

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

July 6, 2018
Invoice # 824

CLIENT: 0002 - Jeffrey Epstein
Re: 0001 Bradley Edwards

Date		Services	Hours	Amount
06/01/18	TLC	Work on scheduling J. Epstein's deposition; work on dates for same; multiple communications with client, C. Pugatch, D. Indyke and J. Goldberger re availability; work on proposed Order on J. Epstein's deposition to incorporate D. Indyke's suggested edits; follow up with client and counsel on our side re same; prepare email to M. McCann re dates; prepare e-mail to D. Vitale re proposed Order	3.20	720.00
06/01/18	SJL	Work on proposed order re J. Epstein's deposition to incorporate D. Indyke's suggestions; review hearing transcript re same; follow up on J. Epstein's deposition dates; work on Motion re V. Roberts' testimony; review court reporter's "corrections" and final transcript; communications with client	5.20	3,900.00
06/02/18	SJL	Continue working on Motion to Strike requested relief in bankruptcy proceeding	2.50	1,875.00
06/04/18	TLC	Work on proposed Order re J. Epstein's deposition; prepare cover letter to Judge Hafele; e-mail communications with D. Indkye re same; follow up on setting UMC hearing on S. Rothstein's Motion to Dismiss; work on hearing folder; prepare Notice of Hearing, proposed Order and letter to Judge; work on redactions to V. Roberts' transcript (i.e., info required by rules to be redacted); work on Motion to Use Certified Transcript; work on updating To Do List	6.50	1,462.50
06/04/18	SJL	Work on letter to Judge re submission of proposed Order re J. Epstein's deposition; work on proposed Order; multiple communications with D. Indyke and J. Epstein re same; follow up on setting hearing on Motion to Dismiss	3.50	2,625.00

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Date		Services	Hours	Amount
06/05/18	AAS	Conduct detailed research of Florida case law on the specific issue of whether a general release will include claims that were unknown at the time of execution and had not yet accrued	2.00	790.00
06/05/18	AAS	Prepare in-depth addition to previously drafted memorandum on the issue of release agreements, this time analyzing the instant release agreement and applying Florida case law to the specific language contained therein	1.20	474.00
06/05/18	TLC	Communications with opposing counsel on proposed order re J. Epstein's deposition; finalize package to Judge Hafele and submit same; follow up on trial setting issues; communications with opposing counsel re same	0.80	180.00
06/05/18	SJL	Review D. Indyke's edits to Response to Motion for Sanctions; work on revision to same; communications with opposing counsel re trial setting; work on trial strategies; meet with R. Glasser re Motion to Strike Requested Relief in bankruptcy proceeding; work on same	5.40	4,050.00
06/06/18	TLC	Work on Response in Opposition to B. Edwards' Motion for Sanctions; follow up on Response to Motion to Dismiss; work on preparations for upcoming hearings	3.20	720.00
06/06/18	SJL	Work on multiple rounds of revision to our Response to B. Edwards' Motion for Sanctions; multiple communications with D. Indyke and J. Epstein re same; follow up on schedule of outstanding hearings and trial setting	5.20	3,900.00
06/06/18	RJG	Review B. Edwards' Summary of Damages, related pleading concerning Bankruptcy Court's Order to Show Cause, and case law re compensatory sanctions for civil contempt, in preparation for drafting opposition to B. Edwards' Summary of Damages	4.50	1,777.50

