

Mr. Jeffrey Epstein
301 East 66th Street
Suite 10 B
New York, NY 10065

January 20, 2012
Page 1

Ref.: LAS-23869-080743-469108

Jeffrey Epstein vs. Scott Rothstein, Bradley Edwards and L.M.

INVOICE	
Total Amount Due for this Invoice	\$ 36,393.75
Total Due	\$ 36,393.75

For Professional Services Through December 31, 2011

Date	Description	Atty	Hours
12/01/11	Review numerous comments and revision to discovery requests from Darren Indyke; review bankruptcy Order re: Rothstein deposition; attend conference call with JEE, Darren Indyke and JLA; review motion to compel re: privilege logs; review comments to amended counterclaim.	LAS	1.50
12/01/11	E-mail communications with Jeffrey Epstein re: deposition of Scott Rothstein, deposition of Brad Edwards, deposition of Jeffrey Epstein and confirmation of preparing new Motion to Dismiss	CEK	0.25
12/01/11	E-mail from J. Epstein; attend conference call with J. Epstein, Darren Indyke, and Lilly Ann Sanchez; e-mail from Darren Indyke regarding Complaint comparison.	JLA	1.50
12/02/11	Work on filing Motion for Order on Taking Depo of Scott Rothstein.	JSG	1.50
12/02/11	Research USDC Southern District Court filings in current open case; research USDC Southern District and 15th Judicial Circuit for new case filings; e-mail update to attorneys.	LAR	0.25
12/02/11	Prepare Renewed Motion to Depose Scott Rothstein; letter to J. Scarola regarding same; prepare proposed Order; review Bankruptcy filings; prepare Motion to Depose Scott Rothstein; e-mail to Charles L. regarding same; e-mail to U.S. Attorney L. Lavecchio regarding same; e-mails with Darren Indyke regarding other discovery requests (3); e-mails from [REDACTED] with pleadings (3); review letters from J. Scarola (3).	JLA	5.50
12/03/11	E-mails to and from Charles L. regarding Rothstein deposition (4); e-mail from J. Scarola regarding Motion to Take Rothstein Deposition.	JLA	0.50
12/05/11	Review pleadings filed; review and respond to emails; confer with JLA.	LAS	0.50
12/05/11	E-mails with Darren Indyke regarding Rothstein deposition and discovery requests (2); e-mail from J. Scarola regarding Motion for Enlargement of Time on Discovery.	JLA	0.75
12/06/11	Review and respond to emails; review Scott Rothstein deposition protocol & scheduling order; forward same; confer with JLA; confer with Joe DeMaria re: background on Rothstein deposition.	LAS	1.00
12/06/11	Attend hearing regarding Rothstein deposition; e-mails to and from Darren Indyke (4); e-mails on Rothstein deposition (4) regarding Order on Rothstein Deposition; e-mail from [REDACTED] regarding Rothstein deposition.	JLA	1.75

