

**BEFORE THE
FEDERAL MARITIME COMMISSION**

PETRA PET, INC.,)

Complainant,)

v.)

Docket No. 11-14

PANDA LOGISTICS LTD., PANDA)
LOGISTICS CO. LTD., AND RDM)
SOLUTIONS, INC.,)

Respondents.)

VERIFIED PETITION REGARDING ATTORNEYS' FEES

Pursuant to 46 U.S.C. § 41305(b) and 46 C.F.R. § 502.254, Complainant PETRA PET, INC., ("Petra Pet") by its attorneys hereby files its Verified Petition Regarding Attorney's Fees against Respondants, PANDA LOGISTICS LTD., PANDA LOGISTICS CO. LTD., AND RDM SOLUTIONS, INC., ("Panda Respondents"), seeking reasonable attorney's fees as party sustaining actual injury entitling it to reparations pursuant to 46 U.S.C. § 41102, 41301, and 41305 of the Shipping act of 1984 as amended by the Ocean Shipping Reform Act of 1998 (the "Shipping Act").

1. Billings of attorneys' fees and expenses to Petra Pet for this case by Greenberg Traurig from July 14, 2011, through September 27, 2013, totaled \$112,507.22, amounting to 277.5 hours of attorney work time, at an hourly rate ranging from \$225 to \$685, 36.8 hours of paralegal time at an hourly rate of \$245, plus \$4,575.72 in expenses. The overwhelming majority of attorney time was billed at a rate of \$362. The Declaration of Sanford M. Saunders, Jr., ("Saunders Declaration") regarding the attorneys' fees is filed at the same time as this Verified Petition and incorporated by reference herein.

2. These billings for attorney services to Complainant Petra Pet in this matter are reasonable and are consistent with attorney fees charged for services in maritime matters in the District of Columbia. The hourly rates charged in this case are within the range of hourly rates charged by attorneys with similar skill and experience in this jurisdiction, as demonstrated by Laffey Matrix as prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (*see* Declaration Exhibit B), the "Adjusted Laffey Matrix" (*see* Declaration Exhibit C), the methodology of which was accepted by the United States District Court for the District of Columbia in *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001), and *Salazar v. Dist. of Col.*, 123 F. Supp. 2d 8 (D.D.C. 2000), and the PWC Revenue Management Report (*see* Declaration Exhibit D).

3. The legal work on behalf of Petra Pet focused on Respondents' violations of the Shipping Act and establishing Petra Pet's rights to reparations pursuant to same. The Panda Defendants asserted numerous and substantive and procedural defenses, all of which were successfully rebutted.

4. The time billed and sought here included work to acquire and review numerous documents, prepare and file the Complaint, draft and issue discovery requests, review and respond to Respondant's discovery requests and analyze their responses, draft Proposed Findings of Facts, a brief and reply brief, and responses to Respondant's Exceptions.

5. The ALJ found, and the Commission upheld that Petra Pet was entitled to damages in the amount of \$207,013.38, for violation of section 10(d)(1) of the Act and to seek attorney fees after a final reparation award.

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Federal Maritime Commission and the Administrative Law Judge grant the following relief:

1. Attorneys' fees and expenses incurred in this matter pertaining to reparations as provided in 46 U.S.C. § 41305(b) and 46 C.F.R. §502.254 in the total amount of \$112,507.22. This amount is supported by attorney billing submitted with the Saunders Declaration filed with this Petition indicating that attorneys' billing is reasonable and consistent with the District of Columbia fees customarily charged for this type of legal work

2. Such other and further relief as the Commission and the Administrative Law Judge deem just and proper.

Dated: January 29, 2014

Respectfully submitted,



Sanford M. Saunders, Jr.
Greenberg Traurig, LLP
2101 L Street, NW
Suite 1000
Washington, DC 20037
(202) 331-3100
saunderss@gtlaw.com

VERIFICATION

I, Sanford M. Saunders Jr., declare under penalty of perjury under the laws of the United States of America that the foregoing Petition Regarding Attorneys' Fees and attached documents are true and correct.

Executed on January 29, 2014.



Sanford M. Saunders, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2014, I have delivered true and correct copies of the foregoing Verified Petition Regarding Attorneys' Fees, Declaration of Sanford M. Saunders, Jr., and Exhibits A-D, to the following addresses at the addresses stated via e-mail transmission and/or by overnight mail, as follows:

Counsel for Panda Logistics Limited and Panda Logistics Co., Ltd.

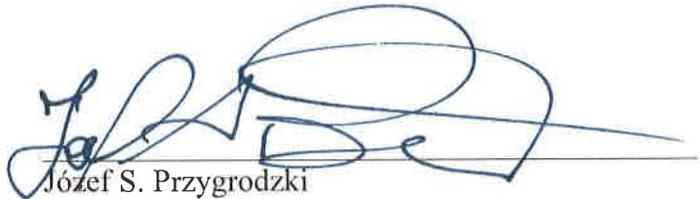
David P. Street
Brendan Collins
GKG Law, P.C.
Canal Square
1054 Thirty-First Street, NW
Washington, DC 00007

Email: DStreet@gkglaw.com
BCollins@gkglaw.com

Agent designated for service of process for RDM Solutions, Inc.

Warren Hirsch (CPA)
65 Roosevelt Avenue
Valley Stream, NY 11581-1151

Email: whirsch28@aol.com


Józef S. Przygodzki

**BEFORE THE
FEDERAL MARITIME COMMISSION**

PETRA PET, INC.,)

Complainant,)

v.)

PANDA LOGISTICS LTD., PANDA)
LOGISTICS CO. LTD., AND RDM)
SOLUTIONS, INC.,)

Respondents. _____)

Docket No. 11-14

DECLARATION OF SANFORD M. SAUNDERS, JR.

I, SANFORD M. SAUNDERS, JR., being of full age, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I am a shareholder in the international law firm Greenberg Traurig, LLP (“Greenberg Traurig”), and am the co-managing shareholder of the firm’s Washington, D.C., office. I am the lead counsel representing Petra Pet, Inc. (“Petra Pet”) in the above captioned matter and submit this Declaration in support of Complainant’s Petition for Attorneys’ Fees.

2. I am familiar with the hourly rates charged by each of the personnel involved in this case. Through my thirty-plus (30+) years of litigation practice, I am also familiar with the customary hourly rates charged by attorneys of similar experience in the District of Columbia.

3. I have reviewed the invoices from Greenberg Traurig to Petra Pet. Copies of our detailed time and expense reports showing the time entries for this matter are attached hereto as Exhibit A. Those invoices reflect work that actually was performed and was necessary for this case.

4. In connection with prosecuting this matter, Petra Pet incurred fees and expenses in the amount of \$112,507.22 to secure reparations in this matter.

