

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X	:	
LINE ROTHMAN AND GLAMOURMOM LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C.A. No. 3:5-CV-4829 (GEB)
	:	
TARGET CORPORATION ; MOTHERWEAR	:	
INTERNATIONAL, INC.; KOHL’S DEPARTMENT,	:	
STORES, INC.; LEADING LADY COMPANIES;	:	
MOTHERS WORK, INC.; FEDERATED	:	
DEPARTMENT STORES, INC.; MACY’S	:	
DEPARTMENT STORES, INC.; J.C. PENNEY	:	
COMPANY, INC.; AMAZON.COM, INC.;	:	
REDCATS USA, L.P. D/B/A LANE BRYANT	:	
CATALOG; SEARS HOLDING CORPORATION;	:	
KMART CORP.; AND ELIZABETH LANGE LLC,	:	
D/B/A LIZ LANGE MATERNITY,	:	
	:	
Defendants.	:	
-----X		

**DECLARATION OF CAMERON S. REUBER
IN SUPPORT OF KMART CORPORATIONS’
MOTION FOR ATTORNEYS’ FEES AND EXPENSES**

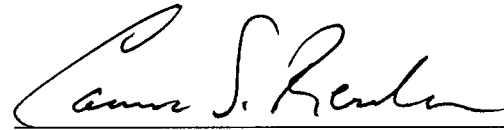
I, Cameron S. Reuber, declare as follows:

1. I am one of the attorneys for Defendant Kmart Corporation (“Kmart”) in this matter.
2. I make this declaration upon my personal familiarity with the facts and papers in this matter, and in support of Kmart’s Motion Pursuant to Local Rule 54, 28 U.S.C. § 1927, and 35 U.S.C. § 285 for Attorney Fees.
3. Attached hereto as Exhibit A is a true and correct copy of all reports reflecting the attorney fees associated with litigating the above captioned action on behalf of Kmart.
4. Exhibit A has been redacted to remove reference to actual work performed in order to protect the privilege associated with this information. A true, correct, and unredacted copy of Exhibit A shall be kept in the files of Ostrolenk, Faber, Gerb, and Soffen LLP until at least five years after the completion of this civil action.

5. These fees were incurred with respect to legal work by the law firms of Ostrolenk, Faber, Gerb, and Soffen LLP and Kaplan, Gilman, Gibson, & Dernier LLP in the following areas: pleadings, discovery, pre-trial, trial, and post-trial activities.

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

Dated: June 10, 2008
New York, New York



Cameron S. Reuber, *pro hac vice*
OSTROLENK, FABER, GERB & SOFFEN, LLP
1180 Avenue of the Americas
New York, New York 10036
Telephone (212) 382-0700
Facsimile (212) 382-0888

Attorneys for Defendant Kmart

EXHIBIT A

EFMINQ	OSTROLENK, FABER, GERB & SOFFEN, LLP		06/02/2008					
JURIS MANAGEMENT INQUIRY								
Client: 000964		Gelmart Industries, Inc.						
00011		Line Rothman v. Target Corp.						
BILLS		ALL BILLS & ADJS from: first through: last						
	matter	date	bill	amount	balance	-date	s	total
1	11	8/21/06	002	617.50		3.25	0	1,894
2	11	9/14/06	003	1,891.25		1.94	0	0
3	11	12/26/06	005	4,859.93		.00	0	0
4	11	2/12/07	007	10,865.15		---	0	0
5	11	3/19/07	008	2,755.30		5.19	8	678
6	11	4/05/07	009	5,258.69			-	---
7	11	5/09/07	010	12,100.16			8	2,573
8	11	6/07/07	011	11,512.14				
9	11	7/16/07	012	9,488.89				
10	11	8/07/07	013	3,742.25				
11	11	9/11/07	014	1,800.37				
						bill lwyr: MJB orig lwyr: MJB law type: GN		
press F1 for next screen or select line number								

EFMINQ	OSTROLENK, FABER, GERB & SOFFEN, LLP	06/02/2008																																																																
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11 2 3 4 5 6	<table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">matter</th> <th style="text-align: left;">date</th> <th style="text-align: left;">bill</th> <th style="text-align: left;">amount</th> <th style="text-align: left;">balance</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>10/17/07</td> <td>015</td> <td>41,194.54</td> <td></td> </tr> <tr> <td>11</td> <td>10/31/07</td> <td>016</td> <td>61,324.83</td> <td></td> </tr> <tr> <td>11</td> <td>12/18/07</td> <td>018</td> <td>22,653.24</td> <td></td> </tr> <tr> <td>11</td> <td>2/07/08</td> <td>020</td> <td>2,759.45</td> <td></td> </tr> <tr> <td>11</td> <td>4/14/08</td> <td>022</td> <td>467.25</td> <td></td> </tr> <tr> <td>11</td> <td>5/07/08</td> <td>023</td> <td>904.25</td> <td></td> </tr> <tr> <td colspan="3">no more entries...</td> <td>194,195.19</td> <td></td> </tr> </tbody> </table>	matter	date	bill	amount	balance	11	10/17/07	015	41,194.54		11	10/31/07	016	61,324.83		11	12/18/07	018	22,653.24		11	2/07/08	020	2,759.45		11	4/14/08	022	467.25		11	5/07/08	023	904.25		no more entries...			194,195.19		<table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">-date</th> <th style="text-align: left;">s</th> <th style="text-align: left;">total</th> </tr> </thead> <tbody> <tr> <td>3.25</td> <td>0</td> <td>1,894</td> </tr> <tr> <td>1.94</td> <td>0</td> <td>0</td> </tr> <tr> <td>.00</td> <td>0</td> <td>0</td> </tr> <tr> <td>---</td> <td>0</td> <td>0</td> </tr> <tr> <td>5.19</td> <td>8</td> <td>678</td> </tr> <tr> <td></td> <td>-</td> <td>---</td> </tr> <tr> <td></td> <td>8</td> <td>2,573</td> </tr> </tbody> </table>	-date	s	total	3.25	0	1,894	1.94	0	0	.00	0	0	---	0	0	5.19	8	678		-	---		8	2,573
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REPRINT OF BILLED DETAILS (as billed)

