CLERK'S OFFICE
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

APR 28 1 42 PM '03

RECEIVED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELOUISE COBELL, et al.,

Plaintiffs,

GALE NORTON, et al.,

Defendants.

Case No. 1:96CV01285 (RCL)
(Judge Lamberth)

INTERIOR DEFENDANTS' MOTION TO DISQUALIFY JOSEPH CHRISTIE AS EXPERT WITNESS FOR PLAINTIFFS AND TO DISQUALIFY DENNIS GINGOLD AS COUNSEL FOR JOSEPH CHRISTIE

Pursuant to Local Rule 7.1, Interior Defendants respectfully move to disqualify Joseph Christie – a retired Department of the Interior employee and a paid consultant to the Special Master in this matter – from testifying as an expert witness on behalf of the plaintiff class. In addition, Interior Defendants move to disqualify Dennis Gingold from serving as Mr. Christie's counsel in these proceedings.[1]

As is more fully explained below, Mr. Christie's service as a testifying expert for Plaintiffs and as a consulting expert for the Special Master creates at least the appearance of impropriety with regard to Mr. Christie's, and, derivatively, the Special Master's, impartiality in this matter. Permitting Mr. Christie to serve as Plaintiffs' expert would create prejudice and unfairness for Interior Defendants, who have provided confidential and privileged information to

[1] In accordance with Local Civil Rule 7.1(m), counsel for Interior Defendants attempted to reach Mr. Gingold, counsel for Plaintiffs and Mr. Christie, to confer regarding this motion. Mr. Gingold has not responded, and Interior Defendants presume Plaintiffs and Mr. Christie will oppose this motion.

the Special Master. To remedy this appearance of impropriety and to preserve the integrity of these proceedings, the Court should disqualify Mr. Christie as an expert for the plaintiff class.

In addition, to avoid (1) the appearance of impropriety created by counsel for Plaintiffs also representing the Court's consultant and (2) the conflict of interest resulting from Mr. Gingold's dual representation of Plaintiffs and of a witness in the proceeding, the Court should disqualify Mr. Gingold from serving as Mr. Christie's counsel.

FACTUAL BACKGROUND

Mr. Christie is a former employee of the Department of the Interior ("Interior"). This Court described Mr. Christie's tenure at Interior as follows:

> Joseph Christie is a former employee of the Department of the Interior . . . whose twenty-eight years of tenure with the Department include services as an agency superintendent where he "[m]anaged trust programs on an Agency level," and "[w]orked on Trust Litigation," as Deputy Director of Education for the Bureau of Indian Affairs, as a member of the Tribal Reconciliation Project and as the Director of the Office of Trust Litigation Support and Records–the office that later became known as OTR. These positions have required him to collect and image documents, publish reports, meet with tribes, draft settlement legislation and provide planning and budget information to the Department of the Interior, Congressional Offices and the Office of Management and Budget.

Memorandum and Order at 2 (Mar. 29, 2002).

In February, 2001, Special Master Balaran retained Mr. Christie as an "advisor to the Special Master in his investigation of the Office of Trust Records." Id. at 1. "Specifically, [Mr.] Christie was retained to 'assist the Special Master in his review and analysis of the thousands of documents presented by the Defendant[s] and . . . accompany[] the Special Master to facilities which store trust records and during his interviews with Interior employees.'" Id. at 4-5 (quoting

Order of the Special Master, at 13 (July 23, 2001)). On May 29, 2001, Defendants filed a motion to rescind the Special Master's hiring of Mr. Christie; this Court denied the motion on March 29, 2002. Billing records for Mr. Christie suggest he has rendered services to the Special Master as recently as February, 2003.

The "Phase 1.5" trial is scheduled to commence on May 1, 2003. Plaintiffs' witness list for the trial identifies Mr. Christie as an expert witness and describes his expected testimony as follows: "Matters concerning the parties' compliance plans, including the effectiveness and credibility of DOI fiduciary management regarding records management and the need for central records facility; consequences of inadequate records management and compliance; and [the] need for [a] remedial order in the nature and scope of plaintiffs' proposed order." Plaintiffs' Witness List at 2.

On March 19, 2003, Defendants served a subpoena duces tecum on Mr. Christie, requiring him to appear for deposition on April 3, 2003. Plaintiffs responded by moving for a protective order that would, among other things, limit the scope of documents Mr. Christie must produce and the range of questions Interior Defendants can pose to Mr. Christie. See Plaintiffs' Motion For Protective Order (April 1, 2003). Plaintiffs' motion for a protective order contained a footnote stating that "Dennis M. Gingold, one of plaintiffs' counsel, also represents Mr. Christie in this matter and joins in the motion with respect to his subpoena." Id. n.4.

ARGUMENT

I. Mr. Christie Should Be Disqualified From Serving As Plaintiffs' Expert.

Federal courts have the inherent power to disqualify expert witnesses. Koch Ref. Co. v. Boudreaux MV, 85 F.3d 1178, 1181 (5th Cir. 1996) (citing Campbell Indus. v. M/V Gemini, 619

F.2d 24, 27 (9th Cir. 1980)). The exercise of this power serves to prevent conflicts of interest and maintain the integrity of the judicial process. Id. at 1182; see also United States v. Salamanca, 244 F. Supp. 2d 1023, 1026 (D.S.D. 2003).

Mr. Christie's service as Plaintiffs' expert endangers his neutrality and imperils the integrity of, and public confidence in, the Special Master's activities. The Court appointed the Special Master; the Special Master, in turn, retained Mr. Christie as an advisor to assist him. The Special Master is an officer of this Court, duty bound both to maintain impartiality in his activities and to avoid the appearance of impropriety.[2] Likewise, Mr. Christie's role requires him to maintain neutrality with regard to the work he has performed for the Special Master. In re Edgar, 93 F.3d 256, 262 (7th Cir. 1996) ("Experts appointed and supervised by a court carry special weight because of their presumed neutrality.").

Certainly the Special Master could not serve as an expert witness for Plaintiffs without compromising his impartiality and raising the appearance of impropriety. To permit the Special Master's retained consultant to serve as an expert witness for Plaintiffs with regard to the very matters on which he advises the Special Master will create the appearance of impropriety by Mr. Christie, and, derivatively, by the Special Master. Permitting Mr. Christie to testify regarding information he obtained as an advisor to the Special Master would also circumvent Federal Rule of Civil Procedure 53, which requires a special master to make written reports and recommendations concerning findings of fact and conclusions of law to the court, which must

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[2] The Court discussed the Special Master's role and relationship to the Court at length in its recent decision on the motions to disqualify. See Cobell v. Norton, 237 F. Supp. 2d 71 (D.D.C. 2003).

ultimately decide to adopt or reject such findings and conclusions after considering written responses and objections by the parties.

