

# Link & Rockenbach, PA

1555 Palm Beach Lakes Blvd.

Suite 930

West Palm Beach, FL 33401



Jeffrey Epstein  
6100 Red Hook Quarter, B3  
St. Thomas, USV 00802

June 12, 2018  
Invoice # 797

CLIENT: 0002 - Jeffrey Epstein  
Re: 0001 Bradley Edwards

Date		Services	Hours	Amount
05/01/18	TLC	Work on Motion to Compel B. Edwards to Identify Witnesses who will be called at trial to incorporate D. Indyke's suggested thoughts and comments; update list of pending Motions; prepare Response to B. Edwards' Motion for Case Management; prepare letter and package to Judge Hafele re UMC hearing on case management; work on Response to B. Edwards' Motion for Sanctions to incorporate D. Indyke's suggested thoughts and comments; work on updated Amended Exhibit List	9.20	2,070.00
05/01/18	SJL	Work on Response to B. Edwards' Motion for Case Management Conference; review list of pending issues; review excluded trial exhibits to narrow down on Amended Exhibit List; work on Motion to Compel B. Edwards to Identify Witnesses; work on Response to Motion for Sanctions	6.40	4,800.00
05/02/18	PVD	[No Charge] Proof Motion to Compel B. Edwards to Identify Witnesses prior to filing; continue review of Clerk's Trial Exhibits for compliance; work on Amended Exhibit List cross referencing exhibits previously marked	6.70	0.00
05/02/18	TLC	Work on scheduling J. Epstein's deposition in bankruptcy proceeding; prepare e-mail to counsel re same; work on Motion to Compel B. Edwards to Identify his Trial Witnesses; work on assembling exhibits to mimic Amended Exhibit List; continue working on Amended Exhibit List; work on Response to Motion for Sanctions; prepare Motion to Compel B. Edwards to identify Bates stamp numbers of documents produced	9.80	2,205.00

Date		Services	Hours	Amount
05/02/18	SJL	Work on Motion to Compel B. Edwards to Identify his Trial Witnesses; work on Response to Motion for Sanctions; review Amended Exhibit List and review potential trial exhibits; follow up with J. Epstein on deposition dates; communications with D. Indyke re strategies and purpose of case management conference; work on Motion to Compel re Bates documents	8.40	6,300.00
05/03/18	PVD	[No Charge] Continue work on Amended Exhibit List cross referencing exhibits previously marked	6.50	0.00
05/03/18	KBR	Prepare for and attend status conference hearing	1.50	1,125.00
05/03/18	SJL	Follow up with J. Scarola re trial setting; prepare for and attend status conference hearing; follow up with J. Epstein and D. Indyke re same; review Court's Order following hearing; work on Bankruptcy Court strategies; work on Motion to Compel B. Edwards to identify Bates numbers of documents produced; work on Motion re filing certified copy of V. Roberts' interview	8.30	6,225.00
05/04/18	PVD	[No Charge] Continue review of Clerk's Trial Exhibits for compliance	4.20	0.00
05/04/18	TLC	Work on Response to Motion for Sanctions to incorporate D. Indyke's thoughts and comments; work on Motion to Compel documents re Bates number identification; work on Motion re V. Roberts' transcript	4.50	1,012.50
05/04/18	RJG	Review B. Edwards' Motion for Rehearing of 4th DCA Order denying appellate fees in Case No.18-087	0.20	79.00
05/04/18	SJL	Work on Response to Motion for Sanctions; communications with D. Vitale re setting hearing on Motion to Extend Scope of J. Epstein's deposition; follow up with clients re same; review pending motions and strategize on how to proceed on same; work on Motion re transcript of V. Roberts' 2011 telephonic interview	6.50	4,875.00

