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Totals

Mr. Jeffrey Epstein
 301 East 66th Street
 Suite 10 B
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153.00 = Amended Complaint
33.50 + Punitive Damages
- Other

September 8, 2011
 Page 1

Ref.: LAS-23869-080743-463407

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

INVOICE	
Total Amount Due for this Invoice	\$ 106,187.50
Past Due	\$ 83,786.25
Total Due	\$ 189,973.75

For Professional Services Through August 31, 2011

Date	Description	Atty	Hours
07/27/11	Multiple e-mail communications with Jeffrey Epstein re: tactics and strategies on amending Complaint; multiple e-mail communications with Martin Weinberg, Esquire re: amending of Complaint, outstanding counterclaim; e-mail communications with Joseph Ackerman, Esquire and Lilly Ann Sanchez, Esquire re: abuse of process counterclaim, affirmative defenses, punitive damages	CEK	2.00
07/28/11	Receipt, review and analyze the deposition transcript of Mark Epstein, brother of Jeffrey Epstein re: future strategy and impact on case	CEK	1.25
07/29/11	Receipt and review of Order on Defendant/Counter-Plaintiff, Bradley J. Edwards' Motion to Dismiss Plaintiff, Jeffrey Epstein's Amended Complaint	CEK	0.25
07/29/11	Receipt and review of Order on Defendant/Counter-Plaintiff, Bradley J. Edwards' Motion for Leave to Assert Claim for Punitive Damages	CEK	0.25
07/29/11	Receipt and review of Order on Plaintiff/Counter-Defendant, Jeffrey Epstein's Motion for Leave to Use Documents Produced Under Confidentiality Agreement	CEK	0.25
07/29/11	Receipt and review of correspondence from Darren Indyke (x4) re: earliest available date through online scheduling with Judge Crow's division for the hearing on Edwards' Motion for Leave to Amend to Assert a Claim for Punitive Damages; draft correspondence to Darren Indyke (x3) re: sufficient notice for hearing	CEK	0.50
07/29/11	Receipt and review of correspondence from Brad Edwards re: language and terms agreed for Settlement and Confidentiality Agreements; draft correspondence to Mr. Edwards re: same	CEK	0.50
07/29/11	Receipt and review of Order on Plaintiff/Counter-Defendant, Jeffrey Epstein's Amended Motion for Protective Order Relating to Extra Judicial Statements served on May 2, 2011	CEK	0.25
07/29/11	Receipt and review of correspondence from Jeffrey Epstein to Brad Edwards (x4) re: edits to correspondence on settlement and offer issues, 57.105 claim; draft correspondence to Mr. Epstein (x4) re: same; telephone conference with Mr. Epstein re: same	CEK	0.50
08/01/11	Review and respond to emails; review Orders and forward.	LAS	0.25
08/01/11	Begin drafting Response in Opposition to Motion for Leave to Amend to Assert a Claim for Punitive Damages.	HSG	1.50

Fowler White Burnett P.A.

