
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
Three Angels Broadcasting Network, Inc.,)	
an Illinois non-profit corporation, and)	
Danny Lee Shelton, individually,)	Case No.: 07-40098-FDS
)	
) Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
) Defendants.)	
_____)	

DEFENDANTS' MOTION TO IMPOSE COSTS

Pursuant to this Court's statements during the status conference of October 30, 2008, the Defendants move the Court to impose upon the Plaintiffs some or all of the costs incurred during the instant litigation, in order to alleviate to a degree the substantial prejudice resulting to the Defendants by the granting of the Plaintiffs' motion for voluntary dismissal.

1. Mileage attributable to two fact-finding trips by Defendant Pickle: \$993.62.
2. Various miscellaneous expenditures by Defendant Pickle over the course of this litigation: \$4,614.90.
3. Costs for copies made on Defendant Pickle's equipment for filings where ECF filing was not permitted: \$206.70.
4. Cost of time invested in research, motion preparation, etc. by Defendant Pickle: \$30,114.75.
5. Invoices from an expert retained by the Defendants, sent to Defendant Pickle:

\$20,342.32.

6. Invoices from an attorney pertaining to the Defendants' defense: \$54,266.94.

WHEREFORE, the Defendants pray the Court to impose some or all of these costs, expenses, and fees upon the Plaintiffs, and to grant whatever further relief the Court deems fair and just, in order to alleviate to a degree the substantial prejudice the Defendants now find themselves in.

Respectfully submitted,

Dated: November 13, 2008

/s/ Gailon Arthur Joy, pro se
Gailon Arthur Joy, *pro se*
Sterling, MA 01564
Tel: (978) 333-3067

and

/s/ Robert Pickle, pro se
Robert Pickle, *pro se*
Halstad, MN 56548
Tel: (218) 456-2568
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LOCAL RULE 7.1 CERTIFICATE

The undersigned hereby attests that the Defendants have complied with the requirements of Local Rule 7.1 by having, in good faith, through counsel conferred with Plaintiffs, and Plaintiffs' counsel represented that he would oppose this motion in its entirety.

Dated: November 13, 2008

/s/ Bob Pickle
Bob Pickle

AFFIDAVIT OF SERVICE

Under penalty of perjury, I, Bob Pickle, hereby certify that this document, with accompanying memorandum, affidavit, and exhibits, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: November 13, 2008

/s/ Bob Pickle
Bob Pickle