATE: 01/28/02

PAUL, HASTINGS, JANOFSKY & WALKER LLP
PROFORMA
(BILLING SUMMARY REPORT)
Thru: 08/31/00

CLIENT: Religious Technology Center
MATTER: v. Liebreich
NUMBER: 24437-02700

Proforma (BSR) No.: 669242
Joint Bill ID.:
Contact:
Billing Frequency: M
Fee Arrangement: H - Hourly
Billing Template: 13 - 1 - 5
Matter Billing Atty: Roger M. Milgrim
Matter Supervising Atty: Roger M. Milgrim
Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
through 08/31/00

Special Billing Instructions

F: RMM-3665; SDR-3600
**Send Time Detail with Bill*

Professional Services

INSTRUCTION CODES

H - Hold until next Proforma
T - Transfer (give Clt/Mtr ID.)
CH - Change; must edit \$ and include
Adjustment Code

ADJUSTMENT CODES

ED - Education Time
ET - Excessive Time
AG - Agreement W/Clt
OT - Other/not specif.

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
08/09/00	SDR Rosen	.50	550.00	275.00	275.00			8837976	Review of correspondence from client; review of draft Complaint; revise Complaint; draft of correspondence to client and to C. Gall.
08/10/00	SDR Rosen	.50	550.00	275.00	275.00			8837988	Review of correspondence from client; draft of correspondence; telephone conference with client; conference with R. Berk regarding research assignment on Summary Judgment Motion.
08/15/00	SDR Rosen	6.30	550.00	3,465.00	3,465.00			8838013	Review of correspondence from C. Gall's office; review of proposed Pra Hac application for SDR; draft of correspondence to C. Gall's office regarding same; telephone conferences with client regarding finding identity of judge selected for the case and regarding preparation of Summary Judgment Motion; work on Summary Judgment Motion; conference with associate

B

MATTER: 24437-02700

PAUL, HASTINGS, JANOFSKY & WALKER LLP Proforma No.: 669242

Page 2 (2)

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									regarding research issues for Summary Judgment Brief.
08/15/00	TDL Lynch	7.60	205.00	1,558.00	1,558.00			8918872	Conference with S. Rosen to discuss research assignment; legal research for caselaw in support of motion for summary judgment.
08/16/00	TDL Lynch	13.00	205.00	2,665.00	2,665.00			8918873	Legal research on potential issues pertinent to motion for summary judgment.
08/17/00	SDR Rosen	5.50	550.00	3,025.00	3,025.00			8838022	Continue work on Summary Judgment papers; draft of correspondence to client and C. Gall; begin review of cases found by Timothy regarding Texas law on certain issues; conference with R. Berk regarding research assignments for case.
08/21/00	SDR Rosen	.30	550.00	165.00	165.00			8851690	Review of telephone message from Jenkins & Gilchrist and response to it regarding identifying correct contract.
08/22/00	SDR Rosen	.30	550.00	165.00	165.00			8851693	Telephone conference with A. Cartwright regarding draft of Summary Judgment Motion.
08/24/00	SDR Rosen	.50	550.00	275.00	275.00			8851702	Review of correspondence from local counsel; extensive telephone conference with C. Gall regarding comments on draft Summary Judgment brief.

TOTAL FEES: ~~25.00~~ 346.94 ~~42,143.00~~ 11,868.00 12,143.00

TOTAL HELD FEES: .00

DATE: 10/04/00

PAUL, HASTINGS, JANOFSKY & WALKER LLP

PROFORMA

(BILLING SUMMARY REPORT)

Thru: 09/30/00

72292

CLIENT: Religious Technology Center

MATTER: v. Liebreich

NUMBER: 24437-02700

Proforma (BSR) No.: 682579

Joint Bill ID.:

Contact:

Billing Frequency: M

Fee Arrangement: H - Hourly

Billing Template: 13 - 1 - 5

Matter Billing Atty: Roger M. Milgrim

Matter Supervising Atty: Roger M. Milgrim

Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane

Suite 1100

1710 Ivar Avenue

Los Angeles, CA 90028

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
through 09/30/00

Special Billing Instructions

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Professional Services

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ADJUSTMENT CODES

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OT - Other/not specif.

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C = 20.50
6586.00

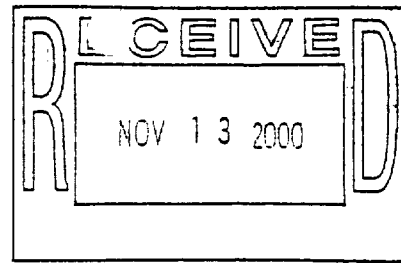
DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
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09/07/00	SDR Rosen	.50	550.00	275.00	275.00			8936422	Review of Liebreich's Rule 11 Motion; review of Liebreich's filing of additional authorities on motion; draft of correspondence to C. Gall and client regarding same.
09/08/00	SDR Rosen	.50	550.00	275.00	275.00			8961184	Telephone conferences with local Dallas counsel and telephone conference with client regarding Dandar's motion to dismiss and motion for sanctions. X

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
09/09/00	SDR Rosen	.50	550.00	275.00	275.00	___	___	8961188	Begin review of motion papers from Jenkins and review of correspondence from client to Jenkins. X
09/12/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	8984041	Telephone conference with client regarding opposing papers on Motion to Dismiss, finalizing Summary Judgment, etc. X
09/16/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	8984056	Review of memorandum from Texas counsel; review of Notice from Court regarding Dandar's filing. X
09/18/00	SDR Rosen	.50	550.00	275.00	275.00	___	___	8984065	Review of correspondence and court order; start review of cases; telephone conference with C. Gall regarding pending motion. X
09/20/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	9024270	Telephone conference with client regarding the logistics on draft of opposition to motion to dismiss; telephone conference with C. Gall regarding motion to dismiss; telephone conference with M. Rinder regarding completing summary judgment motion. X
09/22/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	9024279	Telephone conferences regarding Motions. X
09/23/00	SDR Rosen	1.00	550.00	550.00	550.00	___	___	9024282	Review of draft opposition papers from Liebreich's motion to dismiss; extensive telephone conference with client regarding same; further telephone conference with client and Dallas counsel. X
09/25/00	SDR Rosen	1.30	550.00	715.00	715.00	___	___	9024289	Review and revise latest draft of opposition to motion to dismiss; telephone conferences with client regarding same; review of M. Rathbun's comments on motion papers. X
09/26/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	9042432	Conference with client; review and revise latest draft of opposing papers on motion to dismiss; extensive telephone conference with client and C. Gall; further telephone conference with C. Gall regarding information from local counsel on scheduling. X
09/27/00	SDR Rosen	4.00	550.00	2,200.00	2,200.00	___	___	9042434	Review of cases accumulated for summary judgment motion; review and revise present draft of summary judgment motion and affidavits; telephone conference with Dallas counsel regarding same; conference with client regarding same; further review and revisions in motion papers, brief, affidavits, etc. relating to summary judgment motion.
09/28/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	9073768	Draft of correspondence to C. Gall regarding motion to dismiss and Rule 11 motion.

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	
09/29/00	SDR Rosen	.30	550.00	165.00	165.00			9073772	Telephone conferences with client.

TOTAL FEES: *10.40* *5,720.00*
~~12.30~~ 533.78 ~~4,565.50~~ 6,565.50
 TOTAL HELD FEES: .00
10.40 *5,720.00*



DATE: 11/04/00

PAUL, HASTINGS, JANOFSKY & WALKER LLP
PROFORMA
(BILLING SUMMARY REPORT)
Thru: 10/31/00

CLIENT: Religious Technology Center
MATTER: v. Liebreich
NUMBER: 24437-02700

Proforma (BSR) No.: 695369
Joint Bill ID.:
Contact:

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

72439

Billing Frequency: M
Fee Arrangement: H - Hourly
Billing Template: 13 - 1 - 5
Matter Billing Atty: Roger M. Milgrim
Matter Supervising Atty: Roger M. Milgrim
Client Billing Atty: RMM

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C = 69.78

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
10/01/00	SDR Rosen	.50	550.00	275.00	275.00			9107646	Review of latest draft of our Summary Judgment brief; review of C. Gall's redraft of our brief; telephone conference with client.
10/03/00	SDR Rosen	1.30	550.00	715.00	715.00			9107650	Telephone conference with client; extensive telephone conference with client and Dallas counsel regarding revising Summary Judgment Motion.
10/04/00	SDR Rosen	.30	550.00	165.00	165.00			9107657	Telephone conference with client regarding finalizing Summary Judgment brief.
10/06/00	SDR Rosen	1.30	550.00	715.00	715.00			9130305	Review of draft response to Rule 11 motion and telephone conferences with client regarding same.
10/11/00	SDR Rosen	.30	550.00	165.00	165.00			9146659	Telephone conference with client regarding summary judgment and regarding opposition to Rule 11 motion.
10/12/00	SDR Rosen	.50	550.00	275.00	275.00			9146661	Telephone conference with A. Cartwright

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									regarding revising our summary judgment motion; review of further draft of summary judgment papers and further telephone conference with A. Cartwright regarding revising same.
10/16/00	SDR Rosen	.50	550.00	275.00	275.00	___	___	9157815	Several telephone conferences with client regarding W. McShane's affidavit on Summary Judgment.
10/29/00	SDR Rosen	.30	550.00	165.00	165.00	___	___	9291533	Review of various correspondence from Texas counsel.
TOTAL FEES:		5.00	550.00	2,750.00	2,750.00				
TOTAL HELD FEES:		.00							

DATE: 12/05/00

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 11/30/00

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 709488
 Joint Bill ID.:
 Contact:
 Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

72541

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
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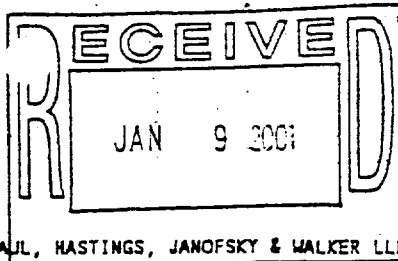
ADJUSTMENT CODES

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 AG - Agreement W/Clnt
 OT - Other/not specif.

