

REEDER & REEDER

ATTORNEYS AT LAW

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July 12, 2009

By email (jeevacation@gmail.com)

Jeffrey Epstein

Re: State and Federal Civil Claims Against Jeffrey Epstein Currently Pending in the
U.S. District Court for the Southern District of Florida and in the Circuit Court for
the Fifteenth Judicial District of Florida

Dear Jeffrey:

Enclosed is our Invoice 1219 (\$30,365.00), representing legal services rendered and costs and expenses incurred on your behalf for the period through and including July 10, 2009. I do not have a mailing address for you, so if you would like me to mail you the original of this letter and invoice, please let me know the address.

I appreciate the privilege of representing you.

Very truly yours,



REEDER & REEDER
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EFTA00722880

REEDER & REEDER

ATTORNEYS AT LAW

Jeffrey Epstein
Atterbury, Goldberger & Weiss, [REDACTED]
250 Australian Avenue South, Suite 1400
West Palm Beach, FL
33401

July 12, 2009

Attention:
Re: Jane Doe, et al. v. Jeffrey Epstein

File #: 165-01
Inv #: 1219

DATE	DESCRIPTION	HOURS	AMOUNT	ATTY/PL
Apr-28-09	Read First Amended Complaint in CMA case and Complaint in BB case per request of R. Critton.	1.00	400.00	LMR
Apr-29-09	Meet with J. Epstein, R. Critton, M. Burman and J. Goldberger.	1.00	400.00	LMR
May-27-09	Review E.W.'s Motion to Unseal; teleconferences with R. Critton and J. Goldberger re same; analyze EW's arguments, review Fla. R. Jud. Admin. rule and local administrative rule in effect in 2008 regarding the sealing of court records; send analysis of rules to J. Goldberger and suggested arguments ofr defeating EW's motion; review Motion to Disqualify Judge Hafele; read hearing transcript; read cases cited in motion and send analysis to M. Pike ofr use in response to motion; suggest other revisions to M. Pike; review and respond to question from R. Critton regarding whether to file a notice of supp. authority beofre Judge Marra, notifying court of J. Hafele's ruling; email to Critton recommending filing such notice under authority of Local Rule 5.1D.	8.50	3,400.00	LMR
	Analyze case law on procedure for sealing court records in a criminal case.	1.00	250.00	CBA
May-29-09	Phone conference with J. Goldberger.	0.10	40.00	LMR
Jun-09-09	Phone conference with R. Critton regarding stay hearing set fro 6/12, appealability if stay is denied, assertion of rights under 3rd party beneficiary theory by victims and Josephsberg; review copy of NPA, stay motion, opposition, government's response memo and J. Marra's order.	3.80	1,520.00	LMR
	Analyze law on obtaining interlocutory appellate review of order denying stay when 5th amendment privilege against self-[REDACTED] is implicated.	6.00	1,500.00	CBA
	Analyze non-prosecution agreement; analyze motion to stay and responses thereto; analyze case law regarding	3.00	750.00	DVD