Furthermore, disqualification of an expert witness is required when the expert has had a confidential relationship with the objecting party. Wang Labs., Inc. v. Toshiba Corp., 762 F. Supp. 1246, 1248 (E.D. Va. 1991)). In making such disqualification determinations, courts assess: (1) whether it is objectively reasonable for the objecting party to conclude that a confidential relationship existed with the expert; and (2) whether the objecting party disclosed any confidential or privileged information to the expert. Mayer v. Dell, 139 F.R.D. 1, 3 (D.D.C. 1991) (quoting Wang Labs., Inc., 762 F. Supp. at 1248). By analogy, in this case, it is objectively reasonable to conclude that Defendants have a confidential relationship with the Special Master in the sense that they have provided a significant volume of confidential and privileged information to him. Interior Defendants have no way of knowing how much of their confidential or privileged information has been shared with Mr. Christie; indeed, as noted above, both Mr. Christie and Plaintiffs have attempted to limit Interior Defendants' discovery. But Mr. Christie's billing records (attached for reference at Exhibit A) are filed in this Court and demonstrate that he has gathered information on a number of sensitive matters, spoken with numerous unidentified individuals, and engaged in extensive consultations with the Special Master. Plaintiffs cannot now use Mr. Christie to testify on their behalf on the same subject matters for which he has been retained to assist the Special Master.[3] Under these circumstances, Mr.

[3] Moreover, Mr. Christie is statutorily prohibited from testifying as an expert about matters in which he "participated personally and substantially," 18 U.S.C. § 207(a), while employed at Interior absent a court order requiring him to serve as an expert witness for Plaintiffs. 18 U.S.C. § 207(j)(6)(A) ("[A] former officer or employee of the executive branch of the United States (including any independent agency) who is subject to the restrictions contained

Christie cannot serve as an expert witness for Plaintiffs. Cf. Paul v. Rawlings Sporting Goods, Inc., 123 F.R.D. 271, 277 (S.D. Ohio 1988) ("The law will imply a relationship of confidence when it is just to do so.") (quoting Conforti & Eiselle, Inc. v. Div. of Bldg. and Constr., 405 A.2d 487, 492 (N.J. Super. Ct. App. Div. 1979)).

Mr. Christie is "simply too close and too intimately involved on the part of [the Special Master] in the very process which will be examined in this case for the Court [to] allow him to testify as an expert for the [P]laintiffs." Theriot v. Parish of Jefferson, Case No. 95-2453, 1996 WL 392149, *2 (E.D. La. July 8, 1996).[4] The Court should act to protect public confidence in this case and preclude Mr. Christie from serving as an expert witness for Plaintiffs in the Phase 1.5 trial. See Sells v. Wamser, 158 F.R.D. 390, 393 (S.D. Ohio 1994) ("[T]he overall guiding principle is to preserve the integrity of court proceedings, and [] any remedy imposed in a case where an expert witness has a conflict of interest should promote fundamental fairness in the litigation process.").

II. Mr. Gingold Should Be Disqualified From Serving As Mr. Christie's Counsel

Disqualification of counsel rests within the sound discretion of the Court, and arises from the Court's inherent supervisory power over the professionalism of lawyers practicing before it. Groper v. Taff, 717 F.2d 1415, 1418 (D.C. Cir. 1983); Palumbo v. Tele-Communications, Inc.,

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in [18 U.S.C. § 207(a)(1)] with respect to a particular matter may not, except pursuant to court order, serve as an expert witness for any other person (except the United States) in that matter.")

[4] This is not a case in which Plaintiffs will be unfairly deprived of expert testimony. Plaintiffs have had ample time to locate and prepare an expert for trial without appropriating the Court's advisor. Koch Refining, 85 F.3d at 1183.

157 F.R.D. 129, 131 (D.D.C. 1994). Counsel's violation of applicable ethical rules supplies a basis for disqualification. Palumbo, 157 F.R.D. at 132.

Although courts treat motions to disqualify with caution, "any doubt is to be resolved in favor of disqualification." Derrickson v. Derrickson, 541 A.2d 149, 152 (D.C. 1988) (citing Mondello v. Mondello, 499 N.Y.S.2d 9, 10 (N.Y. App. Div. 1986)); see also Rentclub, Inc. v. Transamerica Rental Finance Corp., 811 F. Supp. 651, 654 (M.D. Fla. 1992), aff'd, 43 F.3d 1439 (11th Cir. 1995). In this circuit, counsel may be disqualified even where no present impropriety exists, particularly where important societal interests are at stake. E.g., Kessenich v. CFTC, 684 F.2d 88, 98 (D.C. Cir. 1982) (citing Yablonski v. United Mine Workers, 448 F.2d 1175, 1177-82 (D.C. Cir. 1971)). As this Court observed in Palumbo, the class action setting imposes a particularly "heightened" professional standard upon class counsel due in part to his obligations to absent class members. Palumbo, 157 F.R.D. at 132 -33 (disqualifying class counsel) (citing Smith v. Josten's American Yearbook Co., 78 F.R.D. 154, 163 (D. Kan. 1978), aff'd, 624 F.2d 125 (10th Cir. 1980)). These standards require the Court to disqualify Mr. Gingold from representing Mr. Christie in this case.

The D.C. Circuit has held that the Code of Conduct for United States Judges applies to special masters.[5] Jenkins v. Sterlacci, 849 F.2d 627, 632 (D.C. Cir. 1988) (A "special master must hold himself to the same high standards applicable to the conduct of judges."); see also Belfiore v. New York Times Co., 826 F.2d 177, 185 (2d Cir. 1987); In re Joint E. & S. Dist.

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[5] This Court distinguished Jenkins in its decision denying the motions of certain individuals to disqualify the Special Master and others in this case, largely on the ground that the Court would not afford the findings of the Special Master the benefit of "clearly erroneous " deference in the contempt proceedings now before him. Cobell v. Norton, 237 F. Supp. 2d 71, 84 (D.D.C. 2003).