Bill number 003964-00011-002 MJB
Bill date 08/21/06

Gelmart Industries, Inc.
Att: Ralph Djemal
20-07 127 Street
College Point, NY 11356

OFGS File: 7/3964-11
Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

06/07/06 MM

.20 hrs 475 /hr 95.00

07/18/06 MM

.10 hrs 475 /hr 47.50

07/25/06 MM

1.00 hrs 475 /hr 475.00

TOTAL FEES

\$ 617.50

DISBURSEMENTS

TOTAL DISBURSEMENTS

\$.00

BILLING SUMMARY

TOTAL FEES

\$ 617.50

TOTAL CHARGES FOR THIS BILL

\$ 617.50

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-003 MJB
 Bill date 09/14/06

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

08/04/06 MM	.30 hrs	475	/hr	142.50
08/08/06 MM	.25 hrs	475	/hr	118.75
08/09/06 MM				
	.75 hrs	475	/hr	356.25
08/10/06 MM	.40 hrs	475	/hr	190.00
08/16/06 MM				
	.50 hrs	475	/hr	237.50
08/18/06 MM	.40 hrs	475	/hr	190.00
08/21/06 MM	.25 hrs	475	/hr	118.75
08/23/06 MM				
	.25 hrs	475	/hr	118.75
08/30/06 MM				
	.75 hrs	475	/hr	356.25
08/30/06 LAS				
	.50 hrs	125	/hr	62.50

TOTAL FEES \$ 1,891.25

DISBURSEMENTS

TOTAL DISBURSEMENTS \$.00

BILLING SUMMARY

TOTAL FEES \$ 1,891.25
 TOTAL CHARGES FOR THIS BILL \$ 1,891.25

REPRINT OF BILLED DETAILS (as billed)

Bill number 003964-00011-003 MJB
Bill date 09/14/06

Gelmart Industries, Inc.
Att: Ralph Djemal
20-07 127 Street
College Point, NY 11356

OFGS File: 7/3964-11
Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

TOTAL FEES	\$	----- .00
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DISBURSEMENTS

TOTAL DISBURSEMENTS	\$	----- .00
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BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL	\$	----- .00
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REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-005 MJB
 Bill date 12/26/06

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

08/31/06 LAS	.05 hrs	125	/hr	131.25
09/06/06 MM	.20 hrs	475	/hr	95.00
09/11/06 MM	.25 hrs	475	/hr	118.75
09/19/06 MM	.35 hrs	475	/hr	166.25
09/25/06 MM	.40 hrs	475	/hr	190.00
09/26/06 GG	.25 hrs	125	/hr	31.25
09/26/06 MM	.50 hrs	475	/hr	237.50
10/09/06 MM	.50 hrs	475	/hr	237.50
11/20/06 AMA	.25 hrs	250	/hr	62.50
11/20/06 MM	.40 hrs	475	/hr	190.00
11/21/06 AMA	.60 hrs	250	/hr	150.00
11/22/06 AMA	.30 hrs	250	/hr	325.00
11/22/06 MM	.25 hrs	475	/hr	118.75
11/23/06 MM				

REPRINT OF BILLED DETAILS (as worked)
 003964-00011-005 MJB

Page 2

	.75 hrs	475	/hr	356.25
11/24/06 GG	.50 hrs	125	/hr	62.50
11/27/06 AMA				
	1.20 hrs	250	/hr	300.00
11/30/06 AMA	.70 hrs	250	/hr	175.00

TOTAL FEES			\$	2,947.50

DISBURSEMENTS

09/07/06 LOC	Charges of Associate counsel (See Attached) -Kaplan Gilman Gibson inv.8083			1,179.57
10/05/06 LOC	Charges of Associate counsel (See Attached) - Kaplan Gilman Gibson inv.8262			575.68
11/07/06 11	Cost of cumulative efforts in reviewing and reporting to lead counsel discovery responses - Kaplan Gilman Gibson inv.8484			157.18

TOTAL DISBURSEMENTS			\$	1,912.43

BILLING SUMMARY

TOTAL FEES	\$	2,947.50
TOTAL DISBURSEMENTS	\$	1,912.43

TOTAL CHARGES FOR THIS BILL	\$	4,859.93

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-007 MJB
 Bill date 02/12/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