Date		Services	Hours	Amount
06/07/18	TLC	Work on preparations for hearing on all pending Motions; review and update previous hearing folders and identify additional items needed; prepare e-mail to M. Nurik re changing UMC hearing on S. Rothstein's Motion to Dismiss; prepare Re-Notice of Hearing; finalize Response to Motion for Sanctions and file same	3.80	855.00
06/07/18	SJL	Finalize Response to Motion for Sanctions; multiple communications with client; work on Response to Motion to Dismiss; begin reviewing hearing folders in anticipation of upcoming two-day hearing	4.30	3,225.00
06/08/18	RJG	Outline and begin drafting Response in Opposition to B. Edwards' Summary of Damages in bankruptcy proceeding	3.30	1,303.50
06/08/18	RJG	Supplemental research on sanctions for contempt and entitlement to attorney's fees in preparation for drafting Response in Opposition to B. Edwards' Summary of Damages in bankruptcy proceeding	1.90	750.50
06/08/18	SJL	Review May 3, 2018, hearing transcript on Case Management Conference hearing re Court's trial setting status; follow up on same; work on Motion to Strike Intervenor's Request for Relief; follow up with D. Indyke and J. Epstein	5.20	3,900.00
06/11/18	RJG	Finish drafting Response in Opposition to B. Edwards' Summary of Damages in bankruptcy proceeding	1.20	474.00
06/11/18	SJL	Work on bankruptcy issues; work on sanctions motion; work on deposition of J. Epstein	5.20	3,900.00
06/11/18	KBR	Legal research/case law re civil contempt, actual damages and self-creating harm; revise Response to Strike B. Edwards' damage summary in Bankruptcy Court	1.00	750.00
06/12/18	SJL	Work on bankruptcy issues; work on sanctions motion; work on deposition for J. Epstein	4.50	3,375.00
06/13/18	SJL	Work on bankruptcy response to B. Edwards' damages summary; work on deposition issues for J. Epstein	4.80	3,600.00

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Date		Services	Hours	Amount
06/14/18	SJL	Work on comprehensive summary to do list; work on Motion to Strike Intervenors' Damages	5.50	4,125.00
06/15/18	RJG	Review Bankruptcy Court's Order to Show Cause re J. Epstein's deposition; research federal and local rules re (1) proper notice/service of deposition on non-party deponent; (2) whether subpoena is required; and (3) federal rules re good faith attempt to resolve dispute before filing motion for protective order	1.50	592.50
06/15/18	SJL	Work on Response to S. Rothstein's Motion to Dismiss; follow up with J. Goldberger re hearing; review Duces Tecum in J. Epstein's Notice of Deposition; strategize on responding to same; communications with C. Pugatch, J. Epstein and D. Indyke re same	6.20	4,650.00
06/18/18	RJG	Review research with K. Rockenbach re notice of deposition duces tecum in federal court, requirement of subpoena on non-party deponent, and federal and local rules of procedure re objecting to notice in preparation for drafting motion for protective order re B. Edwards' Notice of J. Epstein's Deposition in Bankruptcy Court	0.50	197.50
06/18/18	RJG	Research elements of abuse of process cause of action to include in Response to S. Rothstein's Motion to Dismiss	0.10	39.50
06/18/18	TLC	Work on Response in Opposition to B. Edwards' Summary of Damages; review Bankruptcy Court Federal and Local Rules re deadline to object to discovery; update Master Calendar re same; follow up with M. Nurik re changing date of hearing on S. Rothstein's Motion to Dismiss; prepare Re-Notice of Hearing; work on Motion to Strike Intervenors' List of Requested Relief in bankruptcy proceeding; prepare timeline to insert into Response to Motion to Dismiss; follow up with D. Indyke re drafts	5.20	1,170.00