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<b>Date</b>		<b>Services</b>	<b>Hours</b>	<b>Amount</b>
05/07/18	SJL	Communications with D. Indyke to strategize; work on bankruptcy court issues; review Pre-Trial Stipulation and Jury Instructions re potential amendments	2.50	1,875.00
05/08/18	SJL	Work on Response to B. Edwards' Motion for Rehearing; work on Response to Motion for Sanctions; communications with D. Indyke and J. Epstein	3.00	2,250.00
05/09/18	RJG	Research for possible argument in response to B. Edwards' Motion for Rehearing of 4th DCA denial of appellate attorney's fees; whether a denial of writ petition without prejudice to appeal from final order is a favorable disposition	0.90	355.50
05/09/18	KBR	Conduct legal research re B. Edwards' citation to two cases as basis for conditional fee entitlement in certiorari proceeding; key cite cases and broaden search re 9.400 fee entitlement on interlocutory appeals	2.00	1,500.00
05/09/18	SJL	Work on Response to B. Edwards' Motion for Rehearing; follow up on deposition schedule of J. Epstein; communications with D. Indyke and J. Epstein; work on trial strategies; work on Motion re V. Roberts' transcript	3.20	2,400.00
05/10/18	RJG	Review 4th DCA Order dismissing Petition for Writ of Mandamus as moot; research entitlement to prevailing party fees where court dismisses case/appeal as moot in preparation for drafting Motion for Rehearing of denial of appellate fees	3.10	1,224.50
05/10/18	RJG	Review draft Response to B. Edwards' Motion for Rehearing re Fee Entitlement and draft/revise Motion for Rehearing of Denial of Appellate Fees in mandamus proceeding	1.60	632.00

Date	Services	Hours	Amount
05/10/18 KBR	Analyze timing and language used in related orders from 4th DCA (April 19, 2018 denying Writ of Certiorari and both parties' fees and April 27, 2018, dismissing mandamus petition as moot and denying both parties' fees); work on Response to B. Edwards' Motion for Hearing and Order denying B. Edwards' conditional entitlement to appellate fees; telephone conference with D. Indyke re Response, discussion re 9.400, discretion of appellate court, good-faith argument based on consolidation and intertwined nature of two extraordinary writ proceedings and J. Epstein prevailing on mandamus proceeding by virtue of stay/passage of time; perform additional legal research broadening 9.400 and discretion of appellate courts to deny conditional appellate attorneys' fees in Section 768.79, Rule 1.442 context; revise Response to incorporate same following discussions with D. Indyke and additional research	5.20	3,900.00
05/10/18 SJL	Strategize re seeking rehearing on Order denying our fees and Response to B. Edwards' Motion for Rehearing denying his fees; work on Response to B. Edwards' Motion for Rehearing; telephone conferences with D. Indyke and J. Epstein	3.00	2,250.00
05/10/18 TLC	Work on updating key document notebooks; work on Response to B. Edwards' Motion for Rehearing; follow up on outstanding Motions	2.50	562.50
05/14/18 TMB	[No Charge] Prepare Appendix to Response to B. Edwards' Motion for Rehearing Regarding Appellate Fees	0.30	0.00
05/14/18 SJL	Work on Motion for Rehearing of Denial of Epstein's Motion for Appellate Attorneys' Fees and Costs and Response to Edwards' Motion for Rehearing Regarding Appellate Fees; review B. Edwards' "damages" filed in Bankruptcy Court proceeding; follow up with C. Pugatch, D. Indyke and J. Epstein re same	4.50	3,375.00

