



Our File Number: [REDACTED]
Writer's Direct Dial Number: [REDACTED]
Writer's E-Mail Address: [REDACTED]

November 7, 2017

VIA EMAIL

Jeffrey Epstein
c/o: DARREN K. INDYKE
DARREN K. INDYKE, PLLC
575 Lexington Avenue, 4th Floor
New York, New York 10022
email: [REDACTED]

Re: Jeffrey Epstein vs. Scott Rothstein and Bradley J. Edwards

Dear Darren:

Enclosed please find our Invoice No. 557507 for the above-referenced matter. This invoice reflects services rendered through October 31, 2017 in the amount of \$167,456.60. Additionally, I have included our wiring instructions for your convenience.

Should you have any questions, please feel free to call me.

Best Regards,

David R. Atkinson

DRA/mm
Enclosures

WPB_ACTIVE 8199567.1

Wiring Instructions

Bank Name: Wells Fargo - WPB Operating
ABA Number: 121000248
Account Name: Gunster Yoakley & Stewart Operating Account
Account Number: 2000044459107
Swift Number: WFBIUS6S CHIPS: 0407 (for Int'l wires only)

Notes: Please reference Client Matter Number **44949.1**
or Invoice# **557507**

Address for Domestic/International Wires:

Wells Fargo
420 Montgomery Street
San Francisco, CA 94104

GYS Bank Code: WWPBO



GUNSTER

777 South Flagler Drive, Suite 500
West Palm Beach, Florida 33401
Phone (561) 655-1980
Fax No. (561) 655-5677
Taxpayer ID No. 59-1450702

November 7, 2017

Jeffrey Epstein
c/o: DARREN K. INDYKE
DARREN K. INDYKE, PLLC
575 Lexington Avenue, 4th Floor
New York, NY 10022

Please remit with payment

Invoice for Professional Services

Client Name: Jeffrey Epstein
Matter Name: Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards

Invoice Date: November 7, 2017
Client Matter No.: 44949.1
Invoice No.: 557507

For Legal Services Rendered Through October 31, 2017

Total Fees Due \$166,560.50
Total Disbursements Due \$896.10
Amount Due this Bill \$167,456.60

ACCOUNT BALANCE					
Current	0 - 30 Days	31 - 60 Days	61 - 90 Days	Over 90 Days	Total
\$167,456.60	\$0.00	\$0.00	\$0.00	\$0.00	\$167,456.60

If you have any questions, please contact our Client Services - Accounts Receivable Department at (561) 650-0643.

Please remit payment by mail to: Gunster
777 South Flagler Drive
Suite 500 East Tower
West Palm Beach, FL 33401
Please enclose this page with your payment to ensure proper credit

Please remit payment by wire to: Wells Fargo Bank,
420 Montgomery Street San Francisco, CA 94104
Acct Name: Gunster Yoakley & Stewart Operating Acct.
Please reference Client Matter Number or Invoice# Account Number: 2000044459107
ABA Number: 121000248
Swift Number: WFBUS6S CHIPS: 0407 (for Int'l wire)



GUNSTER

777 South Flagler Drive, Suite 500
West Palm Beach, Florida 33401
Phone (561) 655-1980
Fax No. (561) 655-5677
Taxpayer ID No. 59-1450702

November 7, 2017

Jeffrey Epstein
c/o: DARREN K. INDYKE
DARREN K. INDYKE, PLLC
575 Lexington Avenue, 4th Floor
New York, NY 10022

Invoice for Professional Services

Client Name: Jeffrey Epstein
Matter Name: Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards

Invoice Date: November 7, 2017
Client.Matter No.: 44949.1
Invoice No.: 557507

For Legal Services Rendered Through October 31, 2017

Total Fees Due \$166,560.50
Total Disbursements Due \$896.10
Amount Due this Bill \$167,456.60

ACCOUNT BALANCE					
Current	0 - 30 Days	31 - 60 Days	61 - 90 Days	Over 90 Days	Total
\$167,456.60	\$0.00	\$0.00	\$0.00	\$0.00	\$167,456.60
<i>If you have any questions, please contact our Client Services - Accounts Receivable Department at (561) 650-0643.</i>					

