

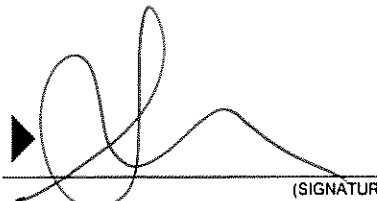
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Lynne C. Hermle (99779)/Jessica R. Perry (209321) Shannon B. Seekao (267536)/Megan M. Lawson (294397) Orrick, Herrington & Sutcliffe LLP 1000 Marsh Road, Menlo Park, CA 94025 TELEPHONE NO.: (650) 614-7400 FAX NO.: (650) 614-7401 ATTORNEY FOR (Name): Defendant Kleiner Perkins Caufield & Byers LLC	FOR COURT USE ONLY  <b>ELECTRONICALLY FILED</b> Superior Court of California, County of San Francisco <b>APR 22 2015</b> Clerk of the Court BY: CAROL BALISTRERI Deputy Clerk
INSERT NAME OF COURT, JUDICIAL DISTRICT, AND BRANCH COURT, IF ANY: San Francisco Superior Court	
PLAINTIFF: Ellen Pao  DEFENDANT: Kleiner Perkins Caufield & Byers LLC	
<b>MEMORANDUM OF COSTS (SUMMARY)</b>	CASE NUMBER: CGC-12-520719

The following costs are requested:

	TOTALS	
1. Filing and motion fees .....	1. \$	910.00
2. Jury fees .....	2. \$	
3. Jury food and lodging .....	3. \$	177.55
4. Deposition costs .....	4. \$	58,878.69
5. Service of process .....	5. \$	785.00
6. Attachment expenses .....	6. \$	
7. Surety bond premiums .....	7. \$	
8. Witness fees .....	8. \$	864,680.25
9. Court-ordered transcripts .....	9. \$	
10. Attorney fees (enter here if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required) .....	10. \$	
11. Models, blowups, and photocopies of exhibits .....	11. \$	224.21
12. Court reporter fees as established by statute .....	12. \$	7,181.50
13. Other .....	13. \$	39,977.30
<b>TOTAL COSTS</b> .....	<b>\$</b>	<b>972,814.50</b>

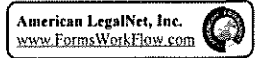
I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

Date: April 22, 2015  
 Shannon Seekao  
 (TYPE OR PRINT NAME)

  
 (SIGNATURE)

(Proof of service on reverse)

**MEMORANDUM OF COSTS (SUMMARY)**



SHORT TITLE:

Pao v. Kleriner Perkins Caufield & Byers LLC

CASE NUMBER:

CGC-12-520719

PROOF OF  MAILING  PERSONAL DELIVERY

1. At the time of mailing or personal delivery, I was at least 18 years of age and not a party to this legal action.
2. My residence or business address is (*specify*):
  
3. I mailed or personally delivered a copy of the *Memorandum of Costs (Summary)* as follows (*complete either a or b*):
  - a.  **Mail.** I am a resident of or employed in the county where the mailing occurred.
    - (1) I enclosed a copy in an envelope AND
      - (a)  **deposited** the sealed envelope with the United States Postal Service with the postage fully prepaid.
      - (b)  **placed** the envelope for collection and mailing on the date and at the place shown in items below following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.
    - (2) The envelope was addressed and mailed as follows:
      - (a) Name of person served:
      - (b) Address on envelope:
  
      - (c) Date of mailing:
      - (d) Place of mailing (*city and state*):
  - b.  **Personal delivery.** I personally delivered a copy as follows:
    - (1) Name of person served:
    - (2) Address where delivered:
  
    - (3) Date delivered:
    - (4) Time delivered:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)

\_\_\_\_\_  
(SIGNATURE OF DECLARANT)



SHORT TITLE: Pao v. Kleiner Perkins Caufield & Byers LLC	CASE NUMBER: CGC-12-520719
<b>MEMORANDUM OF COSTS (WORKSHEET)</b>	

**1. Filing and motion fees**

<u>Paper filed</u>	<u>Filing fee</u>	
a. <u>Answer, June 13, 2012</u>	\$ <u>410.00</u>	
b. <u>Motion to Compel Arbitration, June 13, 2012</u>	\$ <u>40.00</u>	
c. <u>Motion to Seal, June 13, 2012</u>	\$ <u>40.00</u>	
d. <u>Motion to Seal, July 2, 2012</u>	\$ <u>40.00</u>	
e. <u>Stipulated Protective Order, Dec. 17, 2013</u>	\$ <u>20.00</u>	
f. <u>Motion to Seal, May, 28, 2014</u>	\$ <u>60.00</u>	
g. <input checked="" type="checkbox"/> Information about additional filing and motion fees is contained in Attachment 1g.		300.00
<b>TOTAL</b>		1. <span style="border: 1px solid black; padding: 2px;">\$ 910.00</span>

