



Wire Confirmation

The wire transfer request below has been transmitted successfully.

Transmitted: 09/12/2018 12:38:00 PM (ET)

Transmitted By: [REDACTED]

<i>Account</i>	<i>Template Name</i>	<i>Recipient Name</i>	<i>Amount</i>	<i>Currency</i>	<i>Effective Date</i>	<i>Confirmation Number</i>	<i>Approval Status</i>
Jeffrey Epstein - NOW - *9691	JEE to Link and Rockenbach PA	Link and Rockenbach, P.A.	10,000.00	USD	09/12/2018	3033436249	1 of 1 received

From: Jeffrey E. jeevacation@gmail.com
Subject: Re: Rothstein
Date: September 12, 2018 at 9:58 AM
To: Scott J. Link Scott@linkrocklaw.com, Richard Kahn [REDACTED]



done

On Wed, Sep 12, 2018 at 3:57 PM, Scott J. Link

[REDACTED] wrote:

Hey that could be the first hearing we won! How about authorize 10 of the \$19,000 outstanding I will write off the nine and we don't have to discuss that particular bill!

Scott J. Link

Board Certified Business Litigation

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Blvd., Suite 930
West Palm Beach, FL 33401



This e-mail may contain privileged or confidential information. If it is not meant for you, please delete it and notify

us immediately. Please confirm receipt of time sensitive communications because email deliveries may be delayed or unsuccessful. We do not provide tax advice. Our communications may not be relied upon to avoid penalties that may be imposed by the Internal Revenue Service.

On Sep 12, 2018, at 9:53 AM, jeffrey E. <jeevacation@gmail.com> wrote:

| yes

On Wed, Sep 12, 2018 at 3:51 PM, Scott J. Link

<[REDACTED]> wrote:

Judge Hatele denied Rothstein motion to dismiss. Kara argued the motion. Nurick was there and Scarola. Nurick and Scarola were powwowing after the hearing. It's an important ruling for us to be able to tell the jury in Edwards that we still have a pending case against Rothstein. I suggest we set Rothstein for deposition. His deposition was very ineffectively taken before.

Scott J. Link

Board Certified Business Litigation

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Blvd., Suite 930
West Palm Beach, FL 33401



This e-mail may contain privileged or confidential information. If it is not meant for you, please delete it and

notify us immediately. Please confirm receipt of time sensitive communications because email deliveries may be delayed or unsuccessful. We do not provide tax advice. Our communications may not be relied upon to avoid penalties that may be imposed by the Internal Revenue Service.

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this



Wire Confirmation

The wire transfer request below has been transmitted successfully.

Transmitted: 09/06/2018 11:17:07 AM (ET)

Transmitted By: [REDACTED]

Account	Template Name	Recipient Name	Amount	Currency	Effective Date	Confirmation Number	Approval Status
Jeffrey Epstein - NOW - *9691	JEE to Link and Rockenbach PA	Link and Rockenbach, P.A.	100,000.00	USD	09/06/2018	2408164201	1 of 1 received

\$10,000 per Jee 9/12/2018

all

9/12/2018

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

August 7, 2018
Invoice #1034

CLIENT: 0002 - Jeffrey Epstein
Re: 0001 Bradley Edwards

Date		Services	Hours	Amount
07/02/18	TLC	Follow up with D. Indyke re status of drafting; working on hearing folders for over twenty pending matters in preparation for upcoming hearing; work on draft Joint Response to summary of damages filed by B. Edwards and Farmer Jaffe	3.20	720.00
07/02/18	SJL	Follow up on outstanding drafting; address setting of Fowler White's and Link & Rockenbach's representative's depositions; work on Objection to Duce Tecum in state court action; communications with client	4.80	3,600.00
07/03/18	SJL	Work on bankruptcy plan; work on Responses to Summary of Damages; work on Response to S. Rothstein's Motion to Dismiss; work on strategies	5.60	4,200.00
07/05/18	TLC	Work on Response to S. Rothstein's Motion to Dismiss to incorporate D. Indyke's big picture comments/concepts and line edits; work on hearing folder; follow up on scheduling of deposition of Fowler White and Link & Rockenbach	5.20	1,170.00
07/06/18	SJL	Work on Objections to Duces Tecum; multiple communication with D. Indyke	4.50	3,375.00
07/08/18	SJL	Work on Response to S. Rothstein's Motion to Dismiss; work on Objections to state court Duces Tecum	2.80	2,100.00

