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17 Attorneys for Defendant

18 IXL Learning, Inc.

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21 U.S. EQUAL EMPLOYMENT OPPORTUNITY : Case No.: 3:17-cv-02979-VC
22 COMMISSION, :

23 Plaintiff, : Judge: Honorable Vince Chhabria

24 and : Courtroom: 4, 17th Floor

25 ADRIAN SCOTT DUANE, :

26 Plaintiff-Intervenor, : **DEFENDANT’S RESPONSE TO**
27 : **PLAINTIFFS’ OPPOSITION TO**
28 : **MOTION TO RETAX COSTS**

29 v. :

30 IXL LEARNING, INC., :

31 Defendant. :

1 **I. INTRODUCTION**

2 Defendant IXL Learning, Inc. submits this reply in further support of its Motion to Retax Costs
3 (the “Motion”) and in response to the opposition submitted by Plaintiff U.S. Equal Employment
4 Opportunity Commission and Plaintiff-Intervenor Adrian Scott Duane (“the Opposition”). DE 174; DE
5 176. Plaintiffs dispute Defendant’s claimed costs associated with online discovery document
6 management fees, trial exhibit fees, and witness fees in the amount of \$6,635.70. Defendant maintains
7 that it is entitled to these costs.

8 **II. ARGUMENT**

9 **A. Defendant is Entitled to Costs Associated with Online Discovery Document
10 Management Fees.**

11 Defendant seeks costs disallowed by the Clerk in the amount of \$4,510.00, representing costs for
12 use of its electronic management system Logikcull. Such costs are taxable pursuant to Civil Local Rule
13 54-3(d)(2), as well as the authorities relied upon in Defendant’s Motion. Likewise, Defendant provided
14 reasonable documentation of these costs by submitting a tabulation of monthly, flat rate payments made
15 to Logik Systems, Inc. and an affidavit signed by attorney of record for the Defendant, Jeffrey D. Wilson,
16 attesting to the fact that the \$4510.00 sought reflected the amount actually billed to IXL regarding the
17 same. Caselaw cited in the Motion says this is enough.

18 Plaintiffs’ arguments against these costs are unavailing. Plaintiffs rely on *Phoenix Techs. Ltd. v.*
19 *VMWare, Inc.*, 2018 WL 4700347 (N.D. Cal. 2018), *Kwan Software Eng’g, Inc.*, 2014 WL 1860298 (N.D.
20 Cal. 2014), and *Golden Bridge Tech., Inc. v. Apple Inc.*, 2015 WL 13427805 (N.D. Cal. 2015) to support
21 an assertion that costs associated with Defendant’s use of Logikcull are not recoverable. DE 176 at 2.
22 These cases actually support the opposite conclusion. In each of these cases, this Court awarded at least a
23 portion of the prevailing parties’ electronic database costs. In *Phoenix Techs.*, the prevailing party was
24 awarded a share of production costs billed by its e-discovery vendor. In *Kwan Software*, the prevailing
25 party was awarded production costs representing bates stamping and TIFF conversion using an e-
26 discovery vendor. In *Golden Bridge*, the prevailing party was awarded electronic discovery costs directly
27 related to the electronic preparation, duplication and production of documents and a percentage of its
28 upload copy costs and work for load file preparations. Defendant submits that Logikcull was used for

1 similar purposes in the present case, including document preparation, duplication, production, TIFF
2 conversion, and bates stamping.

3 Plaintiffs additionally assert that Defendant provides no evidence, other than the counsel's
4 declaration, that the amount billed to Defendant "is at all proportionate to the amount of data stored in
5 comparison to other cases in the law firm database." DE 176 at 3. To the contrary, and as described in the
6 Motion, Defendant presented precisely what it needed to prove up these costs. Plaintiffs cite no legal
7 authority supporting their arbitrary requirement.

