

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

December 7, 2011  
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Ref.: LAS-23869-080743-467778

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

INVOICE	
Total Amount Due for this Invoice .....	\$ 47,535.00
Past Due .....	\$ 146,478.75
Total Due .....	\$ 194,013.75

For Professional Services Through November 30, 2011

Date	Description	Atty	Hours
10/30/11	Review Answer and Affirmative Defenses from Edwards; work on discovery requests; work on Motion for Clarification.	JLA	0.50
10/31/11	Case preparation regarding discovery requests.	JLA	0.50
11/01/11	E-mail communications with Jeffrey Epstein re: Rothstein deposition, hearing on Motion to Dismiss; e-mail communications with Lilly Ann Sanchez, Esquire re: follow up; e-mail communications with Darren Indyke, Esquire re: current hearing setting and status of Motion for Clarification re: Discovery;	CEK	0.50
11/01/11	Research; download and e-mail recent pleadings from USDC case to attorneys.	LAR	0.00
11/01/11	Numerous emails and phone conversations with Darren Indyke; confer with CEK; emails with Susan Aprill and JLA; review status of hearing.	LAS	2.75
11/01/11	E-mails to and from Darren Indyke (3).	JLA	0.25
11/02/11	E-mail communications with Darren Indyke, Esquire re: potential for hearing date in 2012 and anticipated objections by offices of Jack Scarola, Esquire	CEK	0.25
11/02/11	Prepare interrogatories	SA	1.75
11/02/11	Draft Damage Interrogatories and Economic Loss Interrogatories	PMR	1.50
11/02/11	E-mail exchange re: scheduling of hearings.	HSG	0.25
11/03/11	Review and revise draft Interrogatories	CEK	0.50
11/03/11	Revise Motion for Clarification Regarding Discovery; review Renewed Motion for Summary Judgment; e-mail to Client regarding Motion for Clarification; telephone call with Darren Indyke regarding Motion for Clarification (2).	JLA	3.50
11/04/11	Receipt and review of Bradley Edwards' Renewed Motion for Final Summary Judgment; review of draft of Motion for Clarification Regarding Discovery; e-mail communications with client re: changes to draft Motion; e-mail communications with Lilly Ann Sanchez, Esquire re: requested changes to draft Motion	CEK	1.00
11/04/11	Prepare revisions to Motion for Clarification; various telephone calls and e-mails with Darren Indyke regarding same (14); e-mails with J. Epstein regarding same (6); correspondence to J. Scarola regarding same; review Statement of Facts and Renewed Motion for Summary Judgment; review Privilege Log; e-mails with attachments from Jackie Perczek regarding CVRA (3).	JLA	6.75
11/04/11	Prepare Request for Production regarding counterclaim	SA	1.25
11/07/11	E-mail communications with Jeffrey Epstein re: Rothstein's behavior, abuse of process, etc.	CEK	0.25

Date	Description	Atty	Hours
11/07/11	Review draft interrogatories and request for production of documents; review renewed motion for summary judgment and statement of facts; forward same with email to JEE and Darren Indyke with options for response; conference call with JLA and Helaine Goodner re: strategy forthcoming on all issues; follow up call with Darren Indyke.	LAS	3.00
11/07/11	Review and analysis of new 3d DCA case regarding the litigation privilege and abuse of EEG process claims.		0.25
11/07/11	Prepare for hearing on Motion for Protective Order and Motion for Clarification; conference call with Darren Indyke and Lilly Sanchez; review Statement of Facts and begin working on Motion to Strike and Other Remedy; e-mails and telephone calls from Darren (2); e-mails from JEE (3); work on possible Reply to Affirmative Defenses.	JLA	3.50
11/07/11	Review of Edwards' Statement of Undisputed Facts and advise re: potential motion to strike same and Edwards' affirmative defenses.	HSG	1.50
11/08/11	Review pleadings for hearing; confer with Darren Indyke; conference call with JEE, Darren Indyke and JLA; follow up call with JLA.	LAS	1.25
11/08/11	Work on possible Reply for Edwards' Affirmative Defenses; review prior transcripts for hearings (2) on 11/9/2011; e-mails regarding hearing (3); e-mails regarding conference call (3); conference call with Lilly Sanchez, Darren Indyke, and JEE.	JLA	3.25
11/08/11	Review and advise re: filing reply in avoidance of Edwards' affirmative defenses re: immunity.	HSG	0.25
11/08/11	E-mail from J. Scarola regarding hearing; e-mail from Darren Indyke regarding proposals; work on Motion to Strike Statement of Facts.	JLA	0.75
11/09/11	Review and respond to emails; confer with JLA re: hearing; follow up with Darren Indyke.	LAS	0.75
11/09/11	Address issues regarding renewed motion to clarify discovery and/or motion for protective order and begin drafting same.	HSG	2.00
11/09/11	Prepare for and attend hearings on Motion for Protective Order and Motion for Clarification; e-mails to and from JEE (6); e-mails with Scarola regarding Affidavit at hearing (4); case preparation regarding Motion to Strike Statement of Facts and damage discovery.	JLA	4.50
11/10/11	Review and respond to emails re: discovery.	LAS	0.25
11/10/11	Continue drafting motion to clarify and/or protective order re: second deposition of Mr. Epstein.	HSG	6.00
11/10/11	Work on draft of Motion for Protective Order and Motion for Clarification for J. Epstein deposition; review prior Orders and deposition of J. Epstein regarding same.	JLA	1.50
11/11/11	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	0.00
11/11/11	Revise motion for protective order re: second deposition of Jeffrey Epstein.	HSG	1.75
11/11/11	Locate documents/Orders for use on Motion for Protective Order Regarding J. Epstein Deposition; telephone call with Darren Indyke regarding hearing on 11/9/11; e-mails regarding status meetings (4); review draft on Motion for Protective Order.	JLA	2.00
11/14/11	E-mail from Darren Indyke; work on Motion for Protective Order regarding J. Epstein Deposition; telephone calls and e-mails with Scarola's office regarding hearing time (4).	JLA	1.50
11/14/11	Strategy session re: motion for protective order re: Epstein's deposition and motion to stay hearing on Edwards' summary judgment motion.	HSG	0.50
11/15/11	E-mails with Darren Indyke (5); begin preparation for Motion to Dismiss.	JLA	1.50

