

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

August 3, 2011
Page 1

Ref.: LAS-23869-080743-461717

Jeffrey Epstein vs. Scott Rothstein, Bradley Edwards and [REDACTED]

INVOICE	
Total Amount Due for this Invoice	\$ 55,455.00
Total Due	\$ 55,455.00

For Professional Services Through July 31, 2011

Date	Description	Atty	Hours
06/27/11	Review and respond to emails; review pleadings filed in CVRA matter.	LAS	0.50
06/27/11	Email from M. Quinn regarding Cara Holmes; Emails to/from Marty Weinberg (5); Phone call with Marty W.; Emails regarding Wackenhut depositions (4); Email from/to R. Carney regarding status (2)	JLA	1.50
06/29/11	Confer with Jackie Perzcek re: status of JEE Palm Beach matter; conference call with JEE and CEK.	LAS	0.50
07/01/11	E-mail communications with Jeffrey Epstein re: postponing of meeting with Cara Holmes and coordination of same for Martin Weinberg, Esquire and/or Roy Black, Esquire	CEK	0.25
07/01/11	Handle incoming call from Michelle Ganetis and assist her accordingly with discovery requested by LAS from the boxes identified as "Irrelevant";	EQG	1.00
07/01/11	Preparation for hearing on July 13, 2011 and emails regarding same (5); Emails regarding Wackenhut depositions (2); Emails regarding Cara Holmes meeting (9)	JLA	2.00
07/03/11	E-mail communications with Jeffrey Epstein re: continuation of A.J. Discala depo, potential for continuing of July 13th hearing before Judge Crow, setting of Cara Holmes deposition prior thereto, forthcoming documents from Discala counsel, Jonathan Etra, continued strategies	CEK	0.25
07/05/11	Emails from Jeffrey Epstein (8); Emails from/to Marty Weinberg (7); Phone call with J. Goldberger; Phone call with Jeffrey Epstein; Preparation for July 13, 2011 hearing; Emails regarding Wackenhut deposition (3)	JLA	3.25
07/05/11	Continue to review and update accordingly the Index of Volume VII of Conrad Scherer's files;	EQG	4.75
07/06/11	Emails to/from Darren Indyke (2); Emails and phone calls with Marty W. (7); Email to J. Silver; Emails from Jeffrey Epstein (3); Phone call with Mark Quinn; Emails regarding Wackenhut deposition (2); Make revisions to hearing notebook	JLA	2.75
07/07/11	Review documents for use at hearing (continued); Prepare Response to Edwards' Motion for Protective Order regarding Law Enforcement Documents and legal research regarding same; Phone call with Jeffrey Epstein; Emails with Marty Weinberg (8); Fax from Jeffrey Epstein regarding Cara Holmes; Emails with Mark Quinn (4); Emails to/from Darren Indyke (2); Hearing preparation and emails regarding same (2); Emails with Jeffrey Epstein (2); Emails with Scarola's office regarding hearing binder (5)	JLA	5.25
07/08/11	Review and respond to emails re: DK & CO counteroffers; resend to JEE and Darren Indyke.	LAS	0.25