8 Defendant, on the other hand has provided authority. Plaintiffs' arguments against these cases are
9 unavailing. Plaintiffs contend that these cases are inapposite because the accepted declarations in each
10 case supported "*in-house* copying costs that are routinely awarded." DE 176 at 3. This is a distinction
11 without a difference. But even so, and as shown in *Phoenix Techs.*, *Kwan Software*, and *Golden Bridge*,
12 cited above and by Plaintiffs, electronic database costs are routinely awarded by this Court.

13 Moreover, Defendant's costs with respect to its eDiscovery platform were reasonably anticipated
14 in light of this Court's Guidelines for the Discovery of Electronically Stored Information (the Guidelines).
15 For example, Guideline 2.02 of the Guidelines provides, in part: "At the required Rule 26(f) meet and
16 confer conference, when a case involves electronic discovery, the topics that the parties should consider
17 discussing include: 1) preservation; 2) systems that contain discoverable ESI; [and] 3) search and
18 production." There is nothing unreasonable with Defendant's request for reimbursement of this expense.

19 Plaintiffs even benefitted from Defendant's use of an eDiscovery platform! For example, counsel
20 for the Parties met and conferred extensively over Q1 2018 regarding production formats. Plaintiffs
21 requested Defendant to produce electronically stored information in a specified TIFF and Concordance-
22 delimited DAT file format (services specifically called out in *Kwan Software*). *See, e.g.*, Exhibit A.
23 Defendant used Logikcull to comply with these requests at the cost of \$205.00 per month as documented
24 by Defendant.

25 Here, Defendant has reasonably described and established its costs sufficiently to permit a
26 determination that the costs of creating the produced documents in Plaintiffs' specified format were
27 actually necessary for the case. Defendant's position is further supported by *Country Vintner v. E. & J.*
28 *Gallo Winery, Inc.*, 718 F.3d 249, (4th Cir. 2013), which is cited by Plaintiffs in the Opposition: "If, for

1 instance, a case directly or indirectly required production of ESI-unique information such as metadata, we
2 assume, without deciding, that taxable costs would include any technical processes necessary to copy
3 [electronically stored information] in a format that includes such information.” DE 176 at 2-3.

4 **B. Defendant is Entitled to Costs Associated with Trial Exhibit Fees**

5 Defendant seeks costs associated with preparing exhibits for use at trial that were disallowed by
6 the Clerk in the amount of \$1,696.71. These costs are recoverable under 28 U.S.C. §1920(4) and Civil
7 Local Rule 54-3(d)(4). As explained in the Motion, Plaintiffs’ original Objections to Defendant’s Bill of
8 Costs (the “Objections”) only sought a reduction of Defendant’s trial exhibit fees in the amount of
9 \$473.71. DE 160. In its Motion, Defendant pointed out that the Clerk provided no reasoning for the
10 additional reduction of \$1,223.00. Likewise, Plaintiffs’ Opposition could not identify any rationale behind
11 the Clerk’s additional reduction of \$1,223.00.

12 In its Bill of Costs, Defendant supported its trial exhibit fees with invoices from exhibit vendors
13 and a line item summary of the same. Defendant maintains that each invoice submitted was incurred
14 making copies of trial exhibits for use by witnesses, the Judge, or the Clerk as required during trial.
15 Defendant’s trial exhibit fees are therefore recoverable under Civil Local Rule 54-3(d)(4). *See Vectren*
16 *Commc'ns Servs. v. City of Alameda*, 2014 WL 3612754, at *5–6 (N.D.Cal. 2014) (finding that Defendant
17 was entitled to recover the cost of preparing trial exhibits including the cost for copying four binder sets
18 required by the court). These costs are properly recoverable.

