

L.S.J., LLC / LITTLE ST. JAMES / C/O AMERICAN YACHT HARBOR

14573

Hodge & Francois
50404 · Legal

9/17/2010

Molyneux

14,679.94

PAYMENT
PREPARED

FirstBank Operating C Molyneux

14,679.94

564217 (4/08)

Law Offices of Hodge & Francois

1340 Taarneberg
St Thomas, VI 00802
340-774-6845

September 01, 2010

Tax ID: 66-0473483

Jeffrey Epstein
c/o The Epstein Companies
6100 Red Hook Qtr - Suite B-3
St Thomas, VI 00802
Attn: Darren Indyke

Invoice # 34496

In Reference To: Molyneux v Epstein, et al.

For Professional Services Rendered for the Period Ending: August 31, 2010

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
08/01/10	DMF	Review email from D Indyke and review letter from D Indyke to J Goldberg re specific problems with library cabinetry	0.25 300.00/hr	75.00
08/06/10	DMF	Draft memorandum in support of Defendants motion to dismiss	2.00 300.00/hr	600.00
08/09/10	DMF	Research; draft additional sections to memorandum in support of motion to dismiss; forward draft to D Indyke by email	4.00 300.00/hr	1,200.00
08/10/10	DMF	Research rescission and failure of consideration	0.75 300.00/hr	225.00
08/12/10	DMF	Review re draft of memorandum in support of motion to dismiss; confer with MTH re same	0.50 300.00/hr	150.00
08/13/10	DMF	Research for 3d Circuit cases to replace references to 2d Circuit; teleconference with D Indyke re suggested changes to his draft of motion to dismiss; confer with MTH re same; revise and edit Darren's draft of motion to dismiss; draft email to D Indyke on suggested changes to his draft of motion to dismiss	4.00 300.00/hr	1,200.00
08/13/10	DMF	Review email from D Indyke along with his revised draft of opposition to motion to dismiss	0.50 300.00/hr	150.00
08/16/10	DMF	Research motion to dismiss; revise most recent draft of motion to dismiss; draft email to D Indyke with most recent comments on strategy to motion to dismiss	1.50 300.00/hr	450.00
08/16/10	DMF	Review email from D Indyke re final revisions; revise and edit memorandum in support of defendants' motion to dismiss; revise and edit motion to dismiss; file documents electronically; forward electronically filed and served motion and memo to D Indyke	1.50 300.00/hr	450.00

Jeffrey Epstein

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
08/18/10	DMF	Research re complaint against Molyneux	0.50 300.00/hr	150.00
08/19/10	GV	Research settlement agreement rescission, fraud, mistake, joint agreement, liquidated damages; office conference; review pleadings	3.50 225.00/hr	787.50
08/19/10	DMF	Teleconference with associate attorney G Vogel re research to set aside settlement agreement and design services agreement	0.25 300.00/hr	75.00
08/20/10	DMF	Review Scheduling Order entered by Magistrate Judge Miller; calendar same; forward same to D Indyke; confer with MTH re attendance of same if D Francois' criminal trial conflicts	0.25 300.00/hr	75.00
08/23/10	DMF	Review email from D Indyke re latest communication from Molyneux's attorneys; Teleconference with D Indyke re Molyneux will be amending his complaint again as permitted by Fed R Civ P 15	0.25 300.00/hr	75.00
08/23/10	DMF	Research Rule 15; draft email to D Indyke and client re relevant motion response times	1.00 300.00/hr	300.00
08/23/10	GV	Draft (start) memo on fraud and recind contract, recind settlement agreement, elements of rescission. Research elements.	4.75 225.00/hr	1,068.75
08/24/10	GV	Research gist of the action and damages, settlement agreement and funds paid rescion, finish drafting memo	5.75 225.00/hr	1,293.75
08/25/10	GV	Research if liquidated damages clauses can limit recovery of attorney fee's and costs, edit memo on damages, office conference with DF	2.75 225.00/hr	618.75
08/25/10	DMF	Review emails from Rosh D Alger re first Jay Goldberg would listen in on status conference and then he would not; draft emails to D Indyke re same	0.50 300.00/hr	150.00
08/25/10	DMF	Conference with G Vogel re results of her research on rescission of settlement agreement and liquidated damages and re attorney's fees and costs are not covered by liquidated damages	0.25 300.00/hr	75.00
08/26/10	CJ	Review and organize Plaintiff's Memorandum in Support of Defendants' Motion to Dismiss Amended Complaint, Exhibits and Affidavit in Support.	0.25 125.00/hr	31.25
08/26/10	GV	Research grounds to strike exhibits in a response brief to a motion to dismiss, review response to our motion to dismiss; research Court of Appeals Third Circuit Cir elements of a dec action, research cases cited in motion to dismiss, review dismissal pleadings, draft summary of cases cited & if counterclaim or state court action was dispositive in rejection dec action	5.25 225.00/hr	1,181.25
08/26/10	DMF	Review defendant's opposition and research re same; conference with G Vogel re research on Declaratory Judgment	3.00 300.00/hr	900.00