Asbestos Litig., 737 F. Supp. 735, 739 (E.& S.D.N.Y. 1990). The Code of Conduct for United States Judges ("Code of Conduct") requires judges to "act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary." Code of Conduct, Canon 2A. "The test for appearance of impropriety is whether the conduct would create in reasonable minds, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired. Id., cmt. The Code of Conduct imposes a duty of impartiality and further requires judicial officers to take reasonable steps to ensure impartiality by law clerks and other court personnel. See Code of Conduct, Canon 3 & cmt.[6]

The D.C. Rules of Professional Conduct require Mr. Gingold to "avoid contributing to a violation of" the Code of Conduct. D.C. R. Prof. Conduct 3.5 cmt. 1. Yet his representation of both the plaintiff class and Mr. Christie does precisely this by drawing into question the integrity and impartiality of the Special Master's investigation. Mr. Gingold's dual representation gives him undeniable influence over how Mr. Christie will respond to discovery and testify at trial. In effect, Mr. Gingold's representation of Mr. Christie permits the class to influence Mr. Christie's participation in this case, thus stripping Mr. Christie of his presumed neutrality and imbuing him with the partisanship of the plaintiff class. The unavoidable consequence of Mr. Gingold's representation of Mr. Christie will be a perception that the Special Master's investigation has

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[6] The D.C. Circuit has applied the Code of Conduct in a variety of contexts. See, e.g., Pioneer Hotel, Inc. v. NLRB, 182 F.3d 939, 944 (D.C. Cir. 1999) (analyzing ex parte contacts under Canon 3B(7)); Clifford v. United States, 136 F.3d 144, 149 n.6 (D.C. Cir. 1998) (disqualification of judge for impartiality proper under certain circumstances pursuant to Canon 3E(1)); United States v. Barry, 961 F.2d 260, 263 (D.C. Cir. 1992) (analyzing out-of-court comments by judge under Canon 3A(6)).

been compromised. See Rentclub, Inc., 811 F. Supp. at 655 (appearance of impropriety arises from inference that attorney induced another to breach a confidence).

Mr. Gingold's dual representation raises another ethical dilemma in the form of a potential conflict of interest between his clients. Rule 1.7(b) of the D.C. Rules of Professional Conduct states that:

> [A] lawyer shall not represent a client with respect to a matter if:
>
> (1) That matter involves a specific party or parties, and a position to be taken by that client in that matter is adverse to a position taken or to be taken by another client in the same matter....
>
> (2) Such representation will be or is likely to be adversely affected by representation of another client; [or]
>
> (3) Representation of another client will be or is likely to be adversely affected by such representation.

D.C. R. Prof. Conduct 1.7(b).

Courts have interpreted this rule as presenting an ethical barrier to a lawyer representing both a party in interest and a witness in the same matter. See In re Cendant Corp. Sec. Litig., 124 F. Supp. 2d 235 (D.N.J. 2000); see also Bobokoski v. Bd. of Educ., No. 90-C-5737, 1991 WL 140150 (N.D. Ill. July 23, 1991). In granting a motion to disqualify under Rule 1.7 in a class action securities fraud case, the court in Cendant Corp. held that a lawyer could not represent the named defendant in a case in which it also represented a former officer of that company who was a critical and potentially adverse witness in the matter. In describing the many hazards of such a dual representation, the court observed:

> as a general matter examining one's own client as an adverse witness on behalf of another client, or conducting third party discovery of one client on behalf of another client, is likely (1) to

> pit the duty of loyalty to each client against the duty of loyalty to the other; (2) to risk breaching the duty of confidentiality to the client-witness; and (3) present a tension between the lawyer's own pecuniary interest in continued employment by the client-witness and the lawyer's ability to effectively represent the litigation client. The first two of these hazards are likely to present a direct adverseness of interest falling within Rule 1.7(a); all three may constitute material limitations on the lawyer's representation, so as to come under Rule 1.7(b).[7]

Cendant Corp., 124 F. Supp. 2d at 241-42 (emphasis omitted) (quoting ABA Formal Opinion No. 92-367 (October 16, 1992)).[8] The court emphasized that Rule 1.7 is violated where there is a mere "possibility of a breach occurring;" actual improper conduct is not required to establish a violation. Id. at 243, 244. This is because the rule is intended not to prevent actual conflicts but to bolster the public's confidence in the integrity of the legal profession. Id. at 245.

In his dual representation, Mr. Gingold will elicit the testimony of one client (Christie) for the benefit of another (the class). Should Mr. Christie offer views that are unfavorable to the class, Mr. Gingold will have to decide whether to impeach or question the credibility of his individual client or remain silent to the detriment of his class client. Particularly given the heightened standards imposed upon the professionalism of class counsel, disqualification of Mr.

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[7] In Cendant Corp., the conflicted firm had erected "walls" to eliminate intra-firm communications between lawyers representing the two clients but the court deemed those protections insufficient. 124 F. Supp. 2d at 243. Here, of course, no such measures are possible.

[8] Disqualification motions involving representation of both a witness and a party in the same matter arise frequently in the criminal context. See, e.g., Wheat v. United States, 486 U.S. 153, 160 (1988). While conflicts of interest in the criminal arena require a heightened concern for defendants' Sixth Amendment rights, equal judicial caution about permitting counsel to represent witnesses and parties in the same matter applies in civil cases. Compare Perillo v. Johnson, 205 F.3d 775, 808 (5th Cir. 2000) (conflict between former and present clients raised suspicion concerning defense strategies in criminal case) with Cendant Corp., supra.

Gingold as counsel for Mr. Christie is warranted for this reason as well.[9] See Palumbo, 157 F.R.D. at 132-33.

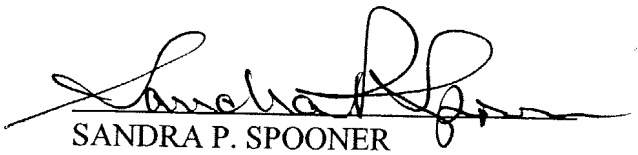
CONCLUSION

For all of the foregoing reasons, the Court should disqualify Mr. Christie from testifying as Plaintiffs' expert in this matter and disqualify Mr. Gingold from serving as counsel of record for Mr. Christie.