19 **C. Defendant is Entitled to Costs Associated with Witness Fees**

20 Defendant seeks witness fees incurred by Jeremy Murphy that were disallowed by the Clerk in the
21 amount of \$428.99. These costs are recoverable under Civil Local Rule 54(e). In the Opposition, Plaintiffs
22 reiterated arguments submitted in the Objections that Mr. Murphy’s airfare for his flight from
23 Raleigh/Durham, NC to San Francisco, CA was not for a “common carrier at the most economical rate
24 reasonably available.” DE 176 at 5. Plaintiffs again submitted that a lower round-trip fare on an arbitrary,
25 non-holiday travel date demonstrates that Mr. Murphy’s actual costs were not reasonable. *Id.* Time and
26 again, Plaintiffs have repeatedly failed to provide evidence that this arbitrary fare was “reasonably
27 available” at the time Mr. Murphy traveled to San Francisco. *See MEMC Elec. Materials v. Mitsubishi*
28 *Materials*, 2004 WL 5361246, at *8 (N.D. Cal. 2004) (Defendants entitled to actual economy class air

1 fare because “[a]lthough Expedia.com lists somewhat lower economy airfares, there is no evidence in the
2 record that these fares were in effect or “reasonably available” at the time the witnesses came to Detroit,
3 and Defendants have presented evidence that these were their “actual” expenses.)

4 Plaintiffs also reiterate arguments submitted in the Objections that Mr. Murphy incurred additional
5 per diem costs by departing San Francisco on October 27, 2018 instead of October 26, the day he was
6 excused from trial. DE 176 at 5. Again, Plaintiffs have failed to provide evidence that any flight was
7 available from San Francisco to Raleigh/Durham on October 26, 2018 after Mr. Murphy’s dismissal from
8 trial (or that a flight purchased “on demand” several hours before departure would be available at the price
9 proffered by Plaintiffs). Further, Defendant purchased Mr. Murphy’s flight to San Francisco on October
10 23, 2018, after Defendant’s counsel learned at trial that Plaintiffs expected to rest their case on October
11 25, potentially allowing the Court to hear Mr. Murphy’s testimony on October 26 (after Paul Mishkin’s
12 testimony)¹. Defendant purchased Mr. Murphy’s return flight on October 25, 2018, when it became clear
13 that Mr. Murphy would testify on October 26, although the specific timing of his testimony on that day
14 was unclear.

15 Regarding Plaintiff’s argument that Mr. Murphy’s alcohol costs are not recoverable, 5 U.S.C.
16 §5702 provides for “a per diem allowance at a rate not to exceed that established by the Administrator of
17 General Services for travel within the continental United States.” The Administrator of General Services
18 provides a Meals & Incidentals Breakdown including allowed costs for “breakfast, lunch, dinner, [and]
19 incidentals.”² Plaintiffs fail to provide any support for cherry-picking what is and is not compensable
20 under the per diem allowance under 5 U.S.C. §5702.

21 **III. CONCLUSION**

22 Defendant is entitled to costs denied by the clerk in the amount of \$6,635.70.
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25
26

27 ¹ Mr. Murphy’s flight receipts are attached as Exhibit B.

28 ² The Meals & Incidentals Breakdown for San Francisco, CA can be found at https://www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-rates-lookup/?action=perdiems_report&state=CA&fiscal_year=2019&zip=&city=San%20Francisco%20.

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Dated: March 21, 2019

Respectfully submitted,
YOUNG BASILE HANLON & MACFARLANE, P.C.

By: /s/ Jeffrey D. Wilson
Jeffrey D. Wilson (Pro Hac Vice)
wilson@youngbasile.com
Eddie D. Woodworth (Pro Hac Vice)
woodworth@youngbasile.com

-and-

IMAI, RADLOCK, KEENEY & CORDERY, LLP
R. Randy Wertz
rrwerts@itkc.com

Attorneys for Defendant
IXL Learning, Inc.

EXHIBIT A

From: AMI SANGHVI <AMI.SANGHVI@EEOC.GOV>
Sent: Thursday, January 25, 2018 3:52 PM
To: Eddie D. Woodworth; Natasha Menezes; Jeffrey D. Wilson
Cc: David Marek; MARCIA MITCHELL; Hind Samona; COLLEEN MCCARTNEY
Subject: RE: EEOC v IXL

Hi Ed,

I can confirm that we can receive the metadata for date and time in separated fields.