Date	Description	Atty	Hours
11/16/11	Review revised motion for protective order and hearing binder.	LAS	0.75
11/16/11	Revise motion for Protective Order relating to deposition of Mr. Epstein and/or Motion for Clarification.	HSG	0.50
11/16/11	Review recent draft of Motion for Protective Order regarding Jeffery Epstein deposition; prepare for status conference.	JLA	0.75
11/17/11	Attend weekly conference call with JEE and Darren Indyke; review revised motion for protective order; confer with counsel re: trustee request to reschedule deposition of Scott Rothstein; confer with Chuck Litchman; review pleadings and Order re: same and forward.	LAS	1.75
11/17/11	Prepare for and attend conference call with Jeffrey Epstein and Darren Indyke; telephone call to Jim Silver; review Order regarding Motion for Clarification; e-mails regarding Rothstein deposition (5); review letter from Jack Scarola; work on filing pleading to appear at Rothstein deposition and e-mails regarding same (4).	JLA	3.00
11/18/11	Receipt and review of Order Setting Hearing on Plaintiff Jeffrey Epstein's Motion for Clarification Regarding Discovery	CEK	0.25
11/18/11	Hearing preparation; e-mails regarding hearing on Motion to Dismiss and Motion for Summary Judgment (11); work on Motion for Enlargement of Time to Respond to Discovery Requests.	JLA	2.25
11/18/11	Prepare for hearing on motion to dismiss Edwards' Amended Counterclaim.	HSG	0.50
11/20/11	Preparation for and attendance at conference call with Jeffrey Epstein, Darren Indyke, Esquire, Joseph Ackerman, Esquire, Lilly Ann Sanchez, Esquire and Helaine Goodner, Esquire re: hearing on Motion to Dismiss, hearing on Motion for Clarification Regarding Discovery, discovery issues; review all Motions and supporting law	CEK	5.00
11/20/11	Telephone conference with Mr. Epstein and Mr. Indyke in preparation for hearing on motion to dismiss amended counterclaim.	HSG	0.25
11/20/11	Conference call with Jeffrey Epstein, Darren Indyke and Chris Knight; e-mails regarding same (15); hearing preparation (continued).	JLA	1.50
11/21/11	Confer with CEK and JLA re: hearing on motion to dismiss counterclaim; conference call with JEE and Darren Indyke; review docket and pleadings filed re: deposition of Scott Rothstein.	LAS	1.50
11/21/11	Preparation for, travel to and attendance at hearing on Epstein's Motion to Dismiss before the Honorable David Crow in West Palm Beach, FL; return from same.	CEK	6.00
11/21/11	Prepare for and attend hearing on Motion to Dismiss Amended Counterclaim; conference call with Jack Goldberger and Chris Knight; conference call with Darren Indyke, Jeffrey Epstein, and Lilly Ann Sanchez; prepare proposed Order and correspondence.	JLA	3.75
11/21/11	Review Orders (2) regarding Motion for Protective Order and Motion for Clarification.	JLA	0.50
11/21/11	Follow-up regarding hearing on motion to dismiss Amended Counterclaim, and going-forward strategy.	HSG	0.25
11/22/11	Review pleadings filed re: postponement of the Scott Rothstein deposition; forward Marc Nurik pleading.	LAS	0.50
11/22/11	Review Order on Motion to Dismiss Amended Counterclaim and e-mail to clients regarding same; review Marc Nurik pleadings.	JLA	1.00
11/23/11	Receipt and review of executed Order on Plaintiff/Counter-Defendant Epstein's Motion to Dismiss Amended Counterclaim; telephone conference with client re: same	CEK	0.50
11/23/11	E-mails and telephone calls from J. Scarola regarding J. Epstein deposition; fax from J. Scarola regarding J. Epstein deposition.	JLA	0.50

