

**FILED**

March 04, 2022 05:36 PM  
ST-2021-RV-00005  
TAMARA CHARLES  
CLERK OF THE COURT

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

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**IN THE MATTER OF THE ESTATE OF  
JEFFREY E. EPSTEIN,**

**Deceased.**

**CASE NO.: ST-2021-RV-  
00005**

**Originating Case No.:  
ST-2019-00080**

**AFFIDAVIT OF CHRISTOPHER A. KROBLIN**

I, Christopher A. Kroblin, Esq., declare and affirm as follows:

1. I am an attorney admitted to practice in New York and the Virgin Islands.

2. I am a 1997 graduate of Lewis & Clark College and a 2002 graduate of Golden Gate University School of Law. I have practiced law in the Virgin Islands since 2005. Since 2010, I have been a partner at Kellerhals Ferguson Kroblin PLLC (“Kellerhals”), counsel in this probate proceeding for the Co-Executors of the Estate of Jeffrey E. Epstein (the “Epstein Estate”), Darren K. Indyke and Richard D. Kahn (the “Co-Executors”).

3. I attach as Exhibit A copies of the professional profiles of myself, Shari N. D’Andrade, Marjorie Whalen and Andrew Heymann, as posted on the websites of Kellerhals or Solomon Blum Heyman LLP (“Solomon”). Each relevant attorney has reviewed his or her profile and confirmed that the statements therein are true and accurate.

4. I attach as Exhibit B a chart showing the contemporaneous time entries of the Kellerhals and Solomon professionals relating to the GVI Motions and GVI Appeal, as those terms are defined in the Motion for Award of Costs and Attorneys’ Fees and Incorporated Memorandum of Law in Support Thereof, filed herewith. The services charged were actually and necessarily performed in connection with the GVI Motions and GVI Appeal.

5. The hourly rates set forth in Exhibit B are the customary rates charged by each attorney listed therein. Clients customarily pay these rates, and the Epstein Estate pays these rates for these firms' representation of the Co-Executors.

6. The hourly rates set forth in Exhibit B are customary and reasonable for similarly experienced attorneys practicing law with firms comparable to Kellerhals and Solomon in the U.S. Virgin Islands.

7. I affirm and declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Date: March 3, 2022

*/s/ Christopher Allen Kroblin*  
Christopher A. Kroblin

# **EXHIBIT A**



## Christopher A. Kroblin

### Member

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Email: [ckroblin@kellfer.com](mailto:ckroblin@kellfer.com)

[vCard](#)

Christopher Allen Kroblin is the lead litigator at Kellerhals Ferguson Kroblin. His focus on civil and commercial litigation includes complex contract disputes, product defect and other tort disputes, arbitration, employment law, commercial banking litigation, and creditor's side bankruptcy representation. Chris also handles tax litigation cases as well as association, partnership, and corporate litigation matters. In addition to his general trial level practice, Chris handles a broad array of appellate issues.

Chris has practiced in the Virgin Islands since 2005. He joined current partners Erika Kellerhals and Greg Ferguson in 2010 as an of counsel attorney before the three formed Kellerhals Ferguson Kroblin. His practice is informed by his prior role as a judicial law clerk for Virgin Islands Supreme Court Justice Maria M. Cabret, in her former position as Presiding Judge of the Superior Court of the Virgin Islands. Chris also interned for the Federal Trade Commission, the Superior Court of the District of Columbia, and the Supreme Court of California.

Chris's academic work includes graduate legal studies at the George Washington School of Law. His publications include a Note entitled "Expanding the Jurisdictional Reach for Intentional Torts: Implications for Cyber Contacts," 31 Golden Gate U.L. Rev. 51 (2001). In law school Chris was Editor-in-Chief of his school's

law review and he represented his school at the Willem C. Vis International Commercial Arbitration Moot competition in Vienna Austria.

## Primary Areas of Practice

- [Commercial & Civil Litigation](#)

## Education

- Golden Gate University School of Law, in San Francisco California, J.D.
- Lewis and Clark College, in Portland Oregon, B.A.

