

# Cislo & Thomas LLP Litigation Cost Control™ (LCC™)

## Stages of Litigation and Expected Fees and Costs

The following is a list of procedural Tasks and Deadlines for actions in the Central District of California based on the Federal Rules; the Court's Local Rules, many District Court Judges' orders and a typical Central District of California litigation time schedule for trial. Assume Central District average time to trial 18 months.

<u>DATE</u>	<u>FILING AND SERVICE OF INITIAL PLEADINGS</u>	<u>AUTHORITY</u>
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### 1. Investigate Matter and Parties involved

#### A. In General:

- Task 1 – Audit File...
- Task 2 – Review Deadlines and Rules
- Task 2A – Avoid Pitfalls in the Local Rules
- Task 3 – Analyze the Pleadings
- Task 4 – Create Proof Outline
- Task 5 – Develop Case Theme

**\$ 3,000**

### 2. Prepare Complaint—Day 1

#### A. Structure Case:

- Task 6A – Seek an Injunction
- Task 6B – Apply for a Temporary Restraining Order
- Task 6C – Seek Declaratory Relief
- Task 5 – Develop Case Theme

#### B. File Complaint/Answer: Day 20

**\$ 7,500** w/o injunction (Cumulative Total = \$ 10,500/  
**\$ 50-\$75,000** w/injunction \$ 60,500—\$85,500)  
(Includes expedited discovery for strongest evidence, two briefs plus hearing)

By **Day 90** Plaintiff must serve Complaint on defendants.....FRCP 4(m)  
(Cpt Filed + 90)

By **Day 106** Defendant must conduct Meet and Confer re Rule 12(b) motion, if any ..... LR 7-3  
(Cpt served + 16)

By **Day 111** Defendant must file answer or Rule 12(b) Motion to Dismiss .....FRCP 12(a)(1)  
(Cpt served + 21)  
**\$ 25-\$75,000** (Cum: \$85,500—\$135,500/\$110,500—\$160,500)  
(Personal Jurisdiction/Venue motion. Includes two briefs plus hearing for plaintiff  
One brief plus hearing for defendant)

3. Opposition to Rule 12(b) Motion/Other Pleadings, if made

Structure Case cont.

Task 6D	\$ 7,500	Amend Pleadings
Task 7	3,500	Oppose Motion to Amend Pleadings
Task 8	6,500	Sever Claims or Parties
Task 9	6,500	Dismiss Claims or Parties
Task 10	6,500	Move for Separate Trials
Task 11	7,000	Add Counterclaims or Cross-Claims
Task 12	6,500	Implead Third Parties
Task 13	8,500—11,500	Add Parties: Mandatory- Joinder
Task 14	8,500—11,500	Add Parties Permissive Joinder
Task 15	4,500	Intervene
Task 16	1,250	Voluntarily Dismiss Actions
Task 17	7,500	Consolidate Cases
Task 18	10,500—15,500	Transfer Venue
Task 19	500	Consent to Magistrate Judge
Task 19A	<u>3,500</u>	Work with Special Master (totals
	\$ 88,000—\$105,000	

Not to exceed    **\$ 75,000**                      (Cum: \$160,500—\$210,500/\$185,500—\$235,500)

4. Pretrial Meetings and Conferences:

Notify Counsel re Early Meeting of Counsel

Task 20	Mandatory Discovery Planning Conference
Task 21	Participate in FRCP 16 Conference

By **[Entry]** Plaintiff must conduct Early Meeting of Counsel ..... FRCP 26(f)  
 (Sched. Conf. - 21<sup>1</sup>)

Prepare **[Proposed]** Joint Report for Defense Counsel review/input

By **[Entry]** Plaintiff must file Joint Report of Early Meeting ..... FRCP 26(f)  
 (Early Mtg + 14)

On **[Entry]** Parties must attend Scheduling Conference .....Scheduling Conf. Order  
 (Sched. Conf.)

**\$ 5,000**                      (Cum: \$165,500—\$213,500/\$190,500—\$240,500)

<sup>1</sup> “Sched. Conf. - 21” means 21 calendar days before the scheduling conference set by the Court.