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
07/26/00	SDR Rosen	.30	550.00	165.00	165.00			9324429	Telephone conference with M. Rathbun and telephone calls to C. Gall.
10/30/00	SDR Rosen	.30	550.00	165.00	165.00			9311169	Telephone conference with client in Texas.
11/05/00	SDR Rosen	.30	550.00	165.00	165.00			9324441	Review of Dandar's motion for reconsideration.
11/10/00	SDR Rosen	.50	550.00	275.00	275.00			9343984	Review and revise brief opposing Dandar's motion for reargument in Texas; telephone conference with client regarding same.
11/11/00	SDR Rosen	.30	550.00	165.00	165.00			9343989	Review of correspondence and proposed Order.
11/13/00	SDR Rosen	.30	550.00	165.00	165.00			9343995	Review of Dandar's supplemental motion for rehearing and draft of correspondence regarding same.
11/21/00	SDR Rosen	.30	550.00	165.00	165.00			9405284	Telephone conference with A. Cartwright; begin review of Dandar's opposition to summary judgment motion

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
11/26/00	SDR Rosen	.80	550.00	440.00	440.00			9405292	Further review of Liebreich's opposition to summary judgment motion; review of our draft reply to that motion; telephone conference with A. Cartwright; telephone conference with A. Cartwright and G. Stephens regarding revising our reply
11/27/00	SDR Rosen	.50	550.00	275.00	275.00			9478640	Review of latest draft of reply brief on Summary Judgment motion; telephone conferences with A. Cartwright and M. Rathbun regarding edits and changes
TOTAL FEES:		3.60	550.00	1,980.00	1,980.00				
TOTAL HELD FEES:		.00							



DATE: 01/04/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 12/31/00

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 721316
 Joint Bill ID.:

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Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

#72625

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 Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

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6095.33

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
12/03/00	SDR Rosen	.30	550.00	165.00	165.00			9482823	Review of correspondence from C. Gall; review of Court's letter regarding case managing conference in proposed scheduling Order; draft of correspondence regarding same
12/11/00	SDR Rosen	.30	550.00	165.00	165.00			9535640	Telephone conference with A. Cartwright regarding preparation for conference call with Texas court
12/13/00	SDR Rosen	3.30	550.00	1,815.00	1,815.00			9535646	Telephone conference with client; further telephone conference with client and Texas counsel in preparation for hearing with Court
12/14/00	SDR Rosen	.50	550.00	275.00	275.00			9535657	Conference with Court and opposing counsel; further telephone conference with C. Gall regarding disclosures and deposition notices
12/15/00	SDR Rosen	.30	550.00	165.00	165.00			9543333	Telephone conference with client regarding Management Conference and regarding making Rule 21 disclosures on liability and damaged documents

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	
12/18/00	SDR Rosen	.30	550.00	165.00	165.00			9543339	Review of correspondence from C. Gall and review of Rule 26 requirements
12/21/00	SDR Rosen	.30	550.00	165.00	165.00			9565321	Review of correspondence from W. Pope; review of proposed Order regarding deposition of Dell; draft of correspondence to A. Cartwright regarding same
12/22/00	SDR Rosen	.30	550.00	165.00	165.00			9577850	Telephone conference with client regarding depositions, preparations, etc
12/23/00	SDR Rosen	.30	550.00	165.00	165.00			9577854	Telephone conferences with A. Cartwright regarding Dandar's filing in Texas and regarding deposition of Dell
12/28/00	SDR Rosen	.50	550.00	275.00	275.00			9593504	Review of correspondence; draft of correspondence to Dandar; telephone conference with client regarding deposition of Dell in Texas; telephone conferences with Texas counsel regarding arrangements
12/29/00	SDR Rosen	.50	550.00	275.00	275.00			9606150	Telephone conferences with A. Cartwright; draft of correspondence to T. Dandar regarding documents to be produced at deposition; review of list of documents from A. Cartwright
TOTAL FEES:		6.90	550.00	3,795.00	3,795.00				
TOTAL HELD FEES:		.00							

DATE: 02/22/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 01/31/01

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 732906
 Joint Bill ID.:
 Contact:
 Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

72701

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

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INSTRUCTION CODES	ADJUSTMENT CODES
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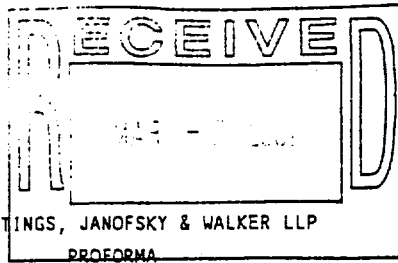
$F = 25,788.75$
 $C = 653.64$
 $\underline{\$24,442.39}$

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
01/03/01	SDR Rosen	2.30	575.00	1,322.50	1,322.50			9639038	Review of correspondence from Texas counsel; telephone conferences with Texas counsel; telephone conferences with T. Dandar regarding depositions of Dell; telephone conference with A. Cartwright regarding same; review of A. Cartwright memorandum and proposed disclosure statement; telephone conference with A. Cartwright regarding same; further telephone conferences with Texas counsel regarding subpoena for deposition of Ken Dandar; begin review of Dandar's motion for summary judgment in Texas case; telephone conference with A. Cartwright regarding same
01/05/01	SDR Rosen	1.30	575.00	747.50	747.50			9639441	Review of correspondence from Dandar regarding upcoming deposition; draft of correspondence; review of Dandar's written response to our document request; review of Dandar's motion for summary judgment; telephone conference with H. Kobrin and A. Cartwright regarding preparing opposition for summary judgment

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
01/08/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	9656440	Telephone conference with A. Cartwright regarding disclosure statements; telephone conference with M. Levin and H. Kobrin regarding redacting documents production to Dandar; telephone conference with M. Rathbun regarding Dandar's request for deposition of W. McShane and D. Miscavige; begin preparation for deposition
01/09/01	SDR Rosen	6.75	575.00	3,881.25	3,881.25	___	___	9656442	Travel to Dallas; attendance at local counsel's office for meeting with client and local counsel; prepare for deposition of Liebreich; revise opposition to Liebreich's motion for summary judgment
01/10/01	SDR Rosen	5.50	575.00	3,162.50	3,162.50	___	___	9656443	Complete rewriting of opposing brief on Liebreich's motion for summary judgment; complete preparation for deposition of Liebreich; attendance at deposition; telephone conference with client; review of latest draft of our brief and affidavit opposing Liebreich's summary judgment motion
01/11/01	SDR Rosen	6.25	575.00	3,593.75	3,593.75	___	___	9656446	Prepare and continue deposition of Liebreich; conference with client; conference with local counsel; continue review of revised brief in opposition to summary judgment motion; attend deposition; travel back to New York; telephone conferences with client regarding court decision on summary judgment motion; draft of various correspondence to opposing counsel regarding discovery matters, etc.; draft of correspondence to client regarding highlights of deposition of Dell and possible claims against Minton, Dandar, etc.
01/12/01	SDR Rosen	4.50	575.00	2,587.50	2,587.50	___	___	9656454	Several telephone conferences with client; conference with client and co-counsel; review of court's Order denying summary judgment; begin review of our motion papers on our summary judgment; review of memoranda regarding research on conditions and time for filing reconsideration motion; draft of various correspondence from T. Dandar; review of various correspondence from T. Dandar; review of materials from client regarding disclosures of damages; review and editing of PHJ&W bills; begin review and editing of M. Addison's bills; draft of correspondence to client regarding same; draft of proposed letter to T. Dandar regarding same; begin preparation of motions for reargument

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
01/13/01	SDR Rosen	6.50	575.00	3,737.50	3,737.50	___	___	9656458	Telephone conference with client and other counsel regarding motion for reargument on summary judgment; edit opposition to Dandar's motion for summary judgment
01/13/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9680813	Review of W. McShane's proposed affidavit in opposition to Dandar's summary judgment motion; telephone conference with H. Kobrin and A. Cartwright regarding revising same
01/17/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9680821	Telephone conference with client; begin review of reply brief
01/18/01	SDR Rosen	2.30	575.00	1,322.50	1,322.50	___	___	9680825	Extensive telephone conference with client and Texas counsel; continue work on revising brief for motion for reconsideration
01/19/01	SDR Rosen	2.30	575.00	1,322.50	1,322.50	___	___	9691356	Numerous telephone conferences with regarding motion for reargument; continue working on editing motion; continue editing motion; review of motion for protective order filed by Dandar regarding Ken's deposition; draft of correspondence to C. Gall regarding basis for opposing same; conference with A. Cartwright and C. Gall regarding motion for reconsideration
01/21/01	SDR Rosen	2.50	575.00	1,437.50	1,437.50	___	___	9720201	Review of a fax from C. Gall; telephone conference with client; complete review and revision of motions for reargument
01/22/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9720209	Review of correspondence from Dandar regarding deposition of COB; draft of correspondence regarding same
01/23/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9720219	Further telephone conference with client and extended telephone conference with C. Gall regarding motion for reargument
01/24/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	9727879	Final review and revisions in motion for reargument; review and revise correspondence to Dandar regarding deposition of COB
01/25/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9727881	Review of memorandum from client; telephone conference with M. Rathbun; final review and revisions in motions for reconsideration; final editing of same
01/26/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9747260	Telephone conference with C. Gall regarding response to Dandar's motion for protective order against deposition of K. Dandar; review of e-mail from J. Crouch regarding same subject
01/28/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9747266	Telephone conference with A. Cartwright



