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12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN JOSE DIVISION

16  
 17 HTC CORPORATION and HTC  
 AMERICA, INC.,

18 Plaintiffs,

19 v.

20 TECHNOLOGY PROPERTIES  
 21 LIMITED, PATRIOT SCIENTIFIC  
 CORPORATION and ALLIACENSE  
 22 LIMITED,

23 Defendants.

Case No. 5:08-cv-00882 PSG

[Related to Case No. 5:08-cv-00877 PSG]

**HTC'S REPLY IN SUPPORT OF ITS  
 OBJECTIONS TO TPL'S AMENDED  
 BILL OF COSTS AND OBJECTIONS TO  
 TPL'S SECOND AMENDED BILL OF  
 COSTS**

Complaint Filed: February 8, 2008

Trial Date: September 23, 2013

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1 **I. INTRODUCTION**

2 HTC respectfully submits this reply in support of its Objections to TPL's Amended Bill of  
3 Costs (Dkt. No. 679) ("Objections") and the objections to TPL's Second Amended Bill of Costs  
4 (Dkt. No. 700), submitted by TPL along with its Response to HTC's Objections to TPL's  
5 Amended Bill of Costs (Dkt. No. 699) ("Response").

6 As an initial matter, TPL's Response is untimely. TPL was required to file its Response  
7 within three days of the Court's order granting leave to file. (Motion for Leave, Dkt. No. 689, at  
8 1.) But TPL did not file its Response until December 18, 2013, five days after the order issued on  
9 December 13, 2013, (Dkt. No. 696). TPL's Response is therefore late and need not be  
10 considered.

11 TPL's Second Amended Bill of Costs also remains replete with charges that HTC is not  
12 obligated to pay under 28 U.S.C. § 1920, Rule 54(d) of the Federal Rules of Civil Procedure, or  
13 Local Rule 54-3. TPL continues to fail to account for the fact that it did not prevail on four out of  
14 five patents in this case. The judgment in this case was, in fact, mixed. Thus, as explained  
15 below, the Court may exercise its discretion pursuant to Ninth Circuit law to award no costs at all.  
16 Should the Court be inclined to award costs, however, HTC asks that it not be forced to shoulder  
17 costs associated with the dismissed patents in this case or with another action in which TPL  
18 actually lost.

19 **II. NO COSTS SHOULD BE AWARDED.**

20 Regional circuit law governs the decision to award costs in patent cases. *See Manildra*  
21 *Milling Corp. v. Ogilvie Mills, Inc.*, 76 F.3d 1178, 1183 (Fed. Cir. 1996) ("[W]e are deferring to  
22 regional circuit law [regarding costs]."). "[E]ven if a party satisfies the definition of prevailing  
23 party, the district court judge retains broad discretion as to how much to award, if anything." *Id.*  
24 In the Ninth Circuit, denial of costs is proper where, among other factors, "the issues in the case  
25 were close and difficult," "the prevailing party's recovery was nominal or partial," and "the  
26 losing party litigated in good faith." *Champion Produce, Inc. v. Ruby Robinson Co.*, 342 F.3d  
27 1016, 1022 (9th Cir. 2003). Further, "[i]n the event of a mixed judgment, . . . it is within the  
28 discretion of a district court to require each party to bear its own costs." *Amarel v. Connell*, 102

1 F.3d 1494, 1523 (9th Cir. 1996). The “district court must ‘specify reasons’ for its refusal to  
2 award costs.” *Champion Produce*, 342 F.3d at 1022. Accordingly, the court in *Endurance*  
3 *American Speciality Ins. Co. v. Lance-Kashian & Co.* denied costs, citing the factors involved in  
4 its analysis:

5 This Court’s rulings resulted in a mixed judgment with both sides prevailing on  
6 issues. In addition, this action involves difficult insurance coverage and defense  
7 issues which the parties litigated in good faith. The issues required this Court’s  
8 significant consideration. Given the mixed judgment and good faith dispute over  
9 difficult issues, an award of costs is unwarranted and each side is to bear its  
10 respective costs.

11 No. CV F 10-1284 LJO DLB, 2011 WL 6012213 (E.D. Cal. Dec. 1, 2011) at \*2.

12 Similarly, the Federal Circuit affirmed a district court’s denial of costs “[where] neither  
13 party prevailed sufficiently to require an award of costs.” *Ruiz v. A.B. Chance Co.*, 234 F.3d 654,  
14 670 (Fed. Cir. 2000). The plaintiffs in that case prevailed on one claim, while the defendants  
15 prevailed on several other claims. *Id.* at 662. Given the mixed judgment, the district court  
16 declined to award costs to either party. In affirming the decision below, the Federal Circuit noted  
17 that courts have broad discretion to deny costs in such situations. *Id.* at 670. And courts often  
18 exercise that discretion when the prevailing party is ultimately awarded much less than initially  
19 sought. *See, e.g., Champion Produce*, 342 F.3d at 1023-24; *K-S-H Plastics, Inc. v. Carolite, Inc.*,  
20 408 F.2d 54, 60 (9th Cir. 1969) (affirming denial of costs based on “the complexity of the case,  
21 the extensive discovery made by the parties, and the limited relief granted to K-S-H”).

22 Here, both sides can be said to have prevailed on certain issues, the judgment was mixed,  
23 and HTC litigated in good faith. Thus, TPL is not entitled to any costs under the controlling case  
24 law in the Ninth Circuit. Not only were four out of five asserted patents dismissed before trial,  
25 but one of them (the ’890 Patent) was dismissed as a result of the Court’s granting of HTC’s  
26 motion for summary judgment, (Dkt. No. 594). The jury also found no willful infringement or  
27 inducement of infringement, and found only literal infringement of the single remaining patent  
28 among the five originally asserted. (*See* Dkt. No. 654.) In addition, the jury awarded TPL *less*  
*than one-tenth* of the damages originally sought. (*Compare* Expert Report of Stephen Prowse,  
Dkt. No. 573, at 39 (opining that TPL should be awarded \$10 million in damages), *with* Jury

1 Verdict, Dkt. No. 654, at 4 (ultimately awarding TPL damages of only \$958,560 for the life of the  
2 '336 Patent.) Further, it was never questioned that HTC litigated the case in good faith, as  
3 demonstrated by the strong defenses presented at trial. *See generally* trial transcripts.

4 Just as in *Endurance American Specialty Ins. Co.*, the issues in this case are complex and  
5 difficult, as TPL itself claims. (*See* Response at 11 (characterizing the technologies involved as  
6 “especially complex”).) And, just as in *Champion Produce* and *K-S-H Plastics*, the damages  
7 ultimately rewarded to TPL were substantially less than TPL sought. Thus, neither HTC nor TPL  
8 substantially prevailed with respect to the entire case. Rather, the issues were “close and  
9 difficult,” the judgment was “mixed,” and HTC litigated “in good faith.” *See Champion Produce*,  
10 342 F.3d at 1022; *see also Amarel*, 102 F.3d at 1523. Pursuant to Ninth Circuit law on this point,  
11 therefore, the Court has the discretion to refuse to award *any* costs to TPL or any other  
12 defendants.

### 13 **III. HTC’ PROPOSED APPORTIONMENT IS PROPER.**

14 If inclined to award costs, however, the Court should exercise its discretion to deny TPL  
15 recovery of costs associated mainly with other actions for which HTC should not shoulder the  
16 entire cost, as well as any costs related to the patents on which TPL did not prevail in this action.  
17 TPL has apportioned some costs in light of two other proceedings related to the instant case:  
18 *Acer, Inc., et al., v. Technology Properties Ltd., et al.*, No. 08-cv-00877 (the “Acer Action”), and  
19 *Barco N.V. v. Technology Properties Ltd., et al.*, No. 08-cv-05398 (the “Barco Action”). But  
20 TPL still fails to apportion costs properly attributable to another related action, *In the Matter of*  
21 *Certain Wireless Consumer Electronics Devices and Components Thereof*, Inv. No. 337-TA-853  
22 (the “ITC Investigation”), wherein the parties entered into a Cross-Use of Documents and  
23 Discovery Agreement (“Cross-Use Agreement”). (*See* Declaration of Kyle D. Chen In Support of  
24 Objections to TPL’s Bill of Costs, Ex. H.)

25 The ITC Investigation was an intense and laborious proceeding in which TPL ultimately  
26 did not prevail, and in which numerous respondents other than HTC were involved. TPL’s  
27 inclusion of costs related to that action is essentially an attempt to have HTC fund its losing  
28 efforts in the ITC. Further, TPL continues to fail to apportion costs in light of the fact that it did



1 not prevail on four out of five patents in this case. TPL is thus not entitled to the costs incurred in  
2 the course of litigating those dismissed patents, nor to the costs incurred in the course of asserting  
3 the '336 Patent in the ITC against numerous other parties.

4 **A. TPL's Costs Should Be Apportioned To Account for the Related ITC**  
5 **Investigation.**

6 TPL claims that it is not obligated to apportion costs to account for common claims or  
7 defenses in related actions, but only "to account for issues uniquely particular to other actions or  
8 plaintiffs." (Response at 4.) In support of this contention, TPL misinterprets both HTC's  
9 argument and the controlling law on this point.

10 TPL mischaracterizes as inapposite a case HTC relies upon. (Response at 4 n.2.) In  
11 *Ortho-McNeil Pharm., Inc. v. Mylan Labs., Inc.*, 569 F.3d 1353 (Fed. Cir. 2009), the court  
12 vacated an award of costs based on a settlement agreement that explicitly addressed taxable costs  
13 in order to avoid a double recovery of costs. *Id.* at 1357. And TPL asserts that "HTC does not  
14 claim there is any danger of double recovery here." (Response at 4 n.2.) But that is exactly what  
15 HTC is claiming. In its Objections, HTC asserts that "TPL's request is essentially a windfall  
16 because it seeks to recoup costs attributable to the ITC investigation in this Court." (Objections at  
17 6.) And just as in *Ortho-McNeil*, four out of the original respondent groups in the related ITC  
18 Investigation settled and paid TPL.<sup>1</sup> In arriving at each of these settlement amounts, TPL would  
19 surely have factored in its costs incurred in the ITC Investigation. Thus, if HTC is now forced to  
20 shoulder these costs *as well*, TPL would not only be reaping a windfall; it would also be  
21 essentially forcing HTC to fund TPL's losing case in the ITC. *See Camarillo v. Pabey*, No. 2:05-  
22 CV-455 PS, 2007 WL 3102144, at \*3 (N.D. Ind. Oct. 22, 2007) (dividing costs of each witness  
23 deposition by the number of cases the depositions were relevant to).

24 TPL's reliance on *Hynix Semiconductor Inc. v. Rambus Inc.* to the contrary is misplaced.  
25 There, the court found that a refusal to apportion costs by the number of other manufacturer  
26 parties was fair "as long as the costs taxed to Hynix are approximately what they would have

27 <sup>1</sup> Respondents Sierra Wireless, Inc. and Sierra Wireless America, Inc. settled on January 15, 2013.  
28 Respondents Kyocera Corporation and Kyocera Communications, Inc. settled on September 9, 2013. Respondents  
Acer, Inc., Acer America Corporation, and Amazon.com, Inc. settled on September 24, 2013.

1 been had Hynix been the only manufacturer participating in the Conduct Proceedings.” 697 F.  
2 Supp. 2d 1139, 1145 (N.D. Cal. 2010). This reasoning is consistent with HTC’s current  
3 objections. HTC’s position is precisely that TPL would not have incurred even approximately the  
4 same costs had it been litigating against HTC alone. For example, Daniel McNary Leckrone’s  
5 deposition was taken in the ITC investigation. (See ECF No. 670-2 at 45-46). Eight other  
6 respondents attended this deposition, and HTC did not ask even a single question. HTC does not  
7 seek to apportion the costs of this transcript eight times, but requests, at a minimum, that the costs  
8 be apportioned so that HTC is not left shouldering the entire amount for a deposition shared  
9 between the *HTC* Action, the *Acer* Action, and the ITC Investigation, which involved numerous  
10 other respondents.