Date	Description	Atty	Hours
11/28/11	E-mail communications with Lilly Ann Sanchez, Esquire re: hearing on outstanding discovery request and extension on same; e-mail communications with Joseph Ackerman, Esquire re: strategies on hearing and requested extension date; telephone conference with Joe Ackerman re: rulings by Judge Crow, including taking under advisement hearing on setting Motion for Summary Judgment, propounding our damage discovery to Edwards; receipt and review of Order on Plaintiff's Motion for Clarification; receipt and review of Order on Plaintiff's Renewed Motion for Protective Order Relating to his Deposition; receipt and review of Unilaterally set Renotice of Taking Video Deposition of Jeffrey Epstein; e-mail communications with Joe Ackerman re: revisions to Motion for Protective Order, coordination of Motion to Strike; receipt and review of Order Denying Trustee's Motion to Continue Deposition, Order Deferring Ruling on Motion to Bifurcate Proceeding, Order Directing Response by Trustee to Cross-Motions, Order Denying All Requests for Relief not Related Specifically to the Deposition of Scott Rothstein	CEK	1.50
11/28/11	Review and respond to emails from Darren Indyke; confer with JLA re: hearing results and Judge's Orders; review and respond to summary emails; confer with CEK; review Order denying rescheduling of Scott Rothstein deposition.	LAS	1.00
11/28/11	Prepare for and attend hearing on Motion to Set Hearing on Motion for Summary Judgment; telephone call with Darren Indyke regarding same; e-mails from Darren Indyke (3); prepare Motion for Enlargement of Time regarding discovery interrogatories and letter to J. Scarola regarding same.	JLA	3.75
11/28/11	Work on Motion to Strike Statement of Facts; work on Motion to Depose Rothstein and review Order regarding same.	JLA	0.75
11/28/11	Follow-up re: motion to strike Edwards' statement of material facts.	HSG	0.25
11/29/11	Review Orders and recent developments; confer with JLA re: strategy forth going; review summary memorandum to JEE.	LAS	1.25
11/29/11	Receipt and review of Jeffrey Epstein's Motion for Enlargement of Time to Respond to Discovery; receipt and review of Bradley Edwards' Second Amended Counterclaim; review of draft Request for Production to Edwards; review of draft Third Set of Interrogatories to Edwards; telephone conference with Joseph L. Ackerman, Esquire re: draft discovery; telephone conference with Lilly Ann Sanchez, Esquire re: same	CEK	1.00
11/29/11	Prepare revisions to discovery requests (2); prepare and send agenda and report letter to J. Epstein; e-mails to and from J. Epstein (3) regarding Rothstein deposition; e-mails to and from Darren Indyke (3) regarding discovery; work on Motion to Attend Rothstein Deposition.	JLA	3.25
11/30/11	Review Edwards second amended complaint; review draft discovery requests; confer with JLA.	LAS	0.50
11/30/11	E-mail communications with Joseph Ackerman, Esquire re: Second Amended Amended Counterclaim and allegations remaining, discussions of draft discovery; receipt and review of e-mail communication from Darren Indyke with additional edits to draft discovery and categories; review of edited draft Second Request for Production to Edwards; review of edited draft of Interrogatories to Edwards	CEK	0.75
11/30/11	Review Exhibit A to Second Amended Counterclaim; e-mails with Darren Indyke regarding discovery requests (4); continue to work on pleadings to attend Rothstein deposition.	JLA	1.25

Fees for Professional Services ..... \$ 47,535.00

**Summary of Timekeeper Fees**

Timekeeper	Hours	Rate/Hour	Dollars
Christopher E. Knight (CEK)	17.50	525.00	9,187.50
Lilly Ann Sanchez (LAS)	15.25	525.00	8,006.25
Joseph L. Ackerman (JLA)	52.25	450.00	23,512.50
Susan H. Aprill (SA)	3.00	450.00	1,350.00
Esther E. Galicia (EEG)	0.25	375.00	93.75
Helaine S. Goodner (HSG)	14.00	375.00	5,250.00
Paula Rescia (PMR)	1.50	90.00	135.00
<b>TOTAL</b>	<b>103.75</b>	<b>\$</b>	<b>47,535.00</b>

**Totals for This Matter**

Fees for Professional Services .....	\$ 47,535.00
Reimbursable Costs .....	\$ 0.00
NET CURRENT BILLING FOR THIS MATTER .....	\$ 47,535.00
Balance Brought Forward .....	\$ 146,478.75
<b>TOTAL AMOUNT DUE FOR THIS INVOICE .....</b>	<b>\$ 194,013.75</b>

**TERMS: DUE UPON RECEIPT**

Please make checks payable to: **FOWLER WHITE BURNETT**  
 Please reference **23869-080743-467778** when making payment.

December 7, 2011

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

**Detail of Balance Brought Forward**

Prior outstanding billing on our Matter No. 080743

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

Last Payment Date: 05/20/11

Invoice Number	Invoice Date	Original Invoice Amount	Payments and Credits	Invoice Balance Due
465667	10/20/11	\$82,822.50	\$0.00	\$82,822.50
467304	11/29/11	63,656.25	0.00	63,656.25

**Balance Brought Forward** ..... \$146,478.75

For Total Amount Due, See Previous Page