Re: our production: We would prefer to produce the data as we currently have it – which in some cases, combines date and time in one field. The reason behind this is because that is how the data was collected. We use X1 for social media collections and that tool collects the information with date and time in one field. Given that, are you ok accepting the metadata in a combined field and then either creating a new field or separating out before you load into your platform as you see fit?

Ami

From: Eddie D. Woodworth [mailto:woodworth@youngbasile.com]
Sent: Thursday, January 25, 2018 11:23 AM
To: AMI SANGHVI <AMI.SANGHVI@EEOC.GOV>; Natasha Menezes <menezes@youngbasile.com>; Jeffrey D. Wilson <wilson@youngbasile.com>
Cc: David Marek <david@marekfirm.com>; MARCIA MITCHELL <MARCIA.MITCHELL@EEOC.GOV>; Hind Samona <samona@youngbasile.com>; COLLEEN MCCARTNEY <COLLEEN.MCCARTNEY@EEOC.GOV>
Subject: RE: EEOC v IXL

Thanks, Ami. I do not think we actually discussed your question below, and as I sit here, I am not sure what the answer to your question is. Can I add this to my list for tomorrow when I discuss with Logikcull? My sense is that we would prefer if you can break out the date and time fields, but I will need to confirm.

Thanks,

Ed

YOUNG BASILE

Eddie D. Woodworth | 248-649-3333 | woodworth@youngbasile.com

YOUNG BASILE HANLON & MACFARLANE P.C.

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From: AMI SANGHVI [mailto:AMI.SANGHVI@EEOC.GOV]
Sent: Thursday, January 25, 2018 2:19 PM
To: Natasha Menezes <menezes@youngbasile.com>; Jeffrey D. Wilson <wilson@youngbasile.com>
Cc: David Marek <david@marekfirm.com>; MARCIA MITCHELL <MARCIA.MITCHELL@EEOC.GOV>; Hind Samona

<samona@youngbasile.com>; COLLEEN MCCARTNEY <COLLEEN.MCCARTNEY@EEOC.GOV>; Eddie D. Woodworth <woodworth@youngbasile.com>

Subject: RE: EEOC v IXL

Natasha & Ed – one quick follow up from our call that my notes were not clear on. I understand that you would like to produce the metadata fields separating out the time and date and need an answer on whether the increase in the # of metadata fields is a problem for us. What I am unclear on though is whether you require that we separate out these fields before producing to you or if you can separate on your end if we produce date and time in one field? I don't know the answer of whether that is even possible on our end, but I just wanted to make sure I understood that correctly. Thanks for any clarification that you can provide.

Ami

From: Natasha Menezes [<mailto:menezes@youngbasile.com>]
Sent: Thursday, January 25, 2018 9:19 AM
To: AMI SANGHVI <AMI.SANGHVI@EEOC.GOV>; Jeffrey D. Wilson <wilson@youngbasile.com>
Cc: David Marek <david@marekfirm.com>; MARCIA MITCHELL <MARCIA.MITCHELL@EEOC.GOV>; Hind Samona <samona@youngbasile.com>; COLLEEN MCCARTNEY <COLLEEN.MCCARTNEY@EEOC.GOV>; Eddie D. Woodworth <woodworth@youngbasile.com>
Subject: RE: EEOC v IXL

That works for us. We will call you around 10:00 PST.

From: AMI SANGHVI [<mailto:AMI.SANGHVI@EEOC.GOV>]
Sent: Thursday, January 25, 2018 12:02 PM
To: Natasha Menezes <menezes@youngbasile.com>; Jeffrey D. Wilson <wilson@youngbasile.com>
Cc: David Marek <david@marekfirm.com>; MARCIA MITCHELL <MARCIA.MITCHELL@EEOC.GOV>; Hind Samona <samona@youngbasile.com>; COLLEEN MCCARTNEY <COLLEEN.MCCARTNEY@EEOC.GOV>; Eddie D. Woodworth <woodworth@youngbasile.com>
Subject: RE: EEOC v IXL

Thanks Natasha –I am also generally available today and am happy to have a call. Can we aim for 10:00 am PST?