**2. Jury fees**

<u>Date</u>	<u>Fee &amp; mileage</u>	
a. _____	\$ _____	
b. _____	\$ _____	
c. _____	\$ _____	
d. _____	\$ _____	
e. <input type="checkbox"/> Information about additional jury fees is contained in Attachment 2e.		
<b>TOTAL</b>		2. <span style="border: 1px solid black; padding: 2px;">\$ 0.00</span>

**3. Juror food: \$ 177.55 and lodging: \$ \_\_\_\_\_**

**TOTAL** 3. \$ 177.55

**4. Deposition costs**

<u>Name of deponent</u>	<u>Taking</u>	<u>Transcribing</u>	<u>Travel</u>	<u>Video-taping</u>	<u>Subtotals</u>
a. <u>Ellen Pao (2.26.14)</u>	\$ _____	\$ <u>1,915.20</u>	\$ _____	\$ <u>1,412.50</u>	\$ <u>3,327.70</u>
b. <u>Ellen Pao (2.27.14)</u>	\$ _____	\$ <u>1,791.00</u>	\$ _____	\$ <u>1,320.00</u>	\$ <u>3,111.00</u>
c. <u>Ellen Pao (4.24.14)</u>	\$ _____	\$ <u>1,803.80</u>	\$ _____	\$ <u>1,412.50</u>	\$ <u>3,216.30</u>
d. <u>Ellen Pao (4.25.14)</u>	\$ _____	\$ <u>1,283.40</u>	\$ _____	\$ <u>1,135.00</u>	\$ <u>2,418.40</u>
e. <input checked="" type="checkbox"/> Information about additional deposition costs is contained in Attachment 4e.					46,805.29
<b>TOTAL</b>					4. <span style="border: 1px solid black; padding: 2px;">\$ 58,878.69</span>

(Continued on reverse)

**5. Service of process**

	<u>Name of person served</u>	<u>Public officer</u>	<u>Registered process</u>	<u>Publication</u>	<u>Other (specify)</u>
a.	Alan B. Exelrod (10.31.13)	\$ _____	\$ 45.00	\$ _____	\$ _____
b.	reddit (10.31.13)	\$ _____	\$ 135.00	\$ _____	\$ _____
c.	Brendan Dolan (10.17.14)	\$ _____	\$ 75.00	\$ _____	\$ _____
d.	<input checked="" type="checkbox"/> Information about additional costs for service of process is contained in Attachment 5d.				530.00
TOTAL					5. \$ 785.00

6. Attachment expenses (specify): ..... 6.

7. Surety bond premiums (itemize bonds and amounts): ..... 7.

**8. a. Ordinary witness fees**

	<u>Name of witness</u>	<u>Daily fee</u>	<u>Mileage</u>	<u>Total</u>
(1)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile ....	\$ 0.00
(2)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile ....	\$ 0.00
(3)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile ....	\$ 0.00
(4)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile ....	\$ 0.00
(5)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile ....	\$ 0.00

(6)  Information about additional ordinary witness fees is contained in Attachment 8a(6).

SUBTOTAL 8a.  0.00

**MEMORANDUM OF COSTS (WORKSHEET) (Continued)**

**8. b. Expert fees (per Code of Civil Procedure section 998)**

	<u>Name of witness</u>	<u>Fee</u>		
(1)	See attachment 8b	_____ hours at \$ _____ /hr ...	\$ _____	0.00
(2)	_____	_____ hours at \$ _____ /hr ...	\$ _____	0.00
(3)	_____	_____ hours at \$ _____ /hr ...	\$ _____	0.00
(4)	_____	_____ hours at \$ _____ /hr ...	\$ _____	0.00
(5)	<input checked="" type="checkbox"/> Information about additional expert witness fees is contained in Attachment 8b(5).			
			864,680.25	
	SUBTOTAL	8b.	\$ 864,680.25	

**c. Court-ordered expert fees**

	<u>Name of witness</u>	<u>Fee</u>		
(1)	_____	_____ hours at \$ _____ /hr ...	\$ _____	0.00
(2)	_____	_____ hours at \$ _____ /hr ...	\$ _____	0.00
(3)	<input type="checkbox"/> Information about additional court-ordered expert witness fees is contained in Attachment 8c(3).			
	SUBTOTAL	8c.	\$ 0.00	

TOTAL (8a, 8b, & 8c)      8.      \$      864,680.25

9. Court-ordered transcripts (specify): \_\_\_\_\_ 9.      \$

10. Attorney fees (enter here if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required): ..... 10.      \$

11. Models, blowups, and photocopies of exhibits (specify): Exhibit imaging 11.      \$      224.21

**12. Court reporter fees (as established by statute)**

- a. (Name of reporter): \_\_\_\_\_ Fees: \$ \_\_\_\_\_
- b. (Name of reporter): \_\_\_\_\_ Fees: \$ \_\_\_\_\_
- c.  Information about additional court reporter fees is contained in Attachment 12c.