Date	Description	Atty	Hours	
08/01/11	Email from Marty Weinberg regarding Punitive Damage Issues; Emails from Jeffrey Epstein regarding 57.105, Punitive Damage Issues and settlement; Draft letter to Bradley Edwards (4); Work on Motion to Amend; Emails from J. Scarola regarding response to M. Weinberg; Emails to J. Scarola regarding hearing time and Jeffrey Epstein deposition (2); Emails to/from Darren Indyke regarding hearing on Amended Motion to Assert Claim for Punitive Damages (4)	JLA	2.00	+
08/01/11	Receipt and review of correspondence from Martin Weinberg re: decision on punitive damages being binding	CEK	0.25	+
08/01/11	Receipt and review of Supplement to Bradley Edwards' Proffer in Support of Motion for Leave to Amend to Assert Claim for Punitive Damages	CEK	0.75	+
08/02/11	Confer with Darren Indyke; review and forward numerous pleadings and pro hac vice application to Jay Lefkowitz' review and respond to emails; confer with CEK and JLA.	LAS	1.00	-
08/02/11	Review LM Court file and work on Amended Complaint; Phone call with Darren Indyke regarding new counsel and emails regarding same (11)	JLA	3.50	o
08/02/11	Receipt and review of correspondence from Jeffrey Epstein to Brad Edwards re: other edits to correspondence on settlement negotiations and 57.105 claim; draft correspondence to Mr. Epstein re: same	CEK	0.50	-
08/02/11	Telephone conference with Darren Indyke re: filing of the Second Amended Complaint; draft correspondence to Mr. Indyke (x4) re: no need for a Jack affidavit, need for Kirkland to file a notice of appearance and Pro Hac Vice motions; receipt and review of correspondence from Mr. Indyke re: motion to continue time to file amended complaint, amended complaint that was dismissed, Second Amended Complaint, Counterclaim by Edwards, and motion for punitive damages; draft correspondence to Mr. Indyke re: same	CEK	0.50	o
08/02/11	Telephone conference with Jeffrey Epstein re: bring in Kirkland & Ellis (Jay Lefkowitz) as Co-Counsel in the Rothstein/Edwards case, filing of the Second Amended Complaint, no need for a Jack affidavit, need for Kirkland to file a notice of appearance, Pro Hac Vice motions, motion to continue time to file Second Amended Complaint, Counterclaim by Edwards, and motion for punitive damages	CEK	1.00	o
08/02/11	Draft response in opposition to Edwards' motion for leave to assert punitive damages.	HSG	7.00	+
08/02/11	Conference call with Jay Lefkowitz re: summary of matter to date.	LAS	0.75	o
08/03/11	Review LM Court file for amending complaint (continued); Phone call with Marty Weinberg regarding Scarola/57.105 issues	JLA	3.00	o
08/03/11	Continue drafting response in opposition to Edwards' motion for leave to amend counterclaim to add punitive damages.	HSG	5.00	o
08/03/11	Work on Complaint amendments; Check status of A.J. Discala documents and emails regarding same (5)	JLA	3.25	o
08/03/11	Receipt and review of correspondence from Jonathon Etra re: Conrad Scherer's review and production of Discala documents in the Razorback litigation and getting additional AJ Discala documents; draft correspondence to Mr. Etra re: order to produce same; telephone conference with Mr. Etra re: same	CEK	0.50	-
08/04/11	Revise response in opposition to Edwards' motion for leave to amend to add punitive damages.	HSG	4.50	+

Date	Description	Atty	Hours
08/04/11	Telephone conference with Jeffrey Epstein re: Second Amended Complaint, changes and/or additions thereto and hearing on Motion to Dismiss; telephone conference with Mr. Epstein, Marty and Lefkowitz re: same; receipt and review of correspondence from Mr. Epstein re: Scarola tainting brad forever by calling him a crook in open court and the co-conspirator of Rothstein; draft correspondence to Mr. Epstein re: same; receipt and review of correspondence from Mr. Epstein re: A federal appeals court has revived an abuse of process suit against a law firm and lawyer that allegedly used unfair tactics in litigation; draft correspondence to Mr. Epstein re: same	CEK	2.00
08/04/11	Receipt and review of correspondence from Darren Indyke re: draft response to the motion for punitive damages along with the abuse of process cases within which we could fit an amended complaint; draft correspondence to Mr. Indyke re: same	CEK	0.25
08/04/11	Emails regarding settlement (17); Discussions/strategies (11); Emails and phone calls from Marty Weinberg and L. Holman regarding Limited Appearance (6); Emails regarding Complaint and Amended Motion to Assert Claim for Punitive Damages (10); Review draft of same; Emails regarding Second Amended Complaint (7) and work on same; Emails from J. Scarola regarding deposition in September; Emails regarding A.J. Discala production (4)	JLA	3.50
08/04/11	Review and respond to emails; pull documents and forward to Jay Lefkowitz.	LAS	1.00
08/05/11	Legal research for draft of Second Amended Complaint; Continue to work on Amendments to Complaint; Review Court files (continued) for Amendments to Complaint; Emails to/from Darren Indyke (2); Emails to/from [REDACTED] regarding Amended Complaint (5); Emails to Darren Indyke, Jeffrey Epstein and Jay Lefkowitz with Amended Complaint; Emails from/to Jeffrey Epstein (s); Motion for Enlargement of Time for Complaint	JLA	5.00
08/07/11	Emails to/from Jay Lefkowitz regarding Amending Complaint and Motions Directed to Counterclaim and Proposal for Settlement (6)	JLA	0.50
08/08/11	Review and advise regarding Second Amended Complaint; review Gen. Refractories case noted in J.E. e-mail and federal proceedings in connection with same.	HSG	2.25
08/08/11	Email from Jeffrey Epstein; Emails to/from [REDACTED] (4); Emails to/from Jay Lefkowitz (4); Continue to work on Amended Complaint and research regarding same; Phone call with Darren Indyke regarding Motion to Extend Time regarding Complaint	JLA	1.75
08/09/11	E-mail communications with Joseph Ackerman, Esquire re: proposed Motions to file, Amended Complaint and response to Counterclaim	CEK	0.50
08/09/11	Emails regarding Amended Complaint (3) from Darren Indyke; Review draft correction	JLA	0.50
08/10/11	Review Critton case files; Conference with [REDACTED] regarding same; Prepare and revise Motion for Enlargement of Time regarding Complaint and Notice of Hearing; Conference with Mike Pike and Bob Critton; To courthouse to review case files; Phone call with Darren Indyke; Email from Darren Indyke	JLA	5.25
08/11/11	Telephone conference with Jeffrey Epstein re: status of matter	CEK	0.50
08/11/11	Emails to/from Darren Indyke regarding amending complaint (4); Email from Jack Scarola regarding complaint and emails regarding same (2); Reset depositions regarding Wackenhut deponents and emails regarding same; Email to/from Maxine Streeter regarding Discala documents (2); Emails to/from [REDACTED]	JLA	2.00
08/11/11	Continue preparation of new complaint and legal research regarding same	JLA	2.25