Dated: April 28, 2003

Respectfully submitted,

ROBERT D. McCALLUM, JR.
Assistant Attorney General
STUART E. SCHIFFER
Deputy Assistant Attorney General
J. CHRISTOPHER KOHN
Director



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[9] Rule 1.7(c) of the Rules of Professional Conduct permits an adversely affected party to waive any conflict of interest. However, as this Court ruled in Palumbo, absent class members cannot, as a matter of law, waive conflicts of interest. 157 F.R.D. at 133. Moreover, a waiver by Mr. Christie would only increase the appearance of impropriety discussed above.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELOUISE PEPION COBELL, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:96CV01285
	)	(Judge Lamberth)
GALE NORTON, Secretary of the Interior, et al.,	)	
	)	
Defendants.	)	
	)	

ORDER

Upon consideration of Interior Defendants' Motion To Disqualify Joseph Christie As Expert Witness For Plaintiffs And To Disqualify Dennis Gingold As Counsel For Joseph Christie ("Interior Defendants Motion"), any responses thereto, and the record of the case, it is hereby

ORDERED, that Interior Defendants' Motion is GRANTED. It is further

ORDERED, that Joseph Christie shall be disqualified from testifying as an expert witness for the plaintiffs in the Phase 1.5 trial; and it is further

ORDERED, that Dennis Gingold, counsel for the plaintiff class in this matter, shall be disqualified as counsel for Joseph Christie.

SO ORDERED this _____ day of _____, 2003.

_____
ROYCE C. LAMBERTH
United States District Judge

cc:

J. Christopher Kohn
Sandra P. Spooner
Commercial Litigation Branch
Civil Division
P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044-0875
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Dennis M Gingold, Esq.
Mark Brown, Esq.
1275 Pennsylvania Avenue, N.W.
Ninth Floor
Washington, D.C. 20004
202-318-2372

Keith Harper, Esq.
Native American Rights Fund
1712 N Street, NW
Washington, D.C. 20036-2976
202-822-0068

Elliott Levitas, Esq.
1100 Peachtree Street, Suite 2800
Atlanta, GA 30309-4530

CERTIFICATE OF SERVICE

I declare under penalty of perjury that, on April 28, 2003 I served the foregoing *Interior Defendants' Motion to Disqualify Joseph Christie as Expert Witness for Plaintiffs and to Disqualify Dennis Gingold as Counsel for Joseph Christie* by facsimile in accordance with their written request of October 31, 2001 upon:

Keith Harper, Esq.
Native American Rights Fund
1712 N Street, N.W.
Washington, D.C. 20036-2976
(202) 822-0068

Per the Court's Order of April 17, 2003, by facsimile and by U.S. Mail upon:

Earl Old Person (*Pro se*)
Blackfeet Tribe
P.O. Box 850
Browning, MT 59417
(406) 338-7530

By facsimile and U.S. Mail:

Alan L. Balaran, Esq.
Special Master
1717 Pennsylvania Avenue, N.W.
13th Floor
Washington, D.C. 20006
(202) 986-8477

Dennis M Gingold, Esq.
Mark Kester Brown, Esq.
1275 Pennsylvania Avenue, N.W.
Ninth Floor
Washington, D.C. 20004
(202) 318-2372

By U.S. Mail upon:

Elliott Levitas, Esq
1100 Peachtree Street, Suite 2800
Atlanta, GA 30309-4530

K.P. Kingston

Kevin P. Kingston

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
2/25/2001	1

Bill To

Alan I. Balaran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
2/12 3 hours work on quarterly reports	390.00
2/14 4 hours work on collected materials and quarterly reports	520.00
2/15 3 hours work on materials collected and quarterly reports	390.00
2/20 3 hours work on collected materials with T.W. discussions of the materials	390.00
2/21 2 hours Faxed materials worked on Financial status materials	260.00
2/22 discussions with Balaran faxed materials	130.00
2/25 discussions with Balaran, analysis of faxed materials refaxed with discussion.	390.00
2/21 faxes sent or received	33.00
2/22 faxes sent or received	8.00
2/25 faxes sent or received	19.00
New Mexico Gross receipts tax 5.8125% on gross $2550.00	147.05
Total	$2,677.05

EXHIBIT A

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
3/20/2001	2

Bill To

Alan I. Baharan
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
2-28 3 hours Analysis of materials	390.00T
3-5 2 hours faxes to Special Master and organizing materials	260.00T
3-5 faxes sent or received	31.00
3-6 2 hours begin review and analysis of trust tng	260.00T
3-7 1 hour discussion with TW	130.00T
3-7 2 faxes sent or received	2.00
3-8 1 hour	130.00T
3-8 2 faxes sent or received	2.00
3-9 1 hour discussions with Special Master and organizing	130.00T
3-12 5 hours completed review of Trust tng materials	650.00T
3-12 2 faxes sent or received	2.00
3-13 1 hour discussions	130.00T
3-14 9 hours 2 pre meeting 7 with Special Master	1,170.00T
3-14 cost of parking while working on project	4.00
3-14 cost of duplication at Kinko's or other location	5.56
3-15 7 hours with Special Master	910.00T
3-15 cost of parking while working on project	4.00
3-15 cost of duplication at Kinko's or other location	4.00
3-16 10 hours with Special Master	1,300.00T
3-16 cost of parking while working on project	4.00
3-18 6 hours 31/2 with Special Master 2 1/2 duplication of requested materials	780.00T
3-18 cost of duplication at Kinko's or other location	57.49
3-19 shipping materials and discussions	260.00T
3-19 shipping of materials via mail Boxes Etc.	43.13
3-20 faxes sent or received	4.00
3-21 7 hours material for HLIP	910.00T
3-21 faxes sent or received	4.00
3-22 7 hours work on materials for Special Master	910.00T
3-22 faxes sent or received	6.00
3-22 cost of duplication at Kinko's or other location	26.89
3-23 6 hours work on material for Special Master	780.00T
3-23 shipping of materials via mail Boxes Etc.	19.98
New Mexico Gross receipts tax	528.94
Total	$9,848.99

Invoice

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
4/25/2001	3

Bill To

Alan L. Balaran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
03-25 1 hr reviewed Financial data discussion	130.00T
03-26 3 hrs Financial Chart and Contracting chart	390.00T
03-26 5 pages of faxes sent or received	5.00T
03-27 7 hours analysis of materials Discussions and e-mails	910.00T
03-28 3 hours work on Financial charts with attachments	390.00T
03-29 3 hours work organized read materials con't work on financial charts	390.00T
03-29 shipping of materials via mail Boxes Etc.	23.46T
03-29 6 pages of faxes sent or received	6.00T
03-30 3 hrs worked on contract analysis and analysis of e-mail	390.00T
04-02 2 hrs contract analysis and sent e-mail	260.00T
04-03 3 hrs contract analysis and sent e-mail	390.00T
04-04 2 hrs discussions and analysis of materials 2001-99	260.00T
04-07 2 hrs discussions contact analysis sent e-mail	260.00T
04-07 8 pages of faxes sent or received	8.00T
04-09 3 hrs contract analysis and finalized Financial chart	390.00T
04-09 shipping of materials via mail Boxes Etc.	41.68T
04-17 2 hrs Analysis of contract	260.00T
04-17 3 pages of faxes sent or received	3.00T
04-18 1 hrs work on materials	130.00T
04-18 shipping of materials via mail Boxes Etc.	21.93T
04-24 1 hr work on materials and discussion	130.00T
New Mexico Gross receipts tax	278.36
Total	$5,067.43