11 Moreover, TPL is not entitled to recover costs that are properly attributable to the ITC  
12 action, even if only in part. Congress has set forth specific procedures and deadlines for  
13 obtaining an award of costs in an ITC proceeding. See 5 U.S.C. § 504(a)(2). Thus, if a portion of  
14 the costs TPL now seeks was accrued in furtherance of its progress in the ITC Investigation—and  
15 HTC contends that it was—TPL cannot now seek to have this Court award those costs. See  
16 *Competitive Techs., et al., v. Fujitsu Ltd., et al.*, No. C-02-1673 JCS, 2006 WL 6338914 at \*5  
17 (N.D. Cal. Aug. 23, 2006) (refusing to award costs associated with a parallel ITC investigation,  
18 “find[ing] no authority suggesting it has the power to circumvent [the procedure set forth in 5  
19 U.S.C. § 504(a)(2)]”). Accordingly, this Court should require that TPL reduce its claimed costs  
20 to account for costs common to the ITC Investigation and the instant action.

21 **B. TPL’s Costs Should Be Apportioned to Account for the Dismissed Patents in**  
22 **this Case, on Which TPL Did Not Prevail.**

23 TPL is not entitled to recover costs incurred in litigating its claims related to patents that  
24 were ultimately dismissed in this action. In support of its contention that no reduction is  
25 necessary to account for the dismissed patents, TPL cites no authority that specifically addresses  
26 *costs*. Rather, each case TPL cites on this point addresses a proposed reduction in *attorneys’ fees*.  
27 For example, TPL relies heavily on *Yeager v. AT&T Mobility, LLC* in support of its position. But  
28 the court there explicitly relied upon California law addressing the right to attorney fees in light

1 of joinder of causes of action. *Yeager v. AT&T Mobility, LLC*, No. CIV S 07-2517 KJM GGH,  
2 2012 WL 6629434, at \*4 (E.D. Cal. Dec. 19, 2012).

3 Furthermore, TPL's argument relies entirely on whether pursuing each of the originally  
4 asserted patents "involve[s] a common core of facts . . . based on related legal theories."  
5 (Response at 5 (internal citations and quotation marks omitted).) But, as TPL itself claimed, each  
6 of the patents originally asserted in this case implicated numerous different claims, based on  
7 different inventions, addressing separate and distinct problems to be solved in the relevant field of  
8 technology. *See* Defs.' Motion for Reconsideration of Certain Aspects of Claim Construction,  
9 Dkt. No. 385, at 2–3 ("That original application included 70 claims, disclosing a large number of  
10 *independent and distinct inventions*. . . . Because the original application contained so many  
11 *different inventions*, the examiner imposed a remarkable ten-way restriction requirement [that  
12 resulted in different patents] . . .") (emphasis added). The fact that TPL accused different sets of  
13 HTC products under different asserted patents further confirms that the infringement theories  
14 were different for each these patents.

15 HTC therefore proposes that three-fourths of the pre-September 19, 2013 costs be  
16 allocated to the three later-dismissed patents and not taxed against HTC. HTC does not seek to  
17 reduce the costs incurred after that date, as they relate solely to the '336 Patent.

#### 18 **IV. SPECIFIC OBJECTIONS**

19 As discussed above, given that the issues were "close and difficult" and that the judgment  
20 was "mixed" in this case, neither TPL nor any other defendant is entitled to any costs at all. But,  
21 in the event the Court is inclined to award costs, HTC sets forth below its specific objections to  
22 TPL's claimed costs, organized by its Exhibits I through O, (Dkt. Nos. 700-1 – 700-6).

##### 23 **A. HTC Accepts TPL's Reduction in its Claimed Service Costs. *See Ex. A.***

24 In response to HTC's Objections, TPL has amended its claimed costs to eliminate the  
25 charge for service of process to Texas Instruments ("TI") related to the *Acer* Action. TPL has  
26 not, however, reduced its costs to account for rush fees and other charges that resulted directly  
27 from TPL's own error. Nonetheless, HTC hereby refrains from further objecting to the remaining  
28 service of process fees currently claimed by TPL and therefore accepts the total of \$2,166.50 for

1 costs related to service of process.

2 **B. TPL Continues to Seek Fees for Transcripts Not Necessarily Obtained for an**  
3 **Appeal of this Case. See Ex. B.**

4 TPL has not made any changes to the amount it seeks to recover related to transcripts. For  
5 the reasons set forth below, HTC objects to TPL's current request for \$50,548.38 in transcript  
6 fees.

7 First, TPL continues to ignore that a large portion of the costs it claims against HTC were  
8 incurred in the parallel ITC Investigation.

9 Second, TPL has agreed to withdraw its costs associated with the deposition of David  
10 May, HTC's expert regarding the '890 Patent. Yet, in its Second Amended Bill of Costs, TPL  
11 has failed to deduct the charge of \$1,950.50 for videographer services related to David May's  
12 deposition. HTC therefore maintains its objection to this charge.

13 Third, TPL continues to seek some costs without any apportionment among Barco, Acer,  
14 and HTC. The *Barco* Action terminated on November 30, 2012. Thus, because TPL cannot tax  
15 HTC with Barco and Acer's costs, only a third of the transcript fees incurred prior to that date  
16 should be apportioned to HTC. For example, the \$433.61 in transcript fees TPL seeks for the  
17 January 27, 2012 hearing before Judge Ware should be apportioned by all three original  
18 defendants, resulting in a cost of only \$144.54 to HTC. TPL counters that, because this hearing  
19 was the *Markman* hearing, "which was relevant to HTC in its entirety," the cost of this transcript  
20 should not be apportioned at all. (Response at 7.) TPL cites no authority for this assertion,  
21 however. Indeed, the authority on this point supports the contrary position. *See, e.g., Camarillo*,  
22 2007 WL 3102144, at \*3 (dividing costs of each witness deposition by the number of cases the  
23 depositions were relevant to).

24 Similarly, the *Acer* Action terminated on September 17, 2013. Therefore, HTC should be  
25 apportioned only half of all transcript fees incurred prior to that date. Indeed, TPL recognizes  
26 that apportionment is appropriate, for it apportioned the transcript fee for the August 13, 2013  
27 hearing before Judge Grewal by twenty percent. Because that hearing was for both the *HTC* and  
28 the *Acer* Actions, however, this amount should instead be divided in half. All additional costs

1 incurred for services related to the *Acer* Action or *Barco* Action should be similarly apportioned.

2 Fourth, with respect to the extraneous costs related to depositions, TPL has agreed to  
 3 eliminate certain of these costs, such as those incurred for shipping and for expedited delivery.  
 4 HTC maintains its objections, however, to the other extraneous costs TPL continues to seek—  
 5 specifically, those related to videotaping depositions. Local Rule 54-3(c)(1) limits deposition  
 6 costs to the cost of an original and a copy. *See, e.g., City of Alameda, Cal. v. Nuveen Mun. High*  
 7 *Income Opportunity Fund*, Nos. C 08-4575 SI, C 09-1437 SI, 2012 WL 177566, at \*3 (N.D. Cal.  
 8 Jan. 23, 2013) (“Courts in the Northern District have held that costs for additional copies of  
 9 transcripts are not recoverable.”) (citing *Intermedics, Inc. v. Ventritex, Inc.*, No. C-90-20233 JW  
 10 (WDB), 1993 WL 515879, at \*3 (N.D. Cal. Dec. 2, 1993) (“If a party elects to have the transcript  
 11 made available in an additional, separate medium, . . . the party must bear any additional expenses  
 12 associated with that choice.”)). “This rule has been interpreted to mean that ‘the cost of *one* copy  
 13 of a deposition transcript’ is allowable.” *Affymetrix, Inc. v. Multilyte Ltd.*, No. C 03-03779 WHA,  
 14 2005 WL 2072113, at \*2 (N.D. Cal. Aug. 26, 2005) (quoting *Intermedics*, 1993 WL 515879, at  
 15 \*3 (emphasis in original)). Accordingly, courts in this district “properly disallow[] the additional  
 16 costs incurred in videotaping depositions for which stenographic written transcripts were also  
 17 obtained.” *Id.* Thus, “[i]f the deposition[s] had *only* been videotaped, [TPL] would have been  
 18 entitled to recover the cost of both an original tape and a copy, *i.e.*, two tapes total. But, having  
 19 ordered written transcripts of its depositions, [TPL] may not recover costs incurred for  
 20 videotaping those *same depositions.*” *Id.*

21 Finally, TPL also continues to seek costs for hearing transcripts not necessarily obtained  
 22 for an appeal in this case—*despite* conceding that such transcripts are “not normally allowable,”  
 23 (Response at 8) (emphasis omitted). In support of its argument that it is entitled to recover costs  
 24 from HTC for transcripts of hearings in the *Acer* Action,<sup>2</sup> TPL cites a completely inapposite case.

25 \_\_\_\_\_  
 26 <sup>2</sup> TPL claims that the March 18, 2011 hearing was not related to Acer alone. (Response at 8 n.4.) It is  
 27 correct that the hearing also addressed the parties’ case management schedule, as TPL points out. (*Id.*) But TPL  
 28 cannot credibly claim that the discussion of deadlines related to the issues in a sufficiently significant way as to  
 render this transcript necessarily obtained for an appeal *against HTC*. Rather, the bulk of this hearing addressed the  
 potential joinder of Mr. Moore, which discussion involved Acer only, and which was the more significant issue  
 addressed. HTC should thus not be forced to cover the cost of that transcript.

1 In *Affymetrix*, the court addressed a request for hearing transcripts *from a single case*. The  
 2 plaintiffs there were not requesting transcripts that involved a separate case, as TPL now does.  
 3 Thus, the language from *Affymetrix* quoted by TPL supports TPL’s claim for “the cost of all  
 4 hearing transcripts” involving HTC—which HTC does not dispute, in the properly apportioned  
 5 amount. But it does not support TPL’s claim for transcripts of hearings that related mainly to  
 6 another party. Such transcripts are completely unrelated to a possible appeal of the *HTC* Action  
 7 and should therefore not be taxed to HTC.

8 Accordingly, HTC respectfully requests the following:

9 **Proposed Reduction:\$22,233.07**

10 **Remaining Cost: \$30,067.28**

11 **C. TPL Seeks Excessive Witness Costs. See Ex. C.**

12 TPL has reduced the costs claimed for Dr. Prowse in light of the duplicate invoices TPL  
 13 submitted for Dr. Prowse’s expenses. TPL has not, however, reduced the unreasonable amount it  
 14 seeks for Mr. Moore’s lengthy stay during trial, nor for the exorbitant amounts Dr. Prowse  
 15 invoiced for his travel expenses. Mr. Moore, the inventor of the ‘336 Patent testified on only two  
 16 days of trial, September 23 and 24, 2013. Yet TPL claims it is entitled to reimbursement for Mr.  
 17 Moore’s expenses for eight consecutive days, September 22 through September 30. In support of  
 18 the its claim that HTC should be taxed for Mr. Moore’s expenses—which include valet parking  
 19 and room service charges—TPL cites no law. Instead, TPL merely claims that Mr. Moore’s  
 20 “presence at trial was necessary” and that “the associated costs are reasonable.” (Response at 8.)  
 21 But TPL provides no reasoning at all for these bald assertions.

22 First, HTC is not obligated to pay for such unnecessary services as valet parking and room  
 23 service meals. See *U.S. ex rel. Davis v. U.S. Training Ctr., Inc.*, 829 F.Supp. 2d 329, 334 (E.D.  
 24 Va. 2011) (refusing to tax charges for valet parking “because they are deemed unnecessary and  
 25 merely a matter of convenience”); *Capital Metro. Transp. Auth. v. Gillig Corp.*, No. A04CA-094-  
 26 SS, 2005 WL 1241877, at \*3 (W.D. Tex. May 11, 2005) (noting that “‘extras’ such as phone  
 27 calls and room service charges are not allowable lodging costs”) (emphasis omitted).