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 2

Date		Services	Hours	Amount
07/09/18	TLC	Work on Response to S. Rothstein's Motion to Dismiss; follow up with D. Indyke re same; follow up with J. Goldberger and C. Pugatch re deposition of Fowler White's and Link & Rockenbach's representatives; work on dates for same; work on Response in Opposition to B. Edwards' and Farmer Jaffe's Summaries of Damages; work on Response and Objection to Duces Tecum in state court action; prepare email to J. Scarola's assistant re depositions of Fowler White and Link & Rockenbach	5.00	1,125.00
07/09/18	SJL	Work on Response to S. Rothstein's Motion to Dismiss; work on Response in Opposition to B. Edwards' and Farmer Jaffe's Summaries of Damages; work on Response and Objections to Duces Tecum in state court action; communications with D. Indyke	5.30	3,975.00
07/10/18	TLC	Continue working on Response to B. Edwards' and Farmer Jaffe's Summaries of Damages to incorporate D. Indyke's thoughts and suggested revisions; review March 23, 2018, hearing transcript and prepare Notice about J. Epstein's testimony at trial; work on Response to S. Rothstein's Motion to Dismiss	3.50	787.50
07/10/18	SJL	Continue working on Response to B. Edwards' and Farmer Jaffe's Summaries of Damages to incorporate D. Indyke's thoughts and suggested revisions; work on Notice about J. Epstein's testimony at trial; follow up with D. Indyke and J. Epstein re same	4.80	3,600.00
07/11/18	TLC	Continue working on Response to S. Rothstein's Motion to Dismiss; work on Response in Opposition to B. Edwards' and Farmer Jaffe's Summaries of Damages; send draft to D. Indyke for review; work on Notice re J. Epstein's trial testimony; work on new dates for J. Epstein's deposition; follow up with J. Goldberger, D. Indyke and C. Pugatch re proposed new dates	3.80	855.00

Date		Services	Hours	Amount
07/11/18	SJL	Telephone conference with J. Epstein and D. Indyke re Notice re testimony; work on same; work on Response in Opposition to S. Rothstein's Motion to Dismiss; work on Response to B. Edwards' and Farmer Jaffe's damage summaries; communications with J. Epstein re his request to change date of his deposition; work on strategies for bankruptcy proceeding	5.50	4,125.00
07/12/18	TLC	Work on Response to S. Rothstein's Motion to Dismiss; forward same to D. Indyke for review; work on incorporating D. Indyke's comments into Objections to state court Duces Tecum to J. Epstein; final review of Motion to Strike Intervenors' Requested Relief in Bankruptcy Proceeding and Response to B. Edwards' and Farmer Jaffe's Summaries of Damages; assemble all exhibits to Response and prepare Appendix; communications with C. Pugatch re filing; forward filed versions to D. Indyke	3.80	855.00
07/12/18	SJL	Work on finalizing Motion to Strike Intervenors' Requested Relief; work on Response to B. Edwards' and Farmer Jaffe's damage summaries; work on issues relating to rescheduling J. Epstein's deposition; communications with J. Scarola re same; follow up with clients; work on bankruptcy hearing preparations	7.20	5,400.00
07/13/18	TLC	Work on rescheduling J. Epstein's deposition; follow up with D. Indyke re same; work on preparations for Bankruptcy Court hearing; work on hearing binder; work on Response to Duces Tecum	2.40	540.00
07/13/18	SJL	Follow up on rescheduling J. Epstein's deposition; communications with D. Indyke; work on strategies for upcoming two-day hearing on all outstanding motions; review hearing folders of same; work on Response to Duces Tecum; review Fowler White's response to document discovery	6.50	4,875.00
07/15/18	SJL	Continue working on strategies for upcoming two-day hearing on pending motions and preparing for same	2.50	1,875.00

