

Troutman Sanders LLP
875 Third Avenue
New York, NY 10022

troutman.com



Federal ID No.:

58-0946915

Billing Inquiries:

404-885-2508

Payment Remittance Address

Troutman Sanders LLP
P.O. Box 933652
Atlanta, Georgia 31193-3652

Jeffrey Epstein
Darren K. Indyke, PLLC
575 Lexington Avenue
4th Floor
New York, NY 10022

Invoice Date
Submitted by
Direct Dial
Invoice No.
File No.

10/17/18
B J Moskowitz
[REDACTED]
2040188
238227.000015

RE: Gerber vs. The Financial Trust Co.

Fees for Professional Services Rendered Through 09/30/18	\$40,017.00
Costs and Expenses Through 10/17/18	\$8,943.59
Total Amount of This Invoice	\$48,960.59

Jeffrey Epstein

Gerber vs. The Financial Trust Co.

FEES FOR PROFESSIONAL SERVICES RENDERED THROUGH 09/30/18

Date	Init	Description of Work Performed	Hours	Amount
08/27/18	BJM	Analyze complaint and compare to prior complaint filed by Hoffenberg; draft email memo to D. Indyke analyzing complaint and recommending litigation strategies	3.7	2,201.50
08/29/18	BJM	Analyze case filings; telephone call with D. Indyke regarding status of service of the complaint; begin outlining motion to dismiss complaint	1.3	773.50
09/04/18	MD	Analyze pleadings and other documents; draft motion to dismiss; research statute of limitations, fraudulent concealment, and the discovery rule	4.4	2,024.00
09/04/18	BJM	Confer with associate M. DiRago concerning strategies for motion to dismiss plaintiffs' complaint	0.3	178.50
09/05/18	MD	Continue drafting motion to dismiss; continue researching various issues for motion to dismiss	6.9	3,174.00
09/05/18	BJM	Confer with associate M. Dirago to further develop strategies for motion to dismiss plaintiffs' complaint	0.3	178.50
09/06/18	MD	Continue drafting memorandum in support of motion to dismiss; continue researching for same	7.1	3,266.00
09/07/18	MD	Continue drafting memorandum in support of motion to dismiss; continue researching for same	7.2	3,312.00
09/07/18	BJM	Draft motion to dismiss plaintiffs' complaint	2.5	1,487.50
09/08/18	BJM	Continue drafting motion to dismiss plaintiffs' complaint	2.6	1,547.00
09/09/18	BJM	Analyze, edit and revise motion to dismiss plaintiffs' complaint; analyze news articles, court filings and other materials concerning Hoffenberg for use in motion to dismiss plaintiffs' complaint	5.2	3,094.00
09/10/18	BJM	Continue drafting motion to dismiss plaintiffs' complaint; continue analyzing New York case law for use in motion to dismiss	4.5	2,677.50
09/11/18	MD	Draft declaration of B. Moskowitz in support of motion to dismiss; revise memorandum in support of motion to dismiss; research jurisdictional requirements under federal question and class action fairness act	6.5	2,990.00
09/11/18	TT	Cite check memorandum of law in support of motion to dismiss	2.6	559.00
09/12/18	MD	Continue revising memorandum of law in support of motion to dismiss; continue researching for same; draft corporate	7.2	3,312.00

Jeffrey Epstein
 Gerber vs. The Financial Trust Co.

FEES FOR PROFESSIONAL SERVICES RENDERED THROUGH 09/30/18

Date	Init	Description of Work Performed	Hours	Amount
		disclosure statement; draft notice of motion; continue drafting of B. Moskowitz declaration		
09/12/18	ALG	Various internal strategy correspondence concerning jurisdictional concerns, including email correspondence, analyze Class Action Fairness Act exceptions, confer with M. DiRago concerning Class Action Fairness Act	0.4	190.00
09/12/18	BJM	Analyze D. Indyke's comments to memorandum of law in support of motion to dismiss; analyze, edit and revise memorandum of law in support of motion to dismiss	1.6	952.00
09/13/18	PC	Analyze reported incorporation status of The Financial Trust Company, US Virgin Islands.	0.3	64.50
09/13/18	MD	Continue revising motion to dismiss; revise declaration of B. Moskowitz; additional research for motion to dismiss	3.7	1,702.00
09/13/18	SH	Update citations in revised memorandum of law in support of motion to dismiss, including declaration citations	2.4	600.00
09/13/18	BJM	Continue analyzing, editing and revising motion papers, including to incorporate comments from D. Indyke	2.5	1,487.50
09/14/18	MD	Revise and finalize motion to dismiss; revise and finalize declaration of B. Moskowitz; revise and finalize notice of motion; finalize exhibits; work with paralegal to prepare documents for filing	5.1	2,346.00
09/14/18	KM	Assemble and format Motion to Dismiss in preparation for filing	2.5	412.50
09/14/18	BJM	Analyze motion papers and provide final comments in preparation for filing; emails with D. Indyke and M. DiRago regarding finalization of motion papers	2.5	1,487.50
Totals			83.3	40,017.00