DATE: 03/05/01

PAUL, HASTINGS, JANOFKY & WALKER LLP
PROFORMA

(BILLING SUMMARY REPORT)
Thru: 02/28/01

CLIENT: Religious Technology Center
MATTER: v. Liebreich
NUMBER: 24437-02700

Proforma (BSR) No.: 744491
Joint Bill ID.:
Contact:

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

Billing Frequency: M
Fee Arrangement: H - Hourly
Billing Template: 13 - 1 - 5
Matter Billing Atty: Roger M. Milgrim
Matter Supervising Atty: Roger M. Milgrim
Client Billing Atty: RMM

72779

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Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
01/29/01	SDR Rosen	.30	575.00	172.50	172.50			9818128	Telephone conference with client regarding designating expert witness
01/30/01	SDR Rosen	.30	575.00	172.50	172.50			9818133	Conference with client and telephone conference with Texas counsel regarding preparing opposition to Dandar's motion for protective order regarding deposition of Ken
02/01/01	SDR Rosen	1.00	575.00	575.00	575.00			9816309	Review of Dandar's letters regarding deposition of Warren and David; draft of correspondence regarding same; review of Dallas counsel's draft of opposition for sanctions motion; review of Dallas counsel's draft on opposition on motion for protective order against Ken Dandar opposition; revise both documents; telephone conference with client regarding revisions; telephone conference with A. Cartwright and further telephone conference with M. Rathbun regarding Dandar letter demanding deposition of COB and of our response

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
02/02/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9816319	Telephone conference with client regarding finalizing redacted attorneys' bills for submission to defendant
02/03/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9816320	Telephone conference with client regarding further redactions and questions on attorneys' bills
02/05/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9816323	Conference with client and other counsel
02/06/01	SDR Rosen	.80	575.00	460.00	460.00	___	___	9816328	Telephone conference with client and H. Kobrin; review of Dandar's motion to compel deposition of W. McShane and COB; review of court order on summary judgment; review of correspondence from local counsel; review of expert designation
02/07/01	SDR Rosen	1.80	575.00	1,035.00	1,035.00	___	___	9816340	Telephone conference with client; review of proposed correspondence to Dandar; review of proposed response to Court; revise same; review of outline of opposition to motion for depositions of W. McShane and COB; telephone conference with client regarding same; rewriting outline for opposition; further telephone conference with W. McShane regarding background brief on Apex issue; further telephone conference with A. Cartwright regarding additional changes to letter to Court; further telephone conference with A. Cartwright regarding opposition to Dandar's motion
02/08/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9816346	Telephone conferences with client regarding discovery dispute in Texas
02/09/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	9816350	Review and extensive revisions in opposition to motion for depositions in Texas and telephone conference with client regarding same; further telephone conference with client regarding opposition to discovery motion
02/12/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	9817377	Review of C. Gall's revisions in our opposition to Dandar's discovery motion; telephone conference with A. Cartwright regarding same; review of Dandar's opposition to our motion for reconsideration; draft of correspondence regarding same; review of various correspondence from local Texas counsel
02/13/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	9817384	Review of latest draft of opposition for motion for discovery; telephone conference with client and Texas counsel regarding same
02/14/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9817393	Conference with E. Lieberman and further telephone conference with A. Cartwright

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	
									regarding possible addition to opposition brief on discovery dispute
02/16/01	SDR Rosen	2.50	575.00	1,437.50	1,437.50	___	___	9817406	Revise opposition to Dandar's motion for deposition of COB; telephone conference with J. Crouch regarding same; review of draft reply on our motion for reargument; extensive revisions in same; telephone conference with client and H. Kobrin regarding revisions; further telephone conference with J. Crouch regarding finalizing and filing opposition to motion for deposition
02/17/01	SDR Rosen	.30	575.00	172.50	172.50	___	___	9817408	Telephone conference with A. Cartwright and begin review of revised brief on motion for reargument
02/19/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9817409	Complete review and revisions of reply brief on motion for reargument and telephone conference with client regarding same
02/21/01	SDR Rosen	2.00	575.00	1,150.00	1,150.00	___	___	9848999	Complete Declaration in support of motion to compel document production; telephone conference with J. Crouch; draft of correspondence regarding same; review of correspondence from Dandar; start review of Dandar's motions regarding experts and to transfer venue; draft of correspondence to client regarding same; draft of correspondence to Dandar regarding non-compliance to our Document Request; draft of Declaration and correspondence regarding motion regarding Document Request
02/22/01	SDR Rosen	3.30	575.00	1,897.50	1,897.50	___	___	9858723	Review of proposed amended complaint; review of proposed motion to file amended complaint; draft of extensive correspondence to client regarding suggested changes
02/23/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	9904270	Telephone conference with client; telephone conference with C. Gall; telephone conference with client and other counsel regarding motion to amend and regarding settlement issues, finalizing correspondence
02/26/01	SDR Rosen	1.30	575.00	747.50	747.50	___	___	9904273	Review and revise opposition to Dandar's latest motion for transfer of venue; review and revise opposition to Dandar's motion for sanctions for incomplete disclosure; review of correspondence from Dandar to local counsel regarding deposition; review of correspondence from local counsel regarding same; telephone conference with client and local counsel regarding responding to Dandar's letter

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	
02/27/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9904282	Review and revise motion to compel Liebreich to produce documents and Privilege Log; conference with client trying to schedule oral argument on our motion for reconsideration
02/28/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9904292	Review of correspondence from J. Walker to Dandar regarding 30(b)(c) designation; conference with A. Cartwright regarding same and regarding filing request for oral argument on motion for reconsideration; telephone conference with J. Walker and A. Cartwright regarding preparing request to be filed for oral argument; conference with A. Cartwright regarding opposition to Dandar's motion to compel production of unredacted attorneys bills

TOTAL FEES: 20.80 575.00 11,960.00 11,960.00
TOTAL HELD FEES: .00

DATE: 04/30/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 03/31/01

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 756347

Joint Bill ID.:

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Fee Arrangement: H - Hourly

Billing Template: I3 - 1 - 5

Matter Billing Atty: Roger M. Milgrim

Matter Supervising Atty: Roger M. Milgrim

Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

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03/01/01	SDR Rosen	.50	575.00	287.50	287.50			9924817	Review of memorandum from Dallas counsel regarding finalizing motion to compel document production; review of letter to Dandar from Texas counsel regarding deposition of COB; telephone conference with client regarding same; draft of memorandum to Texas counsel regarding finalizing motion
03/02/01	SDR Rosen	1.00	575.00	575.00	575.00			9924821	Review of Texas counsel's proposed motion to court for oral argument; review and revise in same; edit Texas counsel's proposed motion for oral argument; conference with client regarding same
03/05/01	SDR Rosen	.30	575.00	172.50	172.50			9924834	Telephone conference with A. Cartwright regarding our opposition to Dandar's motion to

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION

									strike our experts designation
03/07/01	SDR Rosen	1.50	575.00	862.50	862.50	_____	_____	9924838	Extensive editing of our proposed briefs in opposition to Dandar's motion for transfer venue and in opposition to Dandar's motion to strike our expert report, etc.; extensive telephone conference with A. Cartwright regarding same; further telephone conference with A. Cartwright and further telephone conference with A. Cartwright and J. Crouch regarding final edits on Dandar's motion to transfer venue
03/08/01	SDR Rosen	.30	575.00	172.50	172.50	_____	_____	9924843	Telephone conference with client; review of correspondence from local counsel to Dandar
03/09/01	SDR Rosen	.50	575.00	287.50	287.50	_____	_____	9934543	Review of correspondence from client; review of our expert report; draft of correspondence to A. Cartwright regarding same; telephone conference with A. Cartwright and J. Walker regarding same
03/12/01	SDR Rosen	.50	575.00	287.50	287.50	_____	_____	9955544	Telephone conference with A. Cartwright; review of Dandar's filings from Texas; telephone conference with M. Rathbun

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
03/13/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	9955547	Further review of papers filed by Dandar in Texas; telephone conference with A. Cartwright and Texas counsel; review and revise proposed sur-reply brief on Dandar's motion to depose COB; telephone conference with A. Cartwright regarding same
03/15/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	9965199	Review of Liebreich's opposition to our motion to amend our complaint; telephone conference with client regarding same; conference with client and Texas counsel; draft of preliminary statement for reply brief; review and revise same; draft of correspondence circulating draft
03/16/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	9965205	Review of latest court filings; draft of correspondence to Dandar regarding service issues; review of Dandar's corrections to Liebreich's deposition transcript; telephone conferences with A. Cartwright; draft of correspondence to client; draft of correspondence to Dandar
03/20/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	9978608	Review of Dandar's opposition to our motion to compel document production and draft of correspondence regarding same; review of draft reply on our motion to amend; telephone conference with client regarding same
03/20/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	10032707	Telephone conference with client and Texas counsel regarding court's decision on summary judgment motion; further telephone conference with A. Cartwright regarding RTC as creditor of the estate