5. For this representation, my time was charged at an hourly rate ranging from \$645 to \$685. I served in a supervisory capacity. The day-to-day work in the case was performed by Mr. Stang, an attorney with more than 25 years experience (1984 law school graduate) at an hourly rate ranging from \$350 to \$475. A portion of Mr. Stang's time entries reflect a discounted rate given to Petra Pet. Mr. Przygodzki, (2010 law school graduate) was charged at an hourly rate ranging from \$225 to \$250. Ms. McBrayer, a paralegal with more than 20 years experience was charged at an hourly rate of \$245.

6. The hourly rates charged in this case are within the range of hourly rates charged by attorneys with similar skill and experience in this jurisdiction, as demonstrated by Laffey Matrix as prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (attached hereto as Exhibit B), the "Adjusted Laffey Matrix" (attached hereto as Exhibit C), the methodology of which was accepted by the United States District Court for the District of Columbia in *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001), and *Salazar v. Dist. of Col.*, 123 F. Supp. 2d 8 (D.D.C. 2000), and the PWC Revenue Management Report (attached hereto as Exhibit D).

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

Executed on: January 29, 2014


SANFORD M. SAUNDERS, JR.

EXHIBIT A



Invoice No.: 2985044
File No. : 108401.014600
Bill Date : August 3, 2011

Petra Pet, Inc.
c/o Imperial Capital
200 King Street West
Toronto, Ontario MSH 3T4
CANADA

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through July 31, 2011:

Total Fees: \$ 4,797.50

Current Invoice: \$ 4,797.50

RW:LV
Tax ID: [REDACTED]



Invoice No.: 2985044
File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Robert Stang	10.10	475.00	4,797.50
Totals:	10.10	475.00	\$ 4,797.50

* * * * *

RW:LV
Tax ID: [REDACTED]

Invoice No.: 2985044
Re: FMC Matter
Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
07/14/11	Robert Stang	Review of FMC e-docket for Sec. 10(d)(1) rulings and complaints.	0.70
07/15/11	Robert Stang	Review of FMC complaints.	0.50
07/20/11	Robert Stang	Review of FMC procedures regarding remediation and formal complaints.	0.40
07/21/11	Robert Stang	Review of FMC docket for section 10(d)(1) complaints; telephone conference with FMC secretary's office regarding procedure for requesting remediation.	1.30
07/26/11	Robert Stang	Preparation of FMC complaint.	2.50
07/27/11	Robert Stang	Preparation of FMC complaint and review of Panda/Petrapport correspondence.	1.80
07/28/11	Robert Stang	Preparation of FMC complaint.	0.60
07/30/11	Robert Stang	Preparation of complaint.	2.30
<u>Total Time:</u>			10.10



Invoice No.: 3011116
 File No. : 108401.014600
 Bill Date : September 8, 2011

Petra Pet, Inc.
 5801 Westside Avenue
 North Bergen, NJ 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through August 31, 2011:

Total Fees: \$ 12,160.00

Expenses:

Federal Express Charges
 Filing Fees

15.12
 221.00

Total Expenses: \$ 236.12

Current Invoice: \$ 12,396.12

Previous Balance (see attached statement): \$ 4,797.50

Total Amount Due: \$ 17,193.62

RW:LV
 Tax ID: [REDACTED]



Invoice No.: 3011116
File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Robert Stang	25.60	475.00	12,160.00
Totals:	25.60	475.00	\$ 12,160.00

* * * * *

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
08/03/11	2985044	4,797.50	0.00	0.00	4,797.50
Totals:		\$ 4,797.50	\$ 0.00	\$ 0.00	\$ 4,797.50

RW:LV

Tax ID: [REDACTED]

Invoice No.: 3011116
Re: FMC Matter
Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
08/01/11	Robert Stang	Preparation of FMC complaint.	6.00
08/02/11	Robert Stang	Preparation of FMC complaint.	1.50
08/03/11	Robert Stang	Preparation of FMC complaint.	1.20
08/04/11	Robert Stang	Preparation of complaint.	2.10
08/05/11	Robert Stang	Modified FMC complaint; preparation of exhibits.	1.40
08/09/11	Robert Stang	Preparation of exhibits and check of cites for FMC complaint.	0.50
08/10/11	Robert Stang	Review of statutory and regulatory citations in FMC complaint to check accuracy and modifications as needed.	2.00
08/11/11	Robert Stang	Review of citations in FMC complaint to check accuracy; review of FMC rules of procedure; modified complaint to correct "licensing" issue and attorneys fees and include Panda contact information; telephone conference with Federal Maritime Commission to confirm filing requirements including those involving Verification (needed) and Notice of Appearance (not needed); preparation of verification form; follow-up with R. Wexler and S. Saunders to advise on status; emailed complaint and verification to R. Wexler for signatures.	4.50
08/12/11	Robert Stang	Preparation of exhibits and Verification for complaint.	1.20
08/14/11	Robert Stang	Finalized FMC complaint and exhibits.	0.50
08/15/11	Robert Stang	Finalized FMC complaint and exhibits; emailed complaint and exhibits to Panda; follow-up with FMC Office of Dispute Resolution to notify Director of imminent formal complaint.	4.00
08/16/11	Robert Stang	Finalized and filed complaint.	0.50
08/26/11	Robert Stang	Review of FMC correspondence and updates to Petrapport personnel.	0.20
<u>Total Time:</u>			<u>25.60</u>

Invoice No.: 3011116
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
08/15/11	VENDOR 75388: Federal Maritime Commission; INVOICE#: 11081511221; DATE: 8/15/2011 - Filing a formal complaint	\$	221.00
08/16/11	VENDOR: FedEx - ACH INVOICE#: 760616577 DATE: 8/24/2011 - Courier Service Track No. 864668014458 Req.'d by Robert Stang on 8/16/11 from Greenberg Traurig 2101 L St Nw Ste 1000 to Robert Wexler Greenberg Traurig Llp - Ref: 108401 014600	\$	7.38
08/16/11	VENDOR: FedEx - ACH INVOICE#: 760616577 DATE: 8/24/2011 - Courier Service Track No. 864668014469 Req.'d by Robert Stang on 8/16/11 from Greenberg Traurig 2101 L St Nw Ste 1000 to Dean Triandafellos Petrapport - Ref: 108401 014600	\$	7.74
		Total Expenses:	\$ 236.12



Invoice No.: 3025569
File No. : 108401.014600
Bill Date : October 5, 2011

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through September 30, 2011:

Total Fees: \$ 2,090.00

Current Invoice: \$ 2,090.00

Previous Balance (see attached statement): \$ 17,193.62

Total Amount Due: \$ 19,283.62

RW:LV
Tax ID: [REDACTED]