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 4

Date		Services	Hours	Amount
07/16/18	TLC	Work on Response and Objections to Bankruptcy duces tecum directed to Link & Rockenbach; work on finalizing Response to S. Rothstein's Motion to Dismiss; file same; work on hearing folder and letter to judge; follow up with D. Indyke re upcoming schedule; review Court's trial docket re our upcoming two-day hearings; follow up on J. Epstein's deposition rescheduling; work on preparations for depositions; prepare outline of upcoming deadlines	6.20	1,395.00
07/16/18	SJL	Work on Response and Objections to Duces Tecum directed to Link & Rockenbach in Bankruptcy Proceeding; work on Response and Objections to Duces Tecum directed to J. Epstein in state court action; work on bankruptcy strategies; communications with J. Epstein and D. Indyke; follow up on J. Epstein's deposition rescheduling	5.60	4,200.00
07/17/18	TLC	Review D. Indyke's big picture edits to Response and Objection to Duces Tecum directed to Link & Rockenbach; review April 13, 2018, bankruptcy transcript, March 8, 2018, state court transcript, and show cause filings by the movants for additional information to include in the Response and Objection; forward same to D. Indyke for review	3.70	832.50
07/17/18	SJL	Work on Response and Objections to Duces Tecum directed to Link & Rockenbach; multiple communications with D. Indyke and J. Epstein; telephone conferences with jurors in Vero Beach case J. Scarola recently tried	5.80	4,350.00
07/18/18	DMS	[No Charge - getting up to speed on case] Review, analyze, and scrutinize multiple relevant case documents, including lengthy transcript of the Mach 8, 2018 hearing involving Fowler White disk issue, Counter-Plaintiff's Motion for Order to Show Cause in bankruptcy court and Bankruptcy Court's Order to Show Cause, pertinent Complaints filed in Circuit Court case and prior-submitted Joint Pretrial Stipulation, in preparation for drafting Written Opening Statement in connection with Show Cause hearing in bankruptcy case	3.50	0.00

Date		Services	Hours	Amount
07/18/18	TLC	Review bankruptcy docket; follow up with C. Pugatch re court setting hearing on our Motion to Strike Intervenor's Damages and for Limited Discovery; work on Response and Objection to Duces Tecum directed to Fowler White; finalize Response and Objections to Duces Tecum directed to J. Epstein in state court proceeding; file same; forward to D. Indyke; follow up on new dates for J. Epstein's, Fowler White's and Link & Rockenbach's depositions; communicate with D. Indyke, C. Pugatch and J. Goldberger re same	3.50	787.50
07/18/18	DMS	[No Charge - getting up to speed on case] Work with T. Campbell to obtain case-specific factual and procedural background, in preparation for drafting and preparing Written Opening Statement in connection with Show Cause Hearing in U.S. Bankruptcy Court.	0.80	0.00
07/18/18	SJL	Follow up on hearing on Motion to Strike Intervenor's Damages; follow up on resetting depositions; work on preparations for upcoming hearings	4.90	3,675.00
07/19/18	DMS	[No Charge - getting up to speed on case] Continued preparation for drafting Written Opening Statement in connection with the show cause proceeding in Bankruptcy Court, continue review, analysis, and scrutinization of extensive materials associated with the issue of the CD containing the allegedly privileged documents located at Fowler White, including transcript of the April 2018 initial show cause hearing before the bankruptcy court, Epstein's Circuit Court Motion for Court to Declare Relevance and Non-Privileged Nature of Documents and Appointment of Special Master and Supplement thereto, Epstein's Response in Opposition to Farmer Jaffe's Motion for Issuance of Order to Show Cause, and bankruptcy orders leading up to the November 2010 order at issue	3.80	0.00