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									telephone conferencas with A. Cartwright regarding same
03/21/01	SDR Rosen	.50	575.00	287.50	287.50			10032708	Telephone conference with client regarding production of unredacted bills; review of civil court order
03/22/01	SDR Rosen	.75	575.00	431.25	431.25			10032711	Conference call with client and Texas counsel regarding submitting attorneys fees material to court; further telephone conferences with A. Cartwright regarding redactions in attorneys bills; telephone conference with M. Rathburn regarding decision; review of additional orders from Texas court
03/26/01	SDR Rosen	1.75	575.00	1,006.25	1,006.25			10032728	Further review of March 19 Order on Summary Judgment; prepare first draft of brief and McShane affidavit for submission to court, per March 19 Order; telepone conference with client regarding redactive bills
03/27/01	SDR Rosen	.75	575.00	431.25	431.25			10032737	Review and revisions in brief and affidavit to be submitted to Texas court regarding damages
03/28/01	SDR Rosen	.50	575.00	287.50	287.50			10032742	Telephone conference with client; further conference call with client and H. Kobrin regarding redacted bills; further telephone conference with client and Texas counsel regarding same

TOTAL FEES: ~~37.00~~ 12.10 314.77 ~~11,898.25~~ 6,957.50 11,898.25

TOTAL HELD FEES: .00

12.10 6,957.50

DATE: 05/19/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
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 Thru: 04/30/01

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 768254
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 Billing Template: 13 - 1 - 5
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 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

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Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

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 \$6,927.39
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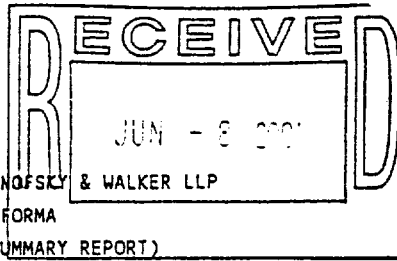
DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION

03/29/01	SDR Rosen	.25	575.00	143.75	143.75	_____	_____	10074842	Telephone conference with client and co-counsel regarding redacting bills to be produced regarding damages
03/30/01	SDR Rosen	.25	575.00	143.75	143.75	_____	_____	10074845	Telephone conference with A. Cartwright regarding further redactions in bills respecting damages
04/04/01	SDR Rosen	.25	575.00	143.75	143.75	_____	_____	10074855	Telephone conference with client regarding new Orders from Texas court and regarding Dandar's motions for reconsideration of summary judgment order
04/06/01	SDR Rosen	1.25	575.00	718.75	718.75	_____	_____	10095035	Review of correspondence to client regarding identification of trial witnesses; draft of correspondence to client regarding same; begin review of Dandar's motion for reargument on summary judgment; telephone conferences with client and co-counsel regarding preparing opposition; complete review of A. Cartwright's submission regarding L. Vaughn's comments on

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									our proposed submission to Texas court on damages and sanctions; review of cases; telephone conference with A. Cartwright regarding errors in memorandum and further research needed
04/09/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	10113271	Telephone conference with client regarding finalizing submission on damages
04/10/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	10113273	Further review of opposition to defendant's motion for reargument; telephone conference with A. Cartwright regarding same; telephone conference with client and further telephone conference with H. Kobrin regarding revising opposition to Dandar's motion for reargument
04/14/01	SDR Rosen	1.75	575.00	1,006.25	1,006.25	___	___	10113286	Review and revise submission to court on damages; review and revise our brief opposing defendant's motion for reargument on summary judgment; extensive telephone conference with H. Kobrin regarding same; review and revise client's affidavit regarding attorneys fees/damages and conference with client regarding same
04/16/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	10145312	Telephone conference with client; telephone conference with co-counsel; conference with W. McShane all regarding filings in Texas court on damage issues, etc.
04/21/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	10145332	Review of Dandar's opposition to our request for confidentiality order; draft of correspondence to client regarding same; review of correspondence from client; review of H. Kobrin's draft reply brief on our motion for confidentiality order; telephone conference with client regarding same
04/23/01	SDR Rosen	1.50	575.00	862.50	862.50	___	___	10173176	Review of memorandum from client; review of H. Kobrin's draft reply brief regarding protective order motion; telephone conference with client; draft of revised reply brief; conference with client regarding finalizing brief on confidentiality order
04/26/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	10184595	Review of court orders; telephone conference with client regarding preparing pre-trial order and other matters; draft of correspondence

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	

									regarding preparation of confidentiality order
04/27/01	SDR Rosen	1.25	575.00	718.75	718.75	___	___	10184602	Telephone conference with client; review of correspondence from local counsel to Dandar regarding his motion to amend and new motion to dismiss; draft of correspondence to client regarding research needed to oppose; further telephone conference with client; begin drafting opposition brief on Dandar's latest motion to dismiss based on voidable contract
04/28/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	10184606	Continue working on opposing brief on Dandar's motion to dismiss
04/29/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	10202764	Draft of correspondence to client regarding Dandar's latest motion to dismiss
04/30/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	10214632	Draft of correspondence to client regarding confidentiality order; review of correspondence from client; review of Dandar's motion to dismiss; review and revise rough draft brief opposing latest motion to dismiss
TOTAL FEES:		11.50	575.00	6,612.50	6,612.50				
TOTAL HELD FEES:		.00							



DATE: 06/06/01

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Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

73070

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Client Billing Atty: RMM

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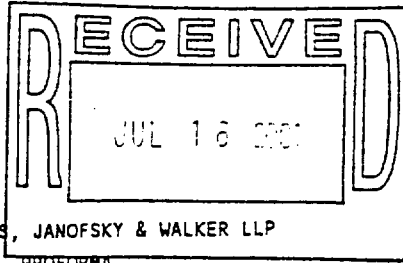
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05/01/01	SDR Rosen	.25	575.00	143.75	143.75			10228455	Review of Judge Hanna's form of pre-trial Order; draft of correspondence to client
05/03/01	SDR Rosen	.25	575.00	143.75	143.75			10228465	Telephone conference with client regarding confidentiality order in Texas, production of unredacted bills, etc.
05/04/01	SDR Rosen	.25	575.00	143.75	143.75			10228473	Telephone conference with client regarding new motion being filed by Dandar
05/08/01	SDR Rosen	.25	575.00	143.75	143.75			10252667	Telephone conference with client; begin review of Dandar's latest motions
05/11/01	SDR Rosen	.25	575.00	143.75	143.75			10252674	Telephone conference with client regarding finalizing brief opposing motion to dismiss
05/12/01	SDR Rosen	1.00	575.00	575.00	575.00			10252680	Review and revise brief in opposition to Dandar's motion to dismiss on grounds of extortion; telephone conference with client regarding same; further telephone conference with client regarding framing out opposition to

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	
									Dandar's motion for attorneys fees and motion to dismiss for stay of filing COB affidavit
05/15/01	SDR Rosen	.25	575.00	143.75	143.75			10269694	Review of memorandum from client regarding confidentiality order; review and revise proposed opposition to Dandar's form of confidentiality order; telephone conference with client regarding same
05/18/01	SDR Rosen	.50	575.00	287.50	287.50			10277657	Review and edit proposed opposition to Dandar's latest motion for attorneys fees; conference with H. Kobrin regarding same; review of draft of additional opposition in Texas; draft of correspondence to Dandar regarding demands for him to withdraw motion to dismiss based on extortion; conference with A. Cartwright regarding following up with supplemental opposition to that motion
05/19/01	SDR Rosen	.50	575.00	287.50	287.50			10277663	Review of H. Kobrin's latest opposition to Dandar's motion for attorneys' fees regarding tort claim
05/21/01	SDR Rosen	1.50	575.00	862.50	862.50			10277673	Review of latest draft of opposition to Liebreich's motion for attorneys fees; extensive editing of same; telephone conference with client regarding same; further telephone conference with H. Kobrin regarding request for charge regarding damages, etc.
05/27/01	SDR Rosen	.50	575.00	287.50	287.50			10331645	Complete review of H. Kobrin's memorandum regarding jury trial; complete review of H. Kobrin's draft of joint pre-trial order; telephone conference with H. Kobrin regarding same
05/28/01	SDR Rosen	.25	575.00	143.75	143.75			10331648	Review of latest opposition filed in Texas
05/29/01	SDR Rosen	.25	575.00	143.75	143.75			10331653	Review of correspondence from H. Kobrin regarding bench or jury trial; telephone conference with client correcting Florida transcript to be submitted to Texas court
05/30/01	SDR Rosen	2.75	575.00	1,581.25	1,581.25			10331657	Review and revise draft pre-trial order, request for charge, etc.; conference with R. Berk on request for charge; telephone conference with client regarding arrangements for trial and other matters; telephone conference with client and C. Gall regarding same; further telephone conference with client, C. Gall and J. Walker regarding jury trial regarding finalizing joint pre-trial order, etc.; review of Dandar's reply brief on his motion for attorneys' fees; review of

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	
									correspondence from client and pages of transcripts of hearing from Florida in preparation for making supplemental filing opposing fee motion in Texas; telephone conference with client regarding changes in transcript
05/30/01	SDR Rosen	.75	575.00	431.25	431.25			10331663	Review of correspondence from local counsel regarding scheduling the trial; telephone conference with client regarding same; further telephone conference with client; draft of extensive correspondence regarding trial preparation, jury selection
05/30/01	REB2 Berk	1.25	320.00	400.00	400.00			10358378	Conference with S. Rosen regarding jury charges, conduct research for same
TOTAL FEES:		10.75	545.35	5,862.50	5,862.50				
TOTAL HELD FEES:		.00							