28 Second, HTC should not be forced to pay for eight days of lodging when Mr. Moore only

1 testified on two days of trial. The United States Supreme Court has interpreted “attendance” in §  
2 1821 to mean “necessary attendance.” *Hurtado v. United States*, 410 U.S. 578, 583–87 (1973).  
3 A witness is in necessary attendance in court when he is ready and available to testify. *Id.* at 584.  
4 A party may recover witness fees for days on which the witness attended the trial before actually  
5 testifying, but only if the witness was holding himself available to testify. *Louisiana Power &*  
6 *Light Co. v. Kellstrom*, 50 F.3d 319, 335 (5th Cir. 1995) (citing *Nissho-Iwai Co., Ltd. v.*  
7 *Occidental Crude Sales, Inc.*, 729 F.2d 1530, 1552–53 (5th Cir. 1984)). Accordingly, HTC  
8 should not be forced to pay for the entirety of Mr. Moore’s lodging. *See Trammel v. BASF Corp.*,  
9 No. 99-6897, 2002 WL 59114, at \*6 (N.D. Ill. Jan. 14, 2002) (awarding airfare and lodging costs  
10 for days on which witness testified but not for days on which he was present solely as a party  
11 representative); *Hartford Fin. Servs. Grp., Inc. v. Cleveland Pub. Library*, No. 99-1701, 2007 WL  
12 963320, at \*10 (N.D. Ohio Mar. 28, 2007) (allowing expenses associated with client  
13 representative’s service as a witness but excluding costs attributable to his service as a corporate  
14 representative). Therefore, Mr. Moore’s taxable subsistence costs during trial should be limited  
15 to four days—September 22 through September 25—to reimburse for the two days he testified,  
16 plus the two days dedicated to traveling to and from the courthouse.

17 In addition, the exorbitant fee TPL is charging for Dr. Prowse’s travel, lodging, and meals  
18 is unreasonably excessive. As TPL points out, the cost of airfare is recoverable *if the fare was the*  
19 *most economical available.* *ASIS Internet Servs. v. Optin Global, Inc.*, No. C-05-5124 JCS, 2008  
20 WL 5245931, at \*4 (N.D. Cal. Dec. 17, 2008). Dr. Prowse’s airfare from Dallas Fort Worth,  
21 Texas to San Jose, California cost \$1,911.60. Moreover, TPL has charged HTC an additional  
22 \$553.05 in change fees. Thus, including travel agent fees, TPL submits that HTC should pay  
23 \$2,528.65 for Dr. Prowse’s airfare. Although it is not possible to determine what the most  
24 economical fare available was at the time this ticket was purchased, a simple search on  
25 Expedia.com reveals that a last-minute roundtrip ticket flying the same route would cost as little  
26 as \$554.60. A cost of nearly five times that is simply unjustifiable. HTC therefore requests that  
27 Dr. Prowse’s airfare be limited to \$600.00.

1 HTC thus respectfully requests the following:

2 **Proposed Reduction: \$4,837.45**

3 **Remaining Cost: \$2,684.81**

4 **D. TPL Overreaches in its Request for Exemplification Fees. See Ex. D.**

5 TPL incorrectly asserts that HTC's objections to TPL's claimed exemplification costs  
6 relate only to apportionment. (Response at 11.) Rather, in addition to the apportionment  
7 argument related to the requested exemplification fees, HTC objects on the basis of TPL's failure  
8 to show that such costs were necessarily incurred. See *Ebay Inc. v. Kelora Systems, LLC*, Nos. C  
9 10-4947 CW (LB), C 11-1398 CW (LB), C 11-1548 CW (LB), 2013 U.S. Dist. LEXIS 49835, at  
10 \*15-18 (finding vaguely worded vendor invoices and declaration that such services were  
11 necessarily incurred were not sufficient). And TPL has failed to provide any counter to HTC's  
12 argument that most of the claimed exemplification fees were incurred well before trial and for  
13 visual aids that ultimately did not even appear at trial. These visual aids were therefore not  
14 "reasonably necessary to assist the jury or the Court in understanding the issue at trial." L.R. 54-  
15 3(d)(5). HTC thus maintains the entirety of its objections to TPL's claim for exemplification fees  
16 and therefore respectfully requests the following:

17 **Proposed Reduction: \$31,736.36**

18 **Remaining Cost: \$76,773.85**

19 **E. TPL Is Not Entitled To Tax HTC with the Full Amount of the Court**  
20 **Appointed Technical Advisor's Fees Because the Technical Advisor Was**  
21 **Appointed for Three Related Cases. See Ex. E.**

22 In response to HTC's objections to TPL's request for the full \$19,035.00 for Mr. Chan's  
23 fees, TPL again cites an inapposite case. The court in *Intermedics*, relied upon by TPL, rejected  
24 the plaintiff's argument that the defendant should not recover its share of the costs for a requested  
25 special master because the court had ordered that cost to be split *between the plaintiff and the*  
26 *defendant*. See *Intermedics*, 1993 WL 515879, at \*5. That situation is clearly distinguishable  
27 from the situation at hand, where the court ordered all plaintiffs in three related cases to share the  
28 cost of the technical advisor. HTC does not contend, as the plaintiff did in *Intermedics*, that TPL  
is not entitled to recovery of *any portion* of the cost it incurred for the technical advisor, but rather



1 that HTC is only obligated to reimburse TPL for its share of that cost and not for the technical  
2 advisor's role in the *Acer* and *Barco* Actions. (See Dkt. No. 350.)

3 HTC therefore respectfully requests that the charge for the court-appointed technical  
4 advisor be reduced by two-thirds, or \$12,690.00. Thus, the remaining cost is, at most, \$6,345.00.

5 **F. TPL Is Not Entitled to Costs for Expert Witness Deposition Preparation. See**  
6 **Ex. F.**

7 TPL has properly eliminated the charges incurred for independent consultants in  
8 connection with expert witness deposition preparation and has reduced the remainder of this cost  
9 by 50%. As an initial matter, TPL's 50% reduction of these charges has nothing to do with  
10 HTC's argument that it should not pay for time spent preparing for depositions, but rather to  
11 apportionment to account for related actions. (See Response at 10.) But, more importantly, TPL  
12 has failed to reduce this cost to eliminate their experts' fees charged for time spent preparing for  
13 their depositions. And contrary to what TPL claims in its Response, (*id.* at 10), HTC's argument  
14 does not go to whether TPL's expert's fees are reasonable, but rather whether HTC is obligated at  
15 all to pay for the many hours those experts spent preparing for their depositions.

16 Only a "slim majority" of federal courts holds that expert fees attributable to deposition  
17 preparation time can be shifted to the deposing party. *Borel v. Chevron U.S.A. Inc.*, 265 F.R.D.  
18 275, 277 (E.D. La.2010) (collecting cases). Underlying the reasoning for denying recovery of  
19 fees for deposition preparation is the "concern [] that the deposing party has no control over how  
20 much time an expert spends preparing for a deposition"). *Rock River Comm'ns, Inc. v. Univ.*  
21 *Music Grp.*, 276 F.R.D. 633, 636 (C.D. Cal. 2011); *see also id.* (noting that some lawyers might  
22 request brief preparation of their expert while others may require extensive preparation and  
23 concluding that, when the deposing party is forced to pay for what the retaining party desires,  
24 "the risk of unfairness is great"). Indeed, the 109 hours Dr. Prowse charged for preparing for a  
25 two-day deposition is a prime example of this risk. It would be an injustice to require HTC to pay  
26 for deposition preparation time that totals *almost ten times the duration of the actual deposition.*  
27 *See id.* (noting that preparation times of even three times or four times the length of a deposition  
28 may be unreasonable).

1 Another concern is that “deposition preparation and trial preparation often inevitably  
 2 overlap.” *Id.* (citing *Patterson Farm, Inc. v. City of Britton, S.D.*, 22 F. Supp. 2d 1085, 1094  
 3 (D.S.D. 1998) (“[T]ime spent ‘preparing’ for a deposition entails not only the expert’s review of  
 4 his conclusions and their basis, but also communication between the responding party’s counsel  
 5 and the expert to prepare the expert to best support the responding party’s case and to anticipate  
 6 questions from seeking party’s counsel.”)). Ultimately, the retaining party should be free to have  
 7 its experts prepare for depositions at length, should they so desire. “It makes little sense,  
 8 however, to require adversaries to scrutinize each other’s respective levels of preparation of their  
 9 experts or to force the court to second-guess the choices of counsel about how much preparation  
 10 is warranted.” *Id.* at 636–37 (holding that the retaining party is responsible for the costs of its  
 11 own experts’ time preparing for depositions). Accordingly, HTC respectfully requests that the  
 12 Court deny TPL’s claimed costs for expert deposition preparation.

### 13 V. SUMMARY

14 HTC provides the following table summarizing HTC’s first set of proposed reductions by  
 15 category for the Court’s convenience.

16 Description	TPL’s Second Amended Request	HTC’s Proposed Reduction	Remaining Cost
17 Service, Ex. A, 18 L.R. 54-3(a)(2)	\$2,166.50	\$0	\$2,166.50
19 Hearing Transcripts, Ex. B1, 20 L.R. 54-3(b)	\$1,648.19	\$938.72	\$709.47
21 Deposition Transcripts, Ex. B2, 22 L.R. 54-3(c)(1)	\$49,567.84	\$20,481.11	\$29,086.73
23 Deposition Exhibits, Ex. B3, 24 L.R. 54-3(c)(3)	\$1,084.32	\$813.24	\$271.08
25 Witness Expenses, Ex. C, 26 L.R. 54-3(3)	\$7,522.26	\$4,837.45	\$2,684.81
27 Obtaining Patents, Ex. D1, 28 L.R. 54(d)(1)	\$1,677.95	\$1,118.63	\$559.32
Exemplification, Ex. D2, L.R. 54(d)(2)	\$35,259.28	\$17,796.73	\$17,462.55
Trial Exhibit Binders, Ex. D3, L.R. 54(d)(4)	\$30,630.93	\$0	\$30,630.93
Graphic Consultants, Ex. D4, L.R. 54(d)(5)	\$40,942.04	\$12,821.00	\$28,121.04



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12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN JOSE DIVISION

17 HTC CORPORATION, HTC AMERICA,  
 INC.,

18 Plaintiffs,

19 v.

20 TECHNOLOGY PROPERTIES  
 21 LIMITED, PATRIOT SCIENTIFIC  
 CORPORATION, and ALLIACENSE  
 22 LIMITED,

23 Defendants.

Case No. 5:08-cv-00882 PSG

(Related to Case Nos. 5:08-cv-00877 PSG)

**DECLARATION OF KYLE D. CHEN IN  
 SUPPORT OF HTC'S OBJECTIONS TO  
 TPL'S SECOND AMENDED BILL OF  
 COSTS**

Complaint Filed: February 8, 2008  
 Trial Date: September 23, 2013

24 I, Kyle D. Chen, declare:

25 1. I am an attorney at the law firm of Cooley LLP, counsel in this action for Plaintiffs  
 26 HTC Corporation and HTC America, Inc. (collectively, "HTC"). I make this declaration in  
 27 support of HTC's Objections to TPL's Second Amended Bill of Costs. (Dkt. No. 700.) I have  
 28

1 personal knowledge based on information provided to me of the facts contained within this  
2 declaration, and if called as a witness, could testify competently to the matters contained herein.

3 1. Attached hereto as **Exhibits I** through **F** are spreadsheets prepared at my direction  
4 which set forth the costs requested by TPL on its Second Amended Bill of Costs, filed on  
5 October 31, 2013, (Dkt. No. 700), along with the itemized breakdown of these costs, the  
6 proposed reductions, and the proposed amended costs.

7 2. Attached hereto as **Exhibit I** is a spreadsheet corresponding to TPL's Exhibit A  
8 (Dkt. No. 700-1).

9 3. Attached hereto as **Exhibits J1, J2, and J3** are three spreadsheets corresponding  
10 to TPL's Exhibit B (Dkt. No. 700-2). **Exhibit J1** covers hearing transcripts. **Exhibit J2** covers  
11 deposition transcripts. **Exhibit J3** covers deposition exhibits.

12 4. Attached hereto as **Exhibit K** is a spreadsheet corresponding to TPL's Exhibit C  
13 (Dkt. No. 700-3).

14 5. Attached hereto as **Exhibits L1, L2, L3, and L4** are four spreadsheets  
15 corresponding to TPL's Exhibit D (Dkt. No. 700-4). **Exhibit L1** covers patents. **Exhibit L2**  
16 covers document production. **Exhibit L3** covers trial binders and exhibits. **Exhibit L4** covers  
17 graphics.

