

From: "jeffrey E." <[REDACTED]>
To: [REDACTED]
Subject: Fwd: Outstanding Invoices
Date: Fri, 10 Nov 2017 15:53:29 +0000

----- Forwarded message -----

From: Gregory Poe <[REDACTED]>
Date: Fri, Nov 10, 2017 at 8:43 AM
Subject: Re: Outstanding Invoices
To: "jeffrey E." <[REDACTED]>

430 is good, thanks [REDACTED]

Law Offices of Gregory L. Poe PLLC
[1001 Pennsylvania Avenue, N.W.](#)
[Suite 7204](#)
Washington, D.C. 20004

[REDACTED]

[REDACTED]

On Nov 10, 2017, at 8:22 AM, jeffrey E. <[REDACTED]> wrote:

sorry you are right. will try late today 430?

On Fri, Nov 10, 2017 at 8:08 AM, Gregory Poe <[REDACTED]> wrote:

You asked me to contact you two days ago but haven't heard from you. Happy to schedule a time to talk. Please let me know.

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[REDACTED]

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On Nov 8, 2017, at 8:06 AM, Gregory Poe <[REDACTED]> wrote:

When can we speak today?

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On Nov 3, 2017, at 11:35 AM, Gregory Poe <[REDACTED]> wrote:

That is good — thanks. Safe travels.

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On Nov 3, 2017, at 11:20 AM, jeffrey E. <jeevacation@gmail.com> wrote:

will be back wed lets talk

On Fri, Nov 3, 2017 at 9:23 AM, Gregory Poe <[REDACTED]> wrote:

Jeffrey –

I hope things on your island are improving and going as well as possible.

Can we please schedule a time to talk on Monday? I've attached the current statement reflecting the balance due. As I have offered before, I am willing to resolve this at a 10% discount. I received \$100,000 in January 2017. So a payment of \$84,146.61 will resolve the matter. ($\$204,607.35 \times 0.10 - \$100,000 = \$84,146.61$.)

Regards,

Greg

Gregory L. Poe

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From: Gregory Poe
Sent: Tuesday, October 10, 2017 10:33 AM
To: jeffrey E. <[\[REDACTED\]](#)>
Subject: Re: Outstanding Invoices

Very sorry to hear about that. Terrible news. I had no idea. All the best to everyone. I will contact you later this month.

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On Oct 10, 2017, at 10:27 AM, jeffrey E. <[REDACTED]> wrote:

sorry, I am dealing with trying to get food to the people stranded on my island please re email me or call after the 22 , you and i should discuss.

On Tue, Oct 10, 2017 at 4:21 PM, Gregory Poe <[REDACTED]> wrote:

Jeffrey —

Can we please resolve this? I would really appreciate a response.

Regards,

Geeg

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Begin forwarded message:

From: Gregory Poe <[REDACTED]>
Date: August 18, 2017 at 9:05:17 AM EDT
To: Jeff Epstein <jeevacation@gmail.com>
Subject: Outstanding Invoices

Dear Jeffrey –

I hope that all is well with you. I am assuming that the issue of the balance due for the work I did has fallen through the cracks somehow. I'm really hoping that we can resolve this quickly.

To recap a bit, it's been more than a year since the engagement terminated and more than six months since you and I spoke. More than half of the balance due is outstanding. When we spoke on January 31 of this year, you authorized your accountant to wire \$100,000 to my firm's operating account. We received that wire (and thanks again). You also asked me on January 31 to send the invoices to you directly (which I had sent to Darren Indyke during the course of the representation). I sent them to you the same day (January 31). I have followed up via email twice since then (on March 30 and May 20, attaching the invoices each time) but have not received any response.

I had one discussion with Darren regarding the invoices. It was over a year ago -- on Friday, July 29, 2016. During that discussion, in which it was evident that he had not looked at the May invoice until he received the June invoice, he expressed his displeasure with the amount of the invoices and told me that he would specify his questions regarding specific invoice entries and get back to me. He never did. After the engagement was terminated, I sent numerous emails to Darren asking about the status of payment and requesting action. He did not reply to my various emails. He sent one email to me, on October 17, 2016, again expressing his displeasure with the amount of the invoices. But he never specified his concerns as he said he would when I spoke with him on July 29, 2016; he simply took the position that he thought the fees were too large for motions practice. That position was based on an inaccurate view of the work that I actually did as I have explained.

To be frank, I have never had an experience like this in almost 28 years of practicing law. From my perspective, as I'm sure you can appreciate, it is not reasonable for more than half of invoiced amounts to remain due more than 15 months since the onset of the work that I performed. I am still willing to resolve the entire issue at a 10% discount. If you want to pay me something less than the amount due, or ask for a discount greater than 10%, I would like to know that. If you don't intend to pay me anything more, I would like to know that too. The total amount invoiced was \$204,607.35. Ninety percent of that amount is \$184,146.62. Applying the \$100,000 payment, the amount due at a 10% discount is \$84,146.62.

I appreciate the opportunity that I had to work for you regarding the *Maxwell* case. As I've expressed before, I performed work as necessary at no charge to you after the representation terminated to ensure a smooth transition to substitute counsel.

On a personal note, let me emphasize that I'm very glad I had the opportunity to meet you in person back in December 2014 when you engaged me the first time around for the CVRA work.

I would really like to get this behind us without unhappy memories. I look forward to hearing from you.

Thanks and all the best,

Greg

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