DATE: 07/05/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
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CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 791478
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 Billing Template: I3 - 1 - 5
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 Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
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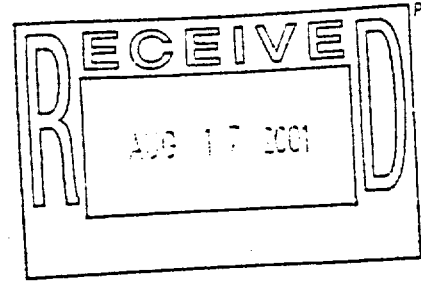
$$F = \$5,514.75$$

$$C = \frac{100.96}{5,615.71}$$

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
06/01/01	SDR Rosen	.75	575.00	431.25	431.25			10403733	Review of marked up jury questionnaire; revise request to charge; telephone conference with client regarding changes in same; further telephone conference with client regarding change in pre-trial order; further telephone conference with client regarding postponement of trial; telephone conference with J. Walker's office regarding same
06/01/01	REB2 Berk	3.00	320.00	960.00	960.00			10496729	Prepare jury charges, conduct research on damages for same
06/02/01	SDR Rosen	.25	575.00	143.75	143.75			10403738	Review of court's Order on Dandar's motion for continuance resetting trial date, etc.; telephone conference with client regarding same
06/04/01	SDR Rosen	.25	575.00	143.75	143.75			10403747	Review of Dandar's latest motion to dismiss; telephone conference with client regarding court's order continuing trial, etc.
06/04/01	REB2 Berk	3.50	320.00	1,120.00	1,120.00			10496731	Prepare jury charges

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
06/05/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	10403753	Review of Dandar's opposing brief on our motion for sanctions; draft of correspondence to client regarding same
06/05/01	REB2 Berk	1.30	320.00	416.00	416.00	___	___	10422570	Revise jury instructions
06/07/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	10403769	Telephone conferences with client; review of Dandar's opposition on our motion for sanctions regarding his motion to dismiss for extortion; draft of reply brief on our sanctions motion
06/08/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	10405912	Review of correspondence and materials from local counsel; review of H. Kobrin's draft of motion to clarify; telephone conference with client regarding same; begin revising same
06/11/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	10405936	Draft of correspondence to client; draft of motion for clarification regarding the Court's June 1 Order
06/12/01	SDR Rosen	1.75	575.00	1,006.25	1,006.25	___	___	10416181	Telephone conferences with client; draft of opposition to Dandar's Rooker-Feldman motion to dismiss; review and revise same; further telephone conference with client regarding same; work on client's motion to clarify June 1 Orde regarding unredacted bills; edit same; telephone conference with client regarding same
06/14/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	10429668	Telephone conference with client regarding finalizing motion to clarify and exhibits
TOTAL FEES:		13.05	422.59	5,514.75	5,514.75				
TOTAL HELD FEES:		.00							



DATE: 08/04/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
PROFORMA
(BILLING SUMMARY REPORT)
Thru: 07/31/01

CLIENT: Religious Technology Center
MATTER: v. Liebreich
NUMBER: 24437-02700

Proforma (BSR) No.: 803390
Joint Bill ID.:
Contact:

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

73278

Billing Frequency: M
Fee Arrangement: H - Hourly
Billing Template: I3 - 1 - 5
Matter Billing Atty: Roger M. Milgrim
Matter Supervising Atty: Roger M. Milgrim
Client Billing Atty: RMM

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
through 07/31/01

INSTRUCTION CODES

ADJUSTMENT CODES

H - Hold until next Proforma
T - Transfer (give Clt/Mtr ID.)
CH - Change; must edit \$ and include Adjustment Code

ED - Education Time
ET - Excessive Time
AG - Agreement W/Clnt
OT - Other/not specif.

Special Billing Instructions

F: RMM-\$650
**Send Time Detail with Bill*

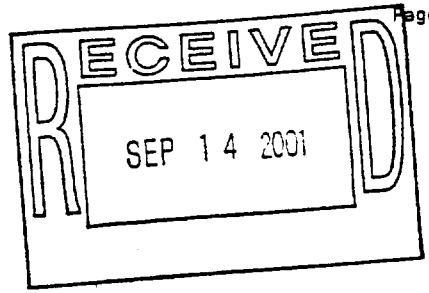
F = \$ 718.75

C = 119.34

\$ 838.11

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
07/04/01	SDR Rosen	.25	575.00	143.75	143.75			10544960	Review of Dandar's latest submissions on motions for sanctions and motion to clarify
07/07/01	SDR Rosen	.25	575.00	143.75	143.75			10567209	Review of correspondence; review of court orders
07/09/01	SDR Rosen	.50	575.00	287.50	287.50			10567218	Review of correspondence from client; review of proposed reply on pending motions; telephone conference with client regarding same
07/17/01	SDR Rosen	.25	575.00	143.75	143.75			10593312	Review of correspondence from client; review of draft reply on motion for clarification; telephone conference with client regarding same
TOTAL FEES:		1.25	575.00	718.75	718.75				
TOTAL HELD FEES:		.00							



DATE: 09/07/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
PROFORMA
(BILLING SUMMARY REPORT)
Thru: 08/31/01

CLIENT: Religious Technology Center
MATTER: v. Liebreich
NUMBER: 24437-02700

Proforma (BSR) No.: 814414
Joint Bill ID.:
Contact:
Billing Frequency: M
Fee Arrangement: H - Hourly
Billing Template: 13 - 1 - 5
Matter Billing Atty: Roger M. Milgrim
Matter Supervising Atty: Roger M. Milgrim
Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
Suite 1100
1710 Ivar Avenue
Los Angeles, CA 90028

73334

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
through 08/31/01

INSTRUCTION CODES	ADJUSTMENT CODES
-----	-----
H - Hold until next Proforma	ED - Education Time
T - Transfer (give Clt/Mtr ID.)	ET - Excessive Time
CH - Change; must edit \$ and include Adjustment Code	AG - Agreement W/Clt
	OT - Other/not specif.

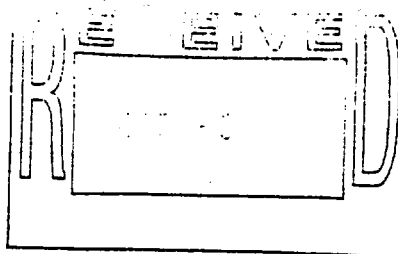
Special Billing Instructions

F: RMM-\$650
**Send Time Detail with Bill*

F = ~~\$~~ 842.50
C = 2.50
\$ 845.00

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE		
08/07/01	SDR Rosen	.25	575.00	143.75	143.75			10752716	Telephone conference with client regarding advising court of scheduling conflict in October; review of court Orders; telephone conference with client regarding same
08/09/01	SDR Rosen	.25	575.00	143.75	143.75			10752728	Review of correspondence from client; review of our expert's proposed report on attorneys' fees; draft of correspondence to client regarding same
08/13/01	SDR Rosen	.50	575.00	287.50	287.50			10769164	Review of expert report; telephone conference with client regarding same; further telephone conference with client and local counsel
08/16/01	SDR Rosen	.50	575.00	287.50	287.50			10783323	Review of various orders from court; review of revised expert report; telephone conference with client; further telephone conference with client and local counsel
TOTAL FEES:		1.50	575.00	862.50	862.50				



DATE: 10/03/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 09/30/01

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 825721

Joint Bill ID.:

Contact:

Billing Frequency: M

Fee Arrangement: H - Hourly

Billing Template: I3 - 1 - 5

Matter Billing Atty: Roger M. Milgrim

Matter Supervising Atty: Roger M. Milgrim

Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

73362

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
 through 09/30/01

INSTRUCTION CODES

- H - Hold until next Proforma
- T - Transfer (give Clt/Mtr ID.)
- CH - Change; must edit \$ and include Adjustment Code

ADJUSTMENT CODES

- ED - Education Time
- ET - Excessive Time
- AG - Agreement W/Clnt
- OT - Other/not specif.

Special Billing Instructions

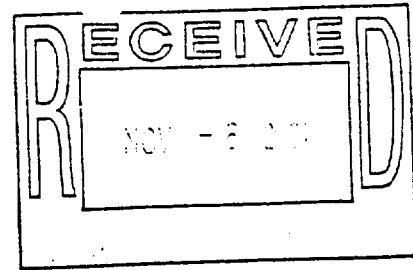
F: RMM-\$650
 **Send Time Detail with Bill*

$$F = \$575.00$$

$$C = \frac{4.85}{579.85}$$

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
09/15/01	SDR Rosen	.25	575.00	143.75	143.75			10924289	Telephone conference with client; draft of correspondence; review of filing by local counsel
09/20/01	SDR Rosen	.75	575.00	431.25	431.25			10979893	Review of correspondence from C. Gall regarding changes in request for charge; review of request for charge; telephone conference with client and co-counsel regarding C. Gall's comment; further telephone conference with C. Gall regarding scheduling and comments on request for charge
TOTAL FEES:		1.00	575.00	575.00	575.00				
TOTAL HELD FEES:		.00							



DATE: 11/06/01

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 10/31/01

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 837266
 Joint Bill ID.:
 Contact:
 Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

73473

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
 through 10/31/01

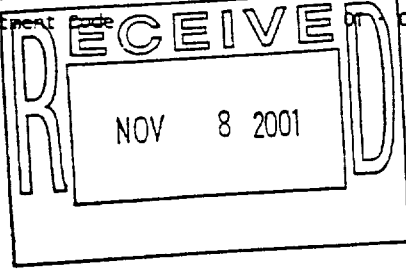
INSTRUCTION CODES	ADJUSTMENT CODES
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H - Hold until next Proforma	ED - Education Time
T - Transfer (give Clt/Mtr ID.)	ET - Excessive Time
CH - Change; must edit \$ and include Adjustment Code	AG - Agreement W/Clnt
	Other/not specif.