Invoice No.: 3025569
 File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>		<u>Amount</u>
Robert Stang	4.40	475.00		2,090.00
	<hr/>			
Totals:	4.40	475.00	\$	2,090.00

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Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>			
08/03/11	2985044	4,797.50	0.00	0.00	4,797.50			
09/08/11	3011116	12,160.00	236.12	0.00	12,396.12			
	<hr/>							
Totals:	\$	16,957.50	\$	236.12	\$	0.00	\$	17,193.62

RW:LV
 Tax ID: XXXXXXXXXX

Invoice No.: 3025569
Re: FMC Matter
Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
09/01/11	Robert Stang	Follow-up on FMC complaint; update on Federal register publication.	0.30
09/12/11	Robert Stang	Review of FMC site for changes or responses to case file.	0.10
09/14/11	Robert Stang	Follow-up on service of RDM; review of reports on Mario Ruiz to determine address and personal contact data; telephone conference and email with Federal Maritime Commission.	1.30
09/15/11	Robert Stang	Obtained New York Department of State authorized service of process entity for RDM Solutions and provided information to FMC.	0.40
09/21/11	Robert Stang	Follow-up on service of Mario Ruiz and RDM; telephone conference with FMC Secretary's office.	0.50
09/23/11	Robert Stang	Follow-up correspondence regarding status of complaint.	0.30
09/30/11	Robert Stang	Review of Answer to FMC Complaint and Judge's Initial order; conference with S. Saunders; Review of FMC procedures.	1.50
<u>Total Time:</u>			4.40

Invoice No.: 3025569
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

DUPLICATE COPY



Invoice No.: 3073516
File No. : 108401.014600
Bill Date : December 6, 2011

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through November 30, 2011:

Total Fees: \$ [REDACTED]
10,754.50

Expenses:

Photocopy Charges

759.90

Total Expenses: \$ 759.90

Current Invoice: \$ [REDACTED] 11,514.40

Previous Balance (see attached statement): \$ 9,506.35

Total Amount Due: \$ [REDACTED] 21,020.75

RW:LV

Tax ID: [REDACTED]

Invoice No.: 3073516
 File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Sanford M. Saunders, Jr.	2.10	645.00	1,354.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Robert Stang	21.20	350.00	7,420.00
Jozef S. Przygodzki	8.80	225.00	1,980.00
Totals:	32.10		\$ 10,754.50

* * * * *

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
10/05/11	3025569	2,090.00	0.00	0.00	2,090.00
11/04/11	3049078	7,398.00	18.35	0.00	7,416.35
Totals:		\$ 9,488.00	\$ 18.35	\$ 0.00	\$ 9,506.35

RW:LV
 Tax ID: [REDACTED]

Invoice No.: 3073516
 Re: FMC Matter
 Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
11/01/11	Robert Stang	Review RDM notice of default issued by FMC Judge Wirth and e-mail correspondence summarizing default and need for response to Panda's discovery requests.	0.40
11/02/11	Sanford M. Saunders, Jr.	Review proposed discovery requests and consult with R. Stang re: same.	0.60
11/02/11	Robert Stang	Preparation of discovery requests; interview with Patty De Avila for discovery requests.	3.50
11/03/11	Robert Stang	Preparation of discovery request and review of documents.	1.50
11/04/11	Sanford M. Saunders, Jr.	Review discovery and consult with R. Stang re: same.	0.50
11/04/11	Robert Stang	Preparation of discovery request and service on opposing counsel.	2.50
11/07/11	Robert Stang	Review of documents and preparation of discovery responses.	1.20
11/08/11	Robert Stang	Review of documents for discovery response and email to Petrapport.	2.00
11/10/11	Sanford M. Saunders, Jr.	Consult with R. Stang re: discovery issues.	0.40
11/10/11	Robert Stang	Review of documents and preparation of discovery response.	2.50
11/11/11	Robert Stang	Review of documents and conference with S. Saunders.	2.00
11/14/11	Jozef S. Przygodzki	Review discovery documents, and prepare for production.	1.50
11/14/11	Robert Stang	Follow up on discovery.	0.60
11/15/11	Jozef S. Przygodzki	Review discovery documents, and prepare for production.	0.60
11/15/11	Robert Stang	Follow up on discovery.	1.60
11/16/11	Jozef S. Przygodzki	Review discovery documents, and prepare for production.	0.70
11/16/11	Robert Stang	Preparation of response to discovery requests.	2.50
11/17/11	Jozef S. Przygodzki	Review discovery documents, and prepare for production.	1.20
11/18/11	Jozef S. Przygodzki	Review discovery documents, and prepare for production.	1.50
11/18/11	Sanford M. Saunders, Jr.	Review discovery responses; consult with R. Stang re: same.	0.60
11/21/11	Jozef S. Przygodzki	Review new documents and prepare for numbering and production.	1.80
11/21/11	Robert Stang	Response to first discovery request.	0.70
11/22/11	Jozef S. Przygodzki	Review new documents and prepare for numbering and production.	1.50
11/28/11	Robert Stang	Follow up on additional documents in response to discovery request.	0.20

Total Time: 32.10

Invoice No.: 3073516
Re: FMC Matter
Matter No.: 108401.014600

Page 2

Description of Professional Services Rendered

DUPLICATE COPY

Invoice No.: 3073516
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
11/14/11	Copy; 30 Page(s) by 000011	\$	4.50
11/14/11	Copy; 6 Page(s) by 000011	\$	0.90
11/14/11	Copy; 33 Page(s) by 000011	\$	4.95
11/14/11	Copy; 288 Page(s) by 000011	\$	43.20
11/14/11	Copy; 78 Page(s) by 000011	\$	11.70
11/14/11	Copy; 2 Page(s) by 000011	\$	0.30
11/14/11	Copy; 878 Page(s) by 000011	\$	131.70
11/14/11	Copy; 6 Page(s) by 000011	\$	0.90
11/14/11	Copy; 291 Page(s) by 000011	\$	43.65
11/15/11	Copy; 53 Page(s) by 000011	\$	7.95
11/15/11	Copy; 2 Page(s) by 000011	\$	0.30
11/15/11	Copy; 549 Page(s) by 000011	\$	82.35
11/15/11	Copy; 2 Page(s) by 000011	\$	0.30
11/15/11	Copy; 6 Page(s) by 000011	\$	0.90
11/15/11	Copy; 46 Page(s) by 000011	\$	6.90
11/15/11	Copy; 26 Page(s) by 000011	\$	3.90
11/15/11	Copy; 152 Page(s) by 000011	\$	22.80
11/15/11	Copy; 38 Page(s) by 000011	\$	5.70
11/15/11	Copy; 394 Page(s) by 000011	\$	59.10
11/15/11	Copy; 14 Page(s) by 000011	\$	2.10
11/16/11	Copy; 1130 Page(s) by 000011	\$	169.50
11/16/11	Copy; 18 Page(s) by 000011	\$	2.70
11/16/11	Copy; 2 Page(s) by 000011	\$	0.30
11/16/11	Copy; 2 Page(s) by 000011	\$	0.30
11/17/11	Copy; 155 Page(s) by 000011	\$	23.25
11/17/11	Copy; 374 Page(s) by 000011	\$	56.10
11/17/11	Copy; 236 Page(s) by 000011	\$	35.40
11/18/11	Copy; 112 Page(s) by 000011	\$	16.80
11/21/11	Copy; 112 Page(s) by 005852	\$	16.80
11/21/11	Copy; 30 Page(s) by 005852	\$	4.50
11/21/11	Copy; 1 Page(s) by 005852	\$	0.15
			<hr/>
Total Expenses:		\$	759.90