Date	Description	Atty	Hours
08/12/11	Telephone conference with Joseph L. Ackerman, Esquire re: status of Second Amended Complaint and positions to be taken by Plaintiff; anticipated positions to be taken by Jack Scarola, Esquire; e-mail communications with Joe Ackerman re: Scarola's desire to depose G. Maxwell, H. Rubenstein, A. Cordero and A. Dershowitz; preparation for telephone conference with Jeffrey Epstein, Darren Indyke, Esquire, Martin Weinberg, Esquire, Jay Lefkowitz, Esquire and Roy Black, Esquire	CEK	3.00
08/12/11	Draft motion for partial summary judgment regarding Counterclaim and review authorities in connection with same.	HSG	5.25
08/12/11	Prepare memo for conference call; Work on Motion for Partial Summary Judgment regarding Damages and 57.105 motion to Jack Scarola; Work on Motion for Protective Order regarding Ghislaine Maxwell, A. Dershowitz, A. Cordero, and H. Rubenstein depositions Email to Maxine Streeter regarding records; Emails to/from Jack Scarola regarding deposition of G. Maxwell, A. Dershowitz, H. Rubenstein and A. Cordero; Preparation for conference call; Draft report letter	JLA	5.25
08/13/11	E-mail communications with Darren Indyke, Esquire re: strategies relative to Second Amended Complaint, intervening, inquiry as to Marra hearing; preparation for and attendance at telephone conference with Jeffrey Epstein, Darren Indyke, Esquire, Martin Weinberg, Esquire, Roy Black, Esquire and Jay Lefkowitz, Esquire re: filing of Second Amended Complaint, continued allegations to add; e-mail communications with Jeffrey Epstein re: filing of Motion for Summary Judgment, discussion of relevant matters to Second Amended Complaint, denial of Critton's Motion to Dismiss,	CEK	2.25
08/13/11	Conference call with J. Lefkowitz, Esq., M. Weinberg, Esq., Mr. Epstein and D. Indyke, Esq. regarding going-forward strategy and pending and proposed motions.	HSG	1.00
08/13/11	Attend conference call with Chris Knight, Jeffrey Epstein, Jay Lefkowitz, Marty Weinberg and Roy Black; Emails regarding conference call with Jeffrey Epstein (3); Emails to/from Darren Indyke (2)	JLA	1.50
08/13/11	Conference call with JEE and defense team; follow up call with CEK and JLA.	LAS	1.50
08/14/11	E-mail communications with Jeffrey Epstein re: legal analysis for Second Amended Complaint, serving of Proposal for Settlement and filing of Summary Judgment Motion to Counterclaim, discussion of review of Critton files, court files, etc.	CEK	0.50
08/14/11	Revise report/recommendation letter to Jeffrey Epstein; Emails regarding same (7); Prepare response to question of Jay Lefkowitz and Marty Weinberg regarding Abuse of Process Claim	JLA	2.25
08/14/11	Continue to work on revisions to Amended Complaint and emails to/from Jeffrey Epstein regarding same (2)	JLA	2.25
08/14/11	Review and advise re: client letter.	HSG	0.75
08/14/11	Review, revise and finalize letter to JEE re: summary of matter to date and recommendations.	LAS	1.25
08/15/11	Review Re-Notices of Wackenhut's depositions (2); Emails regarding research of Abuse of Process Claim (3); Emails and phone calls to/from Maxine Streeter regarding Discala documents (4); Emails to/from Jeffrey Epstein regarding Complaint (3)	JLA	1.25
08/15/11	Emails regarding G. Maxwell, et al. depositions (3); Review Privilege Log from Discala; Review Abuse of Process and Litigation Privilege case law for Amending Complaint; Review Daily Business Review article regarding CVRA case	JLA	1.75
08/15/11	Review authorities re: malicious prosecution; revise memorandum re: abuse of process; review/advise re: on-line DBR article re: <u>Federal Charges Prepared, Not Filed Against Jeffrey Epstein.</u>	HSG	2.75