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
5/25/2001	4

Bill To

Alan I. Baliaran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
4-27 1 hour discussions on meeting and issues	130.00T
5-1 1 hour discussion on Financial materials and issues	130.00T
5-8 1 hour discussion of materials	130.00T
5-9 3 hours analysis of contracts and related issues	390.00T
5-9 cost of duplication at Kinko's or other location	1.04T
5-9 shipping of materials	12.25T
5-10 1 hour Budget materials review	130.00T
5-16 1 hour discussions and analysis	130.00T
5-17 1 hour discussions and analysis	130.00T
5-18 1 hour discussions with AA on storage problem	130.00T
5-21 1hour discussion on meetings and follow up	130.00T
5-22 9 hours meetings and analysis	1,170.00T
5-23 11 hours meetings and analysis	1,430.00T
5-24 9 hours meeting and analysis	1,170.00T
5-25 5 hours wrap up discussions and related items	650.00T
5-23 cost of duplication at Kinko's or other location	21.26T
5-25 cost of duplication at Kinko's or other location	4.62T
5-22 cost of parking while working on project	4.00T
5-24 cost of parking while working on project	7.00T
5-25 cost of parking while working on project	5.00T
5-25 shipping of materials	75.34T
5-25 shipping of materials	53.53T
New Mexico Gross receipts tax	350.73
Total	$6,384.77

Invoice

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
6/21/2001	5

Bill To

Alan I. Baharan
1717 Pennsylvania Ave. N.W
Twelfth Floor
Washington, D.C. 20006

Description	Amount
6-4 3hrs analysis	390.00T
6-5 3 hrs analysis	390.00T
6-6 5 hrs	650.00T
6-6 cost of duplication at Kinko's or other location	16.89T
6-6 shipping of materials via mail Boxes Etc.	5.15T
6-7 2 hrs	260.00T
6-7 cost of duplication at Kinko's or other location	8.81T
6-7 3 faxes sent or received	3.00T
6-12 2 hrs	260.00T
6-13 1 hr	130.00T
6-14 2 hrs	260.00T
6-15 3 hrs analysis	390.00T
6-15 shipping of materials via mail Boxes Etc.	3.95T
faxes sent or received	6.00T
6-18 3 hrs	390.00T
6-19 1 hr	130.00T
6-20 1 hr	130.00T
6-21 3 hr	390.00T
faxes sent or received	7.00T
6-22 2 hr meeting with K I	260.00T
New Mexico Gross receipts tax	237.20
Total	$4,318.00

Invoice

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
7/25/2001	6

Bill To

Alan I. Baharun
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
6-25 1hr	130.00T
faxes sent or received	3.00T
6-26 3 hr	390.00T
faxes sent or received	4.00T
27	260.00T
cost of duplication at Kinko's or other location	3.30T
6-28 3 hr	390.00T
faxes sent or received	7.00T
7-1 4 hrs work on comparison of rpt	520.00T
7-2 2 hr mtg with K. I	260.00T
7-5 4 hr mtg inv problems & org materials	520.00T
7-6 2 hr Index analysis	260.00T
7-9 2 hr I A	260.00T
7-16 2 hr S M discussions	260.00T
7-18 3 hr IA	390.00T
faxes sent or received	18.00T
7-19 3 hr IA	390.00T
7-20 3 hr IA	390.00T
7-23 3 hr IA	390.00T
7-24 2 hr IA	260.00T
New Mexico Gross receipts tax	296.75

Total $5,402.05

Invoice

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
8/25/2001	7

Bill To

Alan I. Baturin
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
8-2 2hrs 10 mins Work on Onsite questionnaire	260.00T
8-3 5 hrs 15 min meeting with M-1 financial discussion and work on the onsite questionnaire	650.00T
8-7 2 hrs meeting with M-2 Onsite questionnaire	260.00T
8-9 3hrs 5 min Onsite questionnaire e-mail to S.M. Meeting with M-1	390.00T
8-12 2hr 50 min Update financial chart, e-mail to SM. Financial budget questionnaire	390.00T
8-13 1hr 45 min Cross walk financial memo, work on Financial/budget questionnaire, information faxed to SM	260.00T
faxes sent or received 11 pages	11.00T
8-14 2hrs 25 min work on Budget/finance questionnaire	260.00T
8-15 1 hr 50 min Review 2002 budget materials, work on questionnaire Budget/Finance, SM call	260.00T
8-17 1hr 55 mins Budget questionnaire Draft sent e-mail to SM	260.00T
8-20 25 min faxes to SM recd from M-7	0.00T
faxes sent or received 6 pages	6.00T
8-21 2hrs 10 min calls from SM Work on Budget questionnaire e-mails to SM	260.00T
8-22 4 hrs worked on requested material for SM e-mailed materials to SM Worked on Budget materials.	520.00T
8-23 4hrs 32 mins analysis of e-mails received M-1 and budget materials forwarded materials to SM	650.00T
8-24 6 hrs 12mins Budget analysis of the 1999,2000,2001,2002 with carryover and obligation % and revised fin. chart sent draft via e-mail to SM	780.00T
New Mexico Gross receipts tax	303.24
Total	$5,520.24