18 6. Attached hereto as **Exhibit M** is a spreadsheet corresponding to TPL's Exhibit E  
19 (Dkt. No 700-5).

20 7. Attached hereto as **Exhibit N** is a spreadsheet corresponding to TPL's Exhibit F  
21 (Dkt. No. 700-6).

22 8. Attached hereto as **Exhibit O1** is a spreadsheet prepared at my direction which  
23 sets forth the pre-September 19, 2013 costs. Attached hereto as **Exhibit O2** is a spreadsheet  
24 prepared at my direction which sets forth the post-September 19, 2013 costs.

25  
26  
27  
28



# EXHIBIT I

Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL- SECOND Amended Amount	Difference	Authority	Comments	First Proposed Deduction by HTC	First HTC Amended Amount	Current Proposed Deduction by HTC	Current HTC Amended Amt.
12/24/2012	S&R Services	Process Service 01/04/2013 (HTC & Acer, et al - 4 invoices)	\$578.50				Civil L.R. 54-3(a)(2)	Rush fees; witness fee advance fee				
		CSR deposition subpoena (HTC)	\$166.50	\$166.50	\$166.50	\$0.00		Rush fee but not separate from service fee; Advance Fee Charge (\$6.50) [fees not specified]	(6.50)	160.00		0.00
		LSI deposition subpoena (Acer)	\$125.50	\$0.00	0	\$0.00		Acer Subpoena		0.00	0.00	0.00
		Qualcomm deposition subpoena (HTC)	\$150.00	\$150.00	\$150.00	\$0.00		Rush fee but not separate from service fee; Advance Fee Charge (\$5.00) [fees not specified]	(5.00)	145.00		0.00
		CSR deposition subpoena (Acer)	\$136.50	\$0.00	0	\$0.00		Acer Subpoena		0.00	0.00	150.00
		Sub-Total for S&R Services (4 invoices)		\$316.50	\$316.50	\$0.00			(11.50)	305.00	0.00	316.50
1/7/2013	S&R Services	Process Service 01/07/2013 (Texas Instruments - 2 invoices)	\$370.00				2, Civil L.R. 54-3(a)(2)	Acer TI subpoena; rush fee		0.00		0.00
		Process Service 01/07/2013: Texas Instruments - HTC		\$200.00	\$200.00	\$0.00	Civil L.R. 54-3(a)(2)		(25.00)	175.00	0.00	200.00
		Process Service 01/07/2013: Texas Instruments - Acer		\$170.00	\$0.00	(\$170.00)	Civil L.R. 54-3(a)(2)		(170.00)	0.00	0.00	0.00
		Sub-Total for S&R Services (2 invoices)		\$370.00	\$200.00	(\$170.00)			(195.00)	175.00	0.00	200.00
1/24/2011	Specialized Legal Services, Inc.	Service on Samsung Semiconductor Inc	\$210.00	\$210.00	\$210.00	\$0.00	Civil L.R. 54-3(a)(2)	Rush fee (\$25.00); Fax charges (\$40.00)	(65.00)	145.00		0.00
1/24/2011	Specialized Legal Services, Inc.	Service on Cambridge Silicon Radio Inc	\$60.00	\$60.00	\$60.00	\$0.00	Civil L.R. 54-3(a)(2)			60.00	0.00	60.00
1/24/2011	Specialized Legal Services, Inc.	Service on Qualcomm Incorporated	\$206.00	\$206.00	\$206.00	\$0.00	Civil L.R. 54-3(a)(2)	Rush fee (\$25.00); Fax charges (\$36.00)	(61.00)	145.00		0.00
8/19/2013	Wheels of Justice, Inc.	Process server fees re: Texas Instruments	\$110.00	\$110.00	\$110.00	\$0.00	Civil L.R. 54-3(a)(2)			110.00	0.00	110.00
8/23/2013	Wheels of Justice, Inc.	Process service re: Sina Dena (8/21/13)	\$470.00	\$470.00	\$470.00	\$0.00	Civil L.R. 54-3(a)(2)	Bad address (\$110.00); Locate fee (\$125.00); time fee (\$125.00)	(360.00)	110.00		0.00
9/10/2013	Wheels of Justice, Inc.	Process service re: second subpoena (Texas Instruments)	\$594.00	\$594.00	\$594.00	\$0.00	Civil L.R. 54-3(a)(2)	Second fee for service (\$110.00); Check charge (\$44.00)	(154.00)	440.00		0.00
		<b>Total Ex. A</b>		<b>\$2,336.50</b>	<b>\$2,166.50</b>	<b>(\$170.00)</b>			<b>(\$846.50)</b>	<b>\$1,490.00</b>	<b>\$0.00</b>	<b>\$2,166.50</b>



# EXHIBIT J1

ALLOCATION OF COSTS  
 EXHIBIT J1

Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL- SECOND Amended Amount	Difference	Authority	Comments	Amount To Deduct	HTC Amended Amount
1/9/2012	Advantage Reporting Services	Transcript of December 21, 2011 telephonic hearing before Special Master	\$66.68	\$0.00	\$0.00	\$0.00	Civil L.R. 54-3(b)			\$0.00
2/22/2012	Advantage Reporting Services	Transcript of February 7, 2012 telephonic hearing before Special Master	100.00	\$0.00	\$0.00	\$0.00	Civil L.R. 54-3(b)			\$0.00
5/4/2012	Advantage Reporting Services	Transcript of February 24, 2012 telephonic hearing before Special Master	\$66.67	\$0.00	\$0.00	\$0.00	Civil L.R. 54-3(b)			\$0.00
8/2/2012	Advantage Reporting Services	Transcript of July 3, 2012 telephonic hearing before Special Master	\$67.68	\$0.00	\$0.00	\$0.00	Civil L.R. 54-3(b)			\$0.00
2/2/2012	Connie Kuhl, RMR, CRR	Transcript of January 27, 2012 hearing before Judge Ware	\$433.61	\$433.61	\$433.61	\$0.00	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$289.07)	\$144.54
12/12/2012	Gina Galvan Colin, CSR, CRR	Transcript of November 30, 2012 hearing before Judge Grewal	256.50	256.50	256.50	\$0.00	Civil L.R. 54-3(b)	Apportion Acer	(\$128.25)	\$128.25
3/7/2013	Irene Rodriguez, CSR, CRR	Transcript of February 8, 2013 hearing before Judge Grewal	\$119.00	\$0.00	\$0.00	\$0.00	Civil L.R. 54-3(b)			\$0.00
11/7/2008	Summer Clanton	Transcript of September 19, 2008 hearing before Judge Fogel	\$34.50	\$34.50	\$34.50	\$0.00	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$23.00)	\$11.50
1/30/2009	Summer Clanton	Transcript of January 30, 2009 hearing before Judge Fogel	\$36.00	\$36.00	\$36.00	\$0.00	Civil L.R. 54-3(b)	Apportion Acer	(\$18.00)	\$18.00
6/12/2009	Summer Clanton	Transcript of June 12, 2009 hearing before Judge Fogel	\$172.50	\$172.50	\$172.50	\$0.00	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$115.00)	\$57.50
11/16/2009	Summer Clanton	Transcript of November 13, 2009 hearing before Judge Fogel	\$23.25	\$23.25	\$23.25	\$0.00	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$15.50)	\$7.75
3/21/2011	Summer Fisher	Transcript of March 18, 2011 hearing before Judge Fogel	\$144.75	\$144.75	\$144.75	\$0.00	Civil L.R. 54-3(b)	Acer only	(\$144.75)	\$0.00
3/20/2013	Summer Fisher	Transcript of March 19, 2013 hearing before Judge Grewal	\$96.80	\$0.00	\$0.00	\$0.00	Civil L.R. 54-3(b)			\$0.00
8/28/2013	Summer Fisher	Transcript of March 13, 2013 hearing before Judge Grewal	683.85	\$547.08	\$547.08	\$0.00	Civil L.R. 54-3(b)	Apportion Acer	(\$205.15)	\$341.93
		<b>Hearing Transcript Sub-Total</b>		<b>\$1,648.19</b>					<b>(\$938.72)</b>	<b>\$709.47</b>