Date	Description	Atty	Hours
08/15/11	Review results of 3771 hearing and related press article.	LAS	0.50 -
08/16/11	Follow up relative to Second Amended Complaint, including discussion of Discala production, Legamaro e-mail and other relevant information; follow up relative to filing of Second Amended Complaint, 57.105 letter, Motions for Partial Summary Judgment and serving of Proposal for Settlement	CEK	1.00 o
08/16/11	Review and respond to emails; review case law on abuse of process and summary memorandum; review amended complaint status.	LAS	1.00 o
08/16/11	Locate deposition summaries as requested by N. Trompet for J. Ackerman	PMR	0.75 -
08/16/11	Review Disk from [REDACTED]; Phone call with [REDACTED] (2); Prepare email/document chronology for Second Amended Complaint; Review Razorback records; Emails to/from Jeffrey Epstein regarding status of Second Amended Complaint (3); Email to client regarding research on Abuse of Process; Continue to work on Second Amended Complaint	JLA	8.50 o
08/16/11	Draft 57.105 letter to Scarola and motion for 57.105 attorney's fees.	HSG	2.00 -
08/17/11	Telephone conference with Helaine Goodner, Esquire re: Second Amended Complaint; receipt and review of e-mail communication from Jay Lefkowitz, Esquire re: observations on memo on abuse of process case law; e-mail communications with Jeffrey Epstein re: Second Amended Complaint and cause of action stated for abuse of process; telephone conference with Martin Weinberg, Esquire re: comments and input on Second Amended Complaint; e-mail communications with Jeffrey Epstein re: requesting additional time to file	CEK	1:25 o
08/17/11	Review and respond to emails; review draft amended complaint; review comments to same; make suggestions and revisions; confer with CEK and JLA; review letter from Marty Weinberg.	LAS	3.75 o
08/17/11	Revisions to Second Amended Complaint; Emails from Jeffrey Epstein, Jay Lefkowitz regarding Second Amended Complaint; Hearing preparation; Emails with [REDACTED] regarding Second Amended Complaint (4); Legal research regarding Conspiracy issues and Abuse of Process issues	JLA	8.00 o
08/17/11	Review and advise regarding draft Second Amended Complaint and conference regarding same; further review Florida law regarding civil conspiracy.	HSG	4.00 o
08/18/11	Continue review of draft amended complaint; analyze options for conspiracy issue; confer with Helaine Goodner; review and respond to emails; confer with JLA re: result of hearing and extension until Monday@ 5pm; review and respond to emails; review draft Rule 57-105 letter and motion for attorney's fees; review motion for summary judgment of the counterclaim.	LAS	3.75 o
08/18/11	E-mail communications with Darren Indyke, Esquire re: comments and edits to Second Amended Complaint, discussion of potential Motion to Dismiss and ruling; e-mail communications with Joseph Ackerman, Esquire re: inquiry from Special Master as to status	CEK	0.50 o
08/18/11	Prepare for and attend hearing on Motion for Enlargement of Time for Complaint, Legal research and continue working on Second Amended Complaint and revisions thereto; Emails from Darren I. regarding complaint (2); Emails regarding hearing for Motion re Punitive Damages; Emails from Jeffrey Epstein (2)	JLA	3:25 o
08/18/11	Emails from/to Judge Carney (3); Legal research regarding conspiracy; Email from Jack Scarola regarding Carney	JLA	0.50 -
08/18/11	Work on Proposal for Settlement	JLA	0.75 -
08/18/11	Continued review of authorities regarding civil conspiracy under Florida law in connection with preparation of amended complaint.	HSG	4:25 o