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
9/25/2001	8

Bill To

Alan L Balaran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
8-27 20 mins sent e-mail to special master	0.00T
8-28 10 mins call to special master on Budget draft	0.00T
8-29 3hrs 14 mins budget questionnaire and file cleanup meeting with KI draft of document for special master	390.00T
8-31 15 min discussion with M 1	0.00T
9-4 3 hrs 7 mins review of trust Def. update of Financial budget questionnaire e-mail to the SM	390.00T
9-5 5hrs 54 mins work on Financial materials for the special master calls with M-1,M-7 update org chart, duplication, shipping of materials to SM, e-mails to SM	780.00T
9-5 cost of duplication at Kinko's or other location	9.03T
9-5 shipping of materials via mail Boxes Etc.	16.25T
9-5 16 pages faxes sent or received	16.00T
9-6 10 mins 2 pages faxes sent or received	2.00T
9-7 2hrs 06 mins preparation for meeting with KI review of trust materials prepared by KI. Sent e-mail to SM. received materials from KI	260.00T
9-10 2hrs 40 mins work on inventory questionnaire.	390.00T
9-12 1hr 10 mins call from K. Garrett(30 mins) on budget questionnaire, work on file inventory questions.	130.00T
9-13 2 hrs 35 mins e-mail to K. G. Meeting with M-1 and M-9 financial and inventory issues faxed materials to SM	390.00T
9-13 16 faxes sent or received	16.00T
9-14 2hrs 20 mins preparation for phone call with K.G, call with KG (1hr 6 mins) follow up work on call with KG.	260.00T
9-15 1hr 5 mins analysis of materials and Financial materials sent to KG	130.00T
9-15 15 pages of faxes sent or received	15.00T
9-20 5 hrs 40 mins call to SM, work on inventory materials, financial discussions with M-1, call to M-5 on QA	780.00T
9-21 25 mins call from SM, calls to M-1,	0.00T
9-24 1hr 15 mins worked on inventory questionnaire draft to SM call to M-1, M-2,M-7	130.00T
9-25 52 mins calls and discussions with M-1, M-4, M-10,M-11	130.00T
call to SM	246.12
New Mexico Gross receipts tax	

Total $4,480.40

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
10/26/2001	9

Bill To

Alan L Balaran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006.

Description	Amount
10-01 50 min meeting with M-1 analysis of Fin data	130.00T
10-02 faxes sent or received 20 pages	20.00T
10-03 3hrs 54 min calls Sp Master,M-1,M-6,M-5,M-8 discussion of organizational charts, meeting with M-5 training materials	520.00T
10-03 faxes sent or received 42 pages	
10-08 3 hrs 14 mins Financial analysis of FY 2001	42.00T
10-09 2 hr 44 mins completed financial analysis and sent the materials to Sp. Master via E-mail	390.00T
10-10 29 min call with M-1 sent Financial analysis to KG	390.00T
10-12 1 hr 10 min review and analysis of training materials	0.00T
10-13 2 hr 46 min Rev of quarterly report, records management issues, Update of the financial chart sent to Sp. Master via e-mail and KG	130.00T
10-16 1hr 15 min review and analysis of the training materials	390.00T
10-18 3hrs 57 mins calls to and from Sp. Master,calls to M-1 e-mail of data to Sp master, meeting with M-1 org data, financial data	130.00T
	520.00T
10-18 faxes sent or received 20 pages	
10-19 Faxes sent or received 3 pages to Sp. Master	20.00T
10-23 4 hrs 28 mins Analysis of R. Report on training, analysis of training materials, meeting with M-1, M-5,M-4,M-9 inventory issues and financial issues	3.00T
10-24 59 mins recd e-mails responded and forwarded to Sp Master	520.00T
10-25 1hr 54 min calls from Sp Master, e-mail to Sp Master, draft Analysis of Monthly reports training and planning and budget drafts sent to Sp. Master	130.00T
New Mexico Gross receipts tax	260.00T
	208.96

Total $3,803.96

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
11/25/2001	10

Bill To

Alan I. Balaran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
10-29 2 hrs 15 mins Call to Special Master issues for meeting with m-12. Mtg with m-12 on issues of concern.	260.00T
11-15 50 mins call with m-1 discussions of problems and issues: call from special master. heads up for call with KG.: call with m-1 followup to discussion of problems and concerns.	130.00T
11-16 25 mins call from m-12 on update of actions, e-mail to Special Master, rec'd e-mail from Sp. Master	0.00T
11-17 4 hrs 3 mins analysis of report sent by special Master	520.00T
11-18 25 mins e-mail to Special Master of analysis	0.00T
New Mexico Gross receipts tax	52.89

Total $962.89

Chata Consulting

Invoice

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
12/10/2001	11

Bill To
Alan I. Baluran 1717 Pennsylvania Ave. N.W. Twelfth Floor Washington, D.C. 20006

Description	Amount
11-26 1hr 45 min E-mail with M 12 faxes reproduction of material and analysis of material	260.00T
11-26 9 pages faxes sent or received	9.00T
11-28 1 hr 25 min call with SP review of M12 materials research reports call and discussion with M-12	130.00T
2-1 1hr 7 min phone discussions SM: discussion on inventory with M-13	130.00T
2-3 1hr 17 min Mtg with M-2 calls with M-1 e-mail to SM inventory issues	130.00T
12-4 1hr 31min calls and meeting with M-1 on inventory issues	260.00T
12-5 3 pages faxes sent or received	3.00T
12-6 2 hrs 3 min faxes rec'd from M-1 discussion of the materials and analysis of the materials	260.00T
12-6 7 pages of faxes sent or received	7.00T
12-7 3 hrs 5 min materials from M-1 and M-12, phone calls, review and analysis of the M-12 materials	390.00T
12-8 20 mins prepared and sent e-mail to SM	0.00T
12-11 50 min calls with M-1 and M-12 meeting with M-1 discussion of inventory problems and office problems	130.00T
New Mexico Gross receipts tax	99.34
Total	$1,808.34

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
1/25/2002	12

Bill To

Alan I. Baharun
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
12/26 21 mins e-mail to SM E-mail response to SM, call from M12 and call from M-1.	0.00T
12/27 48 mins E-mail from M-12 with attachments, sent to SM, analysis of e-mail material and response to M-12.	130.00T
12/28 10 mins E-mail from M-12 with revisions	0.00T
2/30 1 hr 15 mins analysis of M-12 revisions	130.00T
12/31 2 hr 10 mins completed analysis of the M-12 materials, E-mail to SM and E-mail to M-12 for clarifications	260.00T
1/7 10 mins rec'd E-mail from M-12 replied to and sent to SM	0.00T
1/8 12 mins replied to e-mail from SM	0.00T
1-9 55 mins Voice mail M-12. Rec'd e-mail review and requested clarifications, e-mail to SM. Call from M-12	130.00T
1/11 2 hrs 57 mins, call from M-12, meeting with M-12. Materials sent to SM	390.00T
shipping of materials via Fed Express	43.18T
1/12 14 mins E-mail exchange with M-12	0.00T
1/13 2 hrs 17 mins E-mail M-12, begin analysis of materials	260.00T
1/14 1hr 6 mins continued analysis of materials	130.00T
1/15 1hr 36 mins continued work on M-12 materials, call to M-12	260.00T
1/16 56 mins continued work on the M-12 materials, sent e-mail to SM	130.00T
1/17 1hr 4 mins continued work on M-12 materials, call to M-12 for clarification	130.00T
1/18 1 hr 51 mins Completed first reading and analysis of the M-12 materials.	260.00T
1/21 2 hrs 46 mins Analysis of e-mails, identification of links and begin comparisons, Follow up e-mail to M-12 and SM	390.00T
1/22 1hr 15 mins E-mail from M-12 review and analysis, response e-mail to M-12 and to SM, mtg with M-1	130.00T
1/24 2 hr 5 mins Call from SM, Call from JG discussions and recommendations, Sent E-mail to JG and SM, Call from M-1	260.00T
New Mexico Gross receipts tax	176.30

