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June 7, 2000

ORIGINAL

VIA TELECOPY

The Honorable Richard L. Sippel  
Administrative Law Judge  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

RECEIVED

JUN - 8 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Itemized Statement of Telemundo's Costs and Expenses

Dear Judge Sippel:

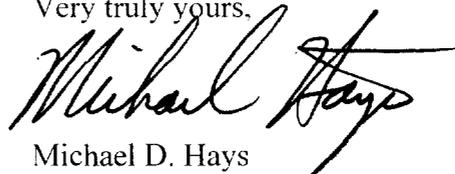
Pursuant to your Order dated May 26, 2000, enclosed please find an itemized accounting of the costs and expenses incurred. We respectfully request that you order Reading to pay the amount set forth in the enclosed accounting.

The subpoena in this case, as noted in Telemundo's prior submissions, sought essentially the same documents that Reading also sought in the Philadelphia federal district court action. Accordingly, in preparing the document production, which was essentially the same in both actions, Telemundo relied on both Washington, D.C. counsel (Dow, Lohnes & Albertson) and Philadelphia counsel (Ballard Spahr Andrews and Ingersoll, LLP).

In terms of the accounting, it is important to note that, when Dow, Lohnes professionals were working on the joint production, the accounting includes only half of their fees. Moreover, the accounting does not include the costs and expenses of attorneys and legal assistants at Ballard, Spar. which incurred substantial costs and expenses in reviewing and stamping documents and preparing the privilege log. Thus, the figures included in the accounting are very conservative.

Please advise us if you wish any further information on our fees and expenses.

Very truly yours,

  
Michael D. Hays

MDH/ses

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List A B C D E

The Honorable Richard L. Sippel  
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Page 2

cc w/encl. via telecopy: James Shook, Esquire  
Thomas Hutton, Esquire  
Harry Cole, Esquire

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bcc w/encl. by telecopy: Ms. Ann Gaulke  
David H. Pittinsky, Esquire

bcc w/encl.: Kevin F. Reed, Esquire  
M. Anne Swanson, Esquire

NON-PARTY TELEMUNDO DISCOVERY EFFORTS AND EXPENSE

Telephone conferences with H. Cole and T. Hutton re upcoming subpoenas and discovery requests; acceptance of service of subpoena; review of same; telephone conferences with client and correspondence to client re same; review firm files; telephone conferences with T. Hutton re production issues; telephone conferences with Telemundo's federal district court counsel re document production; review of firm and client documents; conferences re document production; copying, assembly, and production of documents; review of privilege log; preparation of opposition pleadings on discovery issues; attendance at ALJ discovery conference; review of telephone records, billing records, A. Swanson's work papers, and A. Swanson's personal calendars; redaction, copying, assembly and production (on 6/8) of same; assembly of cost and expense data; correspondence to ALJ re same.

PROFESSIONAL FEES

<u>Timekeeper</u>	<u>Date</u>	<u>Time</u>		
Michael D. Hays	5/8/2000	1.8		
	5/9/2000	.4		
	5/10/2000	1.2		
	5/11/2000	.3		
	5/15/2000	.4		
	5/17/2000	.7		
	5/18/2000	.3		
	5/19/2000	2.4		
	5/23/2000	.8		
	5/24/2000	2.6		
	5/25/2000	2.6		
	5/30/2000	1.2		
	6/1/2000	4.4		
	6/2/2000	2.4		
	6/7 + 6/8 (est.)	<u>4.0</u>		
			Total time:	25.5
M. Anne Swanson	5/4/2000	.1		
	5/5/2000	.8		
	5/8/2000	1.0		
	5/9/2000	.9		
	5/10/2000	.4		
	5/11/2000	1.1		
	5/15/2000	.2		
	5/17/2000	.3		
5/18/2000	2.6			
5/19/2000	.6			

<u>Timekeeper</u>	<u>Date</u>	<u>Time</u>		
	5/22/2000	.6		
	5/23/2000	.8		
	5/24/2000	1.6		
	5/25/2000	1.8		
	5/26/2000	1.6		
	5/30/2000	.2		
	6/1/2000	1.3		
	6/2/2000	1.2		
	6/4/2000	1.6		
	6/5/2000	.2		
	6/6/2000	1.2		
	6/7 + 6/8 (est.)	<u>10.0</u>		
			Total time:	30.1
Todd B. Klessman	6/1/2000	<u>3.3</u>		
			Total time:	3.3
Naira Darius	5/18/2000	.9		
	5/19/2000	1.2		
	5/30/2000	.1		
	6/7 + 6/8 (est.)	<u>8.0</u>		
			Total time:	10.2
Margaret E. Vayo	5/18/2000	<u>.7</u>		
			Total time:	.7
Joshua M. Davis	5/11/2000	5.1		
	5/15/2000	1.9		
	5/17/2000	3.3		
	6/7 + 6/8 (est.)	<u>10.0</u>		
			Total time:	20.3
Stephanie M. Martinez	5/11/2000	<u>.5</u>		
			Total time:	.5
Total hours billed:				90.6
Total professional fees:				<u>\$24,279.50</u>

COSTS

Telephone, copying, messenger, faxing,  
postage, transportation  
(Total reflects the proportion professional  
fees listed above bear to total  
costs in account for the same period)

Total Costs: \$668.08

Total professional fees and costs \$24,947.58