Date		Services	Hours	Amount
07/19/18	DMS	Begin drafting and preparing J. Epstein's "Written Opening Statement" to be filed in connection with evidentiary show cause hearing ordered by the bankruptcy court, including excerpts of the "Introduction" section setting forth material factual background of the firm's discovery of the CD at issue, inter-weaving explanations of J. Epstein's innocence vis-a-vis any alleged violation of the November 2010 bankruptcy court order and outlining sub-headings therein concerning what we expect the evidence to show as to lack of wrongdoing as well as lack of any cognizable damages or losses by Farmer Jaffe, B. Edwards, or Intervenors	1.20	474.00
07/19/18	SJL	Work on preparations for upcoming two-day hearing on more than twenty motions; review Motion to Strike filed by Intervenors in Bankruptcy Court proceeding; review B. Edwards' Responses to our Motion to Amend Exhibit List and our Motion to Compel Edwards to Identify Witnesses; follow up on J. Scarola's communications with court on same; communications with J. Indyke and J. Epstein; follow up on deposition schedule; work on preparations for bankruptcy court hearing	4.50	3,375.00
07/20/18	TLC	Finalize Objections and Responses to Duces Tecums directed to Link & Rockenbach and Fowler White; communications with co-counsel re filing of same; multiple communications concerning the rescheduling of J. Epstein's, Link & Rockenbach's and Fowler White's depositions; work on Motion for Permission to Unseal Disc and 47 Exhibits to use at bankruptcy evidentiary hearing; provide filings to D. Indyke and J. Epstein	4.20	945.00
07/20/18	SJL	Review B. Edwards' Response to our Motion to Allow Disclosure of Expert Witness; work on Show Cause requirements; follow up with D. Indyke and J. Epstein; work on deposition schedule; work on finalizing Objections to Duces Tecum to Link & Rockenbach and Fowler White; follow up with Fowler White re depositions	4.80	3,600.00

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 7

Date		Services	Hours	Amount
07/22/18	SJL	Work on preparations and strategies for upcoming two-day hearing in state court matters; work on Opening Statement in Bankruptcy proceeding; follow up on Declarations to use in Bankruptcy Court	3.50	2,625.00
07/23/18	TLC	Follow up with J. Scarola's assistant re deposition schedule; prepare Amended Notice of Hearing to add Motion to Compel Bates Number to August hearing time; telephone conference with judicial assistant re hearing; work on preparations for same	1.50	337.50
07/23/18	SJL	Continue working on preparations for August 2-3 two-day hearing on all pending Motions (22 Motions) in state court action; work on Bankruptcy Court strategies; communications with client	5.80	4,350.00
07/24/18	DMS	Prepare first draft of J. Epstein's Sworn Declaration of Fact to be used as an exhibit at the Bankruptcy Court's Show Cause Hearing setting forth factual allegations material to J. Epstein's lack of knowledge of CD at issue or documents contained thereon and destruction of select emails after receipt of same in 2018, while using Response in Opposition to Issuance of Order to Show Cause as a guide to the pertinent facts	1.50	592.50
07/24/18	DMS	Review J. Epstein's Response in Opposition to Farmer Jaffe's Issuance of an Order to Show Cause why Fowler White and J. Epstein Should not be Held in Contempt, and the exhibits thereto, for purposes of and as needed to prepare Sworn Declaration of Fact of S. Link, Esq.	0.80	316.00
07/24/18	DMS	Review B. Edwards' Motion to Strike J. Epstein's Untimely Supplemental Exhibits and to Strike All Exhibits and Reference to Documents Containing Privileged Materials, and Epstein's Motion for Court to Declare Relevant and Non-Privileged Nature of Documents, for purposes of drafting Sworn Declaration of Fact of Scott J. Link, as part of Bankruptcy Court show cause hearings	0.70	276.50
07/24/18	DMS	Prepare first draft of Sworn Declaration of Fact of Scott J. Link, Esq., as required by Show Cause Order in preparation for Bankruptcy Court hearing	2.00	790.00

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 8

Date		Services	Hours	Amount
07/24/18	TLC	Telephone conference with judicial assistant re hearing; work on hearing folders for 22 motions to be addressed at August 2 and 3 hearings; prepare letter to Judge Hafele sending banker box of filings for hearing; follow up with D. Indyke re hearing submissions	3.80	855.00
07/24/18	SJL	Continue working on preparations for August 2-3 hearings on all pending Motions; telephone conference with D. Indyke re same; work on preparations for August 1 hearing on Epstein's Motion to Strike Intervenors' Requested Relief in Bankruptcy Proceeding; work on submissions for Bankruptcy Court	4.50	3,375.00
07/25/18	DMS	Review Fowler White's Response to Motion for Issuance of Order to Show Cause, for purposes of drafting J. Epstein's Written Opening Statement	0.50	197.50
07/25/18	DMS	Work on J. Epstein's Written Opening statement, by editing and revising existing Introductory explaining events that occurred from November 1, 2017 through March 8, 2018 and thereafter, and framing the arguments as to what the evidence will show into two subsections: (a) that J. Epstein did not violate the November 30, 2010 Order; and (b) that Farmer Jaffe, Edwards, and Intervenors have sustained no actual, compensatory losses, encompassing	2.00	790.00
07/25/18	SJL	Work on preparation for two-day hearing in front of Judge Hafele; work on attorney-client work product issues relating to emails; telephone conference with J. Epstein re upcoming hearings and position to take regarding emails	4.80	3,600.00
07/25/18	TLC	Finalize package to Court; prepare e-mail transmittal to counsel re same; communications with client group	0.50	112.50