CLIENT COPY

MUCCAR/ATKIDAV

EFTA00800946

<u>FEES</u>				
10/01/17	Atkinson, David R.	1.5	\$1,125.00	Background research, review of "evidence" offered to oppose summary judgment, share thoughts with team, identify follow up research needed
10/09/17	Atkinson, David R.	1.0	\$750.00	Communications with Darren Indyke, review motion for summary judgement and related papers
10/12/17	Julin, Thomas R.	2.4	\$1,800.00	(Epstein) Receipt and review of motion for summary judgment, opposition to motion for summary judgment, counterclaim with pending malicious prosecution claim and other materials.
10/13/17	Julin, Thomas R.	0.4	\$300.00	Conference with David Atkinson regarding first amendment defense of malicious prosecution counterclaim
10/16/17	Atkinson, David R.	0.4	\$300.00	Review communications relating to additional in proposal for settlement, follow up regarding same
10/16/17	Atkinson, David R.	2.5	\$1,875.00	Review background materials provided by Darren Indyke
10/17/17	Atkinson, David R.	5.5	\$4,125.00	Review various pleadings and documents
10/17/17	Atkinson, David R.	0.5	\$375.00	Communications with Attorney S. Link regarding mediation; case status; research and strategy issues
10/17/17	Brinson, Crystal	1.0	\$160.00	Initial review and receipt of key emails and pleadings, initiate organization of key documents and pleadings into OneNote binder
10/17/17	McGinn, Timothy J.	0.4	\$180.00	Review settlement proposal
10/18/17	Atkinson, David R.	0.6	\$450.00	Communications with attorney Scott Link regarding proposal for settlement, review research and analysis prepared by attorney Tom Julin and follow up regarding same
10/18/17	Atkinson, David R.	2.9	\$2,175.00	Review pleadings and documents for background

10/18/17	Julin, Thomas R.	3.1	\$2,325.00	Review of case materials in preparation for initial team meeting in West Palm Beach.
10/18/17	Julin, Thomas R.	1.1	\$825.00	Review and revision of proposal for settlement.
10/18/17	McGinn, Timothy J.	5.1	\$2,295.00	Review prior pleadings and news reports
10/19/17	Aiello, Jack J.	1.2	\$900.00	Analyze pleadings and portions of record
10/19/17	Atkinson, David R.	4.4	\$3,300.00	Continued review of case pleadings and strategy discussions with attorney Scott Link
10/19/17	Atkinson, David R.	0.6	\$450.00	Review issues associated with proposal for settlement, follow up with attorney Tom Julin
10/19/17	Brinson, Crystal	0.5	\$80.00	Work with Attorney D. Atkinson regarding organization of materials in OneNote binder
10/19/17	Brinson, Crystal	0.7	\$112.00	Begin organization charts for key pleadings and fact witnesses and upload documents
10/19/17	Julin, Thomas R.	0.3	\$225.00	Further review of release and dismissal to accompany proposal for settlement.
10/19/17	McGinn, Timothy J.	1.1	\$495.00	Continue review of prior pleadings
10/20/17	Aiello, Jack J.	4.5	\$3,375.00	Analyze record and prepare for meeting of trial team
10/20/17	Aiello, Jack J.	2.0	\$1,500.00	Meet with trial team re strategy and trial planning
10/20/17	Atkinson, David R.	2.5	\$1,875.00	Review pleadings and documents from underlying cases in preparation for strategy meeting
10/20/17	Atkinson, David R.	2.5	\$1,875.00	Attend team strategy meeting, follow up after meeting, assign tasks
10/20/17	Brinson, Crystal	1.5	\$240.00	Work with team and review case strategy in preparation for meeting with client
10/20/17	Brinson, Crystal	0.4	\$64.00	Work with Paralegal T. Campbell regarding management of documents in OneNote binder

Invoice No. 557507

44949.1

Jeffrey Epstein

Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/20/17	Julin, Thomas R.	5.0	\$3,750.00	Preparation for initial team meeting (1.5); initial conference with legal team (3.5)
10/20/17	McGinn, Timothy J.	8.9	\$4,005.00	Meeting with Project VI litigation team; legal research
10/21/17	Atkinson, David R.	0.8	\$600.00	Review expert report
10/21/17	Atkinson, David R.	1.0	\$750.00	Review summary judgment transcript
10/21/17	Atkinson, David R.	1.5	\$1,125.00	Research differences in defamation and malicious prosecution damages
10/21/17	Atkinson, David R.	3.0	\$2,250.00	Review case law and think tank discussions with team, further research and analysis legal issues
10/21/17	Atkinson, David R.	0.8	\$600.00	Review and comment on attorney Tom Julin's first amendment analysis, collaboration with attorney Scott Link, review historic articles on Florida defamation law and provide Scott Link with excerpts of Florida Supreme Court case
10/21/17	Julin, Thomas R.	3.2	\$2,400.00	Review of potential for adding affirmative defense that Jeff Edwards is a public figure or limited purpose public figure who must provide constitutional actual malice and defense that abuse of process claim constitutes petitioning of government which places burden on Edwards to show that the Epstein claim against him was filed as a sham and preparation of memorandum to team recommending additional affirmative defenses.
10/21/17	Julin, Thomas R.	1.4	\$1,050.00	Preparation of correspondence to team with initial draft of special verdict form that might be provided to jury.
10/21/17	McGinn, Timothy J.	5.4	\$2,430.00	Legal research re elements of malicious prosecution
10/22/17	Aiello, Jack J.	3.5	\$2,625.00	Analyze case law and legal authorities regarding malicious prosecution and work on record development and preservation strategies
10/22/17	Atkinson, David R.	0.8	\$600.00	Strategy calls with attorney Scott Link, follow up on issues identified