**DISCOVERY DEADLINES**

5. Disclosure Requirements

Prepare Initial Disclosures

Task 22                      Review and Make Initial Disclosures  
    **\$ 3,000**                      (Cum: \$168,500—\$216,500/\$193,500—\$243,500)

7. Organize Discovery

Task 25                      Set Discovery- Goals  
 Task 26                      Prepare Deposition Schedule  
 Task 27                      Docket Internal Discovery Schedule  
 Task 28                      Prepare Final Phase Discovery Plan  
 Task 29                      Conduct Freedom of Information Act Discovery  
 Task 30                      Complete Informal Discovery  
    **\$ 4,000**                      (Cum: \$172,500—\$220,500/\$197,500—\$247,500)

8. Nonparty Discovery

Task 31                      Subpoena Records from Nonparties  
 Task 32                      Challenge Subpoenas (*Can be expensive*)\*  
 Task 33                      Enforce Subpoenas (*Can be expensive*)\*  
 Task 34                      Produce and Inspect Nonparty Documents  
    **\$ 5,000-\$25,000\***                      (Cum: \$177,500—\$245,500/\$202,500—\$272,500)

By **[Entry]** Last day to serve Initial Disclosures ..... FRCP 26(a)  
 (Early Mtg + 14)

9. Format Written Discovery

Task 35                      Propound and Answer Interrogatories  
 Task 36                      Propound and Respond to Requests for Admission  
 Task 37                      Propound and Respond to Requests to Produce or Inspect  
 Task 37A                      Plan for and Perform Electronic Discovery  
 Task 38                      Request Physical and Mental Examinations or Reports  
 Task 39                      Object to Discovery

A. Interrogatories to Defendant

B. Document Production Requests to Defendant

C. Requests for Admission to Defendant

**\$ 25,000-75,000**                      (Cum: \$202,500—\$315,500/\$227,500—\$342,500)

## DISCOVERY DEADLINES CONT.

10. Depositions

Task 40	Notice Depositions
Task 41	Notice Expert Depositions
Task 41A	Advanced Expert Discovery Strategy
Task 42	Prepare For and Take Depositions
Task 43	Take Telephone Depositions
Task 44	Take Videotaped Depositions
Task 45	Object to Depositions
Task 46	Prepare Client or Witness for Depositions
Task 47	Defend Depositions
Task 59	Prepare Experts for Deposition
Task 60	Depose Experts
Task 61	Supplement Expert Discovery

A. Schedule 30(b)(6) and Individual Depositions

B. Additional Discovery as needed

C. Review Discovery Responses

D. Prepare & Serve Responses to Propounded Discovery (Various as applicable)**\$ 75,000**

(Cum: \$277,500—\$390,500/\$302,500—\$417,500)

- Est. Prosecuting five (5) depositions [10-12 hrs prep, 8hrs depo, 3 hrs to review = 21-23 hrs or \$9,000/depo.

- Est. Defending five (5) depositions [4 hrs prep, 8 hrs depo, 3 hrs review = 15 hrs or \$6,000/depo

On [Entry] Last day to serve fact discovery by mail ..... FRCP 34(b)  
 (M to Compel – 33 [but need to add for objections etc below])

11. Resolve Discovery Problems

Task 48	Extend Discovery Time
Task 49	Shorten Discovery Time
Task 50	Stipulate to Protective Order
Task 51	Move for Protective Order

A. Prepare Compel Letter to counsel re deficient discovery responses LR 31-1

On [Entry] Last day to send compel letter (fact). L.R. 37-2, 37-3, Judge's Proc., Standing Order  
 (Disc. C/O - 100(i.e., 10 days for the letter + 14 days to prep stip + 7 days for opponent to prep his portion of stip + 28 + 3 days for the motion + 28 days to respond to compel order)

B. Meet &amp; Confer re discovery

Task 52	Meet and Confer LR 37-1
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C. Prepare and serve Discovery Joint Stipulation re Motion to Compel (Various) 37-2, 37-2.1D. Receive (within 7 days) Responding Party portion of Joint Stipulation 37-2.2

Task 53	Compel Discovery or Disclosures
Task 54	Move for Discovery Sanctions

E. Prepare and File NOTICE OF MOTION & Joint Stipulation re Discovery Motion to Compel (Various) 37-2.2F. Prepare & File Supplemental Memorandum (14 days prior to hearing) re Motion (Various) 37-2.3

Task 55	Supplement Disclosures and Discovery Responses
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On [Entry] Fact discovery cutoff ..... Scheduling Order and Magistrate's hearing date  
 (Disc. C/O)