Date	Description	Atty	Hours
12/07/11	Receipt and review of executed Agreed Order Granting, In Part: The Motion of Trustee Herbert Stettin to Issue a Writ of Habeas Corpus Ad Testificandum; Gibraltar Private Bank & Trust's Motion for Leave to Depose Scott Rothstein and for Certification to District Court for Issuance of Writ of Habeas Corpus Ad Testificandum; and Razorback Creditors' Motion for Issuance of Writ of Habeas Corpus Ad Testificandum to Depose Scott W. Rothstein in State Court Litigation and Establishing Protocol for Examination and Deposition	CEK	0.25
12/07/11	Telephone conference with Judge Ray's office re: Order on Motion to Depose Rothstein. Confer with J. Ackerman re: Order and Notice of Hearing.	JSG	0.50
12/07/11	E-mail communications with Jeffrey Epstein re: current status of matter	CEK	0.25
12/07/11	Prepare Notice of Filing for Rothstein Deposition; revise discovery requests (2); e-mails to and from Darren Indyke regarding same (2); e-mails to and from J. Scarola regarding hearing and discovery requests (4); prepare report letter/agenda; hearing preparation.	JLA	2.50
12/08/11	Review Notice of Hearing on Motion to Depose Rothstein. Draft Certificate of Service for Notice of Hearing. Review Notice of Filing on State Court Order Granting Motion to Depose Rothstein. Prepare and file Notice of Filing. Prepare and file Certificate of Service. Draft proposed Order on Motion to Depose Rothstein for Bankruptcy Court motion. Follow up confirmations on requirements to notice counsel in state court action.	JSG	2.25
12/08/11	Review of comments to Motion to Dismiss Second Amended Counterclaim from Darren Indyke, Esquire	CEK	0.25
12/08/11	Conference call with Mr. Epstein and D. Indyke, Esq. re: going-forward strategy, upcoming hearings and filings and address and advise re: Rothstein deposition issues.	HSG	0.75
12/08/11	E-mails from Darren Indyke with revisions to Motion to Dismiss Second Amended Counterclaim (2); e-mails with Darren Indyke regarding J. Epstein deposition (6); letter to J. Scarola regarding J. Epstein deposition; prepare Motion for Protective Order and Notice of Hearing.	JLA	2.25
12/08/11	Preparation for Bankruptcy hearing on Rothstein deposition; e-mails with C. Lichtman and L. Lavecchio regarding same (2); e-mails with Jack Goldberger regarding J. Epstein deposition (3); conference call with Darren Indyke, J. Epstein, and Lilly Ann Sanchez.	JLA	2.25
12/09/11	Confer with J. Ackerman on results of hearing on Motion to Depose Rothstein. Discuss on planned course of action for hearing next week. Email from J. Ackerman on requirement to upload Order on results of hearing.	JSG	0.50
12/09/11	Review of Epstein's Motion to Dismiss Second Amended Counterclaim and Incorporated Memorandum of Law, Epstein's Second Request for Production to Edwards and review of Epstein's Third Set of Interrogatories to Edwards	CEK	0.25
12/09/11	Preparation and attendance at hearing on Motion to Take Scott Rothstein Deposition in Bankruptcy proceeding; conference with J. Silver and other counsel; e-mails with Darren Indyke regarding same (2); make revisions to discovery requests; e-mails with J. Scarola, Darren Indyke, and J. Goldberger regarding resetting Epstein deposition (5); revise Motion to Dismiss Second Amended Counterclaim and e-mails and telephone calls with Darren Indyke regarding same (6).	JLA	8.00
12/12/11	Review discovery served; review motion to dismiss; review and respond to emails; numerous calls with JLA and Darren Indyke.	LAS	1.75
12/12/11	Draft and upload Order on Motion to Take Rothstein Deposition. Advise on appearance of L. Sanchez in bankruptcy court for motion for transcript availability to press.	JSG	1.25
12/12/11	Begin preparation of motion to strike Edwards' Statement of Undisputed Facts.	HSG	1.50

Date	Description	Atty	Hours
12/12/11	Review Order regarding Motion for Summary Judgment; prepare response to Request to Produce and objections; letter to J. Scarola regarding same; e-mails with Darren Indyke regarding same (6); e-mails with Darren Indyke and J. Epstein regarding hearing on Motion for Protective Order (4); report letter/e-mail to client in response to Darren Indyke's questions.	JLA	2.50
12/12/11	Assist in preparation for Bankruptcy hearing on attending Rothstein deposition and getting daily transcripts.	JLA	1.00
12/13/11	Attend bankruptcy court hearing re: daily transcript issue; review and respond to emails; draft email re: result of hearing and postponement of JEE deposition; confer with Helaine Goodner re: motion to strike & response to undisputed statement of facts.	LAS	3.00
12/13/11	Telephone conference with Jeffrey Epstein re: discovery propounded to Edwards; deposition of Scott Rothstein; Edwards' Renewed Motion for Final Summary Judgment; strategies	CEK	0.50
12/13/11	Prepare for and attend hearing on Motion for Protective Order regarding J. Epstein deposition; work on Motion to Strike Statement of Facts regarding Motion for Summary Judgment; e-mails from J. Scarola regarding resetting of J. Epstein deposition.	JLA	1.50
12/13/11	Conference with Jack Goldberger regarding status of J. Epstein deposition; e-mails regarding the resetting of J. Epstein's deposition (3).	JLA	0.25
12/13/11	Draft motion to strike Edwards' Statement of Material Facts in support of motion for summary judgment and review chronology re: same.	HSG	4.50
12/14/11	Review of Order on Plaintiff's Motion for Protective Order to Postpone Deposition of Plaintiff; e-mail communications with Joseph Ackerman, Esquire re: Court's order, scheduling of deposition, trial conflict, dates available, predeposition conferences; review of unilateral Notices of Taking Deposition of Ghislaine Maxwell, Howard Rubenstein, Ava Cordero, Alan Dershowitz, and Jeffrey Epstein	CEK	0.75
12/14/11	Review and respond to emails; review summary agenda; confer with JLA.	LAS	1.00
12/14/11	Review Order regarding Motion for Protective Order; e-mail from Darren Indyke; e-mails to and from J. Scarola regarding discovery and J. Epstein deposition (3); telephone call with Darren Indyke regarding Motion for Protective Order hearing; e-mails with J. Epstein (3); prepare Agenda; work on discovery responses; e-mails with Jack Goldberger regarding J. Epstein deposition (2).	JLA	2.00
12/15/11	Review and respond to emails; confer with JLA re: conversation with JEE re: settlement of case; confer with JLA re: Jay Lefkowitz.	LAS	1.00
12/15/11	Work on responses to discovery requests (continued); e-mails with Jay Lefkowitz (2); telephone call with J. Epstein; telephone calls with Jay Lefkowitz (2); review Notice of Taking Deposition for J. Epstein; review letter from J. Scarola and Notice of Hearing.	JLA	2.50
12/16/11	E-mails with Darren Indyke regarding discovery responses (10); telephone calls with Darren Indyke regarding discovery responses (3); review Burman, Critton, Luttier & Coleman bills for discovery responses; prepare draft Answers to Interrogatories; e-mails with ██████████ regarding BCLC invoices (5).	JLA	8.25
12/17/11	E-mails with Darren Indyke regarding discovery responses (2); e-mails with ██████████ regarding missing BCL bills (2).		0.50
12/18/11	Work on Answers to Interrogatories (continued); continue to redact invoices; review, revise, and finalize e-mails with Darren Indyke regarding same.	JLA	5.75
12/19/11	E-mails with Darren Indyke regarding Motion for Clarification (2); e-mails from Darren Indyke regarding Burman, Critton, Luttier & Coleman, LLP invoices for Answers to Interrogatories (9).	JLA	0.75

