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Invoice

Law Office of Tonja Haddad, PA
315 SE 7th Street
Fort Lauderdale, FL 33301
954.467.1223
[REDACTED]

Invoice Date:	Invoice No.
9/30/2013	698
Terms	Due Date
NET 20 days	10/20/2013

Bill to

Darren Indyke Jeffrey Epstein 575 Lexington Avenue New York 10022, New York 10022
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Matter Name	Billing Type	Rate
Rothstein/Edwards	Hourly billing	425.00

		Amount
Total hours:		217.25
		75,956.25
Work Hours		
Date	Description	Hours
8/29/2013	Read Goldberger Motion to Disqualify and begin research on our Motion to Disqualify Brad.	3.50
8/29/2013	Finalie and send 57.105 Letter and Motion. Review Motion to Disqualify. Review Darren's comments to Motion to Compel.	1.30
8/30/2013	Review documents and review witness list- send to co-counsels.	0.40
9/3/2013	Review and respond to multiple communications from client and co-counsels. Continue drafting Motion to Disqualify Brad Edwards as co-counsel and send to Darren. Review Federal Indictments re: Rothstein.	5.30
9/4/2013	Hours worked by law clerk/paralegal for August- 10.2 hours at \$50.00 per hour.	10.20
9/4/2013	Read brief to 11th circuit re: US case. Review case law regarding recusal when attorney as client.	1.20
9/6/2013	File Response to negative Inference Motion.	1.50
9/8/2013	Prepare for and attend meeting with client.	4.20

Work Hours

Date	Description	Hours
9/9/2013	Finalize and file Motion to disqualify Edwards. Research and draft Motion for Leave to assert Advice of Counsel as Affirmative Defense.	7.80
9/9/2013	Review trial and exhibit list and draft letter to Scarola.	2.00
9/10/2013	Review Amended Exhibit list and compare to original exhibit list. Send same to clients. Revise Motion re: Affirmative Defenses to conform with evidence and send to co-counselors for review.	2.20
9/10/2013	Review letter from Scarola regarding disqualification. Draft Agreed Order re: Motion to Disqualify Edwards. Review Darren's comments to Motion to Amend Affirmative Defenses and Amended Affirmative Defenses, and revise same. Teleconference with DKI regarding same.	4.50
9/11/2013	Review and respond to multiple communications from opposing counsel. Review discovery requests, subpoenas and motions from Scarola.	1.50
9/11/2013	Revise and send Motion for Leave to Amend, Proposed Amended Answer, and Proposed Agreed Order regarding same. Review Motion to Continue from Fred Haddad. Send letter to co-counselors regarding Motion to Compel and Motion.	2.50
9/12/2013	Conduct additional discovery for Motion for Summary Judgment	3.50
9/12/2013	Continue research for Summary Judgment for facts.	4.50
9/12/2013	Begin Drafting Motion for Summary Judgment.	6.50
9/13/2013	Multiple communications with Darren and co-counselors and client regarding case. Review communications from Scarola. Review Motion to continue trial. Revise Motion for Leave to amend and file- hearing September 17.	5.50
9/15/2013	Revise and continue researching Summary Judgment Motion.	5.50
9/16/2013	Conduct additional research for hearing.	1.50
9/16/2013	Attend hearings on Motion for Leave to Amend and Motion for Adverse Inference and Evidence Preclusion.	4.50
9/16/2013	Multiple communications with Darren and co-counsel regarding hearings and advice of counsel.	1.50
9/16/2013	Review Reply Motion filed by Scarola. Review and respond to multiple communications regarding same. Teleconference with Darren regarding communications.	1.50
9/17/2013	Teleconferences with Darren and Jeffrey regarding cases.	1.50
9/17/2013	Research regarding deposition and adverse inference and 5th amendment re: Scarola's Motion.	4.50

Work Hours

Date	Description	Hours
9/18/2013	Research and draft Objection to Subpoenas.	4.50
9/18/2013	Revise Summary Judgment.	3.50
9/18/2013	Review and respond to communications. Revise trial objections to exhibits.	2.80
9/19/2013	Revise discovery responses and Summary Judgment. Send to Darren.	1.50
9/19/2013	Read Court Pleadings and depositions for facts for Motion for Summary Judgment. Revise Motion for Summary Judgment.	5.20
9/19/2013	Revise and send Objection to Subppenas to non-party witnesses. Revise Trial exhibit objections.	2.50
9/20/2013	Review request to produce and send to client. Review multiple communications from Scarola. Respond to same. Review Scarola's objections to Epstein's exhibit and witness lists.	3.50
9/21/2013	Research, draft, and file Motion to Quash and for Sanctions. Review and respond to multiple communications from client and co-counsel.	6.50
9/22/2013	Read Epstein Deposition. Revise and continue research on Summary Judgment. Review and repond to multiple communications from opposing counsel, co-counsel, and Darren.	8.60
9/23/2013	Revise Summary Judgment and send to co-counsel. Review Pre-Trial Stipulation; make changes and send to co-counsel.	6.20
9/24/2013	Communications with Darren. Revise Summary Judgment.	3.75
9/24/2013	Revise and finalize Motion for Summary Judgment.	6.40
9/25/2013	Finalize and send Summary Judgment. Complete Exhibit List.	3.75
9/25/2013	Revise Motion to Compel.	5.50
9/25/2013	Review and revise Jeffrey affidavit. Communications with Darren,	1.75
9/25/2013	Communications with Roy Black's office regarding subpoenas and case.	0.50
9/25/2013	Revise Motion to Compel and Pre-Trial Stipulation.	4.20
9/25/2013	Revise and file documents. Communications with Jeffrey and co-counsel regarding Stay.	2.20
9/26/2013	Research and draft Motions in Limine. Revise Pre-Trial Stipulation, review Scarola's changes, and revise again. Communications with client and co-counsel.	9.30
9/27/2013	Review ernalms from co-counsel and opposing counsel. Review documents filed by opposing counsel. Teleconference with co-counsel. Finalize and File Deposition Designation and Motion in Limine.	4.50
9/30/2013	Work performed by Debra Fein- 32 Hours at	32.00

Work Hours

Date	Description	Hours
	150.00 per hour (see attached timesheet).	
9/30/2013	Work performed by Law Clerk in September- 10 hours at \$50.00 per hour.	10.00
	Total hours:	217.25

Expenses

Date	Description	
9/9/2013	Overnight mail to judge for September 16 hearing.	15.00
9/12/2013	Fed Ex Order to Judge re: Edwards Disqualification	23.45
9/30/2013	Copies for Summary Judgment Motion. 1406 pages at .25 per page.	351.50
	Total expenses:	Subtotal 389.95
	Amount	75,956.25
	Subtotal	76,346.20
	Tax	0.00
	Previous Retainer Balance	10,000.00
	Total Due	66,346.20