12/01/06 AMA	1.10 hrs	250	/hr	275.00
12/02/06 MM	.75 hrs	475	/hr	356.25
12/03/06 MM	.35 hrs	475	/hr	166.25
12/04/06 AMA	1.00 hrs	250	/hr	250.00
12/04/06 MM	.20 hrs	475	/hr	95.00
12/05/06 AMA	2.70 hrs	250	/hr	675.00
12/06/06 AMA	.40 hrs	250	/hr	100.00
12/14/06 MM	.10 hrs	475	/hr	47.50
12/14/06 AMA	.10 hrs	250	/hr	25.00
12/18/06 MM	.80 hrs	475	/hr	380.00
12/19/06 AMA	.55 hrs	250	/hr	137.50
12/20/06 MM	1.60 hrs	475	/hr	760.00
12/22/06 MM				

REPRINT OF BILLED DETAILS (as worked)
003964-00011-007 MJB

Page 2

	.35 hrs	475	/hr	166.25
12/24/06 MM				
	.50 hrs	475	/hr	237.50
12/28/06 AMA				
	2.20 hrs	250	/hr	550.00
01/02/07 AMA				
	1.10 hrs	275	/hr	302.50
01/03/07 AMA				
	2.10 hrs	275	/hr	577.50
01/04/07 AMA				
	4.50 hrs	275	/hr	1,237.50
01/05/07 AMA				
	4.30 hrs	275	/hr	1,182.50
01/08/07 MM				
	.10 hrs	495	/hr	49.50
01/08/07 AMA				
	4.50 hrs	275	/hr	1,237.50
01/09/07 MM				
	1.50 hrs	495	/hr	742.50
01/09/07 AMA				
	5.50 hrs	275	/hr	1,512.50
01/10/07 AMA				
	3.10 hrs	275	/hr	852.50
01/11/07 MM				
	1.10 hrs	495	/hr	544.50
01/11/07 AMA				
	.55 hrs	275	/hr	151.25
01/14/07 MM				
	.35 hrs	495	/hr	173.25
01/15/07 MM				
	2.10 hrs	495	/hr	1,039.50
01/17/07 AMA				
	.20 hrs	275	/hr	55.00
01/17/07 MM				
	1.50 hrs	495	/hr	742.50
01/18/07 AMA				
	.30 hrs	275	/hr	82.50
01/18/07 MM				
	1.20 hrs	495	/hr	594.00
01/20/07 AMA				
	.40 hrs	275	/hr	110.00
01/21/07 AMA				

REPRINT OF BILLED DETAILS (as worked)
 003964-00011-007 MJB

Page 3

	.30 hrs	275	/hr	82.50
01/22/07 AMA	.25 hrs	275	/hr	68.75
01/26/07 AMA	.30 hrs	275	/hr	82.50
01/29/07 AMA	.30 hrs	275	/hr	82.50

TOTAL FEES

\$ 15,724.50

DISBURSEMENTS

01/31/07 03 Cost of duplication

4.40

TOTAL DISBURSEMENTS

\$ 4.40

BILLING SUMMARY

TOTAL FEES

\$ 15,724.50

TOTAL DISBURSEMENTS

\$ 4.40

TOTAL CHARGES FOR THIS BILL

\$ 15,728.90

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-008 MJB
 Bill date 03/19/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

02/07/07 AMA					
	.50 hrs	275	/hr	137.50	
02/08/07 LAS					
	.35 hrs	135	/hr	47.25	
02/09/07 AMA					
	1.00 hrs	275	/hr	275.00	
02/09/07 LAS					
	.25 hrs	135	/hr	33.75	
02/13/07 LAS					
	.35 hrs	135	/hr	47.25	
02/15/07 AMA					
	.85 hrs	275	/hr	233.75	

				\$	774.50
TOTAL FEES					

DISBURSEMENTS

02/12/07 11	Cost of NYS Bar certificate of Good Standing for Max - Clerk of the Court ck#51756 Limerick	5.00
02/13/07 11	Cost of fare to/from court for Gary W. 2/13/07 - petty cash 070213	4.00
02/14/07 FEDX	Courier Services - FedEx	15.57
02/16/07 ALP	Associate's charge (copy attached) - Kaplan Gilman Gibson Llp - inv. 8965	1,956.23
02/28/07 03	Cost of duplication	.20

TOTAL DISBURSEMENTS		\$ 1,981.00

BILLING SUMMARY

TOTAL FEES	\$	774.50
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REPRINT OF BILLED DETAILS (as worked)
003964-00011-008 MJB

Page 2

TOTAL DISBURSEMENTS

\$ 1,981.00

TOTAL CHARGES FOR THIS BILL

\$ 2,755.50

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-009 MJB
 Bill date 04/05/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

03/05/07 MM	.10 hrs	495	/hr	49.50
03/06/07 MM	.80 hrs	495	/hr	396.00
03/07/07 MM	.15 hrs	495	/hr	74.25
03/08/07 DQH	1.00 hrs	290	/hr	290.00
03/15/07 MM	.40 hrs	495	/hr	198.00
03/16/07 MM	.50 hrs	495	/hr	247.50
03/30/07 BLD	.50 hrs	150	/hr	75.00