**\$ 25,000-\$40,000**

(Cum: \$302,500—\$430,500/\$327,500—\$457,500)

Compel Motion cost depends on degree of work/complexity

12. Experts

- Task 56                      Determine Whether to Retain Experts
- Task 57                      Retain Consultants
- Task 58                      Use Consultants to Prepare for Trial
- Task 61A                    Challenge Expert Witnesses

A. Prepare Expert Reports

By **[Entry]** Last day to serve expert reports (if not otherwise ordered) ..... FRCP 26(a)(2)  
 (Trial - 90)

B. Disclosure Requirements

- Task 24                      Identify Experts and Disclose Their Reports

C. Prepare Rebuttal Expert Reports

By **[Entry]** Last day to rebuttal expert reports ..... FRCP 26(a)(2)  
 (Exp. Rpt + 30)

D. Prepare Compel Letter to counsel re deficient Expert Report

On **[Entry]** Last day to send compel letter (expert) ..... L.R. 37-2, 37-3, Judge’s Procedures, Standing Order  
 (Exp. Disc. C/O - 75) (i.e., 10 days for letter + 13 days for the stip + 24 days for the motion + 28 days to respond to compel order)

E. Meet & Confer re Expert Reports

F. Expert Joint Stipulation re Motion to Compel

G. Receive (within 5 days) Responding Party portion of Joint Stipulation

H. Prepare and File NOTICE OF MOTION & Joint Stipulation re Expert Motion to Compel (Various)

I. Prepare & File Supplemental Memorandum (14 days prior to hearing)o Motion (Various)

On **[Entry]** Expert discovery cutoff ..... Scheduling Order and District Judge hearing date  
 (Exp. Disc. C/O)

**\$ 90,000**  
 Includes three (3) experts  
 [liability (2) and damages  
 (1), not including expert  
 fees

(Cum: \$392,500—\$520,500/  
 \$417,500—\$547,500)

**AIPLA<sup>2</sup> fee estimate at end of discovery:**  
 Patent Infringement: \$700,000—\$2,500,000  
 Trademark Infring.: \$225,000--\$600,000  
 Copyright Infring.: \$200,000--\$625,000  
 Trade Secret Misapp.: \$200,000--\$1,300,000

- Typically, fees can be \$50,000/expert, not including trial testimony.
- For Trademark cases, assume **\$50,000** for a trademark survey and survey expert

<sup>2</sup> American Intellectual Property Law Association Report of the Economic Survey 2009, figures for \$1-25 million at risk.

**DISPOSITIVE MOTION DEADLINES**

13. Motions

Task 62		Motion Basics
Task 63	<b>\$ 3,500</b>	Make Ex Parte Applications
Task 64	<b>\$60,000-\$75,000</b>	Move for Summary Judgment
Task 65	<b>\$35,000-\$40,000</b>	Oppose Motion for Summary Judgment
Task 65A	<b>\$25,000-\$35,000</b>	Seek Rule 11 Sanctions
Task 65B		Seek Sanctions on Other Grounds
Task 66	<b>\$15,000</b>	Move to Dismiss for Failure to Prosecute
Task 67A	<b>\$ 4,500</b>	Move to Expedite Trial
Task 67B	<b>\$ 2,500</b>	Move to Amend Pretrial Scheduling Order
Task 67C	<b>\$ 2,500</b>	Move for Trial Continuance
Task 68	<b>\$4,000-\$5,500</b>	Move to Stay Federal Proceedings
Task 69		[Reserved]
Task 70	<b>\$ 3,500</b>	Move to Disqualify Judge
Task 71	<b>\$ 4,500</b>	Move to Withdraw as Counsel
Task 72	<b>\$ 3,000</b>	Move for Reconsideration of an Order or to Alter Judgment
..	<b>\$50,000-\$75,000</b>	Markman Hearing on Patent Claims interpretation

A. Give Notice to Counsel re Meet & Confer re motion (Various)

By **[Entry]** Last day to conduct meet and confer re dispositive motions, if any..... LR 7-3  
 (Mot. C/O - 38 [28 + 10 M&C])

B. Prepare and Serve Dispositive Motion (Various)

C. Prepare and Serve Opposition (Various)

D. Prepare and Serve Reply to Opposition (Various)

On **[Entry]** Last day to serve dispositive motions by mail ..... LR 6-1  
 (Mot. C/O - 31)