CLIENT COPY

Page 5

MCCCAR/ATKIDAV

EFTA00800949

Invoice No. 557507
44949.1
Jeffrey Epstein
Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/22/17	Atkinson, David R.	1.5	\$1,125.00	Analyze factual allegations in the complaint and second amended complaint
10/22/17	Atkinson, David R.	2.0	\$1,500.00	Analyze damage cases relating to defamation and reputational damage and consider applicability to a malicious prosecution case
10/22/17	Atkinson, David R.	0.8	\$600.00	Prepare To Do list, confer with attorney Scott Link regarding same
10/22/17	Atkinson, David R.	1.8	\$1,350.00	Background research on Bradley Edwards reputation, share information with attorney Scott Link, discuss strategy
10/22/17	Atkinson, David R.	0.6	\$450.00	Review seminary research, comment on same, follow up communications regarding strategy with attorney Scott Link
10/22/17	Atkinson, David R.	0.4	\$300.00	Review evaluation of Edwards expert report, follow up regarding same
10/22/17	Julin, Thomas R.	0.9	\$675.00	Preparation of correspondence to team with analysis of Dr. Bernard Jansen's analysis of news reports concerning Epstein's filing of claims against Edwards.
10/22/17	Julin, Thomas R.	0.4	\$300.00	Preparation of memorandum to team regarding method of determining public figure status of Edwards.
10/22/17	McGinn, Timothy J.	11.2	\$5,040.00	Call with attorney D. Atkinson re legal research; legal research
10/23/17	Aiello, Jack J.	5.5	\$4,125.00	Analyze record documents and legal authorities and work on record development and preservation strategies
10/23/17	Aiello, Jack J.	1.2	\$900.00	Consult with Attorneys S. Link, K. Rockenbach and T. Julin re law and case strategy
10/23/17	Atkinson, David R.	1.0	\$750.00	Review affidavits and deposition transcripts from underlying cases
10/23/17	Atkinson, David R.	0.4	\$300.00	Post team meeting update with attorney Scott Link and discuss strategy

CLIENT COPY

Page 6

MCCCAR/ATKDAY

EFTA00800950

Invoice No. 557507

44949.1

Jeffrey Epstein

Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/23/17	Brinson, Crystal	0.5	\$80.00	Review numerous e-mail exchanges amongst attorneys regarding client meeting preparations to maintain pending tasks
10/23/17	Brinson, Crystal	0.7	\$112.00	Create electronic trial notebook and motions chart into OneNote binder
10/23/17	Brinson, Crystal	0.9	\$144.00	Link key pleadings into trial notebook and motions chart
10/23/17	Brinson, Crystal	0.1	\$16.00	Review ToDo list for trial preparation
10/23/17	Brinson, Crystal	0.5	\$80.00	Download and organize key pleadings in Edwards v. Dershowitz matter
10/23/17	Brinson, Crystal	0.6	\$96.00	Organize witness statements, deposition transcripts and hearing transcripts in OneNote binder
10/23/17	Julin, Thomas R.	4.7	\$3,525.00	Preparation of initial draft of jury instructions and proposed special verdict form.
10/23/17	McGinn, Timothy J.	11.4	\$5,130.00	Legal research re malicious prosecution, possible affirmative defenses
10/23/17	Radkay, Devin S.	0.7	\$192.50	Conference with attorney J. Aiello re Project VI (.3); analyze malicious prosecution jury instructions (.4)
10/24/17	Aiello, Jack J.	6.5	\$4,875.00	Multiple prolonged meetings with counsel to develop information and strategies for trying and defending case and preservation of record for appeal
10/24/17	Aiello, Jack J.	0.5	\$375.00	Analyze case law re malicious prosecution
10/24/17	Aiello, Jack J.	2.3	\$1,725.00	Analyze portions of record, including client deposition and motion to prevent use of affidavit
10/24/17	Atkinson, David R.	8.0	\$6,000.00	Prepare for and attend team meeting, discuss case strategy, review documents, debrief meeting with Gunster team
10/24/17	Brinson, Crystal	2.0	\$320.00	Download and organize key pleadings into OneNote binder