# EXHIBIT J2

Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL- SECOND Amended Amount	Difference	Authority	<Real Time>	<Rough>	<Computer Rentals>	<Processing/Shipping>	<Expedite>	Comments	First HTC Deductions	First HTC Amended Amount	Current HTC Deductions	Current HTC Amended Amount
1/7/2011	Alderson Reporting Co., Inc.	Court reporter services re: deposition of V. Oklobdzja (12/22/2010)	\$1,088.75	\$544.38	\$544.38	0.00	Civil L.R. 54-3(c)(1)	\$220.00			\$55.00		Extra costs; Acer; ITC	(\$340.94)	\$203.44	(\$340.94)	\$203.44
10/17/2012	Alderson Reporting Company, Inc	Court reporter services re: deposition of V. Oklobdzja (10/12/2012)	\$2,635.12	\$1,317.56	\$623.44	(694.12)	Civil L.R. 54-3(c)(1)	\$518.00			\$55.00	\$694.12	Extra costs; Acer; ITC	(\$975.56)	\$342.00	(\$281.44)	\$342.00
11/15/2012	Gregory Edwards, LLC	Court reporter services re: deposition of A. Wolfe (10/15/2012)	\$1,693.33	\$0.00	\$0.00	0.00	Civil L.R. 54-3(c)(1)						Acer only	\$0.00	\$0.00	\$0.00	\$0.00
2/14/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of R. Fish (1/28/13) (2 invoices @ 50%)	\$1,813.87	\$1,813.87	\$1,813.87	0.00	Civil L.R. 54-3(c)(1)	X	X	X	X		ITC	(\$906.94)	\$906.93	(\$906.94)	\$906.93
2/25/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of E. Liang (1/30/13-2/1/13) (6 invoices)	\$9,489.34	\$9,489.34	\$9,489.34	0.00	Civil L.R. 54-3(c)(1)	X	X	X	X		ITC	(\$4,744.67)	\$4,744.67	(\$4,744.67)	\$4,744.67
2/25/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of J. Chen (2/4/13) (2 invoices)	\$3,488.87	\$0.00	\$0.00	0.00	Civil L.R. 54-3(c)(1)						Acer only	\$0.00	\$0.00	\$0.00	\$0.00
3/6/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of S. Dena (2/7/13) (2 invoices)	\$3,898.81	\$3,898.81	\$3,898.81	0.00	Civil L.R. 54-3(c)(1)	X	X	X	X		Acer; ITC	(\$2,924.11)	\$974.70	(\$2,924.11)	\$974.70
3/7/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of H. Lai (2/5/13) (2 invoices @ 50%)	\$1,542.84	\$1,542.84	\$1,542.84	0.00	Civil L.R. 54-3(c)(1)	X	X	X	X		ITC	(\$771.42)	\$771.42	(\$771.42)	\$771.42
3/19/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of J. Casasanta (2/20/13) (2 invoices)	\$2,742.54	\$0.00	\$0.00	0.00	Civil L.R. 54-3(c)(1)						Acer only	\$0.00	\$0.00	\$0.00	\$0.00
3/20/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of J. Witt (2/12/13) (2 invoices)	\$2,137.51	\$0.00	\$0.00	0.00	Civil L.R. 54-3(c)(1)						Acer only	\$0.00	\$0.00	\$0.00	\$0.00
7/18/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of T. Gafford 7/8/13 (2 invoices)	\$4,369.43	\$4,369.43	\$4,369.43	0.00	Civil L.R. 54-3(c)(1)	X	X	X	X			\$0.00	\$4,369.43	\$0.00	\$4,369.43
7/18/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of C. Bokhart 7/10/13 (2 invoices)	\$3,336.17	\$3,336.17	\$3,336.17	0.00	Civil L.R. 54-3(c)(1)	X	X	X	X			\$0.00	\$3,336.17	\$0.00	\$3,336.17
7/30/2013	Gregory Edwards, LLC	Court reporter and videographer services re: M. May (7/16/13) (2 invoices)	\$4,233.48	\$4,233.48	\$0.00	(4,233.48)	Civil L.R. 54-3(c)(1)						890 patent	(\$4,233.48)	\$0.00	\$0.00	\$0.00
7/30/2013	Gregory Edwards, LLC	Court reporter and videographer services re: Dr. A. Wolfe (7/19/13) (2 invoices)	\$5,551.68	\$0.00	\$0.00	0.00	Civil L.R. 54-3(c)(1)							\$0.00	\$0.00	\$0.00	\$0.00
7/24/2013	LegalLink, Inc.	Court reporter services re: deposition of V. Oklobdzja (7/13, 7/15/13) (2 invoices)	\$6,048.00	\$3,024.00	\$2,113.75	(910.25)	Civil L.R. 54-3(c)(1)	\$646.50	\$646.50	\$100.00	\$30.00	\$1,760.50	Extra costs; Acer; ITC	(\$2,307.88)	\$716.12	(\$1,397.63)	\$716.12
7/24/2013	LegalLink, Inc.	Court reporter services re: deposition of S. Prowse (7/15/13)	\$3,773.00	\$1,886.50	\$1,316.75	(669.75)	Civil L.R. 54-3(c)(1)	\$414.00	\$414.00	\$50.00	\$30.00	\$1,109.50	Extra costs; Acer	(\$1,008.75)	\$877.75	(\$439.00)	\$877.75
7/24/2013	LegalLink, Inc.	Court reporter services re: deposition of V. Oklobdzja (7/13 & 7/15/13) (2 invoices)	\$1,713.00	\$856.50	\$584.25	(272.25)	Civil L.R. 54-3(c)(1)	\$209.00	\$189.00	\$50.00	\$30.00	\$514.50	Extra costs; Acer	(\$496.25)	\$360.25	(\$224.00)	\$360.25
8/22/2013	LegalLink, Inc.	Videographer services re: deposition of V. Oklobdzja (7/13 & 7/15/13) (2 invoices)	\$1,630.00	\$815.00	\$815.00	0.00	Civil L.R. 54-3(c)(1)						Acer; ITC	(\$407.50)	\$407.50	(\$407.50)	\$407.50
1/18/2011	Nogara Reporting Service	Court reporter services re: deposition of D. May (12/13/2010)	\$2,181.25	\$2,181.25	\$0.00	(2,181.25)	Civil L.R. 54-3(c)(1)						Acer	(\$2,181.25)	\$0.00	\$0.00	\$0.00
3/29/2011	Sarnoff Court Reporters	Videographer services re: deposition of G. Goodere (3/29/2011)	\$625.00	\$625.00	\$625.00	0.00	Civil L.R. 54-3(c)(1)						Acer; ITC	(\$468.75)	\$156.25	(\$468.75)	\$156.25
4/15/2011	Sarnoff Court Reporters	Court reporter services re: deposition of G. Goodere (3/29/2011)	\$2,338.05	\$2,338.05	\$2,298.05	(40.00)	Civil L.R. 54-3(c)(1)		\$296.80		\$40.00		Extra costs; Acer; ITC	(\$1,837.74)	\$500.31	(\$1,797.74)	\$500.31
12/13/2010	Tradewinds-West Video Prod.	Videographer services re: deposition of D. May (12/13/2010)	\$1,950.50	\$1,950.50	\$1,950.50	0.00	Civil L.R. 54-3(c)(1)						890 patent	(\$1,950.50)	\$0.00	(\$1,950.50)	\$0.00
2/16/2013	Veritext	Court reporter services re: deposition of Daniel Leckrone (@50%)	\$685.18	\$685.18	\$667.18	(18.00)	Civil L.R. 54-3(c)(1)		\$292.60		\$78.00		Extra costs; ITC	(\$527.89)	\$157.29	(\$509.89)	\$157.29
2/21/2013	Veritext	Court reporter services re: deposition of Dwayne Hannah 2/5/13 (@50%)	\$300.48	\$300.48	\$272.48	(28.00)	Civil L.R. 54-3(c)(1)		\$124.60		\$78.00		Extra costs; ITC	(\$251.54)	\$48.94	(\$223.54)	\$48.94
2/27/2013	Veritext	Court reporter services re: deposition of D. Leckrone (2/8/13)	\$1,069.35	\$1,069.35	\$1,041.35	(28.00)	Civil L.R. 54-3(c)(1)	\$295.35			\$78.00		Extra costs; Acer; ITC	(\$895.35)	\$174.00	(\$867.35)	\$174.00
2/27/2013	Veritext	Court reporter and videographer services re: deposition of D.M. Leckrone (2/11/13) (2 invoices)	\$1,401.20	\$1,401.20	\$1,345.20	(56.00)	Civil L.R. 54-3(c)(1)	\$275.55			\$106.00		Extra costs; Acer; ITC	(\$1,146.29)	\$254.91	(\$1,090.29)	\$254.91
2/27/2013	Veritext	Court reporter services re: deposition of D. Hannah (2/12/13)	\$1,920.45	\$1,920.45	\$1,892.45	(28.00)	Civil L.R. 54-3(c)(1)	\$424.05			\$78.00		Extra costs; Acer; ITC	(\$354.60)	\$1,565.85	(\$326.60)	\$1,565.85
2/27/2013	Veritext	Court reporter and services re: deposition of D. Leckrone (2/14/13)	\$911.05	\$911.05	\$911.05	0.00	Civil L.R. 54-3(c)(1)	\$237.60			\$78.00		Acer; ITC	(\$808.80)	\$102.25	(\$808.80)	\$102.25
10/07/2013	Lee-Anne Shortridge, CSR	Trial transcripts for September 23 through October 3, 2013	New charge	New charge	\$7,835.25	7,835.25	Civil L.R. 54-3(c)(1)									\$0.00	\$7,835.25
11/08/2013	Lee-Anne Shortridge, CSR	Hearing Transcript for September 20, 2013	New charge	New charge	\$281.30	281.30	Civil L.R. 54-3(c)(1)									\$0.00	\$281.30
		<b>Total (Ex. B - L.R. 54-3(c)(1))</b>		<b>\$50,510.39</b>	<b>\$49,567.84</b>	<b>(942.55)</b>		<b>\$3,240.05</b>	<b>\$1,963.50</b>	<b>\$200.00</b>	<b>\$736.00</b>	<b>\$4,078.62</b>		<b>(29,540.21)</b>	<b>\$20,970.18</b>	<b>(20,481.11)</b>	<b>\$29,086.73</b>

# EXHIBIT J3

Date	Vendor	Description	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	Current HTC Deductions	Current HTC Amended Amount
	WARP 9	Reproduction of deposition exhibits designated by Defendants (7930 pages x 2 copies x \$0.08 per page)	\$1,084.32	\$1,084.32	Civil L.R. 54-3(c)(3)		(\$813.24)	\$271.08
		<b>Total (Ex. B, L.R. 54-3(c)(3))</b>		<b>\$1,084.32</b>			<b>(\$813.24)</b>	<b>\$271.08</b>

# EXHIBIT K

Date	Vendor	Description	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	First HTC Deductions	First HTC Amended Amount	Current HTC Deductions	Current HTC Amended Amount
10/1/2013	Charles Moore	Witness travel and lodging expenses for trial	\$3,419.71	\$3,419.71	Civil L.R. 54-3(e)	Only costs incurred 9/22 -- 9/25 recoverable; valet parking	(\$1,634.71)			
								\$1,785.00	(\$2,361.96)	\$1,057.75
10/1/2013	Dr. V. Oklobdzija	Witness parking expenses for trial	\$136.00	\$136.00	Civil L.R. 54-3(e)		(\$136.00)	\$0.00	\$0.00	\$136.00
10/14/2013	Dr. S. Prowse (FTI Consulting)	Witness travel and lodging expenses for trial	\$3,966.55	\$3,966.55	Civil L.R. 54-3(e)	Excessive airfare	(\$3,966.55)			
								\$0.00	(\$2,475.49)	\$1,491.06
		<b>Total (Ex. C, L.R. 54-3(e))</b>		<b>\$7,522.26</b>			<b>(\$5,737.26)</b>	<b>\$1,785.00</b>	<b>(\$4,837.45)</b>	<b>\$2,684.81</b>



# EXHIBIT L1

Date	Vendor	Description	TPL Amended Amount	TPL Second Amended Amount	Authority	Current HTC Deductions	Current HTC Amended Amount
4/15/2008	Cooper Patent Search & Service	Obtain US Patent 6,598,148, 5,809,336, 5,784,584	\$742.60	\$742.60	Civil L.R. 54-3(d)(1)	(\$495.07)	\$247.53
3/24/2010	Cooper Patent Search & Service	P Parker: patent 5,247,212	\$451.35	\$451.35	Civil L.R. 54-3(d)(1)	(\$300.90)	\$150.45
1/31/2011	Cooper Patent Search & Service	Copy of the file wrapper without ref to US Patent 4,689,581	\$148.00	\$148.00	Civil L.R. 54-3(d)(1)	(\$98.67)	\$49.33
4/15/2008	Delphion, Inc.	Delphion Inc - Patent US06598148	\$3.00	\$3.00	Civil L.R. 54-3(d)(1)	(\$2.00)	\$1.00
9/12/2008	Delphion, Inc.	Delphion: copies of patents	\$12.00	\$12.00	Civil L.R. 54-3(d)(1)	(\$8.00)	\$4.00
2/4/2009	Delphion, Inc.	Delphion: TPL Patent Charges	\$33.00	\$33.00	Civil L.R. 54-3(d)(1)	(\$22.00)	\$11.00
2/13/2009	Landon IP, Inc.	2 Patent Title Searches	\$103.75	\$103.75	Civil L.R. 54-3(d)(1)	(\$69.17)	\$34.58
2/18/2009	Landon IP, Inc.	Patent File History 90/002593	\$184.25	\$184.25	Civil L.R. 54-3(d)(1)	(\$122.83)	\$61.42
		<b>Total (Ex. D, L.R. 54-3(d)(1))</b>		<b>\$1,677.95</b>		<b>(\$1,118.63)</b>	<b>\$559.32</b>