TOTAL FEES			\$	1,330.25

DISBURSEMENTS

03/20/07 LOC	Charges of Associate counsel (See Attached) - Kaplan Gilman Gibson inv.9609			3,928.44

TOTAL DISBURSEMENTS			\$	3,928.44

BILLING SUMMARY

TOTAL FEES		\$	1,330.25
TOTAL DISBURSEMENTS		\$	3,928.44

TOTAL CHARGES FOR THIS BILL		\$	5,258.69

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-010 MJB
 Bill date 05/09/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

04/02/07 BLD

	4.00 hrs	150	/hr	600.00
04/05/07 MM	.40 hrs	495	/hr	198.00
04/06/07 MM	.25 hrs	495	/hr	123.75
04/06/07 BLD	.20 hrs	150	/hr	30.00
04/08/07 MM	.40 hrs	495	/hr	198.00
04/09/07 BLD	.50 hrs	150	/hr	75.00
04/09/07 DQH	1.30 hrs	290	/hr	377.00
04/16/07 MM	.25 hrs	495	/hr	123.75
04/17/07 DQH	.20 hrs	290	/hr	58.00
04/17/07 LAS	.30 hrs	135	/hr	40.50
04/17/07 DNG	5.30 hrs	290	/hr	1,537.00
04/17/07 DNG	4.30 hrs	290	/hr	1,247.00
04/19/07 DNG	6.30 hrs	290	/hr	1,827.00
04/20/07 DNG	.30 hrs	290	/hr	87.00
04/20/07 DNG	1.30 hrs	290	/hr	377.00
04/23/07 DNG	6.90 hrs	290	/hr	2,001.00
04/23/07 MM	.60 hrs	495	/hr	297.00

REPRINT OF BILLED DETAILS (as worked)
 003964-00011-010 MJB

Page 2

04/24/07 DNG	1.20 hrs	290	/hr	348.00
04/24/07 JSS	.45 hrs	135	/hr	60.75
04/25/07 DNG	1.00 hrs	290	/hr	290.00
04/25/07 MM	.10 hrs	495	/hr	49.50
04/25/07 JSS	2.65 hrs	135	/hr	357.75
04/26/07 MM	1.30 hrs	495	/hr	643.50

TOTAL FEES			\$	10,946.50

DISBURSEMENTS

04/24/07 LOC	Charges of Associate counsel (See Attached) - Kaplan Gilman Gibson inv.10141	1,153.66
04/30/07 03	Cost of duplication	.40

TOTAL DISBURSEMENTS		\$ 1,154.06

BILLING SUMMARY

TOTAL FEES	\$ 10,946.50
TOTAL DISBURSEMENTS	\$ 1,154.06

TOTAL CHARGES FOR THIS BILL	\$ 12,100.56

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-011 MJB
 Bill date 06/07/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

05/02/07 MM	.10 hrs	495	/hr	49.50
05/02/07 JSS	.45 hrs	135	/hr	60.75
05/03/07 MM	.40 hrs	495	/hr	198.00
05/07/07 MM	.20 hrs	495	/hr	99.00
05/09/07 MM	.90 hrs	495	/hr	445.50
05/10/07 MM	.35 hrs	495	/hr	173.25
05/11/07 MM	.60 hrs	495	/hr	297.00
05/14/07 MM	1.50 hrs	495	/hr	742.50
05/15/07 MM	.50 hrs	495	/hr	247.50
05/16/07 MM	6.90 hrs	495	/hr	3,415.50
05/27/07 MM	.10 hrs	495	/hr	49.50
05/28/07 MM	1.10 hrs	495	/hr	544.50
05/30/07 MM	.90 hrs	495	/hr	445.50
05/31/07 MM				

REPRINT OF BILLED DETAILS (as worked)
 003964-00011-011 MJB

Page 2

.30 hrs 495 /hr 148.50

TOTAL FEES \$ 6,916.50

DISBURSEMENTS

04/30/07 LOC Charges of Associate counsel (See Attached) - 4,502.84

Kaplan Gilman Gibson inv.10170

05/21/07 11 Cost of travel to court for M. Moskowitz 5/16/07 69.00

- petty cash 070521

05/31/07 03 Cost of duplication 3.80

05/31/07 06 Facsimile charges 20.00

TOTAL DISBURSEMENTS \$ 4,595.64

BILLING SUMMARY

TOTAL FEES \$ 6,916.50

TOTAL DISBURSEMENTS \$ 4,595.64

TOTAL CHARGES FOR THIS BILL \$ 11,512.14

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-012 MJB
 Bill date 07/16/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

06/04/07 MM				
	.60 hrs	495	/hr	297.00
06/05/07 LAS				
	.15 hrs	135	/hr	20.25
06/05/07 MM				
	.35 hrs	495	/hr	173.25
06/06/07 LAS				
	.90 hrs	135	/hr	121.50
06/08/07 MM				
	.25 hrs	495	/hr	123.75
06/11/07 MM				
	.30 hrs	495	/hr	148.50
06/12/07 MM				
	.50 hrs	495	/hr	247.50
06/25/07 MM				
	5.00 hrs	495	/hr	2,475.00
06/26/07 MM				
	1.80 hrs	495	/hr	891.00
06/28/07 MM				
	.50 hrs	495	/hr	247.50
06/29/07 MM				
	1.40 hrs	495	/hr	693.00