Date		Services	Hours	Amount
07/26/18	DMS	Conduct legal research, analyze large quantity of Florida and out-of-state case law, and prepare detailed correspondences to S. Link, on the issue of when a party waives the attorney-client and work-product privileges as a result of disclosure to an adversary, including in the case of when there is a confidentiality agreement, and the extent to which such a waiver constitutes same as to third-parties, in preparation for telephone conference with J. Epstein and J. Goldberger, as well as August 2018 hearings in connection with our efforts to use B. Edwards' e-mails for which privileges are claimed, at trial	2.20	869.00
07/26/18	DMS	Communicate with J. Epstein, J. Goldberger and D. Indyke, along with S. Link via telephone conference, to discuss strategy in connection with upcoming show cause proceedings in the bankruptcy court and upcoming state court hearings concerning our efforts to use certain e-mails of B. Edwards for which a privilege is claimed, at trial	0.50	197.50
07/26/18	DMS	Revise, edit, and proofread draft of J. Epstein's Written Opening Statement to be filed with the Bankruptcy Court in connection with the show cause proceeding, prior to providing first draft to S. Link, for his review and comment	1.20	474.00
07/26/18	KBR	Review B. Edwards' Response in Opposition to J. Epstein's Motion to Compel B. Edwards to Identify Bates Numbers of Documents Produced (e-served 7/26/18)	0.50	375.00
07/26/18	KBR	Review B. Edwards' Objection to J. Epstein's Request for Judicial Notice for purposes other than authenticity (e-served 7/26/18)	0.50	375.00
07/26/18	DMS	Preliminarily review and analyze B. Edwards' Supplemental Response to J. Epstein's Motion for Court to Declare Relevance and Non-Privileged Nature of Documents, and Request for Additional Limited Discovery, Evidentiary Hearing, and Appointment of Special Master, served July 26, 2018, as assisting counsel, in furtherance of strategizing as to our arguments to use and/or obtain in camera inspection of e-mails at issue	0.30	118.50

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 10

Date		Services	Hours	Amount
07/26/18	SJL	Work on bankruptcy opening statement; work on Declaration of S. Link; work on Declaration of J. Epstein; telephone conference with J. Epstein, J. Goldberger and D. Indyke; work on arguments for upcoming hearing; review multiple Responses filed by B. Edwards and follow up with client and D. Indyke re same	8.50	6,375.00
07/27/18	SJL	Continue working on preparations for upcoming two-day hearing on 22 pending matters; communications with D. Indyke and J. Epstein re same; work on strategies and demonstratives; review Motions and Responses; work on bankruptcy preparations	7.20	5,400.00
07/29/18	SJL	Work on preparations for upcoming two-day hearing on 22 pending matters	6.50	4,875.00
07/29/18	KBR	Begin review hearing folders in preparation for two-day hearing on 22 pending matters; work on strategies/arguments for same	4.50	3,375.00
07/30/18	DMS	Continue review and analysis of transcript of hearing held April 13, 2018 in bankruptcy court on Motion for Order to Show Cause, for purposes of revising and editing Written Opening Statement and Sworn Declarations of S. Link and J. Epstein	0.30	118.50
07/30/18	DMS	Attend and participate in conference call with S. Link,, K. Rockenbach, T. Campbell and D. Indyke regarding strategy in connection with upcoming August 2, 2018 and August 3, 2018 state court hearings, including obtaining specific instructions re legal research needed and for what purposes	1.90	750.50