# EXHIBIT L2

Date	Vendor	Description	TPL Amount	TPL Second Amended Amount	Authority	Current HTC Deductions	Current HTC Amended Amount
7/26/2010	Amazon.com	Hard drives for TPL productions	\$211.88	\$70.63	Civil L.R. 54-3(d)(2)	(\$35.32)	\$35.32
10/25/2010	Amazon.com	3 Hard Drives for TPL licensee correspondence production	\$149.97	\$49.99	Civil L.R. 54-3(d)(2)	(\$25.00)	\$25.00
11/17/2010	Amazon.com	Hard drives for TPL productions	\$127.96	\$42.65	Civil L.R. 54-3(d)(2)	(\$21.33)	\$21.33
3/29/2011	Amazon.com	G Glass @ Amazon.com: 5x hard drives for TPL email doc prod.	\$194.90	\$64.97	Civil L.R. 54-3(d)(2)	(\$32.49)	\$32.49
11/8/2011	Amazon.com	G Glass: flash drives for document production/collections	\$79.00	\$26.33	Civil L.R. 54-3(d)(2)	(\$13.17)	\$13.17
9/17/2012	Best Buy	USB and back up drives for document production	\$401.00	\$401.00	Civil L.R. 54-3(d)(2)	(\$200.50)	\$200.50
9/29/2012	Best Buy	Hard drives for document production	\$389.67	\$389.67	Civil L.R. 54-3(d)(2)	(\$194.84)	\$194.84
1/3/2013	Best Buy	Hard drives for document production	\$477.36	\$477.36	Civil L.R. 54-3(d)(2)	(\$238.68)	\$238.68
10/31/2010	Iris Data Services, LLC	Tiff processing w/Metadata extraction	\$5,815.92	\$5,815.92	Civil L.R. 54-3(d)(2)	(\$2,907.96)	\$2,907.96
3/31/2011	Iris Data Services, LLC	Tiff processing w/Metadata extraction	\$3,694.96	\$3,694.96	Civil L.R. 54-3(d)(2)	(\$1,847.48)	\$1,847.48
4/6/2011	Iris Data Services, LLC	G Glass: 2x Tiff Processing w/Metadata extraction	\$5,718.91	\$5,718.91	Civil L.R. 54-3(d)(2)	(\$2,859.46)	\$2,859.46
4/19/2011	Iris Data Services, LLC	Tiff processing w/Metadata extraction	\$1,939.31	\$1,939.31	Civil L.R. 54-3(d)(2)	(\$969.66)	\$969.66
9/20/2011	Iris Data Services, LLC	Tiff Processing w/Metadata Extraction; OCR; Tech time	\$3,205.01	\$3,205.01	Civil L.R. 54-3(d)(2)	(\$1,602.51)	\$1,602.51
11/22/2011	WARP 9	Warp 9 Inv #1122201108 - Scanning for production to HTC	\$12.56	\$12.56	Civil L.R. 54-3(d)(2)	(\$6.28)	\$6.28
12/31/2011	WARP 9	Warp 9 Inv #12312011233- Scanning for production to HTC	\$13.08	\$13.08	Civil L.R. 54-3(d)(2)	(\$6.54)	\$6.54
1/23/2012	WARP 9	Warp 9 Inv #12011012 - Scanning for production to HTC	\$578.92	\$578.92	Civil L.R. 54-3(d)(2)	(\$289.46)	\$289.46
1/30/2012	WARP 9	Warp 9 Inv #1201162 - Scanning for production to HTC	\$42.06	\$42.06	Civil L.R. 54-3(d)(2)	(\$21.03)	\$21.03
2/6/2012	WARP 9	Warp 9 Inv #1201223 - Scanning for production to HTC	\$42.06	\$42.06	Civil L.R. 54-3(d)(2)	(\$21.03)	\$21.03
2/13/2012	WARP 9	Warp 9 Inv #1201306 - Scanning for production to HTC	\$42.06	\$42.06	Civil L.R. 54-3(d)(2)	(\$21.03)	\$21.03
4/2/2012	WARP 9	Warp 9 Inv #120171	\$170.71	\$170.71	Civil L.R. 54-3(d)(2)	(\$85.36)	\$85.36
8/6/2012	WARP 9	Warp 9 Inv #1202639 - Scanning for production to HTC	\$279.93	\$279.93	Civil L.R. 54-3(d)(2)	(\$139.97)	\$139.97
10/8/2012	WARP 9	Warp 9 Inv #1202903 - Scanning for production to HTC	\$289.41	\$289.41	Civil L.R. 54-3(d)(2)	(\$144.71)	\$144.71
10/15/2012	WARP 9	Warp 9 Inv #1202933 - Scanning for production to HTC	\$2,487.89	\$2,487.89	Civil L.R. 54-3(d)(2)	(\$1,243.95)	\$1,243.95
10/22/2012	WARP 9	Warp 9 Inv #1202964 - Scanning for production to HTC	\$2,623.07	\$2,623.07	Civil L.R. 54-3(d)(2)	(\$1,311.54)	\$1,311.54
12/3/2012	WARP 9	Warp 9 Inv #1203149 - Scanning for production to HTC	\$2,380.05	\$2,380.05	Civil L.R. 54-3(d)(2)	(\$1,190.03)	\$1,190.03
1/14/2013	WARP 9	Warp 9 Inv #1203345 re discovery - Photocopying for production to HTC	\$3,561.50	\$3,561.50	Civil L.R. 54-3(d)(2)	(\$1,780.75)	\$1,780.75
3/12/2013	WARP 9	Warp 9 Inv #1203686 - Scanning /coding for production to HTC	\$158.93	\$158.93	Civil L.R. 54-3(d)(2)	(\$79.47)	\$79.47
3/19/2013	WARP 9	Warp 9 Inv #1203719 - Scanning for production to HTC	\$8.16	\$8.16	Civil L.R. 54-3(d)(2)	(\$4.08)	\$4.08
4/1/2013	WARP 9	Warp 9 Inv #1203765 - Scanning for production to HTC	\$3.82	\$3.82	Civil L.R. 54-3(d)(2)	(\$1.91)	\$1.91
8/5/2013	WARP 9	Warp 9 Inv #1204308 re pre trial disclosures; damages project	\$668.36	\$668.36	Civil L.R. 54-3(d)(2)	(\$501.27)	\$167.09
		<b>Total (Ex. D, L.R. 54-3(d)(2))</b>		<b>\$35,259.28</b>		<b>(\$17,796.73)</b>	<b>\$17,462.55</b>

# EXHIBIT L3

Date	Vendor	Description	TPL Amount	TPL Second Amended Amount	Authority	Current HTC Deductions	Current HTC Amended Amount
9/19/2013	WARP 9	Warp 9 Inv #1204533 re boxes of trial exhibits placed next to the bench	\$18,472.94	\$18,472.94	Civil L.R. 54-3(d)(4)	\$0.00	\$18,472.94
9/23/2013	WARP 9	Warp 9 Inv #1204538 re trial exhibits binders for opposing counsel, judge and witness during trial	\$13,221.28	\$6,610.64	Civil L.R. 54-3(d)(4)	\$0.00	\$6,610.64
9/24/2013	WARP 9	Warp 9 Inv #1204554 re trial exhibits binders for opposing counsel, judge and witness during trial	\$424.94	\$212.47	Civil L.R. 54-3(d)(4)	\$0.00	\$212.47
9/25/2013	WARP 9	Warp 9 Inv #1204556 re trial exhibits binders for opposing counsel, judge and witness during trial	\$593.01	\$296.51	Civil L.R. 54-3(d)(4)	\$0.00	\$296.51
9/26/2013	WARP 9	Warp 9 Inv #1204563 re trial exhibits binders for opposing counsel, judge and witness during trial	\$1,100.91	\$550.46	Civil L.R. 54-3(d)(4)	\$0.00	\$550.46
9/27/2013	WARP 9	Warp 9 Inv #1204572 re trial exhibits binders for opposing counsel, judge and witness during trial	\$2,070.74	\$1,035.37	Civil L.R. 54-3(d)(4)	\$0.00	\$1,035.37
10/1/2013	WARP 9	Warp 9 Inv #1204583 re trial exhibits binders for opposing counsel, judge and witness during trial	\$1,019.77	\$509.89	Civil L.R. 54-3(d)(4)	\$0.00	\$509.89
10/1/2013	WARP 9	Warp 9 Inv #1204590 re trial exhibits binders for opposing counsel, judge and witness during trial	\$1,674.94	\$837.47	Civil L.R. 54-3(d)(4)	\$0.00	\$837.47
10/2/2013	WARP 9	Warp 9 Inv #1204595 re trial exhibits binders for opposing counsel, judge and witness during trial	\$4,210.35	\$2,105.18	Civil L.R. 54-3(d)(4)	\$0.00	\$2,105.18
		<b>Total (Ex. D, L.R. 54-3(d)(4))</b>		<b>\$30,630.93</b>		<b>\$0.00</b>	<b>\$30,630.93</b>

# EXHIBIT L4

Date	Vendor	Description	TPL Amount	Amended Amount	Authority	Comments	Amount to Deduct	HTC Amended Amount
2/3/2012	Advanced Courtroom Technologies, Inc	Trial consultant - graphics for hearing - Trial visual aids	\$12,833.05	\$12,833.05	Civil L.R. 54-3(d)(5)	1/3 Acer/Barco	(\$8,555.37)	\$4,277.68
10/4/2013	Advanced Courtroom Technologies, Inc	Trial consultant - graphics for trial - Trial visual aids	\$15,230.25	\$15,230.25	Civil L.R. 54-3(d)(5)		\$0.00	\$15,230.25
9/18/2013	Amazon.com	Phone used as exhibit re MMP NCDC trial	\$79.99	\$79.99	Civil L.R. 54-3(d)(5)		\$0.00	\$79.99
10/14/2013	FTI Consulting	Preparation of demonstratives for trial	\$4,267.50	\$4,267.50	Civil L.R. 54-3(d)(5)		\$0.00	\$4,267.50
9/30/2013	LegalVision Inc.	LegalVision (graphics) re MMP NCDC trial - Trial visual aids	\$8,531.25	\$8,531.25	Civil L.R. 54-3(d)(5)		(\$4,265.63)	\$4,265.62
		<b>Total (Ex. D, L.R. 54-3(d)(5))</b>		<b>\$40,942.04</b>			<b>(\$12,821.00)</b>	<b>\$28,121.04</b>



# EXHIBIT M

Date	Vendor	Description	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	Current HTC Proposed Deduction	First HTC Amended Amount
2/8/2012	Chan, Kwan	Kwan Chan - deposit for technical expert per Judge Ware	\$19,035.00	\$19,035.00	Civil L.R. 54-3(f); 28 U.S.C. § 1920(6)	1/3 Acer/Barco	(\$12,690.00)	\$6,345.00
<b>Total (Ex. E, L.R. 54-3(f))</b>				<b>\$19,035.00</b>			<b>(\$12,690.00)</b>	<b>\$6,345.00</b>

# EXHIBIT N

ITEMIZATION OF COSTS  
 EXHIBIT N

Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL-SECOND Amended Amount	TPL's Deduction	Authority	Comments	First HTC Deductions	First HTC Amended Amount	Current HTC Deductions	Current HTC Amended Amount
7/17/2013	FTI Consulting	Expert deposition preparation, including expenses	\$3,893.28	\$3,893.28	\$0.00	(\$3,893.28)	Civil L.R. 54-3(e); FRCP 26(b)(4)(E)	Not Recoverable	(\$3,893.28)	\$0.00	\$0.00	\$0.00
8/16/2013	FTI Consulting	Expert deposition preparation, including expenses	\$66,431.55	\$66,431.55	\$31,232.50	(\$35,199.05)	Civil L.R. 54-3(e); FRCP 26(b)(4)(E)	Not Recoverable	(\$66,431.55)	\$0.00	(\$31,232.50)	\$0.00
8/4/2013	Integration Corp.	Expert deposition preparation	\$13,620.52	\$13,620.52	\$6,810.00	(\$6,810.52)	FRCP 26(b)(4)(E)	Not Recoverable	(\$13,620.52)	\$0.00	(\$6,810.00)	\$0.00
		<b>Total (Ex. F)</b>		\$83,945.35	\$38,042.50	(\$45,902.85)			(\$83,945.35)	\$0.00	(\$38,042.50)	\$0.00