TOTAL FEES			\$	5,438.25

DISBURSEMENTS

06/06/07 11	Cost of parking for M. Moskowitz 5/16/07 - petty cash 070606	6.00
06/28/07 LOC	Charges of Associate counsel (See Attached) - Kaplan Gilman Gibson inv.11288	4,028.24

REPRINT OF BILLED DETAILS (as worked)
003964-00011-012 MJB

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06/30/07 03	Cost of duplication		22.40

	TOTAL DISBURSEMENTS	\$	4,056.64

BILLING SUMMARY

TOTAL FEES	\$	5,438.25
TOTAL DISBURSEMENTS	\$	4,056.64

TOTAL CHARGES FOR THIS BILL	\$	9,494.89

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-013 MJB
 Bill date 08/07/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

07/01/07 MM				
	.15 hrs	495	/hr	74.25
07/11/07 MM				
	.40 hrs	495	/hr	198.00
07/12/07 MM				
	.25 hrs	495	/hr	123.75
07/13/07 MM				
	.35 hrs	495	/hr	173.25
07/15/07 MM				
	.25 hrs	495	/hr	123.75
07/23/07 MM				
	.90 hrs	495	/hr	445.50
07/24/07 DJT				
	.60 hrs	300	/hr	180.00
07/25/07 CW				
	.75 hrs	135	/hr	101.25
07/25/07 DJT				
	.40 hrs	300	/hr	120.00
07/25/07 MM				
	1.20 hrs	495	/hr	594.00
07/26/07 MM				
	1.00 hrs	495	/hr	495.00
07/30/07 MM				
	.50 hrs	495	/hr	247.50
07/31/07 MM				
	.90 hrs	495	/hr	445.50
07/31/07 CW				
	.50 hrs	135	/hr	67.50
07/31/07 DJT				

REPRINT OF BILLED DETAILS (as worked)
003964-00011-013 MJB

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1.00 hrs 300 /hr 300.00

TOTAL FEES \$ 3,689.25

DISBURSEMENTS

07/25/07 11 Cost of subpoena witness fee - J. Christopher Jensen check#51849 50.00

07/31/07 06 Facsimile charges 3.00

TOTAL DISBURSEMENTS \$ 53.00

BILLING SUMMARY

TOTAL FEES \$ 3,689.25

TOTAL DISBURSEMENTS \$ 53.00

TOTAL CHARGES FOR THIS BILL \$ 3,742.25

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-014 MJB
Bill date 09/11/07

Gelmart Industries, Inc.
Att: Ralph Djemal
20-07 127 Street
College Point, NY 11356

OFGS File: 7/3964-11
Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

TOTAL FEES	\$	----- .00
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DISBURSEMENTS

08/08/07 55	Scanning charges	10.00
08/09/07 55	Scanning charges	22.20
08/09/07 55	Scanning charges	27.40
08/09/07 55	Scanning charges	28.40
08/09/07 55	Scanning charges	28.40
08/16/07 LOC	Charges of Associate counsel (See Attached) - Kaplan Gilman Gibson inv.11518	1,683.97
TOTAL DISBURSEMENTS	\$	----- 1,800.37

BILLING SUMMARY

TOTAL CHARGES FOR THIS BILL	\$	----- 1,800.37
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REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-015 MJB
 Bill date 10/17/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

08/01/07 MM	.10 hrs	495	/hr	49.50
08/02/07 DJT	.80 hrs	300	/hr	240.00
08/02/07 MM	.25 hrs	495	/hr	123.75
08/03/07 MM	.40 hrs	495	/hr	198.00
08/07/07 MM	1.10 hrs	495	/hr	544.50
08/08/07 MM	5.50 hrs	495	/hr	2,722.50
08/09/07 MM	1.80 hrs	495	/hr	891.00
08/09/07 CW	3.00 hrs	135	/hr	405.00
08/13/07 MM	.10 hrs	495	/hr	49.50
08/16/07 MM	1.80 hrs	495	/hr	891.00
08/19/07 MM	.10 hrs	495	/hr	49.50
08/21/07 MM	1.25 hrs	495	/hr	618.75
08/22/07 CW	.40 hrs	135	/hr	54.00
08/23/07 MM	.60 hrs	495	/hr	297.00
08/24/07 MM	.40 hrs	495	/hr	198.00

REPRINT OF BILLED DETAILS (as worked)
003964-00011-015 MJB

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08/28/07 CW				
	.30 hrs	135	/hr	40.50
09/03/07 MM				
	.60 hrs	495	/hr	297.00
09/04/07 MM				
	.50 hrs	495	/hr	247.50
09/05/07 MM				
	2.90 hrs	495	/hr	1,435.50
09/05/07 LAS				
	.75 hrs	135	/hr	101.25
09/05/07 CSR				
	.80 hrs	250	/hr	200.00
09/05/07 CW				
	.50 hrs	135	/hr	67.50
09/06/07 MM				
	1.60 hrs	495	/hr	792.00
09/07/07 MM				
	1.40 hrs	495	/hr	693.00
09/07/07 CSR				
	2.30 hrs	250	/hr	575.00
09/07/07 LAS				
	.40 hrs	135	/hr	54.00
09/07/07 CW				
	.50 hrs	135	/hr	67.50
09/08/07 CSR				
	.80 hrs	250	/hr	200.00
09/09/07 MM				
	5.10 hrs	495	/hr	2,524.50
09/09/07 CSR				
	3.10 hrs	250	/hr	775.00
09/10/07 MM				
	3.60 hrs	495	/hr	1,782.00
09/10/07 CSR				