7,181.50  
TOTAL 12.      \$      7,181.50

13. Other (specify): See attachment on next page 13.      \$      39,977.30

<b>TOTAL COSTS</b> .....	<b>\$ 972,814.50</b>
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SHORT TITLE:

Pao v. Kleiner Perkins Caufield & Byers LLC

CASE NUMBER:

CGC-12-520719

**MEMORANDUM OF COSTS (WORKSHEET) (Continued)**

1 13 Other

2 Dr. Gompers - Travel expenses for trial testimony \$2,410.99

3 Dr. Lewin - Travel expenses for trial testimony \$4,785.03

4 Mr. Robbins - Travel expenses for trial testimony \$1,230.73

5 Trial technology equipment rental \$7,196.30

6 Trial transcripts (assisted with jury questions) \$24,354.25

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**Memorandum of Costs (Worksheet)**

**1g. Filing and Motion Fees**

Total from 1a – 1f	\$610.00
Motion to Seal, July 17, 2014	\$60.00
Motion to Seal, Jan. 7, 2015	\$60.00
Motion for Protective Order, Jan. 8, 2015	\$60.00
Motion to Seal, Feb. 17, 2015	\$60.00
Motion to Seal, Mar. 24, 2015	\$60.00
<b>TOTAL:</b>	<b>\$910.00</b>

**Memorandum of Costs (Worksheet)**

**4e. Depositions**

<b>Deponent</b>	<b>Transcribing</b>	<b>Travel</b>	<b>Videotaping</b>	<b>Subtotal</b>
Total from 4a-d	6793.40		5280.00	12073.40
J. de Baubigny (5.14.14)	510.90		328.00	838.90
R. Lane (5.21.14)	679.50		488.00	1167.50
M. Murphy (7.4.14)	862.30			862.30
S. Biglieri (6.11.14)	387.85			387.85
J. Doerr (7.10.14)	579.65		456.00	1035.65
R. Komisar (7.17.14)	696.95			696.95
C. Chien (8.6.14)	602.15			602.15
E. Pao (8.18.14)	1753.80		1645.00	3398.80
E. Pao (9.12.14)	985.50		672.50	1658.00
M. Meeker (9.30.14)	348.95			348.95
J. de Baubigny (10.2.14)	381.75		258.00	639.75
J. Doerr (11.14.14)	742.55		498.00	1240.55
W. Hsieh (10.7.14)	400.25			400.25
A. Deshpande (11.13.14)	400.00			400.00
E. Keller (11.18.14)	542.60			542.60
D. Biondolillo (12.9.14)	413.75			413.75
T. Vassallo (12.19.14)	429.80			429.80
T. Schlein (12.16.14)	584.00		408.50	992.50
T. Schlein (12.17.14)	553.65		408.50	962.15
S. Hirschfeld (12.23.14)	580.40			580.40
P. Gompers (2.9.15)	1079.50	3017.20		4096.70
A. Lee (2.12.15)	276.80			276.80
D. Lewin (2.11.15)	291.20	2855.49		3146.69
M. Robbins (2.5.15)	1043.20	1445.77		2488.97
R. Young (2.3.15)	660.00			660.00
J. Litvak (2.13.15)	392.15	2055.30		2447.45
C. Saba (1.26.15)	3692.31		1785.00	5477.31
A. West (1.29.15)	5515.18		1505.00	7020.18
A. West (2.2.15)	2384.44		950.00	3334.44
A. Duckworth (1.12.15)	257.95			257.95
			<b>TOTAL</b>	<b>\$58,878.69</b>



**Memorandum of Costs (Worksheet)**

**5d. Service of Process**

Total from 5a-c	\$255.00
Alan B. Exelrod (11.19.14)	\$75.00
BEA Systems (11.24.14)	\$245.00
reddit (11.24.14)	\$210.00
<b>TOTAL</b>	<b>\$785.00</b>