Date		Services	Hours	Amount
07/30/18	TLC	Provide J. Goldberger with upcoming schedule; meet with S. Link, K. Rockenbach and D. Schwarz, with D. Indyke attending by phone, to discuss hearing strategies and demonstratives; follow up with J. Scarola's office re setting hearing on our Objection to Duces Tecum; cull through bankruptcy filings to pull out pertinent documents to use at hearing re waiver / Conrad Scherer; review bankruptcy hearing transcripts; cull out and review docket for all Orders Setting Trial and prepare detailed timeline to use as demonstrative at hearing; begin reviewing box of attorneys' eyes only documents to cull out examples to use at two-day hearing	8.30	1,867.50
07/30/18	KBR	Work on preparations for two-day hearing, including specific preparations relating to J. Epstein's Motion for Protective Order and Motion in Limine of Unrelated Settlements, Edwards' Motion in Limine re Admissibility of Exhibit No. 132 and deposition designations; team meeting with S. Link, D. Schwarz and T. Campbell, with D. Indyke attending a portion by phone, to strategize for hearing and discuss demonstratives and presentation	5.50	4,125.00
07/30/18	DMS	Research Florida case law on the issue of a trial court's authority and obligation to allow amendments to exhibit lists, enter a pre-trial order and allow a party's late disclosed exhibits in preparation for August 2, 2018 and August 3, 2018 state court hearings	0.30	118.50
07/30/18	DMS	Review Florida case law (5 cases) on the issue of a trial court's authority and obligation to enter a pre-trial order, allow amendments to an exhibit list and allow a party to use late disclosed exhibits in preparation for August 2, 2018 and August 3, 2018 state court hearings	1.00	395.00
07/30/18	DMS	Research case law on the "common interest" exception to the general rule that attorney-client privilege is waived based on voluntary disclosure of the privileged material to another in preparation for August 2, 2018 and August 3, 2018 state court hearings	0.30	118.50

Client Ref: 0002 - 0001

Invoice # 1034

August 7, 2018

Page 12

Date		Services	Hours	Amount
07/30/18	DMS	Review case law on the "common interest" exception to the general rule of waiver of attorney-client and work-product privilege based on voluntary disclosure of privileged information to another in preparation for August 2, 2018 and August 3, 2018 state court hearings [12 cases, 2 secondary sources (treatises)]	1.20	474.00
07/30/18	DMS	Prepare detailed memoranda to the file for use by S. Link in preparation for August 2, 2018 and August 3, 2018 state court hearings, with applicable and favorable law on the issues of limitations on the trial court's authority to exclude otherwise untimely trial exhibits, and the "common interest" exception to the general rule of waiver of attorney-client privilege based on voluntary disclosure to another	0.50	197.50
07/30/18	SJL	Work on preparations for two-day hearing before Judge Hafele and August 1 hearing before bankruptcy court; work on demonstratives and strategies; team meeting and telephone conference with D. Indyke re same; review B. Edwards' filings and work on review of record to dispute same; work on Bankruptcy Court Opening Statement and Declarations; review research re amendments to trial orders, amendments to exhibit and witness lists, and common interest doctrine	8.20	6,150.00

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 13

Date	Services	Hours	Amount
07/31/18 TLC	Prepare detailed chart of Trial Orders and calculate all exhibit and witness list exchange deadlines set forth in same and prepare analysis compared to what the parties filed in response including an analysis of everything late filed and the changes (number of witnesses and exhibits) from each; check citing history of Debrincat v. Fischer; compare email exhibits used at B. Edwards' October 2013 deposition to charts to determine if any of the documents came from the attorneys' eyes only production; follow up with M. Nurik re August 1, 2018, hearing on S. Rothstein's Motion to Dismiss; telephone conference with J. Goldberger re materials for two-day hearing; review Bankruptcy Court docket and hearing transcripts to locate pertinent documents relating to Razorback's Subpoena to Trustee and positions taken regarding B. Edwards as an adversary; telephone conference with D. Indyke re August 1 hearings; follow up with e-mail to same; work on Bankruptcy Court Opening Statement and Declarations of S. Link and J. Epstein; prepare demonstrative to show waiver issues; review CVRA docket and documents for information to include on same; review privilege log to determine designations for 47 exhibits (i.e., work product, attorney-client, relevance); follow up with C. Pugatch re necessity of renewing Response to Duces Tecum in light of re-notice; telephone conference with D. Indyke re positions taken by B. Edwards' regarding net worth discovery; research positions taken in case re same and forward to J. Goldberger; review B. Edwards' March 23, 2010, May 15, 2013, October 10, 13, and November 10, 2017, deposition transcripts and extrapolate testimony regarding communications/meetings with S. Rothstein to use to show B. Edwards may have been withholding information; review B. Edwards' filings and outlines for disclosure of number of pages produced in case; prepare outline of same to use at hearing	11.20	2,520.00