Invoice No.: 3049078
File No. : 108401.014600
Bill Date : November 4, 2011

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through October 31, 2011:

Total Fees: \$ 7,398.00

Expenses:

Federal Express Charges

18.35

Total Expenses: \$ 18.35

Current Invoice: \$ 7,416.35

Previous Balance (see attached statement): \$ 14,486.12

Total Amount Due: \$ 21,902.47

RW:LV

Tax ID: XXXXXXXXXX



Invoice No.: 3049078
File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Sanford M. Saunders, Jr.	1.20	645.00	774.00
Robert Stang	18.40	360.00	6,624.00
Totals:	19.60	377.45	\$ 7,398.00

* * * * *

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
09/08/11	3011116	12,160.00	236.12	0.00	12,396.12
10/05/11	3025569	2,090.00	0.00	0.00	2,090.00
Totals:		\$ 14,250.00	\$ 236.12	\$ 0.00	\$ 14,486.12

RW:LV

Tax ID: [REDACTED]

Invoice No.: 3049078
Re: FMC Matter
Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
10/03/11	Sanford M. Saunders, Jr.	Review answer.	0.40
10/03/11	Robert Stang	Review of response from Panda and e-mail to Petra regarding same.	0.50
10/07/11	Sanford M. Saunders, Jr.	Review Panda discovery.	0.30
10/07/11	Robert Stang	Review of discovery request and submission of Joint Status Report.	1.60
10/10/11	Robert Stang	Preparation of discovery motion.	0.60
10/12/11	Sanford M. Saunders, Jr.	Conference call with Panda counsel re: joint report.	0.50
10/12/11	Robert Stang	Preparation of discovery request; preparation of motion involving Joint Status report to Judge Wirth; telephone conference with opposing counsel regarding discovery.	2.40
10/13/11	Robert Stang	Preparation of Joint Status Report and order for submission to Administrative Law Judge.	1.00
10/14/11	Robert Stang	Preparation of Joint Status Report and order for submission to ALJ.	2.00
10/18/11	Robert Stang	Preparation of discovery responses.	0.60
10/20/11	Robert Stang	Preparation of discovery request.	1.00
10/21/11	Robert Stang	Preparation of discovery motion.	0.60
10/24/11	Robert Stang	Preparation. of discovery request and response to respondent's motion for discovery.	1.30
10/25/11	Robert Stang	Preparation of discovery request and response to respondent's motion for discovery.	1.50
10/26/11	Robert Stang	Preparation of discovery request.	1.80
10/28/11	Robert Stang	Conference with S. Saunders regarding first discovery request to Panda.	1.00
10/30/11	Robert Stang	Preparation of responses to Panda's first discovery requests.	2.50
<u>Total Time:</u>			19.60

Invoice No.: 3049078
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
10/14/11	VENDOR: FedEx - ACH INVOICE#: 766653707 DATE: 10/19/2011 - Courier Service Track No. 864668014664 Req.'d by Robert Stang on 10/14/11 from Greenberg Traurig 2101 L St Nw Ste 1000 to Ms Rachel Dicken Cr - Ref: 108401 014600	\$	18.35
		Total Expenses:	\$ 18.35

DUPLICATE



Invoice No.: 3096944
File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Robert Stang	2.30	350.00	805.00
Jozef S. Przygodzki	6.90	225.00	1,552.50
Totals:	9.20	256.25	\$ 2,357.50

* * * * *

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
12/06/11	3073516	16,881.50	759.90	0.00	17,641.40
	Totals:	\$ 16,881.50	\$ 759.90	\$ 0.00	\$ 17,641.40

RW:LV

Tax ID: [REDACTED]

Invoice No.: 3096944
Re: FMC Matter
Matter No.: 108401.014600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
12/01/11	Robert Stang	Follow up on discovery responses,	0.30
12/02/11	Robert Stang	Preparation of supplemental responses.	1.00
12/06/11	Jozef S. Przygodzki	Review and prepare supplemental documents for production.	1.80
12/07/11	Jozef S. Przygodzki	Review documents to be produced.	1.00
12/08/11	Jozef S. Przygodzki	Review documents to be produced.	0.70
12/09/11	Jozef S. Przygodzki	Review documents to be produced.	1.90
12/12/11	Jozef S. Przygodzki	Review and prepare documents for production.	1.50
12/13/11	Robert Stang	Preparation of supplemental discovery responses.	1.00
<u>Total Time:</u>			9.20

Invoice No.: 3096944
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
11/18/11	VENDOR: Real Courier - ACH INVOICE#: 7668 DATE: 12/1/2011 - Courier Service Req'd by Przygodzki, Jozef S. on 11/18/11 from G/T., WA, DC to Steven Ring, Gaithersburg, MD,	\$	129.00
11/29/11	VENDOR: Ikon Office Solutions, Inc - ACH INVOICE#: WDC11110256 DATE: 11/29/2011 - Document Procurement Expense Req. by Keisha Bracey on 11/29/11 - Ref: 108401-014600.	\$	2,178.51
12/06/11	Copy; 722 Page(s) by 000011	\$	108.30
12/07/11	Copy; 66 Page(s) by 000011	\$	9.90
12/07/11	Postage by 000011	\$	1.28
12/12/11	Postage by 000011	\$	2.56
Total Expenses:		\$	2,429.55



Invoice No.: 3111413
File No. : 108401.014600
Bill Date : February 7, 2012

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through January 31, 2012:

Total Fees: \$ 2,065.00

Expenses:

Messenger/Courier Services 25.44
Off-site Printing and Copying Charges 292.05

Total Expenses: \$ 317.49

Current Invoice: \$ 2,382.49

Previous Balance (see attached statement): \$ 4,787.05

Total Amount Due: \$ 7,169.54

RW:LV
Tax ID: [REDACTED]



Invoice No.: 3111413
File No. : 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Robert Stang	5.90	350.00	2,065.00
Totals:	5.90	350.00	\$ 2,065.00