Special Billing Instructions

F: RMM-\$650
 **Send Time Detail with Bill*

F = \$1,437.50

C = $\frac{13.75}{1,451.25}$



Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
10/05/01	SDR Rosen	1.25	575.00	718.75	718.75			11056828	Review of correspondence from C. Gall; review of correspondence from Dandar; review of Dandar's proposed pre-trial order; review of Dandar's proposed jury instructions; review of memorandum from client; review of Dandar's motion to postpone January trial; draft of correspondence to client regarding postponement; telephone conference with client regarding same
10/08/01	SDR Rosen	.50	575.00	287.50	287.50			11056834	Review of correspondence and materials from client regarding final pre-trial order; telephone conference with client regarding same; review of further correspondence from client; review of draft opposition to Dandar's motion to postpone the January trial; edit of draft opposition; telephone conference with client regarding same
10/09/01	SDR Rosen	.50	575.00	287.50	287.50			11075227	Review of correspondence from client; review of final form of joint pre-trial Order; telephone

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
10/17/01	SDR Rosen	.25	575.00	143.75	143.75			11090134	conference with client regarding same Review of correspondence from local counsel; review of court order regarding trial setting; telephone conference with client regarding travel preparation issues
TOTAL FEES:		2.50	575.00	1,437.50	1,437.50				
TOTAL HELD FEES:		.00							

RECEIVED BY
FINANCE DEPT.

OT DEC -7 AM 11:30

DATE: 12/05/01

PAUL, HASTINGS, JANOFSKY & WALKER, LLP
PROFORMA
(BILLING SUMMARY REPORT)
Thru: 11/30/01

CLIENT: Religious Technology Center
MATTER: v. Liebreich
NUMBER: 24437-02700

Proforma (BSR) No.: 848658

Joint Bill ID.:

Contact:

Billing Frequency: M

Fee Arrangement: H - Hourly

Billing Template: I3 - 1 - 5

Matter Billing Atty: Roger M. Milgrim

Matter Supervising Atty: Roger M. Milgrim

Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

73514

Attention: Mr. Warren McShane

Suite 1100

1710 Ivar Avenue

Los Angeles, CA 90028

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
through 11/30/01

INSTRUCTION CODES

H - Hold until next Proforma

T - Transfer (give Clt/Mtr ID.)

CH - Change; must edit \$ and include
Adjustment Code

ADJUSTMENT CODES

ED - Education Time

ET - Excessive Time

AG - Agreement W/Clt

OT - Other/not specif.

Special Billing Instructions

F: RMM-\$650

**Send Time Detail with Bill*

$$F = \$575.00$$

$$C = \frac{14.00}{589.00}$$

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
11/20/01	SDR Rosen	.50	575.00	287.50	287.50			11309819	Review of request to charge; review of C. Gall's comments regarding same; review of Dandar's proposed request to charge; extensive telephone conference with client and other defense counsel regarding same
11/29/01	SDR Rosen	.50	575.00	287.50	287.50			11356651	Telephone conference with client; telephone conference with client and co-counsel regarding in limine motions, etc., review of portion of pre-trial order regarding preparation of statement of the case
TOTAL FEES:		1.00	575.00	575.00	575.00				
TOTAL HELD FEES:		.00							

DATE: 03/13/02

PAUL, HASTINGS, JANOFFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 12/31/01

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 862448
 Joint Bill ID.:
 Contact:
 Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

 Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
 through 12/31/01

INSTRUCTION CODES	ADJUSTMENT CODES
-----	-----
H - Hold until next Proforma	ED - Education Time
T - Transfer (give Clt/Mtr ID.)	ET - Excessive Time
CH - Change; must edit \$ and include Adjustment Code	AG - Agreement W/Clnt
	OT - Other/not specif.

Special Billing Instructions

 F: RMM-\$710; SDR-\$575 (2001 rate)
 **Send Time Detail with Bill*

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION

12/05/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	11385009	Review and edit of three in limine motions; telephone conference with co-counsel and client regarding same
12/07/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	11427428	Review of correspondence from client; review of latest draft of three in limine motions; telephone conference with client regarding same
12/10/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	11427431	Telephone conference with client regarding finalizing in limine motions
12/11/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	11427434	Telephone conference with client and other defense counsel regarding in limine motions
12/12/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	11427436	Telephone conference with client regarding finalizing pre-trial materials
12/16/01	SDR Rosen	.75	575.00	431.25	431.25	___	___	11443953	Review of correspondence from client; review of additional, proposed trial exhibits; review and revise statements to judge to read to jury; telephone conference with client all regarding

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE	NO	

									same
12/18/01	SDR Rosen	.50	575.00	287.50	287.50	___	___	11463831	Review of correspondence and materials from client; review of proposed pre-trial order; telephone conference with client regarding same
12/19/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	11525019	Telephone conference with client regarding Dandar's late filed trial exhibits
12/20/01	SDR Rosen	1.00	575.00	575.00	575.00	___	___	11525021	Review of trial exhibits designated by Dandar; conference with client regarding same; formulate objections to exhibits; telephone conference with other defense counsel regarding pre-trial order
12/21/01	SDR Rosen	.25	575.00	143.75	143.75	___	___	11525026	Conference with client reviewing trial exhibits; telephone conference with local counsel regarding filing pre-trial order
TOTAL FEES:		5.00	575.00	2,875.00	2,875.00				
TOTAL HELD FEES:		.00							

DATE: 02/27/02

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 01/31/02

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 871152
 Joint Bill ID.:
 Contact:
 Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
 through 01/31/02

Special Billing Instructions

F: RMM-\$710; SDR-\$575
 **Send Time Detail with Bill*

INSTRUCTION CODES

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 Adjustment Code

ADJUSTMENT CODES

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 AG - Agreement W/Clt
 OT - Other/not specif.

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
01/03/02	SDR Rosen	.50	575.00	287.50	287.50			11559325	Telephone conference with client regarding in limine motions in Texas; review of memorandum from client; further telephone conference with client regarding in limine motion
01/08/02	SDR Rosen	.25	575.00	143.75	143.75			11575208	Telephone conference with client and other counsel regarding preparation for trial
01/09/02	SDR Rosen	.50	575.00	287.50	287.50			11575211	Review of various correspondence; review of further faxes from client regarding trial preparation; telephone conference with client regarding same
01/10/02	SDR Rosen	.75	575.00	431.25	431.25			11624007	Review of various correspondence from client; several telephone conferences with client and co-counsel, all relating to the upcoming trial
01/11/02	SDR Rosen	.25	575.00	143.75	143.75			11646711	Telephone conference with client regarding arrangements for witness preparation
01/13/02	SDR Rosen	7.00	575.00	4,025.00	4,025.00			11646712	Travel to Dallas; conference with client and

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									other defense counsel; continue preparation for pre-trial conference, jury selection, etc.
01/14/02	SDR Rosen	9.00	575.00	5,175.00	5,175.00	___	___	11646713	Prepare for court hearing on in limine motions, etc.; attend court hearing; conferences with client and co-counsel revising documents to submit to court; review of package of materials relating to \$400/hour issue; further conference with client regarding same
01/15/02	SDR Rosen	5.00	575.00	2,875.00	2,875.00	___	___	11646716	Attendance at court for jury selection; conferences with client and co-counsel; further telephone conferences
01/16/02	SDR Rosen	2.50	575.00	1,437.50	1,437.50	___	___	11646717	Telephone conference with J. Walker regarding research issues; telephone conference with co-counsel regarding same; travel from Dallas (at half time)
01/18/02	SDR Rosen	.50	575.00	287.50	287.50	___	___	11646721	Review of co-counsel's memorandum; telephone conference with co-counsel regarding request for charge, etc.; further telephone conference with client and other defense counsel
01/19/02	SDR Rosen	1.50	575.00	862.50	862.50	___	___	11646725	Work on direct and potential cross examinations of client; outline same; review with client reviewing same and preparing for testimony
01/21/02	SDR Rosen	3.25	575.00	1,868.75	1,868.75	___	___	11675725	Travel to Dallas for trial preparation
01/22/02	SDR Rosen	8.00	575.00	4,600.00	4,600.00	___	___	11675727	Attend conference at local counsel's office preparing for trial
01/23/02	SDR Rosen	8.00	575.00	4,600.00	4,600.00	___	___	11675728	Prepare for trial; travel to Tyler, Texas; continue trial preparation
01/24/02	SDR Rosen	9.00	575.00	5,175.00	5,175.00	___	___	11675730	Prepare for trial; attend conference at local counsel's office; attend court hearing; further conferences regarding preparation for remainder of trial
01/25/02	SDR Rosen	16.00	575.00	9,200.00	9,200.00	___	___	11675732	Continue trial; travel back to New York
01/26/02	SDR Rosen	.25	575.00	143.75	143.75	___	___	11675733	Draft of correspondence to client
01/28/02	SDR Rosen	.50	575.00	287.50	287.50	___	___	11692337	Review of proposed press release from client; telephone conference with client regarding same; draft of correspondence to client regarding follow-up matters
01/29/02	SDR Rosen	1.25	575.00	718.75	718.75	___	___	11692342	Review of fax from co-counsel regarding Florida remedies to Texas judgment; telephone conference with client; further telephone conference with client and other defense