CLIENT COPY

Page 7

MCCAB/ATKDAY

EFTA00800951

Invoice No. 557507

44949.1

Jeffrey Epstein

Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/24/17	Julin, Thomas R.	4.5	\$3,375.00	Meeting with Scott Link, Tonja Haddad, Lester Brewer, David Atkinson and others to be brought up to date on the claims and to develop master strategy for litigation of the case.
10/24/17	McGinn, Timothy J.	10.0	\$4,500.00	Meetings with D. Indyke, litigation team; legal research
10/24/17	Radkay, Devin S.	1.2	\$330.00	Conference with litigation team re trial strategy and pre-trial research and strategy issues (1.2)
10/25/17	Aiello, Jack J.	2.8	\$2,100.00	Analysis of motions and work on strategy re record preservation for trial and appeal
10/25/17	Atkinson, David R.	1.5	\$1,125.00	Communications with attorney Scott Link regarding strategy, review updated to do list, review affidavits and background documents
10/25/17	Atkinson, David R.	5.5	\$4,125.00	Continued review background materials, depositions, interrogatories and documents, follow-up strategy communications with attorney Scott Link
10/25/17	Brinson, Crystal	0.5	\$80.00	Confer with Attorney David Atkinson and prepare for document requests from J. Goldberg and T. Haddad' offices
10/25/17	Brinson, Crystal	0.3	\$48.00	Confer with Paralegal T. Campbell regarding document requests from T. Haddad and J. Goldberg's offices
10/25/17	McGinn, Timothy J.	2.3	\$1,035.00	Legal research re malicious prosecution and attorney-client privilege
10/25/17	Radkay, Devin S.	0.2	\$55.00	Conference with attorney J. Aiello re J. Epstein deposition and pending motions
10/26/17	Aiello, Jack J.	2.5	\$1,875.00	Analyze issues re pending motions and outstanding discovery; telephone conference with trial team re strategy re motion for continuance; work with Tina Campbell re same
10/26/17	Atkinson, David R.	0.3	\$225.00	Review communications from co-counsel, follow up regarding same
10/26/17	Atkinson, David R.	3.0	\$2,250.00	Continued review of background pleadings and transcripts

CLIENT COPY

Page 8

MCCABRATKDAY

EFTA00800952

Invoice No. 557507
44949.1
Jeffrey Epstein
Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/26/17	Brinson, Crystal	0.3	\$48.00	Meeting with Paralegal T. Campbell regarding task update and exchange copies of document requests
10/26/17	Brinson, Crystal	0.3	\$48.00	Review documents from Chet Brewer's office; organize and coordinate documents to be scanned electronically
10/26/17	Brinson, Crystal	0.7	\$112.00	Continue uploading key pleadings into OneNote binder
10/26/17	McGinn, Timothy J.	9.5	\$4,275.00	Conference call with team re research update; legal research; reviewing prior filings
10/26/17	Radkay, Devin S.	4.8	\$1,320.00	Analyze Complaint, Fourth Amended Counterclaim, Motion for Summary Judgment on Fourth Amended Counterclaim, transcript of deposition of J. Epstein, Omnibus Motion in Limine, Motion to strike, Motion for Temporary Stay, Motion for Sanctions and responses and replies to same, and pre-trial disclosures and lists and historical discovery in furtherance of developing potential bases to obtain a continuance (4.6); conference with attorney J. Aiello re developing potential bases to obtain a continuance (.2)
10/27/17	Aiello, Jack J.	3.0	\$2,250.00	Analyze motions, discovery issues and related bases for motion to continue and analyze deposition transcripts and issues re potential lay witnesses
10/27/17	Atkinson, David R.	2.0	\$1,500.00	Review transcripts of Edwards deposition
10/27/17	Atkinson, David R.	1.0	\$750.00	Review and comment on documents for focus group
10/27/17	Atkinson, David R.	4.0	\$3,000.00	Overview review of files provided by prior counsel
10/27/17	Brinson, Crystal	0.5	\$80.00	Review flash drive received from Martin Weinberg's office containing video deposition of the Client and video interview of EW; copy files and make available to the Gunster team