Date	Description	Atty	Hours
08/18/11	Analyze pleadings and evaluate issues re: terms and conditions of Proposal for Settlement to Plaintiff	MJS	0.50
08/19/11	E-mail communications with Jeffrey Epstein re: focus on criminal enterprise in Second Amended Complaint; review of draft of Second Amended Complaint; telephone conference with Lilly Ann Sanchez, Esquire re: Second Amended Complaint, 57.105 letter, 57.105 motions and Motion for Summary Judgment; telephone conference with Joseph Ackerman, Esquire re: revisions to Second Amended Complaint, draft of Motion for Partial Summary Judgment, Proposal for Settlement and finalizing of 57.105 letter and 57.105 motion	CEK	2:00
08/19/11	Review and respond to emails; continue review of draft amended complaint and comments to same; confer with JLA and CEK.	LAS	1.75
08/19/11	Emails from/to Jeffrey Epstein regarding hearing (2); Emails to/from Darren Indyke regarding Rothstein Plea and Revisions to Complaint (2); Work with Helaine Goodner to complete revisions to Complaint, 57.105 letter and Motion, and Motion for Partial Summary Judgment; Review transcripts of Discala, Doe and LM depositions	JLA	5.50
08/19/11	Emails to/from Jeffrey Epstein regarding Complaint (2)	JLA	0.50
08/19/11	Revisions to Second Amended Complaint.	HSG	3.25
08/20/11	Review and respond to emails; review JEE email re: facts of matter; confer with CEK and JLA; review draft second amended complaint and forward same; review revised motion for attorneys fees under Rule 57-105; review draft motion for summary judgment on the counterclaim and forward same.	LAS	1.75
08/20/11	Multiple e-mail communications with Joseph Ackerman, Esquire, Helaine Goodner, Esquire and Lilly Ann Sanchez, Esquire re: Second Amended Complaint and comments made by client, including request for rewriting; review and revise of Second Amended Complaint; review and revise of 57.105 letter and multiple e-mail communications with Helaine Goodner re: same; review and review of Motion for Summary Judgment on Counterclaim	CEK	4:00
08/20/11	Further revisions to Second Amended Complaint, 57.105 motion and letter and motion for summary judgment.	HSG	2.00
08/21/11	Review and respond to emails; confer with Darren Indyke; confer with CEK; coordinate conference call; attend conference call with JEE and defense team; review draft complaint and forward same.	LAS	2.75
08/21/11	Telephone conference with Jeffrey Epstein, Darren Indyke, Esquire, Martin Weinberg, Esquire, Jay Lefkowitz, Esquire and Lilly Ann Sanchez re: allegations in Second Amended Complaint as presented and potential for Complaint to survive a Motion to Dismiss; telephone conference with Helaine Goodner, Esquire re: Second Amended Complaint and continued revisions; e-mail communications with Marty Weinberg re: Second Amended Complaint; e-mail communications with Jeffrey Epstein re: status of Complaint; e-mail communications with Helaine Goodner and Joseph Ackerman, Esquire re: expansion with more particularity of dates on meetings, filing of Federal Complaint but lack of service on Epstein and abuse of process claim; review and review paragraph 30 of Second Amended Complaint; e-mail communications with Lilly Ann Sanchez, Esquire re: review of revised Complaint and coordination of telephone conference and filing	CEK	4:00
08/21/11	Further advise and revise Second Amended Complaint.	HSG	3.25

