

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ATLANTIC RECORDING
CORPORATION, a Delaware
corporation; BMG MUSIC, a New York
general partnership; VIRGIN RECORDS
AMERICA, INC., a California
corporation; CAPITOL RECORDS,
INC., a Delaware corporation; SONY
BMG MUSIC ENTERTAINMENT, a
Delaware general partnership; and UMG
RECORDINGS, INC., a Delaware
corporation,

Plaintiffs,

v.

JENNA RALEIGH,

Defendant.

Case No. 4:06-cv-01708-CEJ

**DECLARATION OF SHANE R. CROSS IN SUPPORT OF PLAINTIFFS' VERIFIED
STATEMENT OF EXPENSES**

Shane R. Cross, under penalty of perjury, hereby declares and states:

(a) I am an attorney at law with the law firm of Holme Roberts & Owen LLP ("HRO"), counsel to Plaintiffs in this matter. I am the attorney primarily responsible for the representation of Plaintiffs in regards to this case. I make the statements in this declaration based upon my personal knowledge and I am competent to testify regarding any matters set forth herein.

(b) I reviewed the discovery responses and drafted the Motion to Compel (Plaintiffs' Motion, Doc. No. 53) that the Court granted in its December 15, 2008 Order (Doc. No. 59.).

(c) Below is a chart reflecting hours worked and amounts billed in connection with researching, drafting, and filing Plaintiffs' Motion. I performed the work designated under attorney "SRC."

Date	Atty	Description	Hours	Amount
11/21/08	SRC	Draft Rule 37 Letter regarding Defendant's incomplete discovery responses.	1.0	\$235.00
11/24/08	SRC	Conference with EBurton regarding Motion to Compel and discovery responses; research 8 th Circuit law on discovery obligations and draft Motion to Compel.	4.0	\$940.00
11/25/08	SRC	Revise Motion to Compel and prepare for filing.	1.5	\$352.50
11/25/08	JDR	E-mail with S. Cross regarding Motion to Compel and call to J. Andres and B. Schneider regarding good faith resolution of same; review Motion to Compel and file same with MOED.	2.0	\$692.55
12/08/08	SRC	Review Defendant's Response to Plaintiffs' Motion to Compel.	.2	\$47.00
12/09/08	SRC	Research case law re Rule 37 and discovery obligations; draft Reply in Support of Plaintiffs' Motion to Compel.	4.75	\$1116.25
12/10/08	SRC	Continue research and continue drafting Reply in Support of Motion to Compel.	2.0	\$470.00
		TOTAL	15.45	\$3,853.30

(d) As reflected in the foregoing chart, the amount of attorney time billed in relation to Plaintiffs' Motion to Compel is \$3853.30. I was responsible for \$3,160.75 worth of that time.¹ All of such time represents the necessary and reasonable efforts of HRO on behalf of Plaintiffs in connection with moving the Court to compel the discovery at issue. The hours recorded were actually expended on the topics stated in the foregoing chart. Moreover, the time reflected under SRC in the foregoing chart was billed at HRO's customary hourly rates, and, to the best of my knowledge, information, and belief, these rates are consistent with the rates charged by other attorneys of like experience for matters of this type. The hours expended and rates claimed are reasonable.

(e) I am an associate in HRO's commercial litigation department. I have been in practice for over one year and have significant experience representing Plaintiffs and their

¹ The remainder of the time (under JDR) was recorded by John D. Ryan and addressed in his declaration.

affiliated companies in copyright infringement cases. My billing rate in November/December 2008 was set at \$235.00 per hour.

(f) Plaintiffs incurred no significant costs in drafting and filing their Motion to Compel.

(g) Based on the foregoing, the total amount of reasonable fees and costs incurred by Plaintiffs in connection with filing their Motion to Compel, and for which Plaintiffs are requesting payment from Defendant, is \$3,853.30.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

Dated this 29th day of December 2008.



Shane R. Cross