Jeffrey Epstein
Gerber vs. The Financial Trust Co.

TIMEKEEPER TIME SUMMARY THROUGH 09/30/18

Initials	Name	Hours	Rate	Amount
PC	Cherry	0.3	215.00	64.50
MD	DiRago	48.1	460.00	22,126.00
ALG	Genovese	0.4	475.00	190.00
SH	Harris-Finkel	2.4	250.00	600.00
KM	Molina	2.5	165.00	412.50
BJM	Moskowitz	27.0	595.00	16,065.00
TT	Townsend	2.6	215.00	559.00

Jeffrey Epstein
Gerber vs. The Financial Trust Co.

FOR COSTS AND EXPENSES INCURRED THROUGH 10/17/18

Date	Description	Amount
10/12/18	Computer Research	26.30
10/12/18	Computer Research	70.41
10/12/18	Computer Research	11.73
10/12/18	Computer Research	211.17
10/12/18	Computer Research	875.11
10/12/18	Computer Research	644.82
10/12/18	Computer Research	11.52
10/12/18	Computer Research	875.11
10/12/18	Computer Research	884.32
10/12/18	Computer Research	414.52
10/12/18	Computer Research	386.89
10/12/18	Computer Research	11.52
10/12/18	Computer Research	138.18
10/12/18	Computer Research	36.85
10/12/18	Computer Research	34.54
10/12/18	Computer Research	46.06
10/12/18	Computer Research	73.69
10/12/18	Computer Research	73.69
10/12/18	Computer Research	18.41
10/12/18	Computer Research	46.04
10/12/18	Computer Research	34.54
10/12/18	Computer Research	1,050.14
10/12/18	Computer Research	81.37
10/12/18	Computer Research	36.83
10/12/18	Computer Research	543.74
10/12/18	Computer Research	645.70
10/12/18	Computer Research	11.51
10/12/18	Computer Research	184.24
10/12/18	Computer Research	202.65

Invoice Date 10/17/18
Invoice Number 2040188
File No. 238227.000015
Page 6



Jeffrey Epstein
Gerber vs. The Financial Trust Co.

FOR COSTS AND EXPENSES INCURRED THROUGH 10/17/18

Date	Description	Amount
10/12/18	Computer Research	18.41
10/12/18	Computer Research	1,243.58
	Total:	<u>8,943.59</u>
	Total Fees & Costs:	<u>\$48,960.59</u>

Troutman Sanders LLP
875 Third Avenue
New York, NY 10022



Federal ID No.:

58-0946915

Billing Inquiries:

404-885-2508

Electronic Payments

Wells Fargo Bank, [REDACTED], Atlanta, Georgia

ACH/ABA #061000227

WIRE/ABA #121000248

To Credit Troutman Sanders LLP

Operating Account #2052700305792

Reference Attorney: B J Moskowitz

Reference Client: 238227

From International Locations please add

Swift Address/Code: WFBI US 6S

Payment Remittance Address

Troutman Sanders LLP

[REDACTED] Box 933652

Atlanta, Georgia 31193-3652

Jeffrey Epstein
Attn: Jeffrey Epstein, Doe 43 v. Epstein, et al.
Darren K. Indyke, PLLC
575 Lexington Avenue
4th Floor
New York, NY 10022

Invoice Date
Submitted by
Direct Dial
Invoice No.
File No.

10/17/18
B J Moskowitz
212-704-6087
2040188
238227.000015

RE: Gerber vs. The Financial Trust Co.

Total Amount of This Invoice

\$48,960.59

TO ENSURE PROPER CREDIT, PLEASE RETURN THIS PAGE WITH PAYMENT. THANK YOU!

EFTA00804469