Invoice No. 557507

44949.1

Jeffrey Epstein

Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/27/17	Brinson, Crystal	0.4	\$64.00	Work with Broward County Clerk's office regarding Razorback Funding, LLC vs. Scott Rothstein and retrieving copies of the exhibits in the Complaint and Amended Complaint
10/27/17	Brinson, Crystal	1.0	\$160.00	Finalize key pleadings chart and organize Paralegal T. Campbell's Order Chronology in the OneNote binder
10/27/17	Brinson, Crystal	0.7	\$112.00	Download and organize Supreme Court case in OneNote binder
10/27/17	McGinn, Timothy J.	8.1	\$3,645.00	Review prior pleadings and pleadings in underlying civil actions; prepare summary of facts for focus group
10/27/17	Radkay, Devin S.	4.3	\$1,182.50	Review pleadings in furtherance of developing potential bases to obtain a continuance (3.4); conference with attorney J. Aiello re same (.2)
10/28/17	McGinn, Timothy J.	1.2	\$540.00	Draft and revise materials for focus group
10/29/17	Aiello, Jack J.	0.6	\$450.00	Work on issues re record preservation and support for motion for continuance
10/29/17	Atkinson, David R.	0.8	\$600.00	Review focus group materials and strategy communications from attorney Scott Link
10/29/17	Atkinson, David R.	3.0	\$2,250.00	Review pleadings and transcripts from case file
10/29/17	McGinn, Timothy J.	7.9	\$3,555.00	Analyze deposition transcripts, revise focus group materials, legal research re malicious prosecution
10/29/17	Radkay, Devin S.	3.2	\$880.00	Analyze pleadings in furtherance of developing potential bases to obtain a continuance
10/30/17	Aiello, Jack J.	2.8	\$2,100.00	Prepare for and attend team meeting re strategy and discovery issues
10/30/17	Aiello, Jack J.	2.7	\$2,025.00	Analyze record and work on discovery issues for motion to compel/support for motion for continuance
10/30/17	Atkinson, David R.	2.0	\$1,500.00	Prepare for and attend team meeting regarding strategy, status of research, status of files and

CLIENT COPY

Page 10

MECCARADKDAY

EFTA00800954

				documents not yet provided by Epstein's other counsel, follow up with guarding same
10/30/17	Brinson, Crystal	0.8	\$128.00	Review and organize documents received from Chet Brewer's office
10/30/17	Brinson, Crystal	2.0	\$320.00	Download and organize underlying State and Federal cases into OneNote binder
10/30/17	Brinson, Crystal	1.0	\$160.00	Work with team and discuss strategy for motions to be filed
10/30/17	Brinson, Crystal	0.4	\$64.00	Work with Attorney T. Haddad to coordinate delivery of seven case file boxes
10/30/17	McGinn, Timothy J.	0.8	\$360.00	no narrative yet
10/30/17	McGinn, Timothy J.	8.0	\$3,600.00	Meet with attorney T. Julin re discovery; legal research re malicious prosecution cause of action
10/30/17	Radkay, Devin S.	6.3	\$1,732.50	Analyze pleadings in furtherance of developing potential bases to obtain a continuance (1.8); attend team strategy meeting (1.3); work on discovery issues (3.2)
10/31/17	Aiello, Jack J.	2.8	\$2,100.00	Work on bench memo re probable cause; analyze record re strategy development and appellate record preservation
10/31/17	Atkinson, David R.	1.5	\$1,125.00	Work on probable cause Memo, review case law, confer regarding same
10/31/17	Atkinson, David R.	2.0	\$1,500.00	Work on advice of counsel defense evaluation, review case law, evaluate difficulties created by Critton's interview, suggest further factual investigation, consider alternatives, prepare advice/questions email
10/31/17	Atkinson, David R.	0.6	\$450.00	Review Bar Complaints and follow up with Epstein's General Counsel, contact potential ethics expert Skip Smith
10/31/17	Atkinson, David R.	0.8	\$600.00	Review documents provided by Epstein's General Counsel, select documents to bring to Link's attention

Invoice No. 557507
44949.1
Jeffrey Epstein
Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards



Invoice Date: November 7, 2017

10/31/17	McGinn, Timothy J.	8.0	\$3,600.00	Legal research; drafting memo re probable cause; researching motion for continuance
10/31/17	Radkay, Devin S.	5.2	\$1,430.00	Work on discovery issues and motion to compel

292.6

\$166,560.50 TOTAL LEGAL SERVICES

DISBURSEMENTS

10/31/17	\$896.10	Telephone, postage, and imaging (detail available upon request)
	<u>\$896.10</u>	TOTAL DISBURSEMENTS