

# COVINGTON

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AARP Inc.  
601 E St. NW  
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April 22, 2022

Invoice No.: 60985944  
Account: 024241.00012

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## AARP

### Re: Streaming Service

For professional services rendered in connection with the above referenced matter through  
December 31, 2021:

<b>Fees:</b>	\$	<b>41,290.00</b>
Less Negotiated Discount	\$	(4,129.00)
<b>Total Fees:</b>	\$	<b>37,161.00</b>
<b>Disbursements:</b>		
Westlaw Research	\$	35.72
<b>Disbursements</b>	\$	<b>35.72</b>
<b>Total Fees and Disbursements:</b>	\$	<b>37,196.72</b>
<b>TOTAL AMOUNT DUE:</b>	<hr/> \$ <hr/>	<hr/> <b>37,196.72</b> <hr/>

### Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
12/01/21	Susan Leahy	Conference with P. Kothari regarding memorandum analyzing a streaming service	0.10
12/01/21	Pooja S. Kothari	Call with S. Leahy to discuss timing of opinion.	0.10
12/02/21	Pooja S. Kothari	Continue to prepare draft of opinion discussing AARP streaming service and compliance with section 501(c)(4) as well as UBTI implications.	5.90
12/06/21	Susan Leahy	Additional correspondence regarding the memorandum analyzing a streaming service	0.20
12/06/21	Pooja S. Kothari	Follow up with S. Leahy on updates to opinion and questions related to membership to AARP streaming service.	0.30
12/07/21	Susan Leahy	Meeting with S. Weiswasser and P. Kothari regarding memorandum analyzing a streaming service	0.60
12/07/21	Pooja S. Kothari	Follow up with S. Weiswasser related to membership questions and meet with S. Weiswasser and S. Leahy to discuss same.	1.30
12/08/21	Pooja S. Kothari	Continue to research relevant IRS authorities related to compliance with section 501(c)(4), as well as unrelated business taxable income, and continue to prepare draft of opinion.	4.40
12/09/21	Stephen A. Weiswasser	Review of revised MOU draft.	2.00
12/09/21	Pooja S. Kothari	Continue to research IRS authorities and relevant case law related to compliance with section 501(c)(4), as well as prepare draft of opinion.	4.60
12/10/21	Stephen A. Weiswasser	Meeting with D.Morales et al. regarding draft and follow-up.	3.00
12/12/21	Pooja S. Kothari	Continue to draft opinion related to AARP Plus and tax-related questions, including whether the activity furthers exempt purposes and will generate unrelated business taxable income.	4.80
12/13/21	Stephen A. Weiswasser	Meeting regarding MOU tax issues.	1.50
12/13/21	Pooja S. Kothari	Meet with S. Weiswasser and S. Leahy to discuss outstanding items for AARP.	0.90
12/14/21	Susan Leahy	Conference with P. Kothari regarding new structure of streaming service	0.30
12/14/21	Pooja S. Kothari	Call with S. Weiswasser and follow up call with S. Leahy	0.50

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>
		to discuss alternative structuring options.	
12/15/21	Pooja S. Kothari	Begin preparing bullet points addressing tax implications of AARP Plus.	0.10
12/16/21	Stephen A. Weiswasser	Teleconference with D.Morales regarding draft revisions and follow-up.	2.00
12/16/21	Susan Leahy	Teleconference with S. Weiswasser and P. Kothari regarding a new proposed structure of a streaming service	0.30
12/16/21	Pooja S. Kothari	Call with S. Leahy and S. Weiswasser related to AARP Plus terms, and begin preparing draft of memorandum related to tax implications.	0.90
12/19/21	Pooja S. Kothari	Begin preparing draft of memorandum related to AARP Plus legal and tax issues, including flagging relevant issues.	3.40
12/21/21	Stephen A. Weiswasser	Review of markups for Paramount Plus.	1.00
12/21/21	Pooja S. Kothari	Continue to prepare draft of memorandum outlining relevant tax issues.	2.20
12/22/21	Pooja S. Kothari	Continue to prepare draft of memorandum discussing relevant legal issues related to AARP Plus and parameters to guide structure of AARP Plus.	5.00
12/23/21	Susan Leahy	Review and revise memorandum regarding tax issues of AARP Plus streaming service	1.90
12/23/21	Pooja S. Kothari	Finalize memorandum discussing tax issues related to structuring of AARP Plus, and circulate to S. Leahy; call with S. Leahy to discuss outstanding questions.	1.90
12/27/21	Susan Leahy	Telephone call with S. Weiswasser and correspondence regarding streaming service memorandum	0.80
<b>Total</b>			<b>50.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>		<u>Amount</u>
Weiswasser, Stephen A.	Senior Counsel	9.50	1,220.00	\$	11,590.00
Leahy, Susan	Of Counsel	4.20	935.00	\$	3,927.00
Kothari, Pooja S.	Associate	36.30	710.00	\$	25,773.00
<b>Totals</b>		<b>50.00</b>		<b>\$</b>	<b>41,290.00</b>

### Disbursement Summary

<u>Description</u>		<u>Amount</u>
Westlaw Research	\$	35.72
<b>Totals</b>	<b>\$</b>	<b>35.72</b>