

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
SONY BMG MUSIC ENTERTAINMENT)	
et al.,)	
	Plaintiffs,)	Civ. Act. No 07-cv-11446-NG
)	
v.)	
)	
JOEL TENENBAUM,)	
	Defendant.)	
_____)	

**DECLARATION OF EVE G. BURTON IN SUPPORT OF EXPENSES INCURRED IN
FILING MOTION TO COMPEL**

I, Eve G. Burton, declare:

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

2. Two attorneys and one paralegal at HRO were involved in the Motion to Compel. Laurie J. Rust (referenced in the below chart as “LJR”) is an associate in HRO’s commercial litigation department. Her billing rate in 2009 was set at \$255 per hour. Eve G. Burton (referenced in the below chart as “EB”) is senior counsel in HRO’s commercial litigation department. My billing rate in 2009 was set at \$320 per hour. Susan Haag (referenced in the below chart as “SH”) is a paralegal in HRO’s commercial litigation department. Her billing rate in 2009 was set at \$185 per hour.

3. Below is a chart reflecting the expenses incurred in preparing the Motion to Compel (Doc. 842) and the Motion for Costs and Fees associated with the Motion to Compel (Doc. 851) (“Motions”).

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/04/09	LJR	Draft Motion to Compel MegaUploads info; conf. with client and local counsel re same, incorporate edits	4.5	\$1147.50
06/05/09	EB	Edit motion to compel MegaUploads	1.0	\$320.00
06/05/09	SH	Exhibit preparation for motion	.5	\$92.50
06/18/09	LJR	Research and draft motion for costs; edit same	1.7	\$433.50
06/19/09	EB	Review motion for fees	.4	\$128.00
06/19/09	LJR	Revise Motion to Compel; conference with E. Burton re same	.5	\$127.50
		Total:	8.6	\$2,249.00

4. As reflected in the foregoing chart, the total amount of costs incurred in preparing and filing the Motions was \$2,249.00. All costs represent the necessary and reasonable efforts of HRO on behalf of Plaintiffs in preparing and filing the Motions, and the time was billed at rates which are reasonable and customary for matters of this type.

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

Dated this 8th day of March 2010.

A handwritten signature in black ink, appearing to read "Eve G. Burton". The signature is written in a cursive style with a large, stylized initial "E".

Eve G. Burton