Total $3,209.48

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
2/25/2002	13

Bill To

Alan I. Baleran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount	
1-26 1hr 45 min work on program evaluation, checked on citations		260.00T
1-28 4 hr 14 min call to m-2, call from m-2, work on program evaluation. e-mail to and from Goldstein,rec'd material from SM, call from m-1, and m-3, meeting m-2 policies/procedures program evaluation.		520.00T
1-28 12 pages of faxes sent or received		12.00T
1-29 4 hrs 25 min e-mail to Goldstein, reference materials, call to m-1 and m-3, review of materials from SM, Meeting with m-3 and materials,		520.00T
1-29 4 faxes sent or received		4.00T
1-30 4 hr 15 min call m-12 on materials, continued review of SM materials, materials sent to Goldstein, meeting with m-13 and materials, e-mail to Goldstein.		520.00T
1-30 27 faxes sent or received		26.00T
1-31 7 hr 25 mins, shipment materials to Goldstein of M-12 materials, review/analysis of site visits call Goldstein, duplication of materials for shipment to SM		910.00T
1-31 cost of duplication at Kinko's or other location		38.79T
1-31 shipping of materials via mail Boxes Etc. to Goldstein		52.00T
1-31 shipping of materials via mail Boxes Etc. to SM		48.89T
2-1 1 hr. 15 min, discussion with m-1 rec'd materials, discussed the materials rec'd, additional materials Rec'd		130.00T
2-1 17 faxes sent or received		17.00T
2-2 2 hr 25 min meeting with m-1, duplication of materials, review of m-12 materials		260.00T
2-2 18 pages of faxes sent or received		18.00T
2-2 cost of duplication at Kinko's or other location		1.26T
2-4 2 hr 35 min, duplication and mailing of materials, e-mail Goldstein e-mail to m-12, , review of m-12 material, inventory, discussion m-12, e-mail to SM/m-12.		390.00T
2-4 cost of duplication at Kinko's or other location		1.19T
2-4 shipping of materials via mail Boxes Etc.or USPS		1.52T
2-5 4 hr 5 min Developed materials for Goldstein, materials with narrative to Goldstein, Faxed materials to Goldstein, provided Financial analysis materials to Goldstein faxed materials		520.00T
2-5 56 pages of faxes sent or received		56.00T
2-6 15 min discussion with m-1		0.00T
2-8 10 mins e-mail to Goldstein		0.00T
2-11 9 pages of faxes sent or received		9.00T
2-14 26 min e-mails Goldstein, response to Goldstein e-mail		0.00T

Total

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
2/25/2002	13

Bill To

Alan I. Baiarne
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
2-15 3 hrs 5 min call from m-2 on memo, call from m-12 same subject, call to Goldstein on notification, call form m-1 same subject, faxed memo rec'd and sent, rec'd materials from SM, reviewed materials, rec'd e-mail and sent e-mail.	390.00T
2-15 2 pages of faxes sent or received	2.00T
2-16 18 min e-mails rec'd and sent, M-12 and Goldstein	0.00T
2-17 4 hrs 38 mins reviewed Materials rec'd from m-12 and sent to Goldstein, Second version rec'd and reviewed, e-mails to Goldstein with analysis.	650.00T
2-18 5hr 22 min, materials from m-12, sent to Goldstein, review of M-12 materials, Meeting with m-12 discussion of materials and clarifications. Final materials rec'd and sent to SM and Goldstein.	650.00T
2-19 49 mins call from m-1 and m-12, rec'd m-12 materials, sent materials to Goldstein.	130.00T
2-19 17 pages of faxes sent or received	17.00T
2-20 3 hr 10 min call from m-1 update on incident, meeting with m-12 discussion of materials, e-file to SM and Goldstein, Reviewed m-12 materials. Call from m-1 and discussion with Goldstein.	390.00T
2-21 55 min call with m-1, call from SM discussion of incident, mailed materials to Goldstein	130.00T
2-21 shipping of materials via mail Boxes Etc.or USPS	16.25T
New Mexico Gross receipts tax	388.91

Total $7,079.81

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
3/26/2002	14

Bill To

Alan I. Baforan
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
2-26 1 hr 13 min analysis of on-site evaluation materials call to JG	130.00T
2-27 shipping of materials via USPS	11.65T
2-28 1hr 15 mins discussions with M-1 and JG on site evaluations	130.00T
3-4 1 hr 10 min discussions with M-14 evaluations, call to JG	130.00T
3-7 5 hrs 4 mins calls from SM, review of materials discussions with M-1 and M-12, call to M-12 completed work and send e-mails	650.00T
3-8 55 mins follow up to SM, call to M-12 final narrative to SM	130.00T
3-15 1 hr 10 mins discussions with M-1, call with JG, Check on materials and send information to JG	130.00T
3-18 1 hr 03 min call from JG copy of materials requested confirmed receipt of other materials, SM request, send information, contacted M-1 send requested materials.	130.00T
3-20 20 mins materials from M-1	0.00T
3-22 54 mins call from JG, materials requested researched and sent, confirmation of receipt of materials	130.00T
1-23 25 mins review of materials sent	0.00T
New Mexico Gross receipts tax	91.35