# EXHIBIT 01

## ITEMIZATION OF COSTS

## EXHIBIT O1

PRE-SEPTEMBER 19, 2013

Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	Current HTC Deduction	Current HTC Amended Amount
4/15/2008	Cooper Patent Search & Service	Obtain US Patent 6,598,148, 5,809,336, 5,784,584	\$742.60	\$742.60	\$742.60	Civil L.R. 54-3(d)(1)		(\$495.07)	\$247.53
4/15/2008	Delphion, Inc.	Delphion Inc - Patent US06598148	\$3.00	\$3.00	\$3.00	Civil L.R. 54-3(d)(1)		(\$2.00)	\$1.00
9/12/2008	Delphion, Inc.	Delphion: copies of patents	\$12.00	\$12.00	\$12.00	Civil L.R. 54-3(d)(1)		(\$8.00)	\$4.00
11/7/2008	Summer Clanton	Transcript of September 19, 2008 hearing before Judge Fogel	\$34.50	\$34.50	\$34.50	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$23.00)	\$11.50
1/30/2009	Summer Clanton	Transcript of January 30, 2009 hearing before Judge Fogel	\$36.00	\$36.00	\$36.00	Civil L.R. 54-3(b)	Apportion Acer	(\$18.00)	\$18.00
2/4/2009	Delphion, Inc.	Delphion: TPL Patent Charges	\$33.00	\$33.00	\$33.00	Civil L.R. 54-3(d)(1)		(\$22.00)	\$11.00
2/13/2009	Landon IP, Inc.	2 Patent Title Searches	\$103.75	\$103.75	\$103.75	Civil L.R. 54-3(d)(1)		(\$69.17)	\$34.58
2/18/2009	Landon IP, Inc.	Patent File History 90/002593	\$184.25	\$184.25	\$184.25	Civil L.R. 54-3(d)(1)		(\$122.83)	\$61.42
6/12/2009	Summer Clanton	Transcript of June 12, 2009 hearing before Judge Fogel	\$172.50	\$172.50	\$172.50	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$115.00)	\$57.50
11/16/2009	Summer Clanton	Transcript of November 13, 2009 hearing before Judge Fogel	\$23.25	\$23.25	\$23.25	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$15.50)	\$7.75
3/24/2010	Cooper Patent Search & Service	P Parker: patent 5,247,212	\$451.35	\$451.35	\$451.35	Civil L.R. 54-3(d)(1)		(\$300.90)	\$150.45
7/26/2010	Amazon.com	Hard drives for TPL productions	\$211.88	\$70.63	\$70.63	Civil L.R. 54-3(d)(2)		(\$35.32)	\$35.32
10/25/2010	Amazon.com	3 Hard Drives for TPL licensee correspondence production	\$149.97	\$49.99	\$49.99	Civil L.R. 54-3(d)(2)		(\$25.00)	\$25.00
10/31/2010	Iris Data Services, LLC	Tiff processing w/Metadata extraction	\$5,815.92	\$5,815.92	\$5,815.92	Civil L.R. 54-3(d)(2)		(\$2,907.96)	\$2,907.96
11/17/2010	Amazon.com	Hard drives for TPL productions	\$127.96	\$42.65	\$42.65	Civil L.R. 54-3(d)(2)		(\$21.33)	\$21.33
12/13/2010	Tradewinds-West Video Prod.	Videographer services re: deposition of D. May (12/13/2010)	\$1,950.50	\$1,950.50	\$1,950.50	Civil L.R. 54-3(c)(1)	890 patent	(\$1,950.50)	\$0.00
1/7/2011	Alderson Reporting Co., Inc.	Court reporter services re: deposition of V. Oklobdzija (12/22/2010)	\$1,088.75	\$544.38	\$544.38	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$340.94)	\$203.44
1/18/2011	Nogara Reporting Service	Court reporter services re: deposition of D. May (12/13/2010)	\$2,181.25	\$2,181.25	\$0.00	Civil L.R. 54-3(c)(1)	890 patent	\$0.00	\$0.00
1/24/2011	Specialized Legal Services, Inc.	Service on Samsung Semiconductor Inc	\$210.00	\$210.00	\$210.00	Civil L.R. 54-3(a)(2)	Rush fee (\$25.00); Fax charges (\$40.00)	\$0.00	\$210.00
1/24/2011	Specialized Legal Services, Inc.	Service on Cambridge Silicon Radio Inc	\$60.00	\$60.00	\$60.00	Civil L.R. 54-3(a)(2)		\$0.00	\$60.00
1/24/2011	Specialized Legal Services, Inc.	Service on Qualcomm Incorporated	\$206.00	\$206.00	\$206.00	Civil L.R. 54-3(a)(2)	Rush fee (\$25.00); Fax charges (\$36.00)	\$0.00	\$206.00
1/31/2011	Cooper Patent Search & Service	Copy of the file wrapper without ref to US Patent 4,689,581	\$148.00	\$148.00	\$148.00	Civil L.R. 54-3(d)(1)		(\$98.67)	\$49.33
3/21/2011	Summer Fisher	Transcript of March 18, 2011 hearing before Judge Fogel	\$144.75	\$144.75	\$144.75	Civil L.R. 54-3(b)	Acer only	(\$144.75)	\$0.00
3/29/2011	Sarnoff Court Reporters	Videographer services re: deposition of G. Goodere (3/29/2011)	\$625.00	\$625.00	\$625.00	Civil L.R. 54-3(c)(1)	Acer; ITC	(\$468.75)	\$156.25
3/29/2011	Amazon.com	G Glass @ Amazon.com: 5x hard drives for TPL email doc prod.	\$194.90	\$64.97	\$64.97	Civil L.R. 54-3(d)(2)		(\$32.49)	\$32.49
3/31/2011	Iris Data Services, LLC	Tiff processing w/Metadata extraction	\$3,694.96	\$3,694.96	\$3,694.96	Civil L.R. 54-3(d)(2)		(\$1,847.48)	\$1,847.48
4/6/2011	Iris Data Services, LLC	G Glass: 2x Tiff Processing w/Metadata extraction	\$5,718.91	\$5,718.91	\$5,718.91	Civil L.R. 54-3(d)(2)		(\$2,859.46)	\$2,859.46
4/15/2011	Sarnoff Court Reporters	Court reporter services re: deposition of G. Goodere (3/29/2011)	\$2,338.05	\$2,338.05	\$2,298.05	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$1,797.74)	\$500.31
4/19/2011	Iris Data Services, LLC	Tiff processing w/Metadata extraction	\$1,939.31	\$1,939.31	\$1,939.31	Civil L.R. 54-3(d)(2)		(\$969.66)	\$969.66
9/20/2011	Iris Data Services, LLC	Tiff Processing w/Metadata Extraction; OCR; Tech time	\$3,205.01	\$3,205.01	\$3,205.01	Civil L.R. 54-3(d)(2)		(\$1,602.51)	\$1,602.51
11/8/2011	Amazon.com	G Glass: flash drives for document production/collections	\$79.00	\$26.33	\$26.33	Civil L.R. 54-3(d)(2)		(\$13.17)	\$13.17
11/22/2011	WARP 9	Warp 9 Inv #1122201108 - Scanning for production to HTC	\$12.56	\$12.56	\$12.56	Civil L.R. 54-3(d)(2)		(\$6.28)	\$6.28
12/31/2011	WARP 9	Warp 9 Inv #12312011233- Scanning for production to HTC	\$13.08	\$13.08	\$13.08	Civil L.R. 54-3(d)(2)		(\$6.54)	\$6.54

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Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	Current HTC Deduction	Current HTC Amended Amount
1/9/2012	Advantage Reporting Services	Transcript of December 21, 2011 telephonic hearing before Special Master	\$66.68	\$0.00	\$0.00	Civil L.R. 54-3(b)		\$0.00	\$0.00
1/23/2012	WARP 9	Warp 9 Inv #12011012 - Scanning for production to HTC	\$578.92	\$578.92	\$578.92	Civil L.R. 54-3(d)(2)		(\$289.46)	\$289.46
1/30/2012	WARP 9	Warp 9 Inv #1201162 - Scanning for production to HTC	\$42.06	\$42.06	\$42.06	Civil L.R. 54-3(d)(2)		(\$21.03)	\$21.03
2/2/2012	Connie Kuhl, RMR, CRR	Transcript of January 27, 2012 hearing before Judge Ware	\$433.61	\$433.61	\$433.61	Civil L.R. 54-3(b)	Apportion Acer/Barco	(\$289.07)	\$144.54
2/3/2012	Advanced Courtroom Technologies, Inc	Trial consultant - graphics for hearing - Trial visual aids	\$12,833.05	\$12,833.05	\$12,833.05	Civil L.R. 54-3(d)(5)	1/3 Acer/Barco	(\$8,555.37)	\$4,277.68
2/6/2012	WARP 9	Warp 9 Inv #1201223 - Scanning for production to HTC	\$42.06	\$42.06	\$42.06	Civil L.R. 54-3(d)(2)		(\$21.03)	\$21.03
2/8/2012	Chan, Kwan	Kwan Chan - deposit for technical expert per Judge Ware	\$19,035.00	\$19,035.00	\$19,035.00	Civil L.R. 54-3(f); 28 U.S.C. § 1920(6)	1/3 Acer/Barco	(\$12,690.00)	\$6,345.00
2/13/2012	WARP 9	Warp 9 Inv #1201306 - Scanning for production to HTC	\$42.06	\$42.06	\$42.06	Civil L.R. 54-3(d)(2)		(\$21.03)	\$21.03
2/22/2012	Advantage Reporting Services	Transcript of February 7, 2012 telephonic hearing before Special Master	100.00	\$0.00	\$0.00	Civil L.R. 54-3(b)		\$0.00	\$0.00
4/2/2012	WARP 9	Warp 9 Inv #120171	\$170.71	\$170.71	\$170.71	Civil L.R. 54-3(d)(2)		(\$85.36)	\$85.36
5/4/2012	Advantage Reporting Services	Transcript of February 24, 2012 telephonic hearing before Special Master	\$66.67	\$0.00	\$0.00	Civil L.R. 54-3(b)		\$0.00	\$0.00
8/2/2012	Advantage Reporting Services	Transcript of July 3, 2012 telephonic hearing before Special Master	\$67.68	\$0.00	\$0.00	Civil L.R. 54-3(b)		\$0.00	\$0.00
8/6/2012	WARP 9	Warp 9 Inv #1202639 - Scanning for production to HTC	\$279.93	\$279.93	\$279.93	Civil L.R. 54-3(d)(2)		(\$139.97)	\$139.97
9/17/2012	Best Buy	USB and back up drives for document production	\$401.00	\$401.00	\$401.00	Civil L.R. 54-3(d)(2)		(\$200.50)	\$200.50
9/29/2012	Best Buy	Hard drives for document production	\$389.67	\$389.67	\$389.67	Civil L.R. 54-3(d)(2)		(\$194.84)	\$194.84
10/8/2012	WARP 9	Warp 9 Inv #1202903 - Scanning for production to HTC	\$289.41	\$289.41	\$289.41	Civil L.R. 54-3(d)(2)		(\$144.71)	\$144.71
10/15/2012	WARP 9	Warp 9 Inv #1202933 - Scanning for production to HTC	\$2,487.89	\$2,487.89	\$2,487.89	Civil L.R. 54-3(d)(2)		(\$1,243.95)	\$1,243.95
10/17/2012	Alderson Reporting Company, Inc	Court reporter services re: deposition of V. Oklobdzija (10/12/2012)	\$2,635.12	\$1,317.56	\$623.44	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$281.44)	\$342.00
10/22/2012	WARP 9	Warp 9 Inv #1202964 - Scanning for production to HTC	\$2,623.07	\$2,623.07	\$2,623.07	Civil L.R. 54-3(d)(2)		(\$1,311.54)	\$1,311.54
11/15/2012	Gregory Edwards, LLC	Court reporter services re: deposition of A. Wolfe (10/15/2012)	\$1,693.33	\$0.00	\$0.00	Civil L.R. 54-3(c)(1)	Acer only	\$0.00	\$0.00
12/3/2012	WARP 9	Warp 9 Inv #1203149 - Scanning for production to HTC	\$2,380.05	\$2,380.05	\$2,380.05	Civil L.R. 54-3(d)(2)		(\$1,190.03)	\$1,190.03
12/12/2012	Gina Galvan Colin, CSR, CRR	Transcript of November 30, 2012 hearing before Judge Grewal	256.50	256.50	256.50	Civil L.R. 54-3(b)	Apportion Acer	(\$495.07)	\$128.25
12/24/2012	S&R Services	Sub-Total for S&R Services (4 invoices)	\$578.50	\$316.50	\$316.50	Civil L.R. 54-3(d)(2)		\$0.00	\$316.50
1/3/2013	Best Buy	Hard drives for document production	\$477.36	\$477.36	\$477.36	Civil L.R. 54-3(d)(2)		(\$238.68)	\$238.68
1/7/2013	S&R Services	Sub-Total for S&R Services (2 invoices)	\$370.00	\$370.00	\$200.00	Civil L.R. 54-3(d)(2)		\$0.00	\$200.00
1/14/2013	WARP 9	Warp 9 Inv #1203345 re discovery - Photocopying for production to HTC	\$3,561.50	\$3,561.50	\$3,561.50	Civil L.R. 54-3(d)(2)		(\$1,780.75)	\$1,780.75
2/14/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of R. Fish (1/28/13) (2 invoices @ 50%)	\$1,813.87	\$1,813.87	\$1,813.87	Civil L.R. 54-3(c)(1)	ITC	(\$906.94)	\$906.94
2/16/2013	Veritext	Court reporter services re: deposition of Daniel Leckrone (@50%)	\$685.18	\$685.18	\$667.18	Civil L.R. 54-3(c)(1)	Extra costs; ITC	(\$509.89)	\$157.29
2/21/2013	Veritext	Court reporter services re: deposition of Dwayne Hannah 2/5/13 (@50%)	\$300.48	\$300.48	\$272.48	Civil L.R. 54-3(c)(1)	Extra costs; ITC	(\$223.54)	\$48.94
2/25/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of E. Liang (1/30/13-2/1/13) (6 invoices)	\$9,489.34	\$9,489.34	\$9,489.34	Civil L.R. 54-3(c)(1)	ITC	(\$4,744.67)	\$4,744.67
2/25/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of J. Chen (2/4/13) (2 invoices)	\$3,488.87	\$0.00	\$0.00	Civil L.R. 54-3(c)(1)		\$0.00	\$0.00