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									counsel
01/30/02	SDR Rosen	.75	575.00	431.25	431.25			11708364	Review of correspondence from client; review of correspondence and materials from co-counsel regarding Florida rights; telephone conference with client and co-counsel regarding same

TOTAL FEES: ~~75.25~~ 575.90 ~~43,336.25~~ 43,336.25
TOTAL HELD FEES: .00

-22.00 -12,650.00 Transferred to Costs section of application
- .50 - 355.00 for time spent as trial witness
52.75 30,331.25

DATE: 03/13/02

PAUL, HASTINGS, JANOFSKY & WALKER LLP
 PROFORMA
 (BILLING SUMMARY REPORT)
 Thru: 02/28/02

CLIENT: Religious Technology Center
 MATTER: v. Liebreich
 NUMBER: 24437-02700

Proforma (BSR) No.: 882457
 Joint Bill ID.:
 Contact:

MAILING ADDRESS

Religious Technology Center

Attention: Mr. Warren McShane
 Suite 1100
 1710 Ivar Avenue
 Los Angeles, CA 90028

73682

Billing Frequency: M
 Fee Arrangement: H - Hourly
 Billing Template: 13 - 1 - 5
 Matter Billing Atty: Roger M. Milgrim
 Matter Supervising Atty: Roger M. Milgrim
 Client Billing Atty: RMM

INTRODUCTORY LINE: FOR PROFESSIONAL SERVICES RENDERED
 through 02/28/02

INSTRUCTION CODES	ADJUSTMENT CODES
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H - Hold until next Proforma	ED - Education Time
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	OT - Other/not specif.

Special Billing Instructions

 F: RMM-\$710; SDR-\$575 (2001 rate)
 **Send Time Detail with Bill*

Professional Services

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
02/02/02	SDR Rosen	1.50	575.00	862.50	862.50	___	___	11754564	Review of various correspondence and materials from client, co-counsel and Dallas counsel regarding writ of garnishment, entry of motion for entry of judgment, etc.; draft of correspondence regarding same; further review of correspondence and materials from client regarding prior bills, declaration, attorneys' fee application to be prepared, etc., draft of correspondence to client regarding same; further telephone conferences with client regarding motions for entry of judgment, computation of interests and related questions
02/05/02	SDR Rosen	2.25	575.00	1,293.75	1,293.75	___	___	11754576	Several telephone conferences with client and other counsel; conference with K. Koerner regarding research issues; review of court's order to show cause, etc.
02/05/02	KJK3 Koerner	1.25	400.00	500.00	500.00	___	___	11753437	Meet with S. Rosen regarding Rule 26/order to show cause assignment; review order to show cause; meet with S. Rosen regarding affidavit;

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR CODE	ADJ CODE	INDEX NO	DESCRIPTION
									review file
02/06/02	SDR Rosen	.50	575.00	287.50	287.50	___	___	11754582	Review of correspondence and research materials from client; telephone conference with client regarding same
02/06/02	KJK3 Koerner	2.00	400.00	800.00	800.00	___	___	11753444	Review fax from A. Cartwright; review file
02/07/02	SDR Rosen	.50	575.00	287.50	287.50	___	___	11754586	Telephone conference with client; telephone conference with client and other counsel; leave telephone message with K. Koerner
02/07/02	KJK3 Koerner	2.00	400.00	800.00	800.00	___	___	11753454	Review file; review S. Rosen correspondence; conference call with S. Rosen regarding Gall affidavit, time sheet review, and correspondence review
02/08/02	SDR Rosen	1.50	575.00	862.50	862.50	___	___	11754588	Review of materials from clients regarding post-trial motions; review of materials and telephone conference with client regarding computation of judgment
02/08/02	KJK3 Koerner	3.00	400.00	1,200.00	1,200.00	___	___	11753455	Review file and SDR timesheets
02/09/02	KJK3 Koerner	10.25	400.00	4,100.00	4,100.00	___	___	11753465	Review file; draft S. Rosen affidavit; draft memorandum to S. Rosen regarding items missing from file; draft chronology of factual support; visit Texas court's website for rule revisions; research regarding Local Rule CV 26 and sanctions for violation; draft letter to Gall and Jenkins regarding collective decision not to produce time sheets; draft affidavit of S. Rosen; research regarding "lie beneath log" strategy
02/10/02	KJK3 Koerner	9.50	400.00	3,800.00	3,800.00	___	___	11753466	Draft memorandum of law in response to court's order to show cause; revise affidavit of S. Rosen; review file; review research; review Federal Rules of Civil Procedure and advisory committee comments; draft memorandum of law in response to court's order to show cause
02/11/02	KJK3 Koerner	7.50	400.00	3,000.00	3,000.00	___	___	11753471	Draft memorandum of law in response to order to show cause; revise affidavit; additional research
02/12/02	SDR Rosen	1.25	575.00	718.75	718.75	___	___	11754604	Conference with K. Koerner regarding draft of affidavit, draft briefs, etc.; discuss with K. Koerner regarding materials from client; draft of correspondence to client and co-counsel
02/12/02	KJK3 Koerner	9.00	400.00	3,600.00	3,600.00	___	___	11753476	Revise affidavit; revise memorandum of law; meet with S. Rosen; review materials provided by client; further revisions to affidavit and

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE		
									memorandum of law
02/13/02	SDR Rosen	1.25	575.00	718.75	718.75			11754606	Review of correspondence from client; review of K. Koerner's materials regarding communications with other defense counsel; draft of correspondence to C. Gall; draft of correspondence to client regarding preparation of drafts; telephone conference with client; begin review of draft memorandum and affidavit; telephone conference with client and C. Gall
02/14/02	SDR Rosen	3.25	575.00	1,868.75	1,868.75			11767444	Review of correspondence; draft of correspondence regarding execution of judgment; begin review of K. Koerner's draft of memorandum of law; telephone conference with client; telephone conference with client and co-counsel regarding response to Order to Show Cause; draft of various correspondence to client and co-counsel regarding same; begin editing draft affidavit; review of proposed juror affidavits; telephone conferences with client regarding same
02/15/02	SDR Rosen	1.50	575.00	862.50	862.50			11767446	Review of various correspondence; telephone conferences with client, all regarding Order to Show Cause and timesheets; continue work on affidavit regarding same
02/19/02	SDR Rosen	5.00	575.00	2,875.00	2,875.00			11774379	Work on brief and affidavit; review and revise same; draft of various correspondence and revisions; conference with K. Koerner regarding same
02/19/02	KJK3 Koerner	1.75	400.00	700.00	700.00			11767372	Review revised memorandum of law; meet with S. Rosen; review S. Rosen's correspondence to client regarding change to memorandum and affidavits; review file
02/20/02	SDR Rosen	2.50	575.00	1,437.50	1,437.50			11774384	Telephone conferences with client; telephone conference with client and other counsel; work on papers regarding Orders to Show Cause; conferences with K. Koerner regarding same
02/20/02	SDR Rosen	1.25	575.00	718.75	718.75			11774385	Draft of correspondence; draft of outline of brief on motion for award of attorneys' fees and expenses for the trial
02/20/02	KJK3 Koerner	3.00	400.00	1,200.00	1,200.00			11771069	Meet with S. Rosen; review revised Rosen Affidavit; calls to J. Crouch regarding amended disclosures; review Walker Affidavit; conference call with S. Rosen and local counsel; revise Rosen Affidavit accordingly
02/21/02	SDR Rosen	.75	575.00	431.25	431.25			11774388	Review of fax from C. Gall regarding proposed

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE		
									changes to my affidavit; draft of correspondence regarding same; further telephone conference with client
02/21/02	KJK3 Koerner	.25	400.00	100.00	100.00			11789729	Conference call with Allan Cartwright; meet with S. Rosen
02/22/02	SDR Rosen	2.50	575.00	1,437.50	1,437.50			11783814	Review of telephone calls; leave messages with K. Koerner regarding revising attorney affidavit, etc.; extensive telephone conference with client and other defense counsel; review of J. Crouch's revisions in complaint and C. Gall's affidavit; review of draft affidavit of J. Walker; telephone conference with client regarding same
02/22/02	KJK3 Koerner	1.50	400.00	600.00	600.00			11789734	Review S. Rosen correspondence regarding C. Gall's comments; review C. Gall's comments; revise S. Rosen affidavit; conference calls with A. Cartwright
02/23/02	SDR Rosen	3.25	575.00	1,868.75	1,868.75			11783818	Review and revise affidavit; review of revised affidavits of other counsel; numerous telephone conferences with client; draft of various correspondence to client and other defense counsel; review of changes in brief; review of notes from client; review of portions of trial transcript; several conferences with K. Koerner refinalizing papers
02/23/02	KJK3 Koerner	5.00	400.00	2,000.00	2,000.00			11789738	Review revised memorandum of law; meet with S. Rosen regarding revisions to affidavit; review new revisions; conference call with A. Cartwright; revise S. Rosen affidavit; review trial transcript; review revised brief; review Walker and Crouch affidavits
02/24/02	SDR Rosen	.50	575.00	287.50	287.50			11783819	Telephone conference with K. Koerner regarding changes to papers; telephone conference with client regarding changes to papers and finalizing opposition to show cause; further telephone conference with K. Koerner regarding problems in revising papers
02/24/02	KJK3 Koerner	4.00	400.00	1,600.00	1,600.00			11789741	Call to A. Cartwright; review revised Crouch and Walker affidavits; review revised memorandum of law; conference calls with A. Cartwright; conference calls with S. Rosen
02/25/02	SDR Rosen	.75	575.00	431.25	431.25			11795751	Review of correspondence from client; draft of correspondence to client; conferences with K. Koerner regarding finalizing court papers; telephone conference with client regarding same