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Date		Services	Hours	Amount
05/14/18	TLC	Work on Motion for Rehearing of Denial of J. Epstein's Motion for Appellate Attorneys' Fees and Costs (4D18-0762); work on Response to B. Edwards' Motion for Rehearing Regarding Appellate Fees and Appendix to same (4D18-0787); prepare for e-service; review damages filing in Bankruptcy Court	1.40	315.00
05/15/18	SJL	Review damage summaries filed by Farmer Jaffe and the Intervenor and work on strategies responding to same; work on Motion re V. Roberts' transcript; communications with client and D. Indyke; work on Response to Motion for Sanctions	6.20	4,650.00
05/16/18	TLC	Work on Motion to Use April 7, 2011, Interview of V. Roberts; follow up with D. Indyke and C. Pugatch re telephone conference; prepare proposed Order for May 23, 2018, UMC hearing; work on updating binders	2.50	562.50
05/17/18	KBR	Review 4th DCA's Order denying Respondent's May 4, 2018 Motion for Rehearing	0.10	75.00
05/17/18	SJL	Attend telephone conference with C. Pugatch and D. Indyke re strategies in bankruptcy proceedings; work on same; work on Motion to Strike the Intervenor's List of Requested Relief	6.20	4,650.00
05/17/18	TLC	Work on Motion to Strike Intervenor's List of Requested Relief or, in the Alternative, to Conduct Limited Discovery	2.80	630.00
05/18/18	SJL	Continue working on Motion to Strike the Intervenor's List of Requested Relief; communications with client; work on Response to Motion for Sanctions	4.60	3,450.00
05/20/18	SJL	Work on trial strategies; work on addressing Bankruptcy Court issues	2.20	1,650.00
05/21/18	TLC	Work on preparations for UMC hearing on B. Edwards' Motion to depose J. Epstein; work on Motion to Strike Intervenor's List of Requested Relief	1.00	225.00

Date		Services	Hours	Amount
05/21/18	SJL	Continue working on Motion to Strike Intervenors' List of Requested Relief; work on preparations for UMC hearing; follow up on trial and sanction strategies; work on Motion re V. Roberts' transcript	5.20	3,900.00
05/22/18	RJG	Begin researching proof of actual damages re contempt proceedings in preparation for drafting Motion to Strike Intervenors' List of Requested Relief	2.10	829.50
05/22/18	RJG	In Bankruptcy Proceedings, review/analyze (1) Farmer Jaffe's Motion for Order to Show Cause-Contempt; (2) Intervenors' Joinder in Motion for Order to Show Cause; (3) Court's Order to Show Cause-Contempt; and (4) Intervenors' Requested Relief, in preparation for drafting Motions to Strike Farmer Jaffe's and Intervenors' damages claims	3.50	1,382.50
05/22/18	SJL	Work on preparations for UMC hearing on B. Edwards' Motion to Take J. Epstein's deposition; review March 8, 2018 transcript, the two certifications of compliance we prepared and the Court's orders on sealing; work on proposed Order; work on Response to B. Edwards' Motion for Sanctions; work on trial strategies; work on Bankruptcy Court issues	4.20	3,150.00
05/22/18	TLC	Work on Motion to Strike Intervenors' List of Requested Relief; work on Response to B. Edwards' Motion for Sanctions	0.80	180.00
05/22/18	KBR	Prepare for UMC hearing on B. Edwards' Motion to Allow Limited Deposition of J. Epstein re disc/documents	0.60	450.00
05/23/18	TLC	Telephone conferences with court reporter re V. Roberts' transcription; follow up on outstanding motions; work on Response to Motion for Sanctions	1.40	315.00
05/23/18	KBR	Prepare for and attend UMC hearing on B. Edwards' Motion to Allow Limited Deposition of J. Epstein re disc/documents	1.00	750.00