Ami

From: Natasha Menezes [<mailto:menezes@youngbasile.com>]
Sent: Thursday, January 25, 2018 6:46 AM
To: AMI SANGHVI <AMI.SANGHVI@EEOC.GOV>; Jeffrey D. Wilson <wilson@youngbasile.com>
Cc: David Marek <david@marekfirm.com>; MARCIA MITCHELL <MARCIA.MITCHELL@EEOC.GOV>; Hind Samona <samona@youngbasile.com>; COLLEEN MCCARTNEY <COLLEEN.MCCARTNEY@EEOC.GOV>; Eddie D. Woodworth <woodworth@youngbasile.com>
Subject: RE: EEOC v IXL

Ami,

Do you have time for a call today to discuss ESI? I have included Ed Woodworth on this email. Ed is an attorney with our firm who specializes in ESI and will be able to address your logistical points below. Ed and I are generally available today.

Thanks,
Natasha

From: AMI SANGHVI [<mailto:AMI.SANGHVI@EEOC.GOV>]
Sent: Wednesday, January 24, 2018 12:48 PM
To: Natasha Menezes <menezes@youngbasile.com>; Jeffrey D. Wilson <wilson@youngbasile.com>
Cc: David Marek <david@marekfirm.com>; MARCIA MITCHELL <MARCIA.MITCHELL@EEOC.GOV>; Hind Samona <samona@youngbasile.com>; COLLEEN MCCARTNEY <COLLEEN.MCCARTNEY@EEOC.GOV>
Subject: RE: EEOC v IXL

Thanks Natasha. I also wanted to raise a few logistical points with you so that we are on the same page re: production of documents electronically.

1. Metadata associated with the ESI: As indicated on the Concordance spec sheet I sent in December, we would like ESI to be produced in single-page TIFF format (300 DPI resolution) with corresponding document-level extracted text and a Concordance-delimited DAT file containing the metadata fields. We did not however finalize the specific metadata fields. I propose the fields in the attached document. We will comply with this in our production of ESI to the extent that such metadata is available. Please let me know if you have concerns or questions and if you agree to producing the same metadata fields where available.
2. Format of production that Defendant prefers: I have not received any indication from Defendant about how you would like the documents produced and I am unaware of what litigation review platform you are utilizing. We can, of course, produce the discovery in the same format that we have requested it. Please let me know in advance of Friday if you have specific requests that I need to be aware of.
3. Privilege logs: I propose that the parties identify and agree to a category of "clearly privileged" documents that do not need require a document-by-document catalogue in a privilege log. Primarily, I think it would minimize the burden for all parties given the ease of identifying relevant communication with counsel in the age of electronic discovery. Secondly, I believe Courts are increasingly in favor of permitting less detailed disclosure in appropriate, well-defined circumstances. To that end, I propose the following: The parties agree to forego the need for a document-by-document listing of communications between the following entities:
 - a. IXL and private outside counsel;
 - b. Adrian Scott Duane and attorneys and staff of Liddle & Robinson;
 - c. Adrian Scott Duane and David Marek of the Marek Law Firm;
 - d. Adrian Scott Duane and EEOC personnel after issuance of the EEOC's Letter of Determination;
 - e. Adrian Scott Duane and any counsel for the purpose of requesting or receiving legal advice relating to the allegations in the complaint.
4. Thread suppression: We utilize Concordance as our litigation review software and therefore unfortunately do not have an automated email thread suppression process. In an effort to reduce the number of duplicate documents I intend on producing the most complete version of an email thread between the same group of senders and recipients. (Rather than also producing the 10 sub-parts to a conversation)

Are you willing to similarly conduct an analysis to reduce the number of duplicate emails in a thread?