Date	Description	Atty	Hours
12/20/11	Draft Amended Order Denying Epstein to depose Rothstein. Telephone call to Judge Ray's clerk about amended order.	JSG	0.50
12/20/11	Telephone call with Darren Indyke regarding hearing on objections to discovery requests; legal research for hearing and regarding Motion for Re-Hearing on discovery issues; review status of Bankruptcy Order revisions; hearing preparation.	JLA	1.50
12/21/11	E-mail communications with Jeffrey Epstein re: current status of matters and strategies	CEK	0.25
12/21/11	E-mails with Darren Indyke regarding J. Epstein deposition (2); prepare for and attend hearing on Motion to Compel.	JLA	2.75
12/22/11	Multiple e-mail communications with Jeffrey Epstein re: status of case, position taken, strategies, outstanding discovery, testimony of Scott Rothstein	CEK	0.50
12/22/11	Receipt and review of Amended Order from Court. Correct Certificate of Service and file.	JSG	0.50
12/23/11	Multiple e-mail communications re: Jeffrey Epstein matters and outstanding accounts receivables	CEK	1.00
12/26/11	Telephone conference with Jeffrey Epstein re: deposition of Scott Rothstein and testimony to date, discussion of current status of matter; e-mail communications with Jeffrey Epstein re: same	CEK	0.25
12/31/11	E-mail communications with Jeffrey Epstein re: testimony given by Scott Rothstein; discussion of potentially bringing in Adler as Defendant; e-mail communications with Roy Black, Esquire re: discussion of propounding testimony in a request for admission to Edwards; e-mail communications with Lilly Ann Sanchez, Esquire re: request for admission; e-mail communications with Jeffrey Epstein re: strategy discussions	CEK	0.75

Fees for Professional Services \$ 36,393.75

Summary of Timekeeper Fees

Timekeeper	Hours	Rate/Hour	Dollars
Christopher E. Knight (CEK)	5.25	525.00	2,756.25
Lilly Ann Sanchez (LAS)	9.75	525.00	5,118.75
Joseph L. Ackerman (JLA)	54.25	450.00	24,412.50
Helaine S. Goodner (HSG)	6.75	375.00	2,531.25
John S. Graham (JSG)	7.00	225.00	1,575.00
█ A. Roberts (LAR)	0.25	0.00	0.00
TOTAL	83.25	\$	36,393.75

Totals for This Matter

Fees for Professional Services	\$	36,393.75
Reimbursable Costs	\$	0.00
NET CURRENT BILLING FOR THIS MATTER	\$	<u>36,393.75</u>
TOTAL AMOUNT DUE FOR THIS MATTER	\$	<u><u>36,393.75</u></u>

TERMS: DUE UPON RECEIPT

Please make checks payable to: **FOWLER WHITE BURNETT**
Please reference **23869-080743-469108** when making payment.