Jeffrey Epstein

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
08/27/10	GV	Research declaratory action, review third circuit opinions on dec actions, draft case summary sheet, review motion for areas of great concern	4.25 225.00/hr	956.25
08/27/10	DMF	Review and compare Molyneux' amended opposition memorandum and amended affidavit to the memo and affidavit filed previously in order to discern the difference; teleconference with D Indyke re same	0.75 300.00/hr	225.00
08/27/10	DMF	Review email from B Moskowitz and final signed affidavit of process server	0.25 300.00/hr	75.00
08/27/10	CJ	Review additional pleadings filed by opposing counsel and organize same; conference with D Francois re same; review Court Docket and discuss with D Francois	1.00 125.00/hr	125.00
08/27/10	CJ	Research Court Docket and pleadings; update client's e-file re same	1.25 125.00/hr	156.25
08/27/10	DMF	Research permitted parameters of Molyneux's opposition	1.00 300.00/hr	300.00
08/27/10	DMF	Review email from E Hill of J Goldberg's office	0.25 300.00/hr	75.00
08/31/10	DMF	Review email from D Indyke re recent filings by Molyneux compared to actual amended complaint filed	0.25 300.00/hr	75.00
Total Hours and Legal Fees			52.25	\$13,268.75

Expenses:

<u>Date</u>	<u>Description</u>	
8/12/2010	Federal Express - Darren Indyke 7/28/10	25.38
8/24/2010	LD Phone Calls - August 2010	1.98
Total Expenses		\$27.36
Interest on overdue balance		\$176.39
Total Amount Due This Billing Cycle		\$13,472.50
Previous balance		\$17,307.24
TOTAL BALANCE DUE		\$30,779.74

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We appreciate your business. Please make your check payable to Hodge & Francois and include Invoice # on payment. Terms - Due Upon Receipt. An interest charge of 1% per month is automatically generated on all balances in excess of thirty (30) days.

L.S.J., LLC / LITTLE ST. JAMES / C/O AMERICAN YACHT HARBOR

14572

Hodge & Francois
50404 · Legal

9/17/2010

Service rendered for July 2010

3,281.98

PAYMENT
PRECORDER

FirstBank Operating C Invoice #34316 dated 08/01/10 - JUL 2010

3,281.98

564217 (4/08)

Law Offices of Hodge & Francois

1340 Taarneberg
St Thomas, VI 00802
340-774-6845

August 01, 2010

Tax ID: 66-0473483

Jeffrey Epstein
c/o The Epstein Companies
6100 Red Hook Qtr - Suite B-3
St Thomas, VI 00802
Attn: Darren Indyke

Invoice # 34316

In Reference To: Corporate Matters

For Professional Services Rendered for the Period Ending: July 31, 2010

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
07/01/10	CJ	Prepare Complaint, Exhibits, Civil Cover Sheet and Summonses for preparation of filing; review Epstein v. Molyneaux Books to find Purchase Order for Exhibit; email to Darren Indyke re Complaint and exhibits to same; conferences with Denise Francois re same	4.00 125.00/hr	500.00
07/01/10	CJ	Conferences with Darren Indyke re Complaint revisions and officers of Fancelli Paneling, Inc.	0.25 125.00/hr	31.25
07/01/10	DMF	Review revised complaint; confer with paralegal re exhibits	0.50 300.00/hr	150.00
07/01/10	CJ	Review documents for additional Exhibits to Complaint; telephone conferences with D Indyke re same; conference with D Francois re meeting on LSJ Island and status of cabinets in library as well as additional Exhibit D, Purchase Order	1.50 125.00/hr	187.50
07/02/10	GV	Research service of process in France	1.00 225.00/hr	225.00
07/02/10	DMF	Research on line for more information on Fancelli Paneling; conference with MTH re allegations against both Atelier Fancelli in France and Fancelli Paneling in New York; revise and edit complaint against Fancelli entities	1.50 300.00/hr	450.00
07/02/10	DMF	Review email from D Indyke re naming Atelier Fancelli in France as an additional defendant; draft email to D Indyke re same	0.25 300.00/hr	75.00
07/02/10	DMF	Revise and edit complaint against Fancelli; review settlement agreement to confirm it does not include Fancelli; draft email to D Indyke re same	0.75 300.00/hr	225.00
07/03/10	DMF	Review email from D Indyke and review information on Mercure which seems to be French company or legal entity for Atelier Fancelli	0.25 300.00/hr	75.00