Total $1,663.00

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
4/24/2002	15

Bill To

Alan I. Baluran
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount	
4-7 1 hr 18 min picked up materials for the SM	$169	130.00T
4-8 1 hr 04 min materials sent to SM meeting with m-12 rev of materials	$143	130.00T
shipping of materials via mail Boxes Etc.		141.85T
4-9 50 min phone call M-1 and review of M-1 materials	$104	130.00T
4-9 27 pages of faxes sent or received		27.00T
4-10 1hr 55 min Meeting with M-12 review of materials and faxes to SM	$247	260.00T
4-10 29 faxes sent or received		29.00T
4-11 45 mins materials shipped to SM	$91	130.00T
4-11 shipping of materials via mail Boxes Etc.		26.24T
4-19 1 hr 40 min phone call with M-12: meeting with M-12 discussion of materials and issues	$221	260.00T
4-22 10 min call with M-1	$26	0.00T
4-24 15 min call with m-1	$39	0.00T
New Mexico Gross receipts tax		73.48

*Invoice adjusted by the Special Master

Total $1,337.57

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
6/17/2002	16

Bill To
Alan I. Baiaran 1717 Pennsylvania Ave. N.W. Twelfth Floor Washington, D.C. 20006

Description	Amount
6-3 2 hrs 27 min. Meeting with M-1 OTR developed problems and solutions presentation	260.00T
6-4 36 min e-mail from M-12 review and analysis and response: transmitted to Special Master	130.00T
6-5 15 min telephone calls from M-1	0.00T
6-6 21 min telephone calls from M-1: e-mail to SM	0.00T
6-10 9 min telephone call SM	0.00T
6-11 6 hrs 17 mins preparation for mtg with SM: meeting with SM discussion of situation and problems.	780.00T
6-11 cost of parking while working on project	9.00T
6-12 2 hrs 55 min meeting with SM: presentation of issues and problems OTR discussion of solutions: call from M-14	390.00T
6-14 42 mins SM: review and analysis of process materials:e-mailed to SM:	130.00T
6-17 44 mins call M-1: Discussions with M-12 referred to SM: E-mail to M-12 process materials: call to M-12	130.00T
New Mexico Gross receipts tax	106.31
Total	$1,935.31

Invoice

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
7/24/2002	17

Bill To
Alan L Balutis 1717 Pennsylvania Ave. NW Twelfth Floor Washington, D.C. 20006

Description	Amount
7-4 25 mins call to JC, call to SM and E-mail to SM	0.00T
7-8 1hr 6 min call to M-12 , call to M-12, e-mail from M-12, reviewed materials, e-mail to M-12, call to M-1	130.00T
7-9 1hr 44 mins discussion with M-5, received materials, reviewed materials, second set of materials from.	260.00T
M-5 call from M-13, call to SM, call to JC, call to Hyatt Regency	
faxes sent or received	
7-10 4 hrs 6 mins call from SM, call to SM, review of M-12 materials, call from JC, preparation for meeting	11.00T
with JC, call from JC, changes of plans, mtg with SM	520.00T
7-16 12 mins call from M-12	
7-19 8 mins call from SM	0.00T
7-23 40 mins call from M-1 discussion of issues and problems with IM box	0.00T
7-24 1hr 41 mins call from M-1, call from M-5, received materials reviewed, sent to SM, received materials	130.00T
M-1 organized and sent to SM via e-mail	260.00T
faxes sent or received	
New Mexico Gross receipts tax	4.00T
	76.43

Total $1,391.43

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
8/23/2002	18

Bill To
Alan I. Baharav 1717 Pennsylvania Ave. N.W. Twelfth Floor Washington, D.C. 20006

Description	Amount
8-1 2 hrs 54 mins calls from and to S.M., call from M-13, meeting with Special Master.	390.00T
8-4 2 hrs 48 mins meeting with SM and M-1	390.00T
8-9 28 min Call from M-1	0.00T
8-12 13 mins call from S. A. and from M-1	0.00T
8-13 2hrs 10 mins Meeting with S.A, OTR problems and issues	260.00T
8-15 19 mins call from SM to discuss meeting issues and impact.	0.00T
8-19 42 mins Call from M-15 on RM production problems and M-1 on work issues	130.00T
New Mexico Gross receipts tax	68.01
Total	**$1,238.01**

Chata Consulting

Joe C. Christie
11704 San Victorio NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
9/25/2002	19

Bill To
Alan I. Batarini 1717 Pennsylvania Ave. N.W. Twelfth Floor Washington, D.C. 20006

Description	Amount
8/26 15 mins call from M-15, E-mail to SM to establish meeting and provide phone numbers	0.00T
9/5 5 min call from SM on trip to Albuquerque.	0.00T
9/6 1hr 40 min Meeting with SM	260.00T
9/8 28 min preparation time for meeting with SM, identified materials for review and consolidated them.	0.00T
9/9 3 hrs 48 mins continued preparation time reviewed materials on computer , organized for use. Meeting with SM discussion of issues and problems	520.00T
9/10 8hrs 46 mins meeting with SM, attended presentation with DOI. OTR, post discussions with SM of presentation	1,170.00T
9/17 13 mins discussion of problems of M-16	0.00T
9/18 8 mins sent e-mail to SM alerting him to the discussion of M-16 problems.	0.00T
9/25 20 mins call from M-16 discussion of problem contracted SM via e-mail on problem	0.00T
New Mexico Gross receipts tax	113.34
Total	$2,063.34

Chata Consulting

Joe C. Christie
1 Fruit Star Victoria NE
Albuquerque, New Mexico, 87111

Invoice

Date	Invoice #
11/24/2002	20

Bill To

Alan I. Baker
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
11-9 1 hr 48 mins meeting with the special master	260.00T
11-12 2 hr 25 mins collection of information for special master, analysis of information, e-mail to SM, Telephone call to SM on the information	260.00T
11-14 15 mins collection of information and e-mail to SM	0.00T
New Mexico Gross receipts tax	30.23
Total	$550.23

Invoice

Chata Consulting

Joe C. Christie
1704 San Victorio NE
Albuquerque, New Mexico, 87111

Date	Invoice #
2/24/2003	21

Bill To

Alan I. Baform
1717 Pennsylvania Ave. N.W.
Twelfth Floor
Washington, D.C. 20006

Description	Amount
2-5 10 min call from special master : returned call left message	0.00T
2-6 15 mins calls to Special Master, left messages and numbers	0.00T
2-7 2hrs 41 mins calls to and from Special Master to arrange meeting, return call for changes, meeting with Special Master and others	390.00T
2-10 2 hrs 15 meeting with M-1 & M-11,13, 15 and Special Master problems and issues.	260.00T
New Mexico Gross receipts tax	37.78
Total	$687.78