REPRINT OF BILLED DETAILS (as worked)
003964-00011-015 MJB

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09/11/07 MM	4.60 hrs	250	/hr	1,150.00
09/11/07 CSR	1.10 hrs	495	/hr	544.50
09/11/07 CW	2.60 hrs	250	/hr	650.00
09/12/07 CSR	.50 hrs	135	/hr	67.50
09/12/07 MM	1.40 hrs	250	/hr	350.00
09/13/07 CSR	1.30 hrs	495	/hr	643.50
09/13/07 CW	1.20 hrs	250	/hr	300.00
09/13/07 LAS	5.50 hrs	135	/hr	742.50
09/14/07 CSR	.95 hrs	135	/hr	128.25
09/14/07 CW	.50 hrs	250	/hr	125.00
09/16/07 CSR	4.00 hrs	135	/hr	540.00
09/16/07 MM	.50 hrs	250	/hr	125.00
09/17/07 MM	1.80 hrs	495	/hr	891.00

REPRINT OF BILLED DETAILS (as worked)
003964-00011-015 MJ̄

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09/17/07 CSR	6.90 hrs	495	/hr	3,415.50
09/18/07 MM	.70 hrs	250	/hr	175.00
09/18/07 CSR	4.30 hrs	495	/hr	2,128.50
09/18/07 LAS	1.70 hrs	250	/hr	425.00
09/19/07 MM	.65 hrs	135	/hr	87.75
09/19/07 CSR	1.10 hrs	495	/hr	544.50
09/20/07 MM	1.30 hrs	250	/hr	325.00
09/20/07 CSR	.50 hrs	495	/hr	247.50
09/21/07 CSR	.20 hrs	250	/hr	50.00
09/23/07 MM	.25 hrs	250	/hr	62.50
09/24/07 MM	.50 hrs	495	/hr	247.50
09/24/07 CSR	.60 hrs	495	/hr	297.00
09/24/07 LAS	.20 hrs	250	/hr	50.00
09/25/07 MM	.20 hrs	135	/hr	27.00
09/25/07 CSR	.10 hrs	495	/hr	49.50

REPRINT OF BILLED DETAILS (as worked)
003964-00011-015 MJB

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09/26/07 MM	.50 hrs	250	/hr	125.00
09/26/07 CW	5.90 hrs	495	/hr	2,920.50
09/26/07 CSR	6.00 hrs	135	/hr	810.00
09/26/07 LAS	6.10 hrs	250	/hr	1,525.00
09/27/07 MGL	1.75 hrs	135	/hr	236.25
09/27/07 CSR	.50 hrs	125	/hr	62.50
09/27/07 CW	7.80 hrs	250	/hr	1,950.00
09/27/07 LAS	4.00 hrs	135	/hr	540.00
09/28/07 CSR	.95 hrs	135	/hr	128.25

REPRINT OF BILLED DETAILS (as worked)
 003964-00011-015 MJB

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3.50 hrs 250 /hr 875.00

TOTAL FEES \$ 40,746.25

DISBURSEMENTS

09/07/07	11	Cost of travel for M. Moskowitz 8/8/07 - petty cash 070907	26.00
09/13/07	11	Cost of Pro Hac Vice admission in NJ for Cameron Reuber - NJ Lawyers' Fund for Client Protection check#51872	186.00
09/13/07	FEDX	Courier Services - FedEx	19.92
09/13/07	FEDX	Courier Services - FedEx	16.13
09/18/07	11	Cost of tolls, parking, milege & food for Max Moskowitz 9/17/07 - petty cash 070918	80.00
09/27/07	55	Scanning charges	2.20
09/27/07	55	Scanning charges	25.60
09/27/07	FEDX	Courier Services - FedEx	37.44
09/30/07	03	Cost of duplication	54.00
09/30/07	06	Facsimile charges	1.00
TOTAL DISBURSEMENTS			\$ 448.29

BILLING SUMMARY

TOTAL FEES	\$ 40,746.25
TOTAL DISBURSEMENTS	\$ 448.29
TOTAL CHARGES FOR THIS BILL	\$ 41,194.54

REPRINT OF BILLED DETAILS (as billed)

Bill number 003964-00011-016 MJB
Bill date 10/31/07

Gelmart Industries, Inc.
Att: Ralph Djemal
20-07 127 Street
College Point, NY 11356