Date	Description	Atty	Hours
08/22/11	E-mail communications with Darren Indyke, Esquire re: Second Amended Complaint and revisions made thereto; e-mail communications with Jeffrey Epstein re: Second Amended Complaint, allegations in Complaint, continued revisions to Complaint and filing of same; multiple e-mail communications with Lilly Ann Sanchez, Esquire, Helaine Goodner, Esquire and Joseph Ackerman, Esquire re: revisions to Second Amended Complaint; e-mail communications with Jeffrey Epstein re: timing of serving of Proposal for Settlement	CEK	1.75 0
08/22/11	Numerous phone calls and emails re: second amended complaint; attend conference calls with JEE and defense team; confer with Darren Indyke; confer with Helaine Goodner and CEK; review drafts of complaint.	LAS	3.50 0
08/22/11	Review all LM v. Epstein files and on line research for dates regarding same at the request of H. Goodner	PMR	1.00 —
08/22/11	Review all deposition transcripts and summaries to confirm date of first investor meeting.	PMR	1.25 —
08/22/11	Detailed analysis and evaluation of viability of the dueling abuse of process claims and motions for Section 57.105 attorneys' fees.	EEG	1.00 —
08/22/11	Research and analyze recent legal authority re: procedural requirements for proposals for settlement	MJS	0.50 —
08/22/11	Draft Proposal for Settlement to Defendant/Counter-Plaintiff	MJS	0.75 —
08/22/11	Draft proposed General Release to attach to Proposal for Settlement to Defendant/Counter-Plaintiff	MJS	0.75 —
08/22/11	Draft proposed Stipulation for Dismissal with Prejudice to attach to Proposal for Settlement to Defendant/Counter-Plaintiff	MJS	0.50 —
08/22/11	Final revisions to Second Amended Complaint and numerous extended conference calls with client and counsel regarding same.	HSG	5.25 0
08/23/11	Review and respond to emails re: scrivener's error; confer with CEK and Helaine Goodner re: same; conference call with Marty Weinberg; follow up call re: same; respond to email re: request for September 22 hearing.	LAS	1.50 —
08/23/11	Review and revise draft Proposal for Settlement, proposed General Release and proposed Stipulation for Dismissal with Prejudice directed only to Edwards' Counterclaim	CEK	0.50 —
08/23/11	Preparation for and attendance at conference call with Martin Weinberg, Esquire, Helaine Goodner, Esquire and Joseph Ackerman, Esquire re: Second Amended Complaint, Proposal for Settlement, Motion for Partial Summary Judgment and future course of action	CEK	1.75 0
08/23/11	Telephone conference with Marty Weinberg; Review revisions to portions of Second Amended Complaint	JLA	2.00 0
08/23/11	Review Epstein indexes	PMR	0.50 —
08/23/11	Draft correspondence to Jeffrey Epstein re: Proposal for Settlement and exhibits thereto	MJS	0.25 —
08/23/11	Telephone conference with Marty Weinberg, Esq. regarding revising portion of Second Amended Complaint; revise Second Amended Complaint and prepare Notice of Scrivener's Error.	HSG	2.50 0
08/24/11	Review motion to dismiss amended complaint; review and respond to emails; confer with JLA and CEK.	LAS	0.75 0
08/24/11	Follow up relative to filing of Notice of Scriveners' Errors and Corrected Second Amended Complaint; e-mail communications with Darren Indyke, Esquire re: service of Proposal for Settlement and Florida law	CEK	0.75 0
08/24/11	Review 2d amended complaint	SA	0.50 0