Date		Services	Hours	Amount
07/31/18	DMS	Work on Sworn Declaration of S. Link, Sworn Declaration of J. Epstein, and J. Epstein's Written Opening Statement to be filed with the bankruptcy court, to incorporate changes and revisions directed by S. Link, and limit arguments and facts set forth in same to eliminate excess references to J. Epstein's possession of emails in state court proceedings based on Judge's limitation of deposition to not include conduct in state court proceedings	1.30	513.50
07/31/18	SJL	Review Bankruptcy Court records re positions taken by Razorback; review detailed production timeline; review attorneys' eyes only production to cull out sampling to use at hearing to show judge type of work product documents withheld were similar to the documents listed on the privilege log; work on waiver demonstrative; work on preparations for two-day hearing; work on preparations for August 1, 2018, bankruptcy court hearing on J. Epstein's Motion to Strike the Intervenors' request for relief; communications with C. Pugatch re same; multiple communications with D. Indyke and J. Epstein; work on strategies	9.50	7,125.00
07/31/18	DMS	Research case law on the "joint prosecution" doctrine to determine if this has different elements from the "common interest" and/or "joint defense" doctrines	0.50	197.50
07/31/18	DMS	Prepare Memoranda to the file on "joint prosecution" doctrine, summarizing conclusion that same is not meaningfully distinct from "common interest" and/or "joint defense" doctrines regarding non-waiver of attorney-client privilege, in preparation of August 2, 2018 and August 3, 2018 state court hearings	0.20	79.00

Date	Services	Hours	Amount
07/31/18	DMS Review Florida and federal case law cited in J. Epstein's Motion for Court to Declare Relevance and Privileged Nature of Documents and with Specific Request for In Camera Review to Determine Relevance, Inapplicability, and Waiver, Plaintiff's Response thereto, and our Supplement thereto on the issues of "issue injection" and "implied waiver" as bases for finding a waiver of attorney-client or work product privileges; conduct additional legal research of case law on these doctrines, in preparation for August 2, 2018 and August 3, 2018 state court hearings	1.00	395.00
07/31/18	DMS Prepare Memorandum to the file for use by S. Link at August 2, 2018 and August 3, 2018 state court hearings, containing summary of the law and favorable propositions concerning the "at issue" and "implied waiver" doctrines as bases for finding a waiver of attorney-client and work product privileges	0.60	237.00

Recapitulation

	Rate	Hours	Amount
TLC Tina L. Campbell	225.00	69.80	15,705.00
SJL Scott J Link	750.00	133.60	100,200.00
KBR Kara Berard Rockenbach	750.00	11.00	8,250.00
DMS Daniel M Schwarz	395.00	30.10	8,690.00
Sub Total			132,845.00
Courtesy Discount			-14,274.50
For Current Services Rendered		244.50	\$118,570.50

Expenses and Advances

Date	Expenses	Amount
06/01/18	Courier /Delivery Fee 6/5/18 to PBC Courthouse - Judge Hafele - Coastal Messenger Service, Inc.	25.00
07/10/18	Outside Copy Charge Hearing Materials (2 day hearing on all pending motions) - Palm Beach Copy Service, Inc.	1,087.61
07/31/18	Westlaw Research	139.53
Total Expenses and Advances		\$1,252.14

Client Ref: 0002 - 0001
Invoice # 1034

August 7, 2018
Page 16

Sub Total

\$134,097.14

Courtesy Discount

-14,274.50

Total Current Work

\$119,822.64

Trust Funds Balance: \$41,394.86