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Jeffrey Epstein

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
07/30/10	DMF	Several teleconferences with D Indyke re filing complaint; conference with staff re same; finalize complaint for filing; revise and edit complaint; conference with staff re correct identification of exhibits and filing of complaint	3.00 300.00/hr	900.00
07/30/10	CJ	Prepare Exhibits to Complaint	1.00 125.00/hr	125.00
Total Hours and Legal Fees			14.00	\$2,943.75

Expenses:

<u>Date</u>	<u>Description</u>	
7/1/2010	Clerk of Court - Complaint Filing Fee	50.00
7/22/2010	LD Phone Calls - July 2010	4.11
Total Expenses		\$54.11
Interest on overdue balance		\$2.87
Total Amount Due This Billing Cycle		\$3,000.73
Previous balance		\$281.25
TOTAL BALANCE DUE		\$3,281.98

We appreciate your business. Please make your check payable to Hodge & Francois and include Invoice # on payment. Terms - Due Upon Receipt. An interest charge of 1% per month is automatically generated on all balances in excess of thirty (30) days.

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14571

L.S.J., LLC / LITTLE ST. JAMES / C/O AMERICAN YACHT HARBOR

9/17/2010

Hodge & Francois
50404 · Legal

Service rendered for August 2010

1,735.08

PAYMENT
PRECE

1,735.08

FirstBank Operating C Invoice #34495 dated 09/01/10 - AUG 2010

564217 (4/08)

Law Offices of Hodge & Francois

1340 Taarneberg
St Thomas, VI 00802
340-774-6845

September 01, 2010

Tax ID: 66-0473483

LSJ, LLC
6500 Red Hook Qtr., Suite B-3
St. Thomas, VI 00802
Attn: Darren Indyke

Invoice # 34495

In Reference To: General Representation

For Professional Services Rendered for the Period Ending: August 31, 2010

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
08/03/10	MTH	Telephone call(s) deJongh re plans to amend submission on parcel A to include spa, appropriate communication with CZM re same in advance of filing	0.25 300.00/hr	75.00
08/03/10	MTH	Telephone call(s) and draft email to CZM legal counsel requesting discussion of issue of notice requirement for advocacy groups re pending permit applications; draft email to Indyke re Parcel A proposed revision; telephone call, Indyke, re mooring permit, Parcel A land permit, etc; telephone call, Anthony Richards at CZM re same l/w	0.50 300.00/hr	150.00
08/11/10	MTH	Telephone call(s) Anthony Richards, re status of CZM applications; telephone call, JP Oriole and Bob deJongh re same l/w	0.25 300.00/hr	75.00
08/12/10	MTH	Research VI law (statutes and regulations) on deadlines for CZM to raise any objections to completeness of application, deadline to act on application, when deemed complete and when deemed approved without action; Draft email to Indyke re same with recommendations	1.25 300.00/hr	375.00
08/13/10	MTH	Review email from Indyke re new litigation in BVI filed by OBM Limited; draft email response with comments and preliminary advice; telephone call, Indyke, re same; preliminary review of summons and complaint received by email	1.00 300.00/hr	300.00
08/13/10	MTH	Review email from client with summary of meeting with Commissioner and CZM director on permit issues	0.25 300.00/hr	75.00
08/16/10	MTH	Telephone call(s) Bob deJongh re CZM permits and client email on meeting with CZM officials re status and guidance	0.25 300.00/hr	75.00
08/18/10	MTH	Telephone call(s) Gary Kearney re status of development plans for LSJ related to CZM permit applications	0.25 300.00/hr	75.00
08/19/10	MTH	Teleconference with client and Indyke re CZM meeting, permit issues, etc.	0.25 300.00/hr	75.00

EFTA0122230

LSJ, LLC

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hrs/Rate</u>	<u>Amount</u>
08/24/10	MTH	Telephone call(s) Gary Kearney re preparation for filing amendment to major CZM permit for dock, moorings, etc; telephone call, representative of deJongh, re plan revision for new application for minor permit for spa	0.50 300.00/hr	150.00
08/26/10	MTH	Research legal requirements and forms for application to modify major CZM permit; telephone call, Oriole, re same l/w; begin draft of letter of application for modification; review ACOE letter rejecting previous after the fact application to approve after the fact dock permit	1.00 300.00/hr	300.00
Total Hours and Legal Fees			5.75	\$1,725.00

Expenses:

<u>Date</u>	<u>Description</u>	
8/9/2010	Westlaw Research - 7/31/10	9.58
8/24/2010	LD Phone Calls - August 2010	0.50
Total Expenses		\$10.08
Total Amount Due This Billing Cycle		\$1,735.08
Previous balance		\$3,663.91
TOTAL BALANCE DUE		\$5,398.99

We appreciate your business. Please make your check payable to Hodge & Francois and include Invoice # on payment. Terms - Due Upon Receipt. An interest charge of 1% per month is automatically generated on all balances in excess of thirty (30) days.

*Paid towards
\$25K in Sept
per DEI per
JE/B
via phone*