## Bar Admissions

- New York
- U.S. Virgin Islands
- United States District Court of the Virgin Islands
- Third Circuit Court of Appeals

## Services

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[Probate & Estate Planning](#)



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# Shari N. D'Andrade

[Associate](#)  
[vCard](#)

Shari N. D'Andrade is a civil litigator admitted to practice in the U.S. Virgin Islands and New York. She rejoined the firm in 2019 after serving several years as an Assistant Attorney General with the Virgin Islands Department of Justice and General Counsel for the Government of U.S. Virgin Islands, Bureau of Corrections. There, Shari handled a broad range of legal matters, including prison litigation, defamation, class action suits, elections disputes, and Title VII-employment discrimination cases. Shari argues before the local and federal courts of the Virgin Islands, including the Virgin Islands Supreme Court. Her practice areas are commercial and civil litigation, civil rights, employment law, personal injury, and medical malpractice. She also has experience in compliance and regulatory matters and corporate governance. Before practicing law, Shari served as a judicial law clerk for Virgin Islands Superior Court Judge James S. Carroll, III. Shari graduated with honors from the American University Washington College of Law. During her course work, served as a law clerk for the United States Department of Justice, Civil Division, Federal Tort Claims Act Section, was a judicial intern for the Honorable Reggie B. Walton, United States District Court Judge for the District of Columbia, and represented clients in the General Practice Clinic. Shari also studied abroad in the People's Republic of China. Shari earned her undergraduate degree with honors from Howard University.

## Services

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# Marjorie Whalen

## Associate

Email: [mwhalen@kellfer.com](mailto:mwhalen@kellfer.com)

[vCard](#)

Marjorie Whalen is a litigation associate with Kellerhals Ferguson Kroblin PLLC. Before joining Kellerhals Ferguson Kroblin PLLC in October 2015, she served as Law Clerk to the Honorable Kathleen Y. Mackay of the Virgin Islands Superior Court for two years. As a student at Roger Williams University School of Law, Marjorie was a Notes & Comments Editor on the Roger Williams University Law Review and represented indigent clients as a student attorney in the Law School's Criminal Defense Clinic. For one year during law school, she interned for the Honorable O. Rogeriee Thompson in the U.S. Court of Appeals for the First Circuit.

## **Primary Areas of Practice**

- [Commercial & Civil Litigation](#)

## **Education**

- Roger Williams University School of Law, J.D.
- Clark University, M.P.A.
- Clark University, B.A.

## **Bar Admissions**

- U.S. Virgin Islands
- Massachusetts
- Rhode Island

## **Services**

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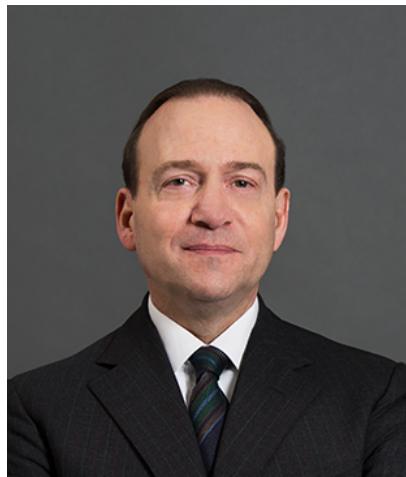
[Commercial & Civil Litigation](#)

[Banking & Banking Regulations](#)

[Probate & Estate Planning](#)

# Andrew Heymann

PARTNER • INTERNATIONAL TRUST, ESTATE, BUSINESS LAWYER



Andrew W. Heymann provides sophisticated international trust, estate and business planning, combined with estate administration and litigation, allowing him to provide comprehensive services to both U.S. and non-U.S. nationals. He has counseled numerous cross-border transactions, from the purchase of U.S. and non-U.S. businesses by multinational investors to investments in U.S. real property, art and other assets by entrepreneurs, international families and their closely held businesses. He has decades of experience in wealth preservation planning, including the establishment of domestic and foreign asset protection trusts, charitable foundations, family offices and the creation of intergenerational gifting strategies, and has administered complex multinational estates. Mr. Heymann also has more than thirty years' experience litigating trust, estate and complicated multi-jurisdiction commercial disputes (for example, obtaining notable judgments defending fiduciaries and beneficiaries in proceedings involving foreign forced heirship, undue influence, breach of fiduciary duty, and fraudulent conveyance claims; foreign tribunal arbitrations resulting in the successful dissolution and distribution of international trusts; international reinsurance litigation resulting in multi-million dollar settlements; and, U.S. tax reporting, advice and financial disclosure cases). He is admitted to practice before the federal, state and territorial courts in the jurisdictions of New York, New Jersey, and the U.S. Virgin Islands and before several Federal Circuit Courts of Appeal and the U.S. Tax Court.

