

1 Amy Sommer Anderson (STATE BAR NO. 282634)
anderson@aroplex.com

2 Aroplex Law
156 2nd Street
3 San Francisco, California 94105
Telephone: 415-529-5148
4 Facsimile: 415-520-0606

5 Attorney for Defendant
POWER VENTURES, INC.

6 STEVEN VACHANI (*pro se*)
7 2425B Channing, #216
8 Berkeley, CA 94704
Telephone: (917) 267-8823

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 FACEBOOK, INC.,

14 Plaintiff,

15 v.

16 POWER VENTURES, INC., a Cayman Island
corporation and d//b/a POWER.COM, a
17 California corporation; STEVE VACHANI, an
individual; DOE 1, d/b/a POWER.COM,
18 DOES 2-25, inclusive,

19 Defendants.

Case No. 5:08-CV-05780 LHK

**DEFENDANTS' OPPOSITION TO
FACEBOOK, INC.'S BILL OF COSTS**

Dept: Courtroom 8, 4th Floor
Judge: Hon. Judge Lucy H. Koh

20
21 Defendants Power Ventures, Inc. and Steven Vachani object to the taxation by the Clerk
22 of this Court of the following items in the Bill of Costs filed in this action by Plaintiff Facebook,
23 Inc., on November 8, 2013, as follows:

24 **1. Defendants Object to Costs Incurred in Unrelated Litigation**

25 Specifically, Defendants object to invoice number 112912¹ for \$122.30, dated 11/27/2012,
26 under "FEES FOR PRINTED OR ELECTRONICALLY RECORDED TRANSCRIPTS"
27

28

¹ See Plaintiff's Itemization, Dkt. No. 382-1 at 2:10.

1 NECESSARILY OBTAINED FOR USE IN THE CASE,” as this cost relates to transcription of a
2 hearing in a separation action.

3 Defendants further object to invoice number B96474² for \$685.94, dated 9/12/2012, under
4 “FEES FOR EXEMPLIFICATION AND THE COSTS OF MAKING COPIES OF ANY
5 MATERIALS WHERE THE COPIES ARE NECESSARILY OBTAINED FOR USE IN THE
6 CASE,” as this cost does not appear related to the instant action, which was stayed at the time of
7 invoicing.
8

9 **2. Defendants Object to Cost Items Included in Order for Discovery Sanctions**

10 Specifically, Defendants object to invoice number 422744³ for \$5,128.73, dated 3/9/2012,
11 under “FEES FOR PRINTED OR ELECTRONICALLY RECORDED TRANSCRIPTS
12 NECESSARILY OBTAINED FOR USE IN THE CASE,” as this cost is for a renewed deposition
13 included in the Court’s August 7, 2013 order for costs.
14

15 Defendants further object to invoice number 417426⁴ for \$342.50, dated 3/8/2012, and
16 invoice number 417694⁵ for \$317.50, dated 3/9/2012, under “OTHER COSTS –
17 TRANSLATION SERVICES,” as these costs are already included in the Court’s August 7, 2013
18 order for costs.
19

20 Respectfully submitted,

21 Dated: November 22, 2013

AROPLEX LAW

22 By _____ /s/

23 Aroplex Law
24 156 2nd Street
San Francisco, California 94105

25 _____
26 ² See Plaintiff’s Itemization, Dkt. No. 382-1 at 3:8.

27 ³ See Plaintiff’s Itemization, Dkt. No. 382-1 at 2:7. See also Invoice 422744 submitted June 6, 2013, Dkt. No. 348-5
at 2.

28 ⁴ See Plaintiff’s Itemization, Dkt. No. 382-1 at 3:25. See also Invoice 417426 submitted June 6, 2013, Dkt. No. 348-4
at 2.

⁵ See Plaintiff’s Itemization, Dkt. No. 382-1 at 3:25. See also Invoice 417694 submitted June 6, 2013, Dkt. No. 348-4
at 3.

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anderson@aroplex.com
Telephone: 415-529-5148
Facsimile: 415-970-5016
Attorney for Defendant
POWER VENTURES, INC.

Dated: November 22, 2013

STEVEN VACHANI

By /s/

STEVEN VACHANI (*pro se*)
2425B Channing, #216
Berkeley, CA 94704
Telephone: (917) 267-8823

FILER'S ATTESTATION: Pursuant to General Order No. 45 §X(B), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from its signatory.

Dated: November 22, 2013

Respectfully submitted,

 /s/
Amy Sommer Anderson

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CERTIFICATE OF SERVICE

I hereby certify that this document(s) has been or will be filed through the ECF system, and notice will be sent via the following method(s):

X ECF System: By filing the document(s) listed above on the Court’s Electronic Case Filing System, I am informed and believe that the documents will be electronically served on all individuals registered with such system. To my knowledge, every individual to whom notice is required is registered with this system and, thus, has been served with due notice by action of this electronic filing.

I declare under penalty of perjury under the laws of the State of California that the above statements are true and correct.

Executed November 22, 2013 at San Francisco, California.

By: /s/ Amy Sommer Anderson
Amy Sommer Anderson