Date	Description	Atty	Hours	
08/24/11	Research and analyze legal authority re: whether counterclaim may be subject of proposal for settlement without disposition of main claim	MJS	1.00	—
08/24/11	Research and analyze legal authority re: enforceability of proposal for settlement directed to less than all claims	MJS	0.75	—
08/24/11	Evaluate issues re: enforceability of proposal for settlement directed only to counterclaim	MJS	0.50	—
08/24/11	Revise/address issues regarding Notice of Scrivener's Error regarding Second Amended Complaint.	HSG	1.50	•
08/25/11	Review and respond to emails.	LAS	0.25	—
08/25/11	Supplement and revise Proposal for Settlement to Defendant/Counter-Plaintiff to cover all claims asserted by both Plaintiff and Defendant	MJS	0.50	—
08/25/11	Supplement and revise Stipulation for Dismissal with Prejudice to attach to Proposal for Settlement to Defendant/Counter-Plaintiff to cover all claims asserted by both Plaintiff and Defendant	MJS	0.25	—
08/25/11	Draft proposed General Release to attach to Proposal for Settlement to Defendant/Counter-Plaintiff to cover all claims asserted by both Plaintiff and Defendant	MJS	0.25	—
08/26/11	E-mail communications with Lilly Ann Sanchez, Esquire re: strategies on Proposal for Settlement on Counterclaim, Proposal for Settlement on Epstein lawsuit against Edwards; e-mail communications with Jeffrey Epstein re: Motion to Dismiss Second Amended Complaint; e-mail communications with Joseph Ackerman, Esquire re: coordination of response to Motion to Dismiss and finalize response to Motion for Punitive Damages	CEK	0.75	•
08/26/11	Draft Plaintiff/Counter-Defendant Jeffrey Epstein's Notice of Serving Proposal for Settlement to Defendant/Counter-Plaintiff Bradley J. Edwards, Individually	MJS	0.25	—
08/26/11	Review and advise regarding 57.105 motion/letter to J. Scarola and revisions to same.	HSG	1.00	—
08/29/11	Review pleadings file in the 3771 matter; review and respond to emails re: scheduling issues; confer with JLA and CEK re: same; review Supplement to Edwards' Motion to Dismiss and Motion for Leave to Amend to Assert Claim for Punitive Damages; forward same; review motion to withdraw Marty Weinberg requests to file;	LAS	1.00	+
08/29/11	Telephone conferences with Jack Scarola regarding hearing dates for his Motion to Dismiss the Second Amended Complaint and Motion to Amend to add a claim for punitive damages and draft correspondence to him regarding the same	JMC	0.50	•
08/29/11	Review and revise Epstein's Motion for Partial Summary Judgment; receipt and review of Edwards' Supplement to Motion to Dismiss and Motion for Leave to Amend to Assert Claim for Punitive Damages; e-mail communications with Lilly Ann Sanchez, Esquire re: follow up on client comment relative to Motion for Summary Judgment on Counterclaim; e-mail communications with Joseph Ackerman, Esquire and Lilly Ann Sanchez re: unilateral hearing set by Jack Scarola, Esquire	CEK	0.75	+
08/29/11	Review and revise Marty Weinberg's Motion to Withdraw and emails to/from Marty Weinberg regarding same (5); Emails with Jack Scarola regarding hearing (5); Review amended motions from Jack Scarola and work on response	JLA	2.50	—
08/29/11	Review Edwards' supplement to motion to assert punitive damages claim and begin drafting response to same.	HSG	1.50	+

Date	Description	Atty	Hours
08/30/11	E-mail communications with Darren Indyke, Esquire re: Response to Motion to Dismiss; e-mail communications with Helaine Goodner, Esquire and Lilly Ann Sanchez, Esquire re: Response to Motion to Dismiss; receipt and review of Edwards' Notice of Serving Proposal for Settlement and Proposal; analysis of Proposal for settlement; e-mail communications with Lilly Ann Sanchez, Esquire re: proposed hearing dates before Judge Crow and availability in October; e-mail communications with Esther Galicia, Esquire re: Response in Opposition to Edwards' Motion to Dismiss Second Amended Complaint; e-mail communications with Lilly Ann Sanchez, Helaine Goodner and Esther Galicia re: comments on Response to Motion to Dismiss; telephone conference with Jeremy Colvin, Esquire re: offering of hearing dates before Judge Crow	CEK	1.75 •
08/30/11	Review and respond to emails; confer with Darren Indyke re: scheduling hearing; review Edwards proposal for settlement and forward same; confer with CEK re: same; prepare Jeremy Colvin for hearing.	LAS	1.50 —
08/30/11	Review, study and analysis of Defendant/Counter-Plaintiff's Motion to Dismiss Second Amended Complaint (for purposes of preparing Response in Opposition to Motion to Dismiss).	EEG	0.25 •
08/30/11	Detailed review, study and analysis of Corrected Second Amended Complaint plus cross-referencing with Defendant's Motion to Dismiss (for purposes of preparing Response in Opposition to Motion to Dismiss).	EEG	2.00 •
08/30/11	Analysis for and outlining, drafting and preparation of Response in Opposition to Defendant's Motion to Dismiss Corrected Second Amended Complaint.	EEG	1.50 •
08/30/11	Review various pleadings and correspondence in preparation for hearing on Defendant Edwards' Motion to Schedule Hearing on his Motion to Dismiss the Second Amended Complaint before Judge Crow and reviewed various correspondence regarding the availability of legal team for a hearing on the Motion	JMC	1.75 •
08/30/11	Draft correspondence to members of legal team regarding punitive damage claim and review responses regarding the same	JMC	0.25 +
08/30/11	Continue drafting response in opposition to motion for leave to assert punitive damages.	HSG	4.50 +
08/30/11	Analyze Defendant/Counter-Plaintiff's Proposal for Settlement Pursuant to Rule 1.442, Florida Rules of Civil Procedure and Sect. 768.79, Florida Statutes and evaluate issues re: validity of same for purposes of determining entitlement to attorney's fees	MJS	0.50 —
08/31/11	Review results of hearing ; confer with CEK; review and respond to emails re: hearing dates; confer with Darren Indyke; review draft response to motion to dismiss; review suggestions revisions to draft motion for summary judgment; confer with Helaine Goodner.	LAS	1.25 —
08/31/11	E-mail communications with Helaine Goodner, Esquire, Esther Galicia, Esquire and Lilly Ann Sanchez, Esquire re: filing of Motion for Summary Judgment and deadline for same; e-mail communications with Joseph Ackerman, Esquire re: response to punitive damages motion;	CEK	0.50 +
08/31/11	Telephone conferences with counsel for Defendant Edwards regarding hearing on Motion to Dismiss Second Amended Complaint and scheduling issues and draft correspondence to him regarding the same	JMC	0.50 •
08/31/11	Attend hearing on Defendant's Motion to Set Hearing on his Motion to Dismiss the Second Amended Complaint before Judge Crow	JMC	1.50 •
08/31/11	Review and respond to various correspondence regarding hearing before Judge Crow on Defendant Edwards' Motion to Schedule Hearing on his Motion to Dismiss the Second Amended Complaint and Motion to Amend to Add Punitive Damages	JMC	0.50 •

