

Law Office of Tonja Haddad, PA  
 524 South Andrews Avenue  
 Suite 200 North  
 Fort Lauderdale, FL 33301  
 [REDACTED]

<b>Date:</b>	<b>No.</b>
7/30/2012	615
<b>Terms</b>	<b>Due Date</b>
NET 30 days	8/29/2012

*upon receipt*

**Bill to**

Darren Indyke  
 Jeffrey Epstein  
 301 East 66th Street, 10B  
 New York 10065, New York 10065

Project Name	Billing Type	Rate
Rothstein/Edwards	Retainer - Hourly	385.00

		Amount
<b>Total hours:</b>		124.25
		29,636.25
<b>Work Hours</b>		
Date	Description	Hours
6/27/2012	Finish Researching and Draft Motion to Strike Motion to Compel. Review and respond to Communications from client, co-counsels, and opposing counsel.	4.50
6/28/2012	Review Initial Complaint. Send letter regarding same. Revise letter and send to co-counsels regarding discovery.	2.50
6/29/2012	Review and respond to emails from co-counsels. Revise and finalize Motion to Strike. Finish Civil Theft Condition Precedent research.	1.50
7/3/2012	Research for Summary Judgment. 5th Amendment issues and Litigation Privilege.	6.50
7/3/2012	Review and respond to emails regarding case.	0.50
7/9/2012	Review Civil Theft Statutes and respond to Request to Produce.	0.50
7/9/2012	Review Privilege logs and drafts of letter to Scarola re: discovery. Revise letter and send same to Darren to review.	0.50

**Work Hours**

Date	Description	Hours
7/10/2012	Review and revise discovery letters and send same.	0.50
7/10/2012	Research regarding Civil theft Demands. Draft discovery response to request to produce regarding civil theft demand letter and cover letter explaining law regarding same.	2.50
7/10/2012	Revise letter to Scarola regarding discovery and case evaluation. Send same to client and co-counsels to review. Communications with Darren.	0.30
7/11/2012	Revise and send letter requesting emails. Teleconference with Darren regarding same. (NO CHARGE)	0.20
7/12/2012	Read statement of undisputed facts from Edwards' Motion for Summary Judgment. Label and list disputed allegations.	3.20
7/13/2012	Review and respond to communications regarding hearing date. Review letter from Scarola. Emails regarding same. Teleconference with Darren regarding Summary Judgment.	0.60
7/16/2012	Review Referenced Exhibits in file (in our possession) from the Statement of Undisputed Facts. Mark issues and send to Darren.	3.00
7/17/2012	Conduct research on Motion for Summary Judgment issues as presented in statement of undisputed facts.	6.25
7/17/2012	Teleconference with Darren Indyke.	0.40
7/17/2012	Teleconference with Jack Goldberger re: Criminal plea and Statement of Facts for Summary Judgment. Receive and Review Plea Colloquy and Charging documents for Criminal case, Non-Prosecution Agreement and Addendum to Non-Prosecution Agreement.	2.00
7/19/2012	Research regarding dismissal of case and prevailing party attorneys fees.	3.75
7/20/2012	Continue research regarding dismissal of case and attorneys fees under 57.105 Notice.	2.50
7/24/2012	Continue researching legal issues regarding potential dismissal of lawsuit and liability.	3.20
7/24/2012	Legal Research and Writing performed by Debra Fein at reduced rate of \$125.00 per hour. See addendum to this bill for specific work and time spent.	70.00
7/24/2012	Prepare for and attend Hearings on Motion to Compel and Motion to Continue.	3.50
7/25/2012	Review documents. Draft Amended Answer and Affirmative Defenses.	0.80
7/25/2012	Revise and finalize Memorandum of law regarding case dismissal.	1.75
7/27/2012	Prepare for and attend meeting with client. [Do not charge for Debbie's time].	3.00
7/30/2012	Teleconference with Darren.	0.30

**Work Hours**

Date	Description	Hours
	Revise and finalize Answer and Affitmativ Defenses.	
	<b>Total hours:</b>	124.25

<b>Amount</b>	29,636.25
<b>Subtotal</b>	29,636.25
<b>Tax</b>	0.00
<b>Total Due</b>	29,636.25

Debra Fein- Epstein July Time on Summary Judgment- Final (edited by THC)

7/2/12	2.5	research for summary judgment; 5th amendment
7/3/12	3	research 5th amendment issue and correspondence with THC re same
7/7/12	3.50	compile material for 5th amendment argument; formulate the argument; review the material to see what to include
7/8/12	3.5	compile material for 5th amendment argument; formulate the argument; review the material to see what to include; start writing
7/9/12	8.5	write fifth amendment argument; research litigation privilege; Epstein research litigation privilege; review draft of 5th amendment issue; add factual information from this case and send to THC for review.
7/10/12	8.75	litigation privilege research for motion for summary judgment
7/11/12	7.5	write litigation section of the response to the motion for summary judgment
7/12/12	8	continue drafting litigation privilege section of response to motion for summary judgment; work on introduction section
7/15/12	6	research issue on 5th amendment and adverse inference; also standard for summary judgment and trial court's role in ruling on the motion for summary judgment; write the section
7/16/12	5.25	edit inferences section of response motion; edit and rewrite sections of litigation privilege sections
7/17/12	5	edit litigation privilege section of the response motion; research additional issues; rewrite sections
7/18/12	3.25	put all three written sections together -- litigation privilege, negative inference and fifth amendment sword and shield, edit and send to THC
7/19/12	6.25	abuse of process research; finish research; organize research; outline and start writing this section of the motion for summary judgment; review disk from Fowler White (1 hour- do not bill)

Total: 70 hours (modified by THC on July 24, 2012 (reduced by 17 hours))