E. Prepare and Serve Opposition (Various)

F. Prepare and Serve Reply to Opposition (Various)

On **[Entry]** Last day to hear dispositive motions ..... Scheduling Order and Magistrate’s hearing date  
 (Mot. C/O)

**\$ 65,000-\$125,000** or (Cum: \$457,500—\$645,500/\$472,500—\$672,500)  
 more for Motion costs

COUNTDOWN TO FINAL PRETRIAL CONFERENCE

14. Settlement and ADR

a. Notify Counsel re M & C for Settlement Procedure Selection

- Task 73                      Prepare for Settlement Negotiations and Alternative Dispute Resolution (ADR)
- Task 74                      Analyze Damages and Remedies
- Task 75                      Negotiate Settlement
- Task 76                      Make Offer of Judgment
- Task 77                      Consider Arbitration
- Task 78                      Try Mediation

b. Meet & Confer re Settlement Procedure Selection

By **[Entry]** Parties must file a Notice of Settlement Procedure Selection .....LR 16-15.2  
(Sched. O + 14)

c. Prepare Settlement Brief

d. Conduct Settlement Procedure selected

By **[Entry]** Parties must complete settlement procedures .....LR 16-15.2  
(FPC - 45)

**\$ 10,000**                      (Cum: \$467,500—\$655,500/\$482,500—\$682,500)

15. EVIDENCE

A. Gear Up For Trial

- Task 79                      Review Evidence Rules
- Task 80                      Develop Trial Plan

B. Lay and Expert Witnesses

- Task 81                      Ensure that Client and Witnesses Appear to Testify
- Task 82                      Prepare Client and Lay Witnesses to Testify
- Task 83                      Ensure that Client and Lay Witnesses' Testimony is Admissible
- Task 84                      Prepare Experts to Testify
- Task 85                      Ensure that Experts' Testimony is Admissible
- Task 86                      Prepare to Use Learned Treatises

C. Non-Testimonial Evidence

- Task 87                      Create and Obtain Demonstrative Evidence
- Task 88                      Prepare to Offer "Real Evidence"
- Task 89                      Prepare to Offer Business Records
- Task 90                      Prepare to Offer Public Records

D. Evidence From Formal Discovery

- Task 91                      Prepare to Offer Depositions and Other Records of Testimony
- Task 92                      Prepare to Offer Responses to Requests for Admission
- Task 93                      Prepare to Offer Interrogatory Responses

E. Evidence Motions and Requests

- Task 94                      Request Judicial Notice of Facts
- Task 95                      Move to Strike Undisclosed Evidence
- Task 96                      Prepare Motions in Limine
- Task 96A                      Advanced Motions in Limine

**\$ 50,000**                      (Cum: \$517,500—\$705,500/\$532,500—\$732,500)

**16. FINAL PRETRIAL CONFERENCE**

Task 97      Request and/or Participate in Final Pretrial Conference

- A. Contact Counsel to schedule pretrial meeting of counsel
- B. Prepare Stipulation of Facts
- C. Prepare Exhibits and Objections to Exhibits
- D. Prepare List of Witnesses
- E. Identify deposition testimony to be lodged as evidence
- F. Prepare Contentions of Law & Fact
- G. Prepare for discussion Expert Witnesses, Evidentiary Issues

On **[Entry]**      Parties must conduct pretrial meeting of counsel .....LR 16-2  
**(FPC - 40)**      Confirm subject matter jurisdiction ..... LR 16-2.1  
                    Stipulation of facts ..... LR 16-2.2  
                    Exchange Exhibits (marked according to LR 26-4) ..... LR 16-2.3  
                    Exchange List of Witnesses ..... LR 16-2.4  
                    Discuss Experts Witnesses ..... LR 16-2.5  
                    Resolve Evidentiary Matters ..... LR 16-2.6  
                    Identify any deposition testimony to be lodged as evidence ..... LR 16-2.7  
                    Prepared contentions of law and fact ..... LR 16-2.8  
                    Exhaust settlement possibilities ..... LR 16-2.9

H. Prepare Memorandum of Contentions of Fact & Law

By **[Entry]**      Last day to file memorandum of contentions of fact and law .....LR 16-4  
**(FPC - 21)**      Claims and Defenses ..... LR 16-4.1  
                    Bifurcation of Issues..... LR 16-4.3  
                    Identify issues triable to a jury..... LR 16-4.4  
                    Discuss any claim to attorneys' fees ..... LR 16-4.5  
                    Identify any issues abandoned ..... LR 16-4.6  
                    Last day to serve and File Witness List .....LR 16-5  
                    Last day to serve and File Joint Exhibit List ..... LR 16-6.1  
                    Last day to serve and File Witness List .....LR 16-5  
                    Last day to serve and File Witness List .....LR 16-5