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Date		Services	Hours	Amount
05/23/18	SJL	Attend UMC hearing on B. Edwards' Motion to Take J. Epstein's deposition; follow up with client and D. Indyke re outcome of same; explore options on how to respond to Court's Order; work on Response to Motion for Sanctions; work with R. Glasser on Motion to Strike damages claims in bankruptcy proceeding	5.50	4,125.00
05/23/18	RJG	Research on: (1) compensatory v. coercive sanctions for contempt and (2) requirements for recovery of damages for emotional distress, in preparation for drafting Motion to Strike Intervenors' List of Requested Relief Sought in this Case/Alternative Request to Depose Intervenors in Bankruptcy Proceeding	2.10	829.50
05/23/18	RJG	Begin drafting Motion to Strike Intervenors' List of Requested Relief or, in the Alternative, to Conduct Limited Discovery in Bankruptcy Proceeding	2.30	908.50
05/24/18	RJG	Continue to revise Motion to Strike Intervenors' List of Requested Relief or, in the Alternative, to Conduct Limited Discovery in Bankruptcy Proceeding	3.10	1,224.50
05/24/18	RJG	Supplemental research for Motion to Strike Intervenors' List of Requested Relief or, in the Alternative, to Conduct Limited Discovery in Bankruptcy Proceeding; research recovery of attorneys fees as civil contempt sanctions	2.20	869.00
05/24/18	TLC	Work on Response to Motion for Sanctions; follow up with D. Indyke re review of same; review V. Roberts' interview transcript and changes made by court reporter after a further in-depth review; follow up with court reporter on same; prepare e-mail to M. Nurik re setting UMC hearing on S. Rothstein's Motion to Dismiss; prepare Notice of Hearing on outstanding Motions	4.80	1,080.00
05/24/18	SJL	Work on Response to Motion for Sanctions; work on list of pending Motions; review Notice of Hearing for submission to opposing counsel; work on Motion to Strike Intervenors' List of Requested Relief; follow up with D. Indyke re same	5.00	3,750.00

Date		Services	Hours	Amount
05/25/18	RJG	Review D. Indyke's suggested revisions to draft Motion to Strike Intervenor's List of Requested Relief and revise draft accordingly	1.90	750.50
05/25/18	TLC	Communications with D. Vitale re proposed Order; follow up on transcript of hearing; review same for Court's ruling; work on revisions to proposed Order re J. Epstein's limited deposition; follow up with D. Indyke and J. Goldberger re review of same; work on Motion to Strike; finalize Notice of Hearing for trial docket	5.80	1,305.00
05/25/18	RJG	Initial review of S. Rothstein's Motion to Dismiss Second Amended Complaint with Prejudice	1.50	592.50
05/25/18	RJG	Legal research viability of conspiracy count/viability of underlying tort in preparation for drafting response to S. Rothstein's Motion to Dismiss	2.30	908.50
05/25/18	SJL	Work on Motion to Strike Intervenor's List of Requested Relief; meet with K. Rockenbach and R. Glasser re same; review hearing transcript, B. Edwards' Motion seeking permission to take J. Epstein's limited deposition and B. Edwards' proposed Order; work on edits to same; follow up with D. Indyke, M. Weinberg and J. Goldberger	6.50	4,875.00
05/26/18	SJL	Communications with D. Indyke; work on Motion to Strike Intervenor's List of Requested Relief	2.50	1,875.00
05/29/18	AAS	Draft detailed Memorandum of Law analyzing the issue of whether a general release between a client and a law firm will bar claims for issues that were unknown at the time of the execution of the release	1.00	395.00
05/29/18	RJG	Supplemental research for (1) Response in Opposition to S. Rothstein's Motion to Dismiss (rules and general principles re motions to dismiss; (2) stating a cause of action for conspiracy to commit abuse of process; (3) failure to identify other co-conspirator(s) as fatal; (4) pleading adequate damages; and (5) when dismissal with prejudice is warranted	3.10	1,224.50
05/29/18	RJG	Discuss strategy for response to S. Rothstein's Motion to Dismiss with K. Rockenbach	0.50	197.50