Date	Description	Atty	Hours
07/08/11	E-mail communications with Jack Goldberger, Esquire re: hearing preparation and strategies	CEK	0.25
07/08/11	Finalize Response to Motion for Protective Order regarding Law Enforcement Subpoena; Prepare Motion for Leave to Use Attorneys' Eyes Documents with revisions; Phone calls (2) with Darren Indyke; Conference call with Jeffrey Epstein, Marty Weinberg and Darren Indyke; Letter to Judge Crow; Letter to Counsel; Hearing preparation and legal research regarding same; Continued preparation of notebooks for hearings; Emails to/from M. Weinberg (13); Review Notices of Cancellation (2); Emails to/from Jeffrey Epstein (7); Emails to/from Mark Quinn (3)	JLA	8.00
07/08/11	Meeting with Lilly Ann Sanchez, Esquire and Joseph Ackerman, Esquire re: preparation and strategies for upcoming hearing before Judge Crow on all pending motions; telephone conference with Jack Goldberger, Esquire re: hearing preparation and roles played by counsel	CEK	1.00
07/09/11	Email from M. Quinn; Email to/from Marty Weinberg regarding Cara Holmes	JLA	0.25
07/10/11	Email from Marty Weinberg	JLA	0.25
07/11/11	Review pleading in CVRA case; review and respond to emails re: DK & CO; review binder of motions scheduled for wednesday all-day hearing before Judge Crow.	LAS	2.25
07/11/11	Preparation for hearing on all pending motions before Judge Crow; receipt and review of e-mail communication between Jeffrey Epstein and Martin Weinberg, Esquire re: meeting with Cara Holmes with court reporter	CEK	1.00
07/11/11	Continue preparation for hearing on July 13, 2011; Continue preparation of notebooks for hearing; Emails from Jeffrey Epstein (3); Emails to/from Marty Weinberg (10); Email to Mark Quinn	JLA	3.75
07/12/11	Review motions & pleadings for hearing before Judge Crow; confer with JLA & CEK.	LAS	1.00
07/12/11	E-mail communications with Joseph Ackerman, Esquire re: coordination of hearing preparation meeting with Martin Weinberg, Esquire and Jack Goldberger, Esquire; preparation for hearing on all pending motions, including motions directed to the pleadings; review of case law provided by Jack Searcy, Esquire relative to Edwards interfering with Epstein's Non-Prosecution Agreement; e-mail communications with Joe Ackerman re: outcome of conversation with counsel for Cara Holmes; meeting with Helaine Goodner, Esquire re: response to punitive damages claim, case law on standard	CEK	4.00
07/12/11	Review, outline issues and advise and prep regarding hearing on Edwards' Motion to Dismiss Amended Complaint and motions for leave to add punitive damages.	HSG	3.75
07/12/11	Phone calls with Jack Goldberger regarding Cara Holmes and hearing (3); Phone calls with Marty Weinberg regarding Cara Holmes and hearing; Conference call with Mark Quinn and Marty Weinberg; Emails from J. Scarola (case law (2)); Emails regarding Cara Holmes and hearing (9)	JLA	5.50
07/12/11	Prepare and revise proposed Orders for hearing; Emails to/from Jim Silver (4); Hearing preparation (continued)	JLA	3.50
07/13/11	Preparation for and attendance at prehearing conference with Joseph Ackerman, Esquire, Martin Weinberg, Esquire and Jack Goldberger, Esquire; attendance at hearing on all pending motions before Judge Crow in West Palm Beach, FL; post hearing meeting with Joe Ackerman re: Judge's rulings, strategies on amending pleadings; e-mail communications with Jeffrey Epstein post hearing re: Judge's rulings	CEK	10.00
07/13/11	Confer with CEK and JLA re: final hearing preparation; review and respond to emails; update file.	LAS	1.00
07/13/11	Prepare for and attend all day motion hearing; Conference with counsel and mostly with Jack Goldberger and Chris Knight; Emails regarding Razorback issues (4)	JLA	11.00

Date	Description	Atty	Hours
07/14/11	E-mail communications with Jeffrey Epstein re: Judge's rulings, strategies relative to Amended Complaint, continued instructions on Cara Holmes; e-mail communications with Lilly Ann Sanchez, Esquire re: amending Complaint and further instructions on Cara Holmes meeting; receipt and review of Omnibus Order on Motion to Compel in Jane Doe 2 matters (copy from Jeffrey Epstein); e-mail communications with Martin Weinberg, Esquire re: new strategies; amending Complaint, specific explanation to Court on why documents to Silver ends work product privilege; e-mail communications with Marty Weinberg re: crime fraud exceptions and cases to support our position, specifically 3rd Circuit case with compelling language and submitting of same to Judge Crow; coordination of preparation of letter to Judge Crow; e-mail communications with Jeffrey Epstein re: strategies	CEK	2.00
07/14/11	Emails to/from Marty Weinberg regarding Crime Fraud matters; Phone calls regarding same (7); Emails to/from Jeffrey Epstein and Darren Indyke regarding hearing (2); Emails regarding DK/CD settlement discussions (6); Emails regarding Razorback/Jim Silver (6)	JLA	1.25
07/15/11	Prepare Orders (4) for July 13, 2011 hearing; Phone call with Jim Silver; Prepare report letter; Emails from Marty and phone call with Marty regarding waiver of privilege matters	JLA	2.25
07/15/11	Review Florida authorities and advise regarding selective disclosure of documents.	HSG	2.00
07/18/11	Receipt and review of transcript of hearing on all pending motions before Judge Crow on July 13, 2011; receipt and review of executed Order on Edwards' Motion for Reconsideration; receipt and review of executed Order on Defendant's Motion or Protective Order in Regard to the Deposition Duces Tecum of Records Custodian and Trustee Herbert Stettin	CEK	1.25
07/18/11	Review July 13 hearing transcript and orders; review and respond to emails; confer with CEK re: global resolution of matter.	LAS	1.50
07/18/11	Continue to review and input information to the Index of Volume VII of Conrad Scherer's files;	EQG	6.00
07/19/11	Receipt and review of Edwards' Motion for Leave to Amend to Assert a Claim for Punitive Damages; receipt and review of Omnibus Order Regarding Update Deposition of Plaintiff	CEK	0.25
07/19/11	Continue to review documents and input same to Index of Volume VII of Conrad Scherer's files;	EQG	4.00
07/19/11	Review Motion to Add Punitive Damages; Reivew Orders from Judge Crow (3); Prepare recommendation email regarding same	JLA	1.75
07/20/11	Telephone conference with Joseph Ackerman, Esquire re: strategies relative to amending Complaint, review of Robert Critton, Esquire's correspondence files, responses to two outstanding interrogatories as ordered by Judge Crow and follow up relative to privilege waiver issues	CEK	0.50
07/20/11	Continue to review and input data to Index of Volume VII of Conrad Scherer's files;	EQG	3.50
07/20/11	Email from/to M. Weinberg (5); Letter to client regarding future work to be done and emails regarding same (6)	JLA	1.50
07/21/11	E-mail communications with Joseph Ackerman, Esquire, Lilly Ann Sanchez, Esquire and Martin Weinberg, Esquire re: preparation of responses to interrogatories and conference with client; e-mail communications with Jeffrey Epstein re: availability for strategy conference	CEK	0.25
07/21/11	Continue and complete reviewing and adding data to the Index of Volume VII of Conrad Scherer's files;	EQG	6.25