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Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	Current HTC Deduction	Current HTC Amended Amount
2/27/2013	Veritext	Court reporter services re: deposition of D. Leckrone (2/8/13)	\$1,069.35	\$1,069.35	\$1,041.35	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$867.35)	\$174.00
2/27/2013	Veritext	Court reporter and videographer services re: deposition of D.M. Leckrone (2/11/13) (2 invoices)	\$1,401.20	\$1,401.20	\$1,345.20	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$1,090.29)	\$254.91
2/27/2013	Veritext	Court reporter services re: deposition of D. Hannah (2/12/13)	\$1,920.45	\$1,920.45	\$1,892.45	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$326.60)	\$1,565.85
2/27/2013	Veritext	Court reporter and services re: deposition of D. Leckrone (2/14/13)	\$911.05	\$911.05	\$911.05	Civil L.R. 54-3(c)(1)	Acer; ITC	(\$808.80)	\$102.25
3/6/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of S. Dena (2/7/13) (2 invoices)	\$3,898.81	\$3,898.81	\$3,898.81	Civil L.R. 54-3(c)(1)	Acer; ITC	(\$2,924.11)	\$974.70
3/7/2013	Irene Rodriguez, CSR, CRR	Transcript of February 8, 2013 hearing before Judge Grewal	\$119.00	\$0.00	\$0.00	Civil L.R. 54-3(b)		\$0.00	\$0.00
3/7/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of H. Lai (2/5/13) (2 invoices @ 50%)	\$1,542.84	\$1,542.84	\$1,542.84	Civil L.R. 54-3(c)(1)	ITC	(\$771.42)	\$771.42
3/12/2013	WARP 9	Warp 9 Inv #1203686 - Scanning /coding for production to HTC	\$158.93	\$158.93	\$158.93	Civil L.R. 54-3(d)(2)		(\$79.47)	\$79.47
3/19/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of J. Casasanta (2/20/13) (2 invoices)	\$2,742.54	\$0.00	\$0.00	Civil L.R. 54-3(c)(1)		\$0.00	\$0.00
3/19/2013	WARP 9	Warp 9 Inv #1203719 - Scanning for production to HTC	\$8.16	\$8.16	\$8.16	Civil L.R. 54-3(d)(2)		(\$4.08)	\$4.08
3/20/2013	Summer Fisher	Transcript of March 19, 2013 hearing before Judge Grewal	\$96.80	\$0.00	\$0.00	Civil L.R. 54-3(b)		\$0.00	\$0.00
3/20/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of J. Whitt (2/12/13) (2 invoices)	\$2,137.51	\$0.00	\$0.00	Civil L.R. 54-3(c)(1)		\$0.00	\$0.00
4/1/2013	WARP 9	Warp 9 Inv #1203765 - Scanning for production to HTC	\$3.82	\$3.82	\$3.82	Civil L.R. 54-3(d)(2)		(\$1.91)	\$1.91
7/17/2013	FTI Consulting	Expert deposition preparation, including expenses	\$3,893.28	\$3,893.28	\$0.00	Civil L.R. 54-3(e); FRCP 26(b)(4)(E)		\$0.00	\$0.00
7/18/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of T. Gafford 7/8/13 (2 invoices)	\$4,369.43	\$4,369.43	\$4,369.43	Civil L.R. 54-3(c)(1)		\$0.00	\$4,369.43
7/18/2013	Gregory Edwards, LLC	Court reporter and videographer services re: deposition of C. Bokhart 7/10/13 (2 invoices)	\$3,336.17	\$3,336.17	\$3,336.17	Civil L.R. 54-3(c)(1)		\$0.00	\$3,336.17
7/24/2013	Legalink, Inc.	Court reporter services re: deposition of V. Oklobdzija (7/13, 7/15/13) (2 invoices)	\$6,048.00	\$3,024.00	\$2,113.75	Civil L.R. 54-3(c)(1)	Extra costs; Acer; ITC	(\$1,397.63)	\$716.13
7/24/2013	Legalink, Inc.	Court reporter services re: deposition of S. Prowse (7/15/13)	\$3,773.00	\$1,886.50	\$1,316.75	Civil L.R. 54-3(c)(1)	Extra costs; Acer	(\$439.00)	\$877.75
7/24/2013	Legalink, Inc.	Court reporter services re: deposition of S. Prowse (7/16/13)	\$1,713.00	\$856.50	\$584.25	Civil L.R. 54-3(c)(1)	Extra costs; Acer	(\$224.00)	\$360.25
7/30/2013	Gregory Edwards, LLC	Court reporter and videographer services re: M. May (7/16/13) (2 invoices)	\$4,233.48	\$4,233.48	\$0.00	Civil L.R. 54-3(c)(1)	890 patent	\$0.00	\$0.00
7/30/2013	Gregory Edwards, LLC	Court reporter and videographer services re: Dr. A. Wolfe (7/19/13) (2 invoices)	\$5,551.68	\$0.00	\$0.00	Civil L.R. 54-3(c)(1)		\$0.00	\$0.00
8/4/2013	Integration Corp.	Expert deposition preparation	\$13,620.52	\$13,620.52	\$6,810.00	FRCP 26(b)(4)(E)		(\$6,810.00)	\$0.00
8/5/2013	WARP 9	Warp 9 Inv #1204308 re pre trial disclosures; damages project	\$668.36	\$668.36	\$668.36	Civil L.R. 54-3(d)(2)		(\$501.27)	\$167.09
8/16/2013	FTI Consulting	Expert deposition preparation, including expenses	\$66,431.55	\$66,431.55	\$31,232.50	Civil L.R. 54-3(e); FRCP 26(b)(4)(E)		(\$31,232.50)	\$0.00
8/19/2013	Wheels of Justice, Inc.	Process server fees re: Texas Instruments	\$110.00	\$110.00	\$110.00	Civil L.R. 54-3(a)(2)		\$0.00	\$110.00
8/22/2013	Legalink, Inc.	Videographer services re: deposition of V. Oklobdzija (7/13 & 7/15/13) (2 invoices)	\$1,630.00	\$815.00	\$815.00	Civil L.R. 54-3(c)(1)	Acer; ITC	(\$407.50)	\$407.50
8/23/2013	Wheels of Justice, Inc.	Process service re: Sina Dena (8/21/13)	\$470.00	\$470.00	\$470.00	Civil L.R. 54-3(a)(2)	Bad address (\$110.00); Locate fee (\$125.00); time fee (\$125.00)	\$0.00	\$470.00
8/28/2013	Summer Fisher	Transcript of March 13, 2013 hearing before Judge Grewal	\$683.85	\$547.08	\$547.08	Civil L.R. 54-3(b)	Apportion Acer	(\$205.16)	\$341.93
9/10/2013	Wheels of Justice, Inc.	Process service re: second subpoena (Texas Instruments)	\$594.00	\$594.00	\$594.00	Civil L.R. 54-3(a)(2)		\$0.00	\$594.00



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9/18/2013	Amazon.com	Phone used as exhibit re MMP NCDC trial	\$79.99	\$79.99	\$79.99	Civil L.R. 54-3(d)(5)		\$0.00	\$79.99
9/19/2013	WARP 9	Warp 9 Inv #1204533 re boxes of trial exhibits placed next to the bench	\$18,472.94	\$18,472.94	\$18,472.94	Civil L.R. 54-3(d)(4)		\$0.00	\$18,472.94
							Pre-September 19, 2013 Total		\$71,043.64
							Divide by 4 Patents		\$17,760.91

# EXHIBIT O2

ITEMIZATION OF COSTS  
EXHIBIT O2  
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Date	Vendor	Description	TPL Amount	TPL Amended Amount	TPL Second Amended Amount	Authority	Comments	Current HTC Deduction	Current HTC Amended Amount
9/23/2013	WARP 9	Warp 9 Inv #1204538 re trial exhibits binders for opposing counsel, judge and witness during trial	\$13,221.28	\$6,610.64	\$6,610.64	Civil L.R. 54-3(d)(4)		\$0.00	\$6,610.64
9/24/2013	WARP 9	Warp 9 Inv #1204554 re trial exhibits binders for opposing counsel, judge and witness during trial	\$424.94	\$212.47	\$212.47	Civil L.R. 54-3(d)(4)		\$0.00	\$212.47
9/25/2013	WARP 9	Warp 9 Inv #1204556 re trial exhibits binders for opposing counsel, judge and witness during trial	\$593.01	\$296.51	\$296.51	Civil L.R. 54-3(d)(4)		\$0.00	\$296.51
9/26/2013	WARP 9	Warp 9 Inv #1204563 re trial exhibits binders for opposing counsel, judge and witness during trial	\$1,100.91	\$550.46	\$550.46	Civil L.R. 54-3(d)(4)		\$0.00	\$550.46
9/27/2013	WARP 9	Warp 9 Inv #1204572 re trial exhibits binders for opposing counsel, judge and witness during trial	\$2,070.74	\$1,035.37	\$1,035.37	Civil L.R. 54-3(d)(4)		\$0.00	\$1,035.37
9/30/2013	LegalVision Inc.	LegalVision (graphics) re MMP NCDC trial - Trial visual aids	\$8,531.25	\$8,531.25	\$8,531.25	Civil L.R. 54-3(d)(5)		(\$4,265.62)	\$4,265.63
10/1/2013	Charles Moore	Witness travel and lodging expenses for trial	\$3,419.71	\$3,419.71	\$3,419.71	Civil L.R. 54-3(e)	2 days at trial	(\$2,361.96)	\$1,057.75
10/1/2013	Dr. V. Oklobdzija	Witness parking expenses for trial	\$136.00	\$136.00	\$136.00	Civil L.R. 54-3(e)	not recoverable (2 days)	\$0.00	\$136.00
10/1/2013	WARP 9	Warp 9 Inv #1204583 re trial exhibits binders for opposing counsel, judge and witness during trial	\$1,019.77	\$509.89	\$509.89	Civil L.R. 54-3(d)(4)		\$0.00	\$509.89
10/1/2013	WARP 9	Warp 9 Inv #1204590 re trial exhibits binders for opposing counsel, judge and witness during trial	\$1,674.94	\$837.47	\$837.47	Civil L.R. 54-3(d)(4)		\$0.00	\$837.47
10/2/2013	WARP 9	Warp 9 Inv #1204595 re trial exhibits binders for opposing counsel, judge and witness during trial	\$4,210.35	\$2,105.18	\$2,105.18	Civil L.R. 54-3(d)(4)		\$0.00	\$2,105.18
10/4/2013	Advanced Courtroom Technologies, Inc	Trial consultant - graphics for trial - Trial visual aids	\$15,230.25	\$15,230.25	\$15,230.25	Civil L.R. 54-3(d)(5)		\$0.00	\$15,230.25
10/07/2013	Lee-Anne Shortridge, CSR	Trial transcripts for September 23 through October 3, 2013	New charge	New charge	\$7,835.25	Civil L.R. 54-3(c)(1)		\$0.00	\$7,835.25
11/08/2013	Lee-Anne Shortridge, CSR	Hearing Transcript for September 20, 2013	New charge	New charge	\$281.30	Civil L.R. 54-3(c)(1)		\$0.00	\$281.30
10/14/2013	Dr. S. Prowse (FTI Consulting)	Witness travel and lodging expenses for trial	\$3,966.55	\$3,966.55	\$3,966.55	Civil L.R. 54-3(e)	not recoverable (2 days)	(\$2,475.49)	\$1,491.06
10/14/2013	FTI Consulting	Preparation of demonstratives for trial	\$4,267.50	\$4,267.50	\$4,267.50	Civil L.R. 54-3(d)(5)		\$0.00	\$4,267.50
	WARP 9	Reproduction of deposition exhibits designated by Defendants (7930 pages x 2 copies x \$0.08 per page)	\$1,084.32	\$1,084.32	\$1,084.32	Civil L.R. 54-3(c)(3)		(\$813.24)	\$271.08
<b>Post-September 19, 2013 Total</b>									<b>\$46,993.81</b>