OFGS File: 7/3964-11
Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

10/01/07 CW

1.00 hrs 135 /hr 135.00

10/01/07 CSR

8.50 hrs 250 /hr 2,125.00

10/02/07 MM

1.60 hrs 495 /hr 792.00

10/02/07 CSR

10.00 hrs 250 /hr 2,500.00

10/03/07 CSR

4.60 hrs 250 /hr 1,150.00

10/03/07 MM

1.60 hrs 495 /hr 792.00

10/04/07 CSR

4.50 hrs 250 /hr 1,125.00

REPRINT OF BILLED DETAILS (as billed)
003964-00011-016 MJB

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10/05/07 CSR

2.70 hrs 250 /hr 675.00

10/07/07 MM

4.10 hrs 495 /hr 2,029.50

10/08/07 CSR

7.70 hrs 250 /hr 1,925.00

10/08/07 MM

9.80 hrs 495 /hr 4,851.00

10/09/07 MM

6.80 hrs 495 /hr 3,366.00

10/09/07 CSR

.20 hrs 250 /hr 50.00

10/16/07 CSR

1.25 hrs 250 /hr 312.50

10/17/07 MM

.40 hrs 495 /hr 198.00

10/19/07 CSR

1.25 hrs 250 /hr 312.50

10/21/07 MM

.90 hrs 495 /hr 445.50

10/22/07 CSR

9.50 hrs 250 /hr 2,375.00

10/22/07 MM

9.00 hrs 495 /hr 4,455.00

10/23/07 CSR

8.50 hrs 250 /hr 2,125.00

10/23/07 MM

10.00 hrs 495 /hr 4,950.00

10/24/07 CSR

6.75 hrs 250 /hr 1,687.50

10/24/07 MM

1.40 hrs 495 /hr 693.00

10/25/07 CSR

9.50 hrs 250 /hr 2,375.00

10/25/07 MM

8.40 hrs 495 /hr 4,158.00

10/26/07 MM

.50 hrs 495 /hr 247.50

REPRINT OF BILLED DETAILS (as billed)
 003964-00011-016 MJB

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10/26/07 CSR	6.50 hrs	250	/hr	1,625.00
10/28/07 MM	.70 hrs	495	/hr	346.50
10/28/07 CSR	1.25 hrs	250	/hr	312.50
10/29/07 MM	.60 hrs	495	/hr	297.00
10/29/07 CSR	9.50 hrs	250	/hr	2,375.00
10/30/07 MM	5.30 hrs	495	/hr	2,623.50
10/30/07 CSR	9.50 hrs	250	/hr	2,375.00
10/31/07 CSR	10.00 hrs	250	/hr	2,500.00
10/31/07 MM	5.50 hrs	495	/hr	2,722.50

TOTAL FEES			\$	61,027.00

DISBURSEMENTS

10/01/07 FEDX	Courier Services - FedEx	24.40
10/05/07 LEX	Computer data base charges for legal research	38.50
	-LEXIS - CSR	
10/12/07 11	Cost of lunch and mileage for M. Moskowitz	100.20
	10/9/07 - petty cash 071012	
10/12/07 CITI	Fares - Citicar - C. Reuber 10/3/07 -	131.33
	inv.0741-7031	
10/31/07 03	Cost of duplication	2.00
10/31/07 03	Cost of duplication	.80
10/31/07 03	Cost of duplication	.60

TOTAL DISBURSEMENTS		\$ 297.83

BILLING SUMMARY

TOTAL FEES	\$ 61,027.00
TOTAL DISBURSEMENTS	\$ 297.83

TOTAL CHARGES FOR THIS BILL	\$ 61,324.83

REPRINT OF BILLED DETAILS (as billed)

Bill number 003964-00011-018 MJB
 Bill date 12/18/07

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

11/01/07 MM				
	10.00 hrs	495	/hr	4,950.00
11/01/07 CSR				
	10.00 hrs	250	/hr	2,500.00
11/02/07 MM				
	8.00 hrs	495	/hr	3,960.00
11/04/07 CSR				
	.25 hrs	250	/hr	62.50
11/05/07 MM				
	1.40 hrs	495	/hr	693.00
11/05/07 CSR				
	8.25 hrs	250	/hr	2,062.50
11/06/07 MM				
	.50 hrs	495	/hr	247.50
11/06/07 CSR				
	8.25 hrs	250	/hr	2,062.50
11/08/07 CSR				
	1.20 hrs	250	/hr	300.00
11/12/07 MM				
	.40 hrs	495	/hr	198.00
11/13/07 MM				

REPRINT OF BILLED DETAILS (as billed)
003964-00011-018 MJB

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	.25 hrs	495	/hr	123.75
11/20/07 MM	.40 hrs	495	/hr	198.00
11/20/07 CW				
	1.00 hrs	135	/hr	135.00
11/20/07 CSR	1.25 hrs	250	/hr	312.50
11/21/07 MM				
	.40 hrs	495	/hr	198.00
11/21/07 CW	.50 hrs	135	/hr	67.50
11/26/07 CSR				
	1.50 hrs	250	/hr	375.00
11/26/07 CSR				
	.25 hrs	250	/hr	62.50
11/28/07 MM	.25 hrs	495	/hr	123.75
11/28/07 CSR				
	.40 hrs	250	/hr	100.00
11/29/07 CSR	1.35 hrs	250	/hr	337.50