- I. Prepare Joint [Proposed] Final Pretrial Conference Order & send to opposing counsel
- J. Finalize Joint [Proposed] Final Pretrial Conference Order
- K. Prepare Join Exhibit List (LR 16.6.1)
- L. Prepare Objections to Exhibits (included in proposed Final Pretrial Conf Order) ..... LR 16-6.3



**FINAL PRETRIAL CONFERENCE cont.**

Task 98      Prepare Final Pretrial Stipulation

By **[Entry]** Parties must lodge joint proposed final pretrial conference order ..... LR 16-6.1  
**(FPC - 11 days)**

- A. Give Notice re Meet & Confer for Motions for Final Pretrial Conference
- B. Meet & Confer for Motions for Final Pretrial Conference
- C. Prepare Motions for Final Pretrial Conference

On **[Entry]** at **[Day]** am/pm Parties must attend final pretrial conference .....Scheduling Order  
**(FPC)**

Dismiss all unserved parties..... LR 16-7.1  
Motions & Other Proceedings (if not already cut off) ..... LR 16-7.2  
Set date for trial (if not already set)..... LR 16-7.3

**\$ 100,000-\$125,000** (Cum:\$617,500—\$830,500/\$632,500—\$857,500)

COUNTDOWN TO JURY TRIAL

17. TRIAL PROCESS

- |          |   |
|----------|---|
| Task 101 | Retain and Use Jury Consultants             |
| Task 102 | Create and Use Mock Juries and Focus Groups |
| Task 103 | Prepare Jury Instructions and Verdict Form  |
| Task 104 | Prepare for Jury Selection                  |
| Task 105 | Prepare Voir Dire Questions                 |
| Task 106 | Prepare Jury Questionnaires                 |
|          |   |
| Task 108 | Prepare Opening Statement                   |
| Task 109 | Prepare Direct Examination Plans            |
| Task 110 | Prepare Cross-Examination Plans             |
| Task 111 | Prepare to Examine Experts                  |

A. Prepare Pretrial Disclosure (witnesses, depositions & exhibits)

By **[Entry]** Parties must file Pretrial Disclosure (witnesses, depositions & exhibits).....FRCP 26(a)(3)  
**(Trial - 30 days)**  
 35 U.S.C. § 282 Notice (Patent cases)

B. Disclosure Requirements

- |         |                                       |
|---------|---------------------------------------|
| Task 23 | Make Disclosures 30 Days Before Trial |
|---------|---------------------------------------|

C. Prepare Objections to Pretrial Disclosures

By **[Entry]** Parties must file objections to pretrial disclosures (depositions & exhibits) .....FRCP 26(a)(3)  
**(Trial - 16 days)**

D. Give Notice re need to Disclose graphic or illustrative material to be used at trial

On **[Entry]** Parties must disclose all other graphic or illustrative material to be used at trial .....LR 16.3  
**(Trial - 11 days)**

- |          |                            |
|----------|----------------------------|
| Task 115 | Prepare Trial Notebook     |
| Task 99  | Prepare <u>Trial Brief</u> |

On **[Entry]** Parties must file Trial Brief .....LR 16-9  
**(Trial - 7 days)**

E. Give Notice re Meet & Confer re continuance

F. Meet & Confer re continuance

G. Prepare Motion/Application for Continuance

By **[Entry]** Last day to file any continuance .....LR 40-1  
**(Trial - 5 days)**

H. Prepare Request for Special Verdict or General Verdict with Interrogatories

By **[Entry]** Parties must file request for special verdict or general verdict with Interrogatories .....LR 49-1  
**(Trial - 7 days)**

TRIAL PROCES cont.