* * * * *

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
01/10/12	3096944	2,357.50	2,429.55	0.00	4,787.05
Totals:	\$	2,357.50	\$ 2,429.55	\$ 0.00	\$ 4,787.05

RW:LV
Tax ID: [REDACTED]

Invoice No.: 3111413
Re: FMC Matter
Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
01/04/12	Robert Stang	Follow up on discovery requests and status of case.	0.20
01/05/12	Robert Stang	Review of discovery documents received from opposing counsel.	2.50
01/11/12	Robert Stang	Preparation of Joint Status Report.	0.50
01/12/12	Robert Stang	Prepared and filed Joint status report.	1.50
01/30/12	Robert Stang	Preparation of Joint Status Report to judge; Conference with opposing counsel regarding request to file joint default motion against RDM and seek enforcement against RDM bond.	1.20
<u>Total Time:</u>			<u>5.90</u>

Invoice No.: 3111413
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
12/19/11	VENDOR 08087: Real Courier - ACH INVOICE#: 7705 DATE: 1/1/2012 - Courier Service Req'd by Przygodzki, Jozef S. on 12/19/11 from GT(D.C.) to Galland Kharasch, WA., DC,	\$	25.44
12/22/11	VENDOR: Ikon Office Solutions, Inc - ACH INVOICE#: WDC11120200 DATE: 12/22/2011 - Document Procurement Expense Req. by Keisha Bracey on 12/22/11 - Ref: 10840-0146000	\$	292.05
		Total Expenses:	\$ 317.49



Invoice No.: 3132098
File No. : 108401.014600
Bill Date : March 7, 2012

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through February 29, 2012:

Total Fees: \$ 2,250.00

Expenses:

Federal Express Charges	15.26
Messenger/Courier Services	21.20
Postage	0.90

Total Expenses: \$ 37.36

Current Invoice: \$ 2,287.36

Previous Balance (see attached statement): \$ 2,382.49

Total Amount Due: \$ 4,669.85

RW:LV
Tax ID: XXXXXXXXXX



Invoice No.: 3132098
File No. : 108401.014600

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
02/07/12	3111413	2,065.00	317.49	0.00	2,382.49
	Totals:	\$ 2,065.00	\$ 317.49	\$ 0.00	\$ 2,382.49

RW:LV
Tax ID: [REDACTED]

Invoice No.: 3132098
Re: FMC Matter
Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/12	Robert Stang	Review of documents received from opposing counsel.	1.20	206.11
02/02/12	Robert Stang	Reviewed documents from Panda for terms evidencing business agreements with RDM.	1.20	206.11
02/03/12	Robert Stang	Review of documents in response to discovery request.	2.30	395.04
02/06/12	Robert Stang	Reviewed documents from Panda for terms evidencing business agreements with RDM.	1.50	257.63
02/07/12	Robert Stang	Reviewed documents from Panda for terms evidencing business agreements with RDM; conference with S. Saunders regarding discovery issues.	2.20	377.86
02/09/12	Robert Stang	Prepared Motion for Default Judgment against RDM; Reviewed documents received from Panda for business terms with RDM.	2.50	429.39
02/10/12	Robert Stang	Finalized Motion for Default Judgment against RDM and filed with FMC, service to RDM and Panda; follow up with Panda regarding "signed agreement" e-mail between Panda and RDM.	2.20	377.86
			<u>Total Time:</u>	13.10
			<u>Total Fees:</u>	\$ 2,250.00

Invoice No.: 3132098
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
01/13/12	VENDOR: Best Messenger, Inc. - ACH INVOICE#: 57169 DATE: 1/31/2012 - Ticket Ref: 11320 - Messenger Service from Greenberg Traurig to Federal Maritime on 01/13/12 Req'd by C.Campb - File Ref: 108401.014600,	\$	10.60
01/30/12	VENDOR: FedEx - ACH INVOICE#: 778455288 DATE: 2/8/2012 - Tracking #793169323435; From: Robert D. Stang, Greenberg Traurig Llp, 2101 L St. Nw, Washington, DC 20037; To: Karen Gregoryoffice Of Secre, Federal Maritime Commission, 800 N Capitol St Nw # 900, Washington, DC 20002	\$	7.68
01/31/12	VENDOR: Best Messenger, Inc. - ACH INVOICE#: 57169 DATE: 1/31/2012 - Ticket Ref: 13118 - Messenger Service from Greenberg Traurig to Federal Maritime on 01/31/12 Req'd by D.Furna - File Ref: 108401.014600,	\$	10.60
02/10/12	VENDOR: FedEx - ACH INVOICE#: 779211934 DATE: 2/15/2012 - Tracking #798048465332; From: Robert Stangesq., Greenberg Traurig Llp, 2101 L St. Nw, Washington, DC 20037; To: Karen Gregoryoffice Of Secre, Federal Maritime Commission, 800 N Capitol St Nw # 900, Washington, DC 20002	\$	7.58
02/29/12	Postage by 000011	\$	0.90
		Total Expenses:	\$ 37.36



Invoice No.: 3169757
File No. : 108401.014600
Bill Date : May 4, 2012

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

W/O AS PER R. WEXLER - JG

Expenses:

Federal Express Charges

Total Fees: \$ 735.00

7.75

Total Expenses: \$ 7.75

Discount Applied: (742.75)

Total Current Invoice: \$ 0.00

RW:JG

Tax ID: XXXXXXXXXX

Invoice No.: 3169757

Page 1

Matter No.: 108401.014600

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/12	Robert Stang	Draft of claim letter to Lincoln general for payment of claim pursuant to Default Judgment order.	0.20	98.00
04/27/12	Robert Stang	Identified personnel in surety, prepared and emailed claim letter.	1.30	637.00
			<u>Total Time:</u>	1.50
			<u>Total Fees:</u>	\$ 735.00

Invoice No.: 3169757

Re: FMC Matter

Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
04/12/12	VENDOR: FedEx - ACH INVOICE#: 785981417 DATE: 4/18/2012 - Tracking #793447570040; From: Robert D. Stang, Greenberg Traurig LLP, 2101 L St. NW, Washington, DC 20037; To: Karen V. Gregory secretary, Federal Maritime Commission, 800 N Capitol St NW # 900, Washington, DC 20002	\$ 7.75
Total Expenses:		\$ 7.75



Invoice No.: 3189465
File No. : 108401.014600
Bill Date : June 4, 2012

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Expenses:

Federal Express Charges
Photocopy Charges

7.75
769.20

Total Expenses: \$ 776.95
Current Invoice: \$ 776.95

RW:JG
Tax ID: [REDACTED]



Invoice No.: 3189465
File No. : 108401.014600

Summary of Fees (Current Invoice)

Timekeeper

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Totals:	0.00	0.00	\$ 0.00

* * * * *

RW:JG
Tax ID: [REDACTED]