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	non prosecution agreements and third party beneficiaries.			
Jun-10-09	Analyze NPA; exchange emails with R. Critton seeking answers re critical facts; analyze stay motion and potential appellate remedy for denial of stay; analyze third party beneficiary issues.	3.00	1,200.00	LMR
	Analyze law on interlocutory review of orders denying stay; prepare memorandum to M. Reeder.	2.50	625.00	CBA
	Analyze case law regarding construing non prosecution agreements and third party beneficiaries' rights; analyze cause of action under 2255.	7.50	1,875.00	DVD
Jun-11-09	Exchange emails with J. Epstein re motion to unseal; teleconference with J. Goldberger; review cases regarding indictment of defendants when they are alleged to have breach an NPA, and remedies available to defendant; analyze issues related to hearing.	1.50	600.00	LMR
	Analyze local rule governing closure of court records; strategy conference with M. Reeder; prepare notice of hearing on motion to vacate sealing order; review motion to seal; teleconference with J. Goldberger.	1.50	375.00	CBA
	Analyze Florida contract law and third party beneficiary standing thereunder; conference and email with M. Reeder regarding results of analysis.	5.50	1,375.00	DVD
Jun-12-09	Attend hearing on Epstein's stay motion; post hearing conference with Critton, Burman and Goldberger.	2.00	800.00	LMR
	Strategy conference with M. Reeder regarding positions taken at the hearing.	0.20	50.00	DVD
	Analyze non-prosecution/third party beneficiary cases to determine how the court should construe.	3.10	775.00	DVD
Jun-14-09	Exchange emails with J. Epstein.	0.10	40.00	LMR
Jun-17-09	Research and analyze Florida case law regarding court's analysis of third party beneficiary's rights under a contract, if contract ambiguous.	5.00	1,250.00	DVD
Jun-18-09	Prepare memorandum regarding construction of non prosecution agreement.	6.50	1,625.00	DVD
Jun-19-09	Analyze case law and prepare memorandum regarding third party beneficiaries and contract interpretation applicable to non prosecution agreement.	7.00	1,750.00	DVD
Jun-20-09	Prepare memorandum to ██████ regarding case law on contract interpretation, third party beneficiary rights, and interpretation of non prosecution agreements.	2.00	500.00	DVD
Jun-22-09	Review draft memo of law on third party beneficiary issues prepared by D. Davis; assign follow-up on several issues.	1.00	400.00	LMR
	Research and analyze possibility that federal common law could be applied to interpretation of non prosecution agreement; research contemplation of non	2.00	500.00	DVD

	prosecution agreement in speedy trial act; research history of usage of non prosecution agreements.			
Jun-23-09	Review additional authorities found by D. Davis on 3rd party beneficiary issues; read Petition for Writ of Certiorari filed by EW challenging order requiring her to reveal her sexual history; teleconference with Critton regarding no automatic stay and procedure likely to be followed by 4th District Court of Appeal.	3.00	1,200.00	LMR
	Research framework under which court decides if contract is ambiguous; email ██████ regarding same	0.80	200.00	DVD
	Research and analyze impact of E.W.'s appeal of discovery order; procedure for stay; impact on case in lower court and appellate court's procedure; email ██████ regarding analysis.	1.80	450.00	DVD
Jun-24-09	Teleconference with J. Goldberger.	0.10	40.00	LMR
Jun-25-09	Review 4th DCA's acknowledgement of new case.	0.10	40.00	LMR
Jun-26-09	Review 4th DCA docketing statement.	0.10	40.00	LMR
Jul-02-09	Review Injunction Motion, Motion to Appt. Receiver and Motion to Require Epstein to Post \$15 Million Bond; teleconference with R. Critton re motion; conference with D. Yarema.	1.00	400.00	LMR
Jul-07-09	Review draft of response to injunction motion; email comments to D. Yarema; analyze adverse inference for asserting 5th amd. in a civil case; locate cases holding that adverse inference is allowed only if there is independent evidence to support the inference.	1.50	600.00	LMR
Jul-08-09	Exchange emails with R. Critton regarding status of EW's cert. petition; send Yarema more cases on 5th Amd. adverse inference issue for response to Injunction Motion.	2.00	800.00	LMR
Jul-09-09	Work on 3rd Party Beneficiary Memo.	4.00	1,600.00	LMR
Jul-10-09	Complete 3rd Party Beneficiary Memo; review revised draft of Injunction Response Memo; send comments to D. Yarema; exchange emails with R. Critton; review comments of Weinstein, Critton and Epstein (with follow up questions.)	5.00	2,000.00	LMR
	Totals	94.20	\$29,370.00	

DISBURSEMENTS

Westlaw	422.00
Photocopies - June	68.00
Westlaw Legal Research - June	505.00

Totals

\$995.00

Total Fee & Disbursements

\$30,365.00

TAX ID Number: EIN 01-0668548