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Date		Services	Hours	Amount
06/18/18	KBR	Analyze Notice of Taking Deposition Duces Tecum of J. Epstein and cross-reference with ruling by bankruptcy court re scope and subject matter of deposition; legal research re bankruptcy rules regarding timing and any additional rules referencing federal rules; legal research Federal Rules of Court, local federal rules for the Southern District Court re good faith, motion for protective order, and service of subpoena for deposition on non-party; prepare email to C. Pugatch re concerns of service of notice of taking deposition and proposed response to J. Scarola; revise Response to S. Rothstein's Motion to Dismiss	3.20	2,400.00
06/18/18	SJL	Work on Response in Opposition to B. Edwards' Summary of Damages in Bankruptcy Proceeding; work on Motion to Strike Intervenors' Requested Relief; work on deposition issues; follow up with J. Epstein and D. Indyke re same; work on objection to duces tecum; work on Response to S. Rothstein's Motion to Dismiss; communications with J. Ianno re Fowler White's insurance information	5.00	3,750.00
06/19/18	RJG	Review Notice and Re-Notice of taking Video Deposition Duces Tecum of J. Epstein, Bankruptcy Court's Order to Show Cause and Federal Rules of Civil Procedure re scope of discovery in preparation for drafting Objections and Motion for Protective Order	1.90	750.50
06/19/18	RJG	Begin drafting Objections to Re-Notice of Taking J. Epstein's Video Deposition Duces Tecum and Motion for Protective Order	2.20	869.00
06/19/18	RJG	Begin researching Judge Ray's rulings on overbroad discovery requests and case law from 11th Circuit Court re protective orders	1.30	513.50
06/19/18	TLC	Work on Motion to Strike Intervenors' Requested Relief to address D. Indyke's comments; work on Response in Opposition to B. Edwards' Summary of Damages; follow up with C. Pugatch and J. Goldberger re potential new date for J. Epstein's deposition; work on Motion to Compel B. Edwards to Identify Bates Numbers of Documents Produced	3.80	855.00

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Date		Services	Hours	Amount
06/19/18	SJL	Work on Motion to Compel B. Edwards to Identify Bates Number of Documents Produced; work on Motion to Strike Intervenors' Requested Relief to address D. Indyke's comments; work on Response in Opposition to B. Edwards' Summary of Damages; communications with D. Indyke	6.40	4,800.00
06/19/18	KBR	Review 4th DCA Order (1) discharging its 3/29/18 Order regarding trial; (2) denying Petitioner's Motion for Appellate Attorney's Fees and Costs; (3) denying request for Oral Argument; (4) denying respondent's Motion for Appellate Attorney's Fees; and (5) denying Petitioner's Motion for Rehearing of denial of Petitioner's Motion for Appellate Attorney's Fees and Costs; analyze same	0.20	150.00
06/20/18	RJG	Supplemental research on requirements of rule 26 re discovery/work product privilege and attorney-client privilege; continue drafting/revising Objections to Re-Notice of Taking Video Deposition Duces Tecum of J. Epstein and Motion for Protective Order	4.10	1,619.50
06/20/18	RJG	Review Notice of Taking Video Deposition Duces Tecum of J. Epstein (State Court) and hearing transcript on B. Edwards' Motion to Permit Limited Deposition of J. Epstein in preparation for drafting Objections to Notice	0.90	355.50
06/20/18	SJL	Work on Motion to Use V. Roberts' Interview; work on Motion to Strike Intervenors' List of Requested Relief or, in the Alternative, to Conduct Limited Deposition Discovery to incorporate additional suggestions by D. Indyke; work on Motion for Protective Order and Objection to Duces Tecums	7.50	5,625.00
06/20/18	TLC	Work on preparations for two-day hearing on all pending motions; update hearing folders for same; follow up on new date for J. Epstein's deposition; e-mails with co-counsel and opposing counsel re same; work on Motion to Use V. Roberts' Interview; work on Motion to Strike Intervenors' List of Requested Relief; work on Motion for Protective Order	8.90	2,002.50