250
 15

Date	Description	Atty	Hours
08/31/11	Review, study and analysis of legal precedent regarding allegation of damages required to state a cause of action for abuse of process.	EEG	1.50 —
08/31/11	Detailed analysis for and revising and supplementing of Epstein's Response in Opposition to Edward's Motion to Dismiss the Corrected Second Amended Complaint (several drafts).	EEG	2.50 •
08/31/11	Prepare response re: Edwards' motion for leave to assert punitive damages; review K & E assessment re: motion for partial summary judgment and advise re: same.	HSG	4.50 +
08/31/11	Address and evaluate parameters of recoverable damages as to abuse of process claim, in particular with respect to party defendant/attorney's lost professional time/fees for time spent defending the action; commence research re: same	JGH	2.75 —
08/31/11	Address and advise re: procedural propriety of motion for summary judgment and/or judgment on the pleadings with respect to independent counterclaim notwithstanding open pleadings regarding main claim; related research and analysis	JGH	1.50 —

Fees for Professional Services \$ 106,187.50

*Other Amended Punitive
 Complaint Damages*

Summary of Timekeeper Fees

Timekeeper	Hours	Rate/Hour	Dollars
Christopher E. Knight (CEK)	39.50	525.00	20,737.50
Lilly Ann Sanchez (LAS)	30.75	525.00	16,143.75
Joseph L. Ackerman (JLA)	78.25	450.00	35,212.50
Susan H. Aprill (SA)	0.50	450.00	225.00
Esther E. Galicia (EEG)	8.75	375.00	3,281.25
Helaine S. Goodner (HSG)	69.50	375.00	26,062.50
June G. Hoffman (JGH)	4.25	375.00	1,593.75
Jeremy M. Colvin (JMC)	5.00	255.00	1,275.00
Marc J. Schleier (MJS)	7.25	185.00	1,341.25
Paula Rescia (PMR)	3.50	90.00	315.00
TOTAL	247.25	\$	106,187.50

Totals for This Matter

Fees for Professional Services	\$	106,187.50
Reimbursable Costs	\$	0.00
NET CURRENT BILLING FOR THIS MATTER	\$	106,187.50
Balance Brought Forward	\$	83,786.25
TOTAL AMOUNT DUE FOR THIS INVOICE	\$	189,973.75

TERMS: DUE UPON RECEIPT

Please make checks payable to: **FOWLER WHITE BURNETT**
Please reference **23869-080743-463407** when making payment.

September 8, 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
460830	07/13/11	\$28,331.25	\$0.00	\$28,331.25
461717	08/03/11	55,455.00	0.00	55,455.00
Balance Brought Forward				\$83,786.25

For Total Amount Due, See Previous Page