HADDON, MORGAN & FOREMAN, P.C.

150 East 10th Avenue
Denver, CO 80203-2740
303-831-7364

Darren Indyke

Statement Date:	November 30, 2018
Statement No.	310228
Account No.	2592.0002
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Re: ████████ v. Epstein, et al.

Duplicate

Fees

Date		Description	Hours	
11/01/2018	LAM	Edit responses, email correspondence with all counsel re. PO, review new documents; Email correspondence with opposing counsel, serve responses; telephone call with Indyke and Link	2.60	1,365.00
11/02/2018	LAM	Depo prep-gather & organize documents, email correspondence with paralegal, internet research, review Epstein depo transcript, review doc production by defendant Epstein; draft subpoenas to Sugardaddy, research FIT office of general counsel; email correspondence with Boise et al re. protective order; telephone client- depo prep	5.40	2,835.00
11/04/2018	LAM	Depo prep, FaceTime call with client	7.30	3,832.50
11/05/2018	AML	Prepare document production; database organization; review pleadings re ESI issue	1.40	196.00
	LAM	Depo prep including call with client (2.8), telephone call with Link, prepare document production; draft pleading to court re. protective order; email correspondence with Sigrid re. protective order; office conference with paralegal re. production, email correspondence with counsel re. protective order; telephone call with client	7.60	3,990.00
11/06/2018	AML	Review ████ & ████████ productions re flight logs; prepare Dropbox link for document production & email group; database organization; emails w/ Menninger	1.60	224.00
	LAM	Email correspondence with counsel conferral request; email correspondence with court; produce documents, draft letter to court re. protective order, draft email correspondence to client; telephone call with client	4.80	2,520.00
	LAM	Travel time (not working on case)	4.00	1,140.00
11/07/2018	LAM	Prep for court hearing; court hearing by phone; office conference with client; prep for depo; telephone call with Link	10.00	5,250.00
11/08/2018	LAM	Travel time (not working on case)	8.50	2,422.50
	LAM	Meeting with client, attend depo	9.50	4,987.50

Ghislaine Maxwell
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			Hours	
11/09/2018	LAM	Email correspondence with counsel re. Igor depo (multiple)	0.30	157.50
11/12/2018	AW	Review documents re: Zinoviev; prepare deposition materials for L. Menninger.	1.90	266.00
	LAM	Email correspondence with counsel re. depo schedule	0.40	210.00
11/13/2018	AW	Reviewing documents re: Zinoviev.	1.20	168.00
	LAM	Email correspondence with counsel re. depo	0.30	157.50
	TG	Telephone call with client	0.80	420.00
11/14/2018	LAM	Draft 3rd party subpoenas; email correspondence with counsel re. depo reschedule; modify protective order and circulate	2.80	1,470.00
11/15/2018	LAM	Draft notices of subpoenas, serve; email protective order to all counsel; email correspondence with counsel re. conferral	0.60	315.00
11/16/2018	TG	Confer with L. Menninger re discovery matters; review Zinoviev deposition documents	0.50	262.50
	LAM	Draft letter to court with proposed protective order; serve notices of subpoenas; telephone call with Walgreens legal department, prepare Duane Reade subpoena and notice and serve	0.80	420.00
11/18/2018	TG	Email to P. Cassell re conferral on discovery issues	0.40	210.00
11/19/2018	TG	Emails from L. Menninger re Zinoviev deposition rescheduling	0.20	105.00
	TG	Review email from L. Menninger re response to P. Cassell conferral issues	0.50	262.50
11/20/2018	TG	Emails from L. Menninger re Zinoviev deposition	0.20	105.00
	TG	Emails to/from P. Cassell and B. Henderson re discovery conferral	0.40	210.00
11/21/2018	TG	Conference call with Cassell re conferral on discovery issues; prepare for same	2.20	1,155.00
	TG	Research/draft email to Cassell re supplementing discovery responses; emails to/from L. Menninger re same and re supplemental privilege log	1.30	682.50
	TG	Review discovery order	0.20	105.00
	TG	Emails to/from L. Menninger re enforcement of protective order	0.50	262.50
11/24/2018	TG	Email from P. Cassell re motion to compel	0.10	52.50
11/26/2018	AML	Database organization	0.80	112.00
	TG	Email re Zinoviev deposition	0.10	52.50
	TG	Email from M. Schultz re expert disclosure deadline	0.10	52.50
	TG	Emails from S. Bohrer and J. Wolman re oral argument rescheduling	0.20	105.00
	LAM	Telephone call with client; telephone call and email correspondence with Julie Brown and her counsel; telephone call with Link	1.80	945.00
11/27/2018	AML	Prepare subpoena production; database organization	0.40	56.00
	TG	Confer with and emails from/to L. Menninger re expert deadlines; review scheduling order	0.40	210.00
	TG	Emails from L. Menninger and A. Lundberg re response to SDT	0.20	105.00
	LAM	Email correspondence with counsel re. experts; email correspondence for		

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			Hours	
		subpoenaed entities; review email correspondence from counsel, from FIT counsel, draft protective order to file with court	0.90	472.50
11/28/2018	ANM	Emails re Miami Herald article	0.10	31.50
	TG	Emails from/to L. Menninger and A. Mueller re J. Alessi deposition and settlement-agreement issues	0.40	210.00
	TG	Email from L. Menninger and M. Schultz re expert disclosure deadline	0.10	52.50
11/29/2018	LAM	Review news reports, email correspondence with Link	0.70	367.50
		For Current Services Rendered	84.50	38,531.00

Advances

11/12/2018	Investigative Services: Forensic Pursuit (e-discovery searches for discovery responses)	5,393.40
11/13/2018	Transcript Charges: Southern District Reporters PC	82.95
11/15/2018	Charge for Delivery Service: Associated Services	75.00
11/15/2018	Charge for Delivery Service: Countywide Process Service and Investigations	80.00
11/16/2018	Charge for Messenger/Delivery Service: Parcels, Inc	96.60
11/27/2018	Deposition/Transcript Charges: Magna Legal Services	2,254.50
11/30/2018	Charge for Legal Research: Westlaw	180.76
	Total Advances	8,163.21
	Total Current Work	46,694.21
	Previous Balance	$19,677.01
	Balance Due	$66,371.22

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