## Memorandum of Costs (Worksheet)

### 8b(5). Expert Fees

<b>Date</b>	<b>Expert</b>	<b>Amount</b>
11/11/14	Expert Fee: Cornerstone Res. (P. Gompers support) – 50% discounted	\$5,861.50
12/8/14	Expert Fee: Cornerstone Res. (P. Gompers support) – 50% discounted	\$25,452.25
12/16/14	Expert Fee: Rhoma Young & Associates	\$4,000.00
1/7/15	Expert Fee: EXTTI (M. Robbins)	\$5,000.00
1/8/15	Expert Fee: Competitive Advantage Partners (D. Lewin)	\$30,937.50
1/8/15	Expert Fee: Rhoma Young & Associates	\$9,677.50
1/12/15	Expert Fee: EXTTI (M. Robbins)	\$14,700.00
1/15/15	Expert Fee: Cornerstone Res. (P. Gompers support) – 50% discounted	\$51,681.00
1/15/15	Expert Fee: FTI Consulting (D. Lewin support) – 50% discounted	\$29,618.25
1/16/15	Expert Fee: Rhoma Young & Associates	\$8,738.75
1/26/15	Depo Fee: Hemming Morse, LLP (C. Saba)	\$3,251.25
1/29/15	Depo Fee: Allison West	\$3,800.00
2/3/15	Depo Fee: Allison West	\$1,900.00
2/3/15	Expert Fee: Competitive Advantage Partners (D. Lewin)	\$30,562.50
2/5/15	Expert Fee: Rhoma Young & Associates	\$8,690.00
2/6/15	Expert Fee: EXTTI (M. Robbins)	\$18,200.00
2/13/15	Expert Fee: Rhoma Young & Associates	\$7,406.25
2/15/15	Expert Fee: Paul A. Gompers	\$92,700.00
2/17/15	Expert Fee: Cornerstone Res. (P. Gompers support) – 50% discounted	\$39,778.50
2/19/15	Expert Fee: Rhoma Young & Associates	\$7,930.00
2/23/15	Expert Fee: FTI Consulting (D. Lewin support) – 50% discounted	\$49,685.25
2/23/15	Expert Fee: Jeff Litvak (no charge for FTI support – 100% discount)	\$55,600.00
3/1/15	Expert Fee: Competitive Advantage Partners (D. Lewin)	\$25,312.50
3/4/15	Expert Fee: EXTTI (M. Robbins)	\$11,125.00
3/12/15	Expert Fee: Rhoma Young & Associates	\$9,707.50
3/19/15	Expert Fee: Rhoma Young & Associates	\$8,986.25
3/19/15	Expert Fee: Rhoma Young & Associates	\$8,690.00
3/19/15	Expert Fee: Rhoma Young & Associates	\$6,448.00
3/29/15	Expert Fee: Paul A. Gompers	\$38,700.00
3/31/15	Expert Fee: FTI Consulting (D. Lewin support) – 50% discounted	\$16,119.75
3/31/15	Expert Fee: FTI Consulting (D. Lewin support) – 50% discounted	\$6,937.50
3/31/15	Expert Fee: Cornerstone Res. (P. Gompers support) – 50% discounted	\$22,010.75
3/31/15	Expert Fee: Jeff Litvak (no charge for FTI support – 100% discount)	\$75,060.00
3/31/15	Expert Fee: Jeff Litvak (no charge for FTI support – 100% discount)	\$72,975.00
4/1/15	Expert Fee: Competitive Advantage Partners (D. Lewin)	\$42,187.50
4/2/15	Expert Fee: EXTTI (M. Robbins)	\$15,250.00
	<b>TOTAL</b>	<b>\$864,680.25</b>

**Memorandum of Costs (Worksheet)**

**12c. Court Reporter Fees**

July 24, 2012	\$64.00
May 28, 2014	\$30.00
July 17, 2014	\$30.00
Jan. 7, 2015	\$30.00
Feb. 17, 2015	\$207.50
Feb. 18, 2015	\$264.50
Feb. 20, 2015	\$207.50
Feb. 23, 2015	\$264.50
Feb. 24, 2015	\$264.50
Feb. 25, 2015	\$264.50
Feb. 26, 2015	\$264.50
Feb. 27, 2015	\$264.50
Mar. 2, 2015	\$264.50
Mar. 3, 2015	\$264.50
Mar. 4, 2015	\$264.50
Mar. 5, 2015	\$264.50
Mar. 6, 2015	\$264.50
Mar. 9, 2015	\$264.50
Mar. 10, 2015	\$264.50
Mar. 11, 2015	\$264.50
Mar. 12, 2015	\$264.50
Mar. 13, 2015	\$264.50
Mar. 16, 2015	\$264.50
Mar. 17, 2015	\$264.50
Mar. 18, 2015	\$264.50
Mar. 19, 2015	\$264.50
Mar. 20, 2015	\$264.50
Mar. 24, 2015	\$264.50
Mar. 25, 2015	\$264.50
Mar. 26, 2015	\$264.50
Mar. 27, 2015	\$264.50
<b>TOTAL</b>	<b>\$7,181.50</b>