			\$	19,069.50

TOTAL FEES

\$ 19,069.50

DISBURSEMENTS

10/18/07	11	Cost of deposition of Kathryn Thomas on 10/2/07 - Esquire Deposition Services inv.169192EDC	1,389.40
10/30/07	11	Cost of DVD of Kathy Thomas on 10/2/07 - Esquire Deposition Services inv.169423EDC	50.00
11/07/07	19	Cost of travel by C. Reuber for Kmart deposition in Illinois 9/27/07 to 10/9/07 - reimbursement ck#22779	1,477.17
11/07/07	19	Cost of travel by C. Reuber for attending trial in trenton 10/21/07 to 11/5/07 - reimbursement ck#22779	201.50
11/12/07	19	Cost of travel by Max Moskowitz to & from conference in trenton between 10/22/07 and 11/2/07 - reimbursement	400.00
11/16/07	11	Cost of trip to Trenton (balance) for M. Moskowitz 11/2/07 - petty cash 071116	34.40
12/11/07	03	Cost of duplication	.00
12/11/07	06	Facsimile charges	25.00
12/11/07	44	Cost of printing documents	3.00
12/11/07	55	Scanning charges	3.27

REPRINT OF BILLED DETAILS (as billed)
003964-00011-018 MJB

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TOTAL DISBURSEMENTS

\$ 3,583.74

BILLING SUMMARY

TOTAL FEES

\$ 19,069.50

TOTAL DISBURSEMENTS

\$ 3,583.74

TOTAL CHARGES FOR THIS BILL

\$ 22,653.24

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-020 MJB
 Bill date 02/07/08

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

12/12/07 MM				
	.20 hrs	495	/hr	99.00
12/12/07 CSR				
	1.20 hrs	250	/hr	300.00
12/18/07 MM				
	.75 hrs	495	/hr	371.25
12/18/07 LAS				
	.55 hrs	135	/hr	74.25
12/19/07 CSR				
	.60 hrs	250	/hr	150.00
12/19/07 SFM				
	1.70 hrs	140	/hr	238.00
12/19/07 SFM				
	2.70 hrs	140	/hr	378.00
12/19/07 SFM				
	1.70 hrs	140	/hr	238.00
12/20/07 LAS				
	.65 hrs	135	/hr	87.75
12/28/07 CSR				
	.75 hrs	250	/hr	187.50
12/31/07 CSR				
	.10 hrs	250	/hr	25.00
01/11/08 CSR				
	.40 hrs	260	/hr	104.00
01/23/08 CSR				
	.10 hrs	260	/hr	26.00
01/25/08 CSR				
	.20 hrs	260	/hr	52.00

REPRINT OF BILLED DETAILS (as worked)
 003964-00011-020 MJB

01/31/08 CSR	.10 hrs	260	/hr	26.00

TOTAL FEES			\$	2,356.75

DISBURSEMENTS

01/31/08 03	Cost of duplication	54.00
01/31/08 44	Cost of duplication	41.50
01/31/08 55	Scanning charges	307.20

TOTAL DISBURSEMENTS		\$ 402.70

BILLING SUMMARY

TOTAL FEES	\$	2,356.75
TOTAL DISBURSEMENTS	\$	402.70

TOTAL CHARGES FOR THIS BILL	\$	2,759.45

REPRINT OF BILLED DETAILS (as billed)

Bill number 003964-00011-022 MJB
 Bill date 04/14/08

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

02/10/08 MM	.35 hrs	495	/hr	173.25
02/12/08 CSR	.10 hrs	260	/hr	26.00
02/26/08 CSR	.10 hrs	260	/hr	26.00
03/04/08 CSR	.10 hrs	260	/hr	26.00
03/14/08 RWL	.30 hrs	140	/hr	42.00
03/19/08 CSR	.30 hrs	260	/hr	78.00
03/26/08 CAM	.00 hrs	0	/hr	.00
03/27/08 RWL	.50 hrs	140	/hr	70.00
03/31/08 CSR	.10 hrs	260	/hr	26.00

TOTAL FEES			\$	467.25

DISBURSEMENTS

TOTAL DISBURSEMENTS \$ -----
 .00

BILLING SUMMARY

TOTAL FEES \$ 467.25

 TOTAL CHARGES FOR THIS BILL \$ 467.25

REPRINT OF BILLED DETAILS (as worked)

Bill number 003964-00011-023 MJB
 Bill date 05/07/08

Gelmart Industries, Inc.
 Att: Ralph Djemal
 20-07 127 Street
 College Point, NY 11356

OFGS File: 7/3964-11
 Line Rothman v. Target Corp., et al.

FOR PROFESSIONAL SERVICES RENDERED

04/04/08 CSR	.10 hrs	260	/hr	26.00
04/14/08 CSR	.10 hrs	260	/hr	26.00
04/17/08 RWL	.95 hrs	140	/hr	133.00
04/18/08 CSR	.10 hrs	260	/hr	26.00
04/23/08 MM	.35 hrs	495	/hr	173.25
04/23/08 CSR				

2.00 hrs 260 /hr 520.00

TOTAL FEES \$ 904.25

DISBURSEMENTS

TOTAL DISBURSEMENTS \$.00

BILLING SUMMARY

TOTAL FEES \$ 904.25

TOTAL CHARGES FOR THIS BILL \$ 904.25