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Date		Services	Hours	Amount
06/20/18	AAS	Conduct detailed research of Florida case law to ascertain whether releases of "known and unknown claims" include those claims based on facts that were unknown to the party/parties at the time of the execution of the release	1.20	474.00
06/20/18	AAS	Draft detailed addendum to previously drafted memorandum analyzing whether releases of "known and unknown claims" include those claims based on facts that were unknown to the party/parties at the time of the execution of the release	0.80	316.00
06/21/18	TLC	Continue working on preparations for calendar call to special set hearing on outstanding motions; work on Motion to Use April 7, 2011, Interview of V. Roberts Giuffre at Trial; work on Objections to Duces Tecums in Bankruptcy Proceeding; work on Response to B. Edwards' Summary of Damages; finalize and file Motion to Compel Bates Numbers; follow up with D. Indyke re status of work; prepare Affidavit of J. Epstein	7.80	1,755.00
06/21/18	SJL	Work on Motion to Use April 7, 2011, Interview of V. Roberts Giuffre at Trial; work on Objection to Duces Tecums in Bankruptcy Proceeding; work on Response to B. Edwards' Summary of Damages; prepare for calendar call on outstanding motions; review hearing transcripts	8.50	6,375.00
06/21/18	RJG	Review Motion to Permit B. Edwards to Take Limited Deposition of J. Epstein and proposed orders granting B. Edwards' motion in preparation for drafting Responses and Objections to J. Edwards' Notice of Taking Video Deposition Duces Tecum	0.90	355.50
06/22/18	TLC	Work on Objection to Notices of Taking Deposition Duces Tecum in Bankruptcy Court action; work on Affidavit of J. Epstein in support; work on Response in Opposition to B. Edwards' Summary of Damages in Bankruptcy Court action; send drafts to D. Indyke for his review of same	2.80	630.00

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Date		Services	Hours	Amount
06/22/18	SJL	Prepare for and attend calendar call to special set outstanding motions for hearing; work on Objection to Notices of Taking Deposition Duces Tecum in Bankruptcy Court action; work on Affidavit of J. Epstein in support; work on Response in Opposition to B. Edwards' Summary of Damages in Bankruptcy Court action; communications with D. Indyke	7.30	5,475.00
06/24/18	SJL	Continue working on Response to S. Rothstein's Motion to Dismiss; work on Objection to Duces Tecum in State Court action	4.50	3,375.00
06/25/18	TLC	Work on Response to Farmer Jaffe's Summary of Damages; work on trying to locate recent automobile case J. Scarola tried in order to interview jurors; research Farmer Jaffe's attorneys and corporation formation to determine status	6.20	1,395.00
06/25/18	SJL	Work on Response to Farmer Jaffe's Summary of Damages; review all outstanding draft documents; telephone conference with D. Indyke re same	7.80	5,850.00
06/26/18	RJG	Draft/revise (State Court) Responses and Objections to the Notice of Taking Video Deposition Duces Tecum of J. Epstein	4.30	1,698.50
06/26/18	RJG	Supplemental research for draft Responses and Objections to Notice of Taking Video Deposition Duces Tecum of Epstein (State Court); work product privilege/during litigation; proponent of discovery has burden to show relevancy; scope of permissible discovery; access to deponent's computer systems and electronic devices	2.10	829.50
06/26/18	TLC	Work on Response to Farmer Jaffe's and B. Edwards' Summaries of Damages in the Bankruptcy Proceeding; prepare demonstratives to illustrate B. Edwards' affiliation with Farmer Jaffe; work on Motion to use V. Roberts' Interview; forward draft Affidavit of J. Epstein to J. Goldberger and M. Weinberg for review; follow up with D. Indyke re Objection to Duces Tecum in Bankruptcy Proceeding; work on Response to S. Rothstein's Motion to Dismiss	7.80	1,755.00

