

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

RONALD TUSSEY, <i>et al.</i> ,)	
)	
Plaintiffs;)	
)	
v.)	Case No. 06-04305-CV-C-NKL
)	
ABB, INC., <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF SHERI O’GORMAN

I, Sheri O’Gorman, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am and have been the Office Administrator of Schlichter, Bogard & Denton LLP (SBD) and the Custodian of Records, in charge of payment of expenses in this matter, and monitoring attorney and staff time billed on the case of *Tussey v. ABB*.
2. The itemized costs referred to in the Declarations of Heather Lea are expenses that were paid by SBD and are expenses that SBD customarily charges to the firm’s clients.
3. I am responsible for all employment records and files of all personnel that have worked for the firm during the time period of this litigation.
4. During the normal course of business, SBD attorneys and staff members record their billable time through the program TimeSlips. TimeSlips has the ability to convert attorney and paralegal time entries into a Microsoft Excel spreadsheet.
5. SBD uses the software Concordance for our attorneys to review all documents produced during the course of discovery.
6. XACT Data Discovery is a third-party vendor which our office utilizes for printing and document processing.

7. Additionally, XACT is the host for Concordance and the database associated with this case.

8. The Concordance licensing fees represent those charges incurred by SBD to permit their attorneys to review documents produced in cases that utilize the Concordance software. Accordingly, these licensing fees were evenly distributed among all of the firm's cases that utilize the software, including the *Tussey* matter.

9. Copying expenses are typically charged to SBD's clients. The firm's in-house copy rate is \$0.25 per page.

10. Fees paid to expert witnesses retained on a given case, and reimbursement of their reasonable costs of travel, lodging and meals and incidental expenses, are paid by SBD and are customarily charged to SBD's clients.

11. In addition to the above, reasonable expenses incurred for attorney and staff preparation and attendance at a deposition, mediation or trial (*e.g.*, lodging, travel and equipment rental) are paid for directly by SBD or reimbursed to the attorney or staff member and customarily charged to SBD clients.

12. Attorneys and staff at Schlichter, Bogard & Denton routinely make long-distance phone calls in-house for case-related matters. SBD also utilizes Intercall services for conference calls with the Court, opposing counsel or among SBD attorneys who are located in different locations. The in-house rate for long-distance phone calls is \$0.40 per minute and the costs for long-distance and conference calls are normally charged to the firm's clients.

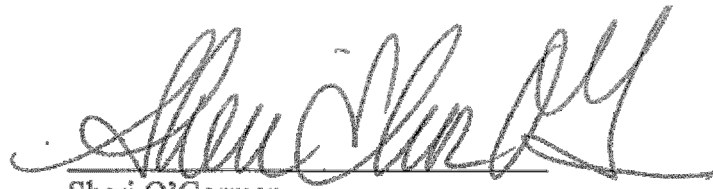
13. SBD attorneys and staff utilize computer assisted legal research (Westlaw) to conduct legal research. SBD pays Westlaw a flat rate for these services, which is allocated among all active cases based upon the amount of time each case spent using the database for a given period,

as calculated and reported by Westlaw. If SBD attorneys incur charges for research conducted outside the subscription plan for a given case, those charges are directly billed to that case and paid accordingly. SBD customarily charges its clients for the allocated amounts.

14. Costs incurred for obtaining deposition transcripts and other deposition related-charges are paid by SBD directly and then are customarily charged to the firm's clients.

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

Dated this 11th day of May, 2012.



Sheri O'Gorman