Date		Services	Hours	Amount
05/29/18	RJG	Outline and begin drafting Response in Opposition to S. Rothstein's Motion to Dismiss	2.30	908.50
05/29/18	SJL	Work with A. Steadman on research project re general releases barring claims for unknown issues; review memo on his findings; follow up with D. Indyke re same; communications with D. Indyke and J. Epstein re moving forward; work on strategies; review B. Edwards' Response to our Motion for Rehearing on attorneys' fees issue in appellate court; follow up on proposed Order re J. Epstein's deposition and Response to Motion for Sanctions; work on Motion to Strike Intervenors' Request for Relief	5.60	4,200.00
05/30/18	TLC	Follow up with J. Goldberger re proposed order on J. Epstein's deposition; work on changes to same; follow up with D. Vitale re our proposed changes; follow up with M. Nurik re hearing on Motion to Dismiss	0.80	180.00
05/30/18	SJL	Work on proposed Order re J. Epstein's deposition; communications with D. Indyke and J. Epstein; review revised transcript prepared by court reporter of V. Roberts' telephonic interview; work on Motion re same	4.90	3,675.00
05/31/18	TLC	Work on proposed Order re J. Epstein's deposition; review entire transcript of hearing on B. Edwards' Motion to Take J. Epstein's Limited Deposition; prepare draft e-mail to D. Vitale re our position on same; send our revised Order and proposed e-mail to D. Indyke to comment on same; work on Notice of UMC Hearing on S. Rothstein's Motion to Dismiss; follow up with M. Nurik re hearing	3.20	720.00
05/31/18	SJL	Communicate with M. Nurik in compliance with Local Rule 4 before setting UMC hearing on S. Rothstein's Motion to Dismiss; work on proposed Order re J. Epstein's deposition and draft email to D. Vitale; review hearing transcript; continue working on Response to S. Rothstein's Motion to Dismiss	7.50	5,625.00

#### Recapitulation

		Rate	Hours	Amount
TMB	Troy M. Bermudez	225.00	0.30	0.00
TLC	Tina L. Campbell	225.00	50.50	11,362.50

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**Recapitulation**

		<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
PVD	Paul V. DeVito	90.00	17.40	0.00
RJG	Rachel J. Glasser	395.00	32.70	12,916.50
SJL	Scott J Link	750.00	111.90	83,925.00
KBR	Kara Berard Rockenbach	750.00	10.40	7,800.00
AAS	Andrew A. Steadman	395.00	1.00	395.00
Sub Total				116,399.00
Courtesy Discount				-1,040.00
<b>For Current Services Rendered</b>			<b>224.20</b>	<b>\$115,359.00</b>

**Expenses and Advances**

<b>Date</b>	<b>Expenses</b>	<b>Amount</b>
04/01/18	Courier /Delivery Fee Misc. Courier Charges - Coastal Messenger Service, Inc.	170.00
04/30/18	Westlaw Research On Line Research 4/1/18 - 4/30/18	833.34
05/04/18	Court Reporter 5/3/18 Hearing Attendance - Palm Beach Reporting Services, Inc.	80.00
05/04/18	Deposition transcripts 4/7/11 Phone Interview Recording - V. Giuffre - Florida Court Reporting	1,058.50
05/29/18	Miscellaneous Research and Transcript Comparison for Corrections - Florida Court Reporting	347.00
05/30/18	Transcript Fee 5/23/18 Copy of Transcript Excerpt - Palm Beach Reporting Services, Inc.	46.80
05/31/18	Transcript Fee 5/23/18 Hearing Transcript - Palm Beach Reporting Services, Inc.	96.80
<b>Total Expenses and Advances</b>		<b>\$2,632.44</b>
<b>Sub Total</b>		<b>\$119,031.44</b>
Courtesy Discount		-1,040.00
<b>Total Current Work</b>		<b>\$117,991.44</b>

Trust Funds Balance: \$41,394.86

# Please return this page with remittance

to  
Link & Rockenbach, PA  
1555 Palm Beach Lakes Blvd.  
Suite 930  
West Palm Beach, FL 33401

Invoice # 797  
Bill Date: June 12, 2018  
Client Code: 0002  
Client Name: Jeffrey Epstein  
Matter Code: 0001  
Matter Name: Bradley Edwards

	<u>\$119,031.44</u>
Courtesy Discount	-1,040.00
<b>Total Current Work</b>	<u><u>\$117,991.44</u></u>

Trust Funds Balance: \$41,394.86

Amount enclosed: \_\_\_\_\_