I. Prepare and serve proposed Requests for Jury Instructions

By **[Entry]** Parties must prepare requests for (jury) instructions .....LR 51-1  
**(Trial - 7 days)**

J. Preserving a Right to Appeal

Task 118

Preserve Objections Re: Jury Instructions

K. Prepare Objections to Jury Instructions

By **[Entry]** Parties must file with the Court any Objections to the Jury Instructions .....LR 51-5  
**(Trial - 0)**

L. Preserving a Right to Appeal

Task 116

Preserve Appeal With Pre-Trial Motions

On **[Entry]** at **[Day]** am/pm JURY TRIAL TO COMMENCE .....Scheduling Order  
**(Trial date)**

M. TRIAL JMOL PROCESS

Task 112

Move for Judgment and Other Trial Motions

Task 112A

Move for Mistrial

Task 113

Oppose Motion for Judgment and Other Trial Motions

N. Preserving a Right to Appeal

Task 117

Preserve Evidentiary Objections for Appeal

Task 114

Prepare Closing Arguments

**COUNTDOWN TO BENCH TRIAL**

Task 100

Convert Jury Trial to Non-Jury Trial

By **[Entry]** Parties must file Findings of Fact & Conclusions of Law in bench trial .....LR 52-1  
**(Trial - 5 court days)**

O. Prepare Findings of Fact & Conclusions of Law (Bench Trial)

Task 107

Prepare Findings of Fact and Conclusions of Law

On **[Entry]** at **[Day]** am/pm BENCH TRIAL TO COMMENCE .....Scheduling Order  
**(Trial date)**

P. Prepare Order for Court

By **[Entry]** Parties must serve and lodge Order with the Court.....LR 52-4  
**(Trial + 5 days)**

Q. Prepare Separate Objection

By **[Entry]** Separate objection, if any, must be filed .....LR 52-7  
**(Trial + 7 days)**

**\$ 100,000**

(Cum: \$717,500—\$955,500/\$732,500—\$982,500)

**POST TRIAL**

18. **POST TRIAL**

A. Prepare Findings of Fact & Conclusions of Law (jury verdict)

By **[Entry]** Parties must serve findings of fact and conclusions of law after jury verdict.....LR 52-2  
**(V + 7 days)**

B. Prepare Objection

By **[Entry]** Last day to file separate objection, if any, must be filed .....LR 52-7  
**(V + 7 days)**

C. Prepare Motion for New Trial

By **[Entry]** Parties must file any motion for a new trial ..... FRCP 59(b)  
**(J + 28 days<sup>1</sup>)**

D. Prepare Motion for Attorneys' Fees

By **[Entry]** Parties must file and serve motion for attorneys' fees..... LR 54-12  
**(J + 14 days)**

E. Prepare Bill of Costs

By **[Entry]** Parties must file Bill of Costs .....LR 54-3  
**(J + 15 days)**

F. Prepare Objections to Bill of Costs

By **[Entry]** Objections to Bill of Costs, if any, must be filed .....LR 54-7  
**(No later than 7 days before date noticed for the Bill of Costs application)**

G. Prepare Reply to Objections to Bill of Costs

By **[Entry]** Parties must file reply to objections to Bill of Costs.....LR 54-7  
**(No later than 3 days before date noticed for the Bill of Costs application)**

H. Prepare Notice of Appeal

By **[Entry]** Parties must file any notice of appeal.....FRAP 4(a)(1)(A) and 4(a)(4)  
**(J + 30 days or Order on last remaining post-trial motion + 30)**

I. Prepare Other Party Notice of Appeal

By **[Entry]** Other party must file any notice of appeal ..... FRAP 4(a)(3)  
**(Notice of Appeal + 14)**

By **[Entry]** Review of Clerk's decision.....LR 54-9  
**(Clerks D + 7 days)**

**DATE**            **FILING/SERVICE PLEADINGS/MOTION PRAC./DISCOVERY, ETC.**            **AUTHORITY**

J. Give Notice of Meet & Confer  
POST TRIAL cont.

K. Conduct Meet & Confer

L. Prepare Motion for Relief From Judgment

By **[Entry]** Parties must file any motion for relief from judgment ..... FRCP 60(b)  
**(J + reasonable time not to exceed 1 year)**

**\$ 50,000**    Cislo & Thomas    \$767,500—\$1,005,500/  
                         Cumulative Fees    \$782,500—\$1,082,500)  
  
(Fees assume all of the above possible motions.)

**AIPLA fee/cost estimate for entire case:**  
Patent Infringement: \$1,500,000—\$4,500,000  
Trademark Infringement: \$375,000—\$1,250,000  
Copyright Infringement: \$370,000—\$1,450,000  
Trade Secret Misappr.: \$500,000—\$2,500,000