Thank you,

Ami

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

EXHIBIT B



Hi Jeremy,

We're looking forward to flying together! It can't come soon enough. Below you'll find your itinerary, important travel information, and trip receipt. See you onboard soon!

OCTOBER 25

RDU  SFO

Raleigh/Durham to San Francisco

Confirmation # **UZXP2B**

Confirmation date: 10/23/2018

PASSENGER **Jeremy Murphy**
 RAPID REWARDS # [Join](#) or [Log in](#)
 TICKET # 5262401976764
 EXPIRATION¹ October 24, 2019
 EST. POINTS EARNED 2,758

Rapid Rewards® points are only estimations.

Your itinerary

Flight: Thursday, 10/25/2018 Est. Travel Time: 7h 35m [Wanna Get Away®](#)

FLIGHT # 1317

DEPARTS
RDU 10:05AM
Raleigh/Durham



ARRIVES
DEN 11:50AM
Denver

Stop:  Change planes

FLIGHT # 2191

DEPARTS
DEN 01:00PM
Denver



ARRIVES
SFO 02:40PM
San Francisco

Payment information

Total cost

Payment

Amer Express ending in 
Date: October 23, 2018

Payment Amount: \$516.79



Tatum Radcliffe <tradcliffe@ixl.com>

Expedia travel confirmation - Oct 27 - (Itinerary # 7387972869886)

1 message

Expedia.com <Expedia@expediamail.com>
Reply-To: Expedia@expediamail.com
To: tradcliffe@ixl.com

Thu, Oct 25, 2018 at 3:49 PM



Thanks!

Your reservation is booked and confirmed. There is no need to call us to reconfirm this reservation.

Raleigh

Oct 27, 2018 - Oct 27, 2018

Because you booked a flight, you qualify for up to 43% off Raleigh hotels.

Expires Sat, October 27

[See hotels](#)

See live updates to your itinerary, anywhere and anytime.

[See your itinerary](#)

[Download to your Phone](#)

Before you go

- **E-ticket:** This email can be used as an E-ticket.
- Remember to bring your itinerary and government-issued photo ID for airport check-in and security.

Contact the airline to confirm:

- specific seat assignments
- special meals
- frequent flyer point awards
- special assistance requests

Flight overview

Your reservation is booked and confirmed. There is no need to call us to reconfirm this reservation.

Travel dates

Oct 27, 2018 - Oct 27, 2018

Itinerary #

7387972869886

Confirmation

G5WR4J (United)

Booking ID

LSJDQC

Ticket #

0167267025844 (Jeremy David Murphy)

[Change](#) or [cancel](#) this reservation

You still have time to protect your trip.

[Protect My Trip](#)

Expires 24 hours after confirmation of flight booking



Departure

Sat, Oct 27

United 1521

San Francisco (SFO)

9:30am

Terminal: 3

Gate 72



Raleigh (RDU)

5:44pm

Terminal: 2

Gate D14

Cabin: Economy / Coach (U)

5h 14m duration

Total Duration

5h 14m

Traveler(s)

Jeremy David Murphy

No frequent flyer details provided

Frequent flyer and special assistance requests should be confirmed directly with the airline.

Price summary

Expedia Rewards

Traveler 1: Adult	\$508.20
Flight	\$459.53
Taxes & Fees	\$48.67

133 points for this trip

Total \$508.20

All prices are quoted in USD.

Additional information

Additional fees

The airline may charge [additional fees](#) for checked baggage or other optional services.

Airline rules + restrictions

We understand that sometimes plans change. We do not charge a cancel or change fee. When the airline charges such fees in accordance with its own policies, the cost will be passed on to you.

Please read the [complete penalty rules for changes and cancellations](#) applicable to this fare.

Tickets are nonrefundable and nontransferable. Itinerary changes are permitted, fee may apply.

Please read important information regarding [airline liability limitations](#).

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FLIGHT&EMLDL=DATE20181025-ISSUX.SIDX.KEY93679051698.PAIDX.LANGEN_US.MCIDX.TEST1.
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