Invoice No.: 3189465
Re: FMC Matter
Matter No.: 108401.014600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
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No time charged to this file

DUPLICATE COPY

Invoice No.: 3189465
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
04/19/12	VENDOR: FedEx - ACH INVOICE#: 786773776 DATE: 4/25/2012 - Tracking #793474907752; From: Robert D. Stangesq., Greenberg Traurig LLP, 2101 L St. Nw, Washington, DC 20037; To: Karen V. Gregorysecretary, Federal Maritime Commission, 800 N Capitol St Nw # 900, Washington, DC 20002	\$	7.75
05/15/12	Copy; 72 Page(s) by 000011	\$	10.80
05/21/12	Copy; 15 Page(s) by 016961	\$	2.25
05/21/12	Copy; 1995 Page(s) by 000011	\$	299.25
05/21/12	Copy; 2112 Page(s) by 000011	\$	316.80
05/21/12	Copy; 484 Page(s) by 016961	\$	72.60
05/21/12	Copy; 126 Page(s) by 016961	\$	18.90
05/21/12	Copy; 19 Page(s) by 000011	\$	2.85
05/21/12	Copy; 228 Page(s) by 000011	\$	34.20
05/21/12	Copy; 1 Page(s) by 000011	\$	0.15
05/21/12	Copy; 63 Page(s) by 000011	\$	9.45
05/22/12	Copy; 11 Page(s) by 000011	\$	1.65
05/22/12	Copy; 2 Page(s) by 000011	\$	0.30
	Total Expenses:	\$	776.95



Invoice No.: 3497028
File No. : 108401.014600
Bill Date : September 27, 2013

Petra Pet, Inc.
5801 Westside Avenue
North Bergen, New Jersey 07047

Attn: Dean Triandafellos

INVOICE

Re: FMC Matter

Legal Services through September 27, 2013:

Total Fees:	\$	64,059.00
Current Invoice:	\$	<u>64,059.00</u>

RW:KIB

Tax ID: [REDACTED]



Invoice No.: 3497028
File No.: 108401.014600

Summary of Fees (Current Invoice)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Sanford M. Saunders, Jr.	1.80	685.00	1,233.00
Robert Stang	152.60	350.00	53,410.00
Jozef S. Przygodzki	1.60	250.00	400.00
Barbara E. McBrayer	36.80	245.00	9,016.00
Totals:	192.80	332.26	\$ 64,059.00

* * * * *

RW:KIB

Tax ID: [REDACTED]

Invoice No.: 3497028
Re: FMC Matter
Matter No.: 108401.014600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
05/03/12	Robert Stang	Preparation of Proposed Findings of Fact.	2.50
05/04/12	Robert Stang	Preparation of Proposed Findings of Fact.	3.00
05/07/12	Robert Stang	Preparation of Proposed Findings of Fact and Brief.	2.50
05/09/12	Robert Stang	Preparation of Proposed Findings of Fact.	2.00
05/10/12	Robert Stang	Preparation of brief.	1.00
05/11/12	Robert Stang	Preparation of brief.	2.50
05/14/12	Robert Stang	Preparation of brief for Federal maritime Commission.	3.70
05/15/12	Robert Stang	Follow up with RDM Customs Bond Surety.	1.00
05/15/12	Robert Stang	Preparation of brief and proposed findings of fact.	3.00
05/17/12	Robert Stang	Preparation of brief and proposed findings of fact.	6.00
05/18/12	Robert Stang	Preparation of brief, Proposed Findings of fact and Appendix of exhibits.	8.00
05/21/12	Jozef S. Przygodzki	Review document production per R. Stang.	1.60
05/21/12	Robert Stang	Preparation of brief, Proposed Findings of fact and Appendix of exhibits, cover letter to judge, table of contents, certificate of service, conference with Sandy Saunders.	8.00
06/15/12	Robert Stang	Reviewed response from opposing counsel and forwarded to Petrapport.	1.00
06/18/12	Robert Stang	Preparation of reply brief.	2.00
06/19/12	Robert Stang	Confer with S. Saunders regarding reply and review of documents.	1.00
06/20/12	Robert Stang	Preparation of reply brief; response to Panda Proposed Findings of Fact; and Declarations.	4.50
06/21/12	Robert Stang	Review of email correspondence and preparation of declarations and reply to opposing counsel.	1.00
06/22/12	Robert Stang	Draft of Declaration for K. Chin; telephone conference with Petrapport regarding status of claims; draft of reply brief.	4.50
06/25/12	Robert Stang	Preparation of brief; draft of affidavit for D. Triandafellos and L. Snyder; response to Panda's Proposed findings of fact.	8.00
06/26/12	Robert Stang	Preparation of replies to Panda's responses to proposed findings of fact.	4.50
06/27/12	Sanford M. Saunders, Jr.	Meeting with R. Stang re: Reply.	0.80
06/27/12	Robert Stang	Meeting with S. Saunders; Preparation of Responses to Panda's Proposed Findings of Fact; Draft of Declarations.	6.00
06/28/12	Barbara E. McBrayer	Discussion with B. Stang re complainant's reply brief, complainant's reply in opposition to Panda's proposed findings of fact and Petra's response to Panda's proposed findings of fact. Assist with review of reply brief.	1.10
06/28/12	Robert Stang	Preparation of brief, Declarations, Response to Proposed Findings of fact.	4.60
06/29/12	Barbara E. McBrayer	Analysis of Complainant's reply brief with declarations of Chin, Triandafellos and Snyder. Analysis of Complainant's response and opposition to Panda's proposed findings of fact with declaration of Chin, Triandafellos and Snyder. Discussions with B. Stang re same. Prepare supplemental appendices 60 through 64, including index. Review production and select certain RDM invoices for use in supplemental appendix.	4.10
06/29/12	Sanford M. Saunders, Jr.	Review reply brief and consult with R. Stang re: same.	1.00