DATE	TIMEKEEPER	HOURS	RATE	DOLLARS	ORIG \$	INSTR ADJ		INDEX	DESCRIPTION
						CODE	CODE		
02/25/02	KJK3 Koerner	2.00	400.00	800.00	800.00			11795580	Review cites to trial transcript; review revised brief; conference call with A. Cartwright; fax Samuel Rosen's affidavit to John Walker and A. Cartwright; conference calls with A. Cartwright regarding revisions to brief
02/26/02	SDR Rosen	.25	575.00	143.75	143.75			11801752	Conference with K. Koerner regarding finishing work on our attorneys' fee application; telephone conference with client
02/26/02	KJK3 Koerner	.75	400.00	300.00	300.00			11795595	Meet with S. Rosen regarding assignment to draft attorneys fees affidavit; conference call with S. Rosen and A. Cartwright regarding 2/25/02 filing; review S. Rosen's letter to A. Cartwright regarding fee application; review outline for memorandum of law regarding same
02/27/02	SDR Rosen	.25	575.00	143.75	143.75			11801758	Telephone conference with client regarding preparation for hearing
02/27/02	KJK3 Koerner	1.50	400.00	600.00	600.00			11801363	Draft and revise S. Rosen affidavit; conference call with A. Cartwright
02/28/02	SDR Rosen	9.00	575.00	5,175.00	5,175.00			11817818	Travel to Texas; attendance at local counsel's office preparing for hearing on Order to Show Cause
02/28/02	KJK3 Koerner	.50	400.00	200.00	200.00			11817012	Revise S. Rosen affidavit in support of fee application
TOTAL FEES:		104.25	466.31	48,612.50	48,612.50				
TOTAL HELD FEES:		.00							

Paul, Hastings, Janofsky & Walker LLP
Billable Time for custom date range by Timekeeper and Date

Printed on Wednesday, March 13, 2002 by Rockers Stella (SEC_SR)

Timekeeper: KJK3 Kimberly J. Koerner

Date: Friday, March 1, 2002

Client: 24437	Religious Technology Center	Time:	3.00
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Revise S. Rosen affidavit in support of RTC's fee application; review time sheets and bills; calculate figures for fee and disbursement requests; allocate time for trial witness versus trial counsel time; revise affidavit accordingly		Transferred	\$ 1,200.00

Totals for Friday, March 1, 2002:	Billable Time(100.00%):	3.00
	Non-Billable Time(0.00%):	0.00
	Total Time:	3.00

Date: Monday, March 4, 2002

Client: 24437	Religious Technology Center	Time:	0.25
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Conference call with S. Rosen regarding status		Transferred	\$ 100.00

Totals for Monday, March 4, 2002:	Billable Time(100.00%):	0.25
	Non-Billable Time(0.00%):	0.00
	Total Time:	0.25

Date: Tuesday, March 12, 2002

Client: 24437	Religious Technology Center	Time:	6.00
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Review message from S. Rosen and A. Cartwright regarding research assignment; conference call with S. Rosen regarding research; review fax from A. Cartwright; research regarding disclosure/relevance of defendants' counsels rates/hours; draft and revise memorandum regarding same; conference calls with S. Rosen and A. Cartwright; fax research results		Transferred	\$ 2,400.00

Totals for Tuesday, March 12, 2002:	Billable Time(100.00%):	6.00
	Non-Billable Time(0.00%):	0.00
	Total Time:	6.00

Totals for Timekeeper: KJK3	Billable Time(100.00%):	9.25
	Non-Billable Time(0.00%):	0.00
	Total Time:	9.25

Timekeeper: SDR Samuel D. Rosen

Date: Friday, March 1, 2002

Client: 24437	Religious Technology Center	Time:	13.00
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Travel to Tyler; conference at local counsel's office; attend hearing in court; travel back to Dallas; travel back to New York; begin review of draft memorandum in support of attorneys fees		Transferred	\$ 7,475.00

Paul, Hastings, Janofsky & Walker LLP
Billable Time for custom date range by Timekeeper and Data

Printed on Wednesday, March 13, 2002 by Rockers Stella (SEC_SR)

Timekeeper: SDR Samuel D. Rosen

Totals for Friday, March 1, 2002:	Billable Time(100.00%):	13.00
	Non-Billable Time(0.00%):	0.00
	Total Time:	13.00

Date: Monday, March 4, 2002

Client: 24437	Religious Technology Center	Time:	0.25
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Telephone conference with client regarding Judge's Order on sanctions, etc.			Transferred
			\$143.75

Totals for Monday, March 4, 2002:	Billable Time(100.00%):	0.25
	Non-Billable Time(0.00%):	0.00
	Total Time:	0.25

Date: Tuesday, March 5, 2002

Client: 24437	Religious Technology Center	Time:	2.00
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Complete reviewing and revising in draft motion for attorneys' fees; telephone conference with client regarding same; telephone conference with co-counsel regarding redrafting same; review of Court's Order regarding timesheets; telephone conference with client; further telephone conference with co-counsel regarding motion			Transferred
			\$1,150.00

Totals for Tuesday, March 5, 2002:	Billable Time(100.00%):	2.00
	Non-Billable Time(0.00%):	0.00
	Total Time:	2.00

Date: Wednesday, March 6, 2002

Client: 24437	Religious Technology Center	Time:	0.25
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Telephone conference with client regarding latest Order and fine for interviewing jurors; prepare attorneys fee motion			Transferred
			\$143.75

Totals for Wednesday, March 6, 2002:	Billable Time(100.00%):	0.25
	Non-Billable Time(0.00%):	0.00
	Total Time:	0.25

Date: Sunday, March 10, 2002

Client: 24437	Religious Technology Center	Time:	1.00
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Review and revise affidavit regarding attorney fee application			Open
			\$575.00

Totals for Sunday, March 10, 2002:	Billable Time(100.00%):	1.00
	Non-Billable Time(0.00%):	0.00
	Total Time:	1.00

Date: Monday, March 11, 2002

Paul, Hastings, Janofsky & Walker LLP
Billable Time for custom date range by Timekeeper and Date

Printed on Wednesday, March 13, 2002 by Rockers Stella (SEC_SR)

Timekeeper: SDR Samuel D. Rosen

<i>Client:</i> 24437	Religious Technology Center	<i>Time:</i>	2.50
<i>Matter:</i> 02700	v. Liebreich		
<i>Task Code:</i>			
<i>Narrative:</i> Continue reviewing and revising affidavit regarding attorneys' fees; review and comment on affidavits of co-counsel regarding attorneys' fees; review and revise motion and brief for attorneys' fees; conferences with client regarding same; telephone conferences with co-counsel regarding same		<i>Open</i>	\$1,437.50

Totals for Monday, March 11, 2002:	<i>Billable Time(100.00%):</i>	2.50
	<i>Non-Billable Time(0.00%):</i>	0.00
	<i>Total Time:</i>	2.50

Date: Tuesday, March 12, 2002

<i>Client:</i> 24437	Religious Technology Center	<i>Time:</i>	1.00
<i>Matter:</i> 02700	v. Liebreich		
<i>Task Code:</i>			
<i>Narrative:</i> Conferences with client and telephone conferences with other defense counsel regarding revising motion for attorneys' fees, affidavits, etc.; telephone conferences with K. Koerner regarding legal research on attorney fee motion		<i>Open</i>	\$575.00

Totals for Tuesday, March 12, 2002:	<i>Billable Time(100.00%):</i>	1.00
	<i>Non-Billable Time(0.00%):</i>	0.00
	<i>Total Time:</i>	1.00

Totals for Timekeeper: SDR	<i>Billable Time(100.00%):</i>	20.00
	<i>Non-Billable Time(0.00%):</i>	0.00
	<i>Total Time:</i>	20.00

Report Total:	<i>Billable Time(100.00%):</i>	29.25
	<i>Non-Billable Time(0.00%):</i>	0.00
	<i>Total Time:</i>	29.25

**Paul, Hastings, Janofsky & Walker LLP
Time and Services Report**

Printed on Thursday, March 14, 2002 by Rockers Stella (SEC_SR)

Timekeeper: SDR Samuel D. Rosen

Date: Wednesday, March 13, 2002

etc.

Client: 24437	Religious Technology Center	Time:	1.00
Matter: 02700	v. Liebreich		
Task Code:			
Narrative: Review of research memorandum from K. Koerner regarding defendants' time records and bills; conference with client regarding same and regarding editing brief for attorneys' fee motion		Closed	\$ 575.00

Totals for Wednesday, March 13, 2002:	Billable Time(100.00%):	7.25
	Non-Billable Time(0.00%):	0.00
	Total Time:	7.25

Report Total:	Billable Time(100.00%):	32.75
	Non-Billable Time(0.00%):	0.00
	Total Time:	32.75