Date	Description	Atty	Hours
07/21/11	Emails to/from Jeffrey Epstein regarding Silver/Edwards' Agreements (5); Emails regarding meeting (4); Emails to/from Marty Weinberg regarding 57.105(2)	JLA	0.75
07/24/11	Preparation for and attendance at conference call with Jeffrey Epstein re: strategies, Amended Complaint, answers to specific interrogatories, privilege issues	CEK	2.00
07/24/11	E-mail communications with Joseph Ackerman, Esquire and Lilly Ann Sanchez, Esquire re: Court's rulings at most recent hearing, Orders received from Court and amending of Complaint	CEK	0.50
07/24/11	Confernece calll with JEE, Darren Indtke, CEK, Marty Weinberg and Joe Ackerman; follow up with emails re: potential global settlement options; confer with CEK re: same.	LAS	1.75
07/24/11	Emails from/to Jeffrey Epstein and Darren Indyke (3); Conference with Jeffrey Epstein, Darren Indyke, Chris Knight, Lilly Sanchez and Marty Weinberg	JLA	2.25
07/25/11	Emails regarding setting Wackenhut employee depositions (4)	JLA	0.25
07/26/11	E-mail communications with Joseph Ackerman, Esquire re: amendment to Complaint; conference with Helaine Goodner, Esquire re: outline of punitive response, including irrelevant and legally insufficient arguments made by Edwards,	CEK	1.00
07/26/11	Review and respond to emails; review summary of highlights for punitive damages; confer with CEK.	LAS	0.75
07/26/11	Work on Response to Motion to Assert Punitive Damages and emails regarding same; Settlement discussions (17); Email from Marty Weinberg	JLA	1.25
07/26/11	Prepare outline of points and authorities in opposition to Edwards' motion for leave to amend counterclaim to add punitive damages.	HSG	4.25
07/27/11	Review and respond to emails; confer with Jack Goildberger; confer Marc Nurik; contact Chuck Lichtman re: status of Qtasks documents; confer with Darren Indyke.	LAS	1.00
07/27/11	Emails to/from Jeffrey Epstein, Chris Knight and Marty Weinberg regarding settlement discussions with Edwards (22); Emails to/from Jackie P. at Roy Black's office regarding media issue (4); Review Orders (4); Begin Motion Reconsideration regarding Interrogatory Answers	JLA	2.50
07/28/11	Review J. Richardson's Order denying Plaintiff's Motion to Compel and advise regarding same.	HSG	0.25
07/28/11	Telephone conference with Darren Indyke regarding deposition of Mark Epstein and Cara Holmes' e-mail.	HSG	0.50
07/28/11	Work on Response to Motion for Punitive Damages (continued) and Emails to/from Darren Indyke regarding same (4); Emails regarding settlement proposals from/to Scarola/Edwards (4); Emails regarding additional depositions relating to abuse of process claim (8)	JLA	2.00
07/29/11	Review and advise regarding response to motion for punitive damages.	HSG	0.50
07/29/11	Review deposition transcript of Mark Epstein.	LAS	0.75
07/29/11	Emails to/from Darren Indyke (4); Work on Motion to Amend and Response to Motion for Punitive Damage; Review Supplement by Edwards to Motion to Add Claim for Punitive Damages	JLA	1.50
07/29/11	Emails to/from Jeffrey Epstein and Darren Indyke regarding hearing and deposition dates (4)	JLA	0.25

Fees for Professional Services \$ 55,455.00

Summary of Timekeeper Fees

Timekeeper	Hours	Rate/Hour	Dollars
Christopher E. Knight (CEK)	24.50	525.00	12,862.50
Lilly Ann Sanchez (LAS)	11.25	525.00	5,906.25
Joseph L. Ackerman (JLA)	64.50	450.00	29,025.00
Helaine S. Goodner (HSG)	11.25	375.00	4,218.75
Elba Gonzalez (EQG)	25.50	135.00	3,442.50
TOTAL	137.00	\$	55,455.00

Totals for This Matter

Fees for Professional Services \$ 55,455.00
 Reimbursable Costs \$ 0.00
 NET CURRENT BILLING FOR THIS MATTER \$ 55,455.00
 TOTAL AMOUNT DUE FOR THIS MATTER \$ 55,455.00

TERMS: DUE UPON RECEIPT
 Please make checks payable to: **FOWLER WHITE BURNETT**
 Please reference **23869-080743-461717** when making payment.