Invoice No.: 3497028
Re: FMC Matter
Matter No.: 108401.014600

Page 2

Description of Professional Services Rendered

06/29/12	Robert Stang	Preparation of Reply Brief and Response to Panda's Proposed Findings of Fact.	7.00
06/30/12	Robert Stang	Preparation of Reply Brief and Response to Panda's Proposed Findings of Fact.	5.00
07/01/12	Barbara E. McBrayer	Work on draft of citations of exhibits as cited in Petra's response and opposition to panda's proposed findings of fact.	2.10
07/02/12	Barbara E. McBrayer	Work with B. Stang re finalizing and preparing for service Petra's response and opposition to panda's proposed findings of fact. Assist with preparation of service on Commission and opposing counsel. Finalize supplemental appendices exhibits 60-64 for submission to Commission.	5.10
07/02/12	Robert Stang	Preparation and submission of Complainant's Reply to Respondent's Opposition Brief and Complainant's Response and Opposition to Respondent Panda's Proposed Findings of Fact in Petra v. Panda (Docket No. 11-14).	4.50
07/03/12	Robert Stang	Follow up on LCL shipments identified in complaint.	0.20
07/09/12	Robert Stang	Follow up with B. McBrayer to obtain numbered appendices; review of submissions.	1.20
07/10/12	Robert Stang	Telephone conference with FMC Secretary and follow up with B. McBrayer to obtain numbered appendices.	0.60
07/11/12	Barbara E. McBrayer	Work on replacement appendices (exhibits) to change format with page numbers as requested by Commission for submission. Discussion with B. Stang re same.	3.40
07/11/12	Robert Stang	Follow up with B. McBrayer regarding submission to Federal Maritime Commission.	1.50
07/12/12	Barbara E. McBrayer	Work with B. Stang re finalizing replacement appendices. Telecon with Federal Maritime commission re requirements. Revise and finalize replacement proposed findings of fact. Serve documents on parties.	7.90
07/12/12	Robert Stang	Follow up with B. McBrayer regarding submission to Federal Maritime Commission.	0.50
07/13/12	Barbara E. McBrayer	Telecon with commission re filing of replacement appendices. Continue to attempt to serve Judges via e-mail of replacement appendices.	0.90
07/15/12	Barbara E. McBrayer	Prepare replacement of complainant's response and opposition to respondent's proposed findings of fact and replacement of complainant's reply to respondent's opposition brief. File and serve on opposing counsel service copies.	2.70
07/16/12	Barbara E. McBrayer	Finalize and proof for filing replacement of complainant's response and opposition to respondent's proposed findings of fact and replacement of complainant's reply to respondent's opposition brief. File and serve on opposing counsel service copies. Telecon with Commission re filings.	6.20
07/17/12	Barbara E. McBrayer	Discussion with R. Stang re filing with Federal Maritime Commission on July 17.	0.30
07/20/12	Robert Stang	Follow up on status of claim with surety.	0.30
07/24/12	Robert Stang	Review and preparation of RDM Solutions release.	0.20
07/26/12	Robert Stang	Prepared and finalized release.	0.50
08/14/12	Robert Stang	Follow up on judge's decision and status of bond claim with RDM surety.	1.00
08/15/12	Barbara E. McBrayer	Discussion with B. Stang re decision of the Federal Maritime Commission. Develop strategy on next task for filing and deadlines.	0.30

Invoice No.: 3497028
Re: FMC Matter
Matter No.: 108401.014600

Page 3

Description of Professional Services Rendered

08/20/12	Barbara E. McBrayer	Conduct research of Federal Maritime Commission website for strategic purposes re length of time it takes for commission to rule on initial determinations.	0.80
08/20/12	Robert Stang	Follow up with all parties on FMC decision to review judge's opinion.	1.00
09/11/12	Robert Stang	Review of Exceptions filed by counsel for Panda and preparation of response.	2.10
09/13/12	Barbara E. McBrayer	Finalize Motion for Extension of Time to file Petra Pet's Reply to Panda's exceptions. Discussion with B. Stang. Prepare propose order and cover letter to Secretary. Discussion with Secretary Federal Maritime Commission re filing. Finalize motion and supporting papers for filing. Serve filing on counsel of record. Serve WORD version of proposed order on Judges.	1.40
09/19/12	Barbara E. McBrayer	Discussion with B. Stang re proposed order of unopposed motion to extend time to respond to Panda's exceptions. Telecon with Federal Maritime Commission re deadline of reply to Panda's exceptions.	0.50
09/23/12	Robert Stang	Preparation of response to exceptions to judge's Initial decision.	7.00
09/24/12	Robert Stang	Preparation of response to Panda's Exceptions.	1.50
09/25/12	Robert Stang	Preparation of response to Panda Fact Exceptions.	1.70
09/27/12	Robert Stang	Preparation of response to Panda fact Exceptions.	2.00
09/28/12	Robert Stang	Preparation of Opposition Memorandum.	4.00
09/29/12	Robert Stang	Preparation of Opposition Memorandum.	4.50
09/30/12	Robert Stang	Preparation of Opposition Memorandum.	9.00
10/01/12	Robert Stang	Preparation of Petra Pet brief.	8.00
10/02/12	Robert Stang	Filed Opposition.	5.00
10/03/12	Robert Stang	Follow up with B. McBrayer regarding Petra Pet filing.	0.30
10/08/12	Robert Stang	Follow up with L. Snyder regarding China shipping claim on containers.	0.50
10/18/12	Robert Stang	Follow up with Kuehne & Nagel and Petra Pet regarding possibility of further relief for China Shipping container late charges.	0.90
10/19/12	Robert Stang	Follow up email to B. Mirsky regarding status of China Shipping claim.	0.60
12/03/12	Robert Stang	Follow up on refusal to provide contract terms for per diem charges claimed on shipping containers.	0.40
12/04/12	Robert Stang	Follow up response to J. Besaw email on per diem container charges.	0.80
12/06/12	Robert Stang	Review of correspondence and follow up with Petrapport on demand for per diem charges.	0.50

Total Time: 192.80

Invoice No.: 3497028
Re: FMC Matter
Matter No.: 108401.014600

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

EXHIBIT B

LAFFEY MATRIX -- 2003-2013
(2009-10 rates were unchanged from 2008-09 rates)

Experience	Years (Rate for June 1 - May 31, based on prior year's CPI-U)									
	03-04	04-05	05-06	06-07	07-08	08-09	09-10	10-11	11-12	12-13
20+ years	380	390	405	425	440	465	465	475	495	505
11-19 years	335	345	360	375	390	410	410	420	435	445
8-10 years	270	280	290	305	315	330	330	335	350	355
4-7 years	220	225	235	245	255	270	270	275	285	290
1-3 years	180	185	195	205	215	225	225	230	240	245
Paralegals & Law Clerks	105	110	115	120	125	130	130	135	140	145

Explanatory Notes:

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia. The matrix is intended to be used in cases in which a "fee-shifting" statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412 (b) (Equal Access to Justice Act). The matrix does **not** apply in cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
2. This matrix is based on the hourly rates allowed by the District Court in *Laffey v. Northwest Airlines, Inc.*, 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985). It is commonly referred to by attorneys and federal judges in the District of Columbia as the "*Laffey* Matrix" or the "United States Attorney's Office Matrix." The column headed "Experience" refers to the years following the attorney's graduation from law school. The various "brackets" are intended to correspond to "junior associates" (1-3 years after law school graduation), "senior associates" (4-7 years), "experienced federal court litigators" (8-10 and 11-19 years), and "very experienced federal court litigators" (20 years or more). *See Laffey*, 572 F. Supp. at 371.
3. The hourly rates approved by the District Court in *Laffey* were for work done principally in 1981-82. The Matrix begins with those rates. *See Laffey*, 572 F. Supp. at 371 (attorney rates) & 386 n.74 (paralegal and law clerk rate). The rates for subsequent yearly periods were determined by adding the change in the cost of living for the Washington, D.C. area to the applicable rate for the prior year, and then rounding to the nearest multiple of \$5 (up if within \$3 of the next multiple of \$5). The result is subject to adjustment if appropriate to ensure that the relationship between the highest rate and the lower rates remains reasonably constant. Changes in the cost of living are measured by the Consumer Price Index for All Urban Consumers (CPI-U) for Washington-Baltimore, DC-MD-VA-WV, as announced by the Bureau of Labor Statistics for May of each year.
4. Use of an updated *Laffey* Matrix was implicitly endorsed by the Court of Appeals in *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc). The Court of Appeals subsequently stated that parties may rely on the updated *Laffey* Matrix prepared by the United States Attorney's Office as evidence of prevailing market rates for litigation counsel in the Washington, D.C. area. *See Covington v. District of Columbia*, 57 F.3d 1101, 1105 & n. 14, 1109 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996). Lower federal courts in the District of Columbia have used this updated *Laffey* Matrix when determining whether fee awards under fee-shifting statutes are reasonable. *See, e.g.*, *Blackman v. District of Columbia*, 59 F. Supp. 2d 37, 43 (D.D.C. 1999); *Jefferson v. Milvets System Technology, Inc.*, 986 F. Supp. 6, 11 (D.D.C. 1997); *Ralph Hoar & Associates v. Nat'l Highway Transportation Safety Admin.*, 985 F. Supp. 1, 9-10 n.3 (D.D.C. 1997); *Martini v. Fed. Nat'l Mig Ass'n*, 977 F. Supp. 482, 485 n.2 (D.D.C. 1997); *Park v. Howard University*, 881 F. Supp. 653, 654 (D.D.C. 1995).

EXHIBIT C

LAFFEY MATRIX

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Year	Adjustmt Factor**	Paralegal/ Law Clerk	Years Out of Law School *				
			1-3	4-7	8-10	11-19	20 +
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05- 5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04- 5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03- 6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02- 5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01- 5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00- 5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99- 5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98- 5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97- 5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96- 5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95- 5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94- 5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

* "Years Out of Law School" is calculated from June 1 of each year, when most law students graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

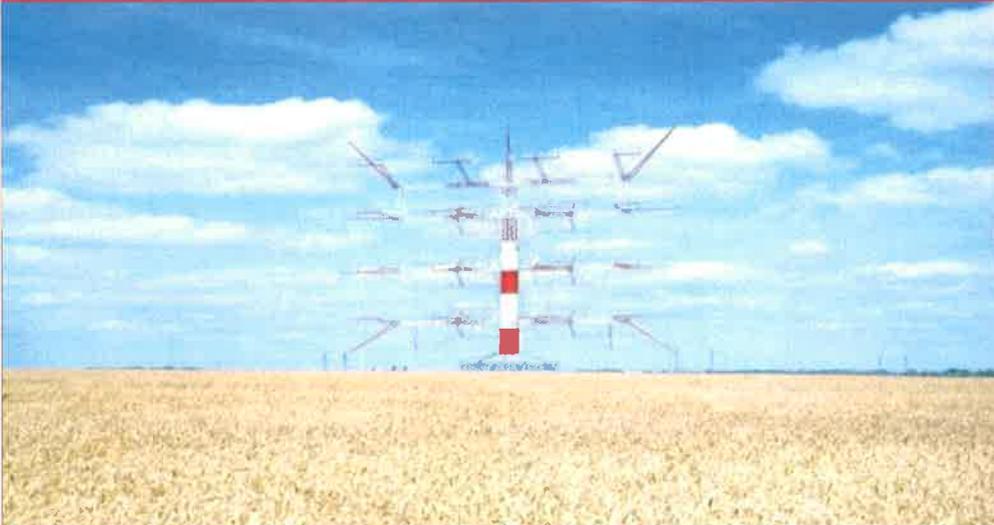
EXHIBIT D

www.pwc.com/lfsurveys

2013 Revenue Management Report

Compiled from the 2013 Billing Rate & Associate Salary Survey *plus*
Initial Release

Issued: May 2013



pwc

Revenue Management Report

Firm #0985 - Custom WDC (13 members)

Issued: May 2013

**Firm: 0985
Washington, DC**

Confidential

This report is intended solely for the information of Partners and authorized employees of the firm.

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Comparison Group Information

Firm #0985 - Custom WDC

Number of Members in the Group
Your Office or Practice Area Displayed in this Report is a Member of the Group
Defined Size Range¹ of Group Members (# of Attorneys)
Maximum
Minimum
Your Firm, Office or Practice Area Size¹ (# of Attorneys)
Average Size of Group Members¹ (# of Attorneys in the Office or Practice Area)
Reporting Entities Included in the Group
Number of Total Firms
Number of Principal Offices (including Single Office Firms)
Number of Non-Principal Offices

Group Information	
	13
	No
	No Maximum
	No Minimum
	80
	203
	0
	8
	5

Billing Rate Adjustment Practices

Date of Last Partner Billing Rate Increase

Your Firm	Number of Firms Reporting
	0
	0
	1
X	11
	1

Date of Last Associate/Sr. Attorney Scale based Rate Increase

Your Firm	Number of Firms Reporting
	0
	0
	1
X	10
	1

Date of Last Associate/Sr. Attorney

Lock-step/Class Year based Rate Increase

Your Firm	Number of Firms Reporting
	0
	0
	1
X	11
	1

¹ Firm, Office or Practice Area size as of 1/1/2013. For all comparison groups that have a defined size range and include data for total firms and individual offices of multi-office firms, group membership is based on the size of the total firm and not the size of the individual office. This may result in the average size of group members to fall below the minimum size range for the group.

Firm #0985 - Custom WDC (13 members)

Partner Standard Billing Rates
As of January 1, 2013

	Your Firm		Group			Your Firm		% Change - 1 year			Median
	Rate	Rank / Of	1 st Quartile	Median	3 rd Quartile	% Change - 1 Year	% Change - 2 year	1 st 3 rd			% Change - 2 Year
								Quartile	Median	Quartile	
All Partner Composite											
High											
Middle											
Low											
Average											
Avg. by Years of Experience											
< 11 Years											
11 - 15 Years											
16 - 20 Years											
21 - 25 Years											
26 - 30 Years											
31 - 35 Years	696	11 / 13	813	802	706	0.6	5.0	6.0	4.2	2.8	7.4
> 35 Years											
Contract Partner Average											