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Date		Services	Hours	Amount
06/26/18	SJL	Work on Response to Farmer Jaffe's and B. Edwards' Summaries of Damages in the Bankruptcy Proceeding; work on Response to S. Rothstein's Motion to Dismiss; follow up on draft Affidavit of J. Epstein; communications with D. Indyke; communications with J. Epstein	8.30	6,225.00
06/27/18	TLC	Work on updating hearing folders and judge's package in preparation of upcoming two-day hearings on pending Motions; work on Response to B. Edwards' and Farmer Jaffe's Summary of Damages; forward same to D. Indyke for review; work on Response to S. Rothstein's Motion to Dismiss; work on proposed Orders for upcoming hearings	4.80	1,080.00
06/27/18	SJL	Work on Response to B. Edwards' and Farmer Jaffe's Summary of Damages; work on Response to S. Rothstein's Motion to Dismiss; work on proposed Orders for upcoming hearings; follow up with M. Weinberg and J. Goldberg re Affidavit; communications with client and D. Indyke; work on strategies for upcoming deposition and bankruptcy hearing	8.20	6,150.00
06/28/18	TLC	Work on Response to S. Rothstein's Motion to Dismiss; work on Affidavit of J. Epstein; follow up with C. Pugatch re Objection to Duces Tecum in bankruptcy proceeding; work on same; follow up D. Indyke re same; follow up with J. Epstein re Affidavit	5.50	1,237.50
06/28/18	SJL	Lengthy telephone conference with M. Weinberg and J. Goldberger re status of litigation, J. Epstein's upcoming deposition testimony, bankruptcy proceeding and draft Affidavit; work on Affidavit; follow up with D. Indkye re response to summaries of damages; work on Response to S. Rothstein's Motion to Dismiss	5.80	4,350.00
06/28/18	DAN	Research Florida case law re whether an allegation of general damages is sufficient to withstand a motion to dismiss	1.30	513.50

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Date	Services	Hours	Amount
06/29/18	TLC Work on Response and Objection to Duces Tecums in Bankruptcy proceeding to restructure to remove references to J. Epstein's Affidavit and to incorporate D. Indyke's thoughts and suggestions; assemble exhibits to same and finalize for filing; work with C. Pugatch's office re filing; follow up with D. Indyke re drafts; work on preparations for upcoming hearing in state court action	6.50	1,462.50
06/29/18	SJL Work on finalizing Response and Objection to Duces Tecums in Bankruptcy proceedings; communications with D. Indyke and J. Epstein re same; work on Response to Motion to Dismiss; work on preparations for J. Epstein's deposition	6.20	4,650.00

Recapitulation

		Rate	Hours	Amount
TLC	Tina L. Campbell	225.00	76.80	17,280.00
RJG	Rachel J. Glasser	395.00	30.70	12,126.50
SJL	Scott J Link	750.00	133.00	99,750.00
DAN	David A. Noel	395.00	1.30	513.50
KBR	Kara Berard Rockenbach	750.00	4.40	3,300.00
AAS	Andrew A. Steadman	395.00	5.20	2,054.00
Sub Total				135,024.00
Courtesy Discount				-440.00
For Current Services Rendered			251.40	\$134,584.00

Expenses and Advances

Date	Expenses	Amount
05/01/18	Courier /Delivery Fee 5/1/18 to Judge Hafele - Coastal Messenger Service, Inc.	25.00
05/31/18	Westlaw Research	587.58
06/11/18	Transcript Fee 5/3/18 Hearing Transcript Judge Hafele - Palm Beach Reporting Services, Inc.	72.60
06/30/18	Westlaw Research	186.35
	Copy Charge through 06/30/18	39.00
Total Expenses and Advances		\$910.53

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Sub Total	<u>\$135,934.53</u>
Courtesy Discount	-440.00
Total Current Work	<u>\$135,494.53</u>
Past Due Balance	<u>\$117,991.44</u>
Balance Due	<u>\$253,485.97</u>

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 # 824
Bill Date: July 6, 2018
Client Code: 0002
Client Name: Jeffrey Epstein
Matter Code: 0001
Matter Name: Bradley Edwards

	<u>\$135,934.53</u>
Courtesy Discount	-440.00
Total Current Work	<u>\$135,494.53</u>
Past Due Balance	<u>\$117,991.44</u>
Balance Due	<u>\$253,485.97</u>

Trust Funds Balance: \$41,394.86

Amount enclosed: _____