Mr. Heymann serves as general counsel to a number of international charitable institutions and sits on the boards of several private foundations. He attended university in the United States, England and China, and speaks Mandarin Chinese. He is a long-

standing member of the international law, and trusts and estates sections of the New York State Bar Association.

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# **EXHIBIT B**

# Kellerhals Ferguson Kroblin PLLC - Client Summary

Clients: \*JEE - Estate of Jeffrey E. Epstein - Probate | Projects: | Users: All | Account Managers: All

Date	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
<b>*JEE - Estate of Jeffrey E. Epstein - Probate</b>						
<b>Andrew Heymann</b>						
01/31/2020	Representation of Estate	Further drafting supp. brief, and opp. to intervention brief and conferences same.	\$630.00 hr	6.40	6.40	\$4,032.00
02/02/2020	Representation of Estate	Correspondence re corrected briefs re intervention and supplemental in support of program and related correspondence.	\$630.00 hr	2.10	2.10	\$1,323.00
02/08/2021	Representation of Estate	Review motion papers, research same and correspondence reply to emergency motion freeze assets	\$660.00 hr	4.30	4.30	\$2,838.00
02/09/2021	Representation of Estate	Strategize on opposition to AG motion to freeze assets and standard and research same and related advice to clients.	\$660.00 hr	5.90	5.90	\$3,894.00
<b>Total Labor For Andrew Heymann</b>					<b>18.70</b>	<b>18.70</b>
<b>Total Expense For Andrew Heymann</b>					<b>\$0.00</b>	<b>\$0.00</b>
<b>Total For Andrew Heymann</b>						<b>\$12,087.00</b>
<b>Christopher Kroblin</b>						
01/23/2020	Representation of Estate	Review Motion for Intervention and Opposition to Claims Program, research re the same, and strategize response.	\$500.00 hr	2.80	2.80	\$1,400.00
01/29/2020	Representation of Estate	Review / edit Opposition to Motion for Intervention.	\$500.00 hr	1.60	1.60	\$800.00
01/30/2020	Representation of Estate	Preparation for hearing including proposed agenda, proposed witnesses, and hearing binders, and review of quarterly accounting and edit of the same.	\$500.00 hr	2.90	2.90	\$1,450.00
01/31/2020	Representation of Estate	Incorporation of final edits to Opposition to Motion to Intervene, Supplemental Brief, and Reply to Opposition to Motion for claims Program.	\$500.00 hr	4.80	4.80	\$2,400.00
02/03/2020	Representation of Estate	Preparation for hearing.	\$500.00 hr	4.50	4.50	\$2,250.00
02/04/2020	Representation of Estate	Appearance at hearing for Estate.	\$500.00 hr	4.50	4.50	\$2,250.00
02/04/2021	Representation of Estate	Review Motion to Freeze assets filled by AG and consider response to the same.	\$500.00 hr	0.30	0.30	\$150.00
02/08/2021	Representation of Estate	Edits to opposition to A.G. Motion for Emergency Relief (including related research).	\$500.00 hr	7.40	7.40	\$3,700.00
02/09/2021	Representation of Estate	Review revised Opposition to Motion to Freeze Assets and final version for filing the same.	\$500.00 hr	0.70	0.70	\$350.00
02/18/2021	Representation of Estate	Preparation for in camera hearing.	\$500.00 hr	1.60	1.60	\$800.00
02/19/2021	Representation of Estate	Appearance at in camera hearing re EVC fund and GVI Motion	\$500.00 hr	1.60	1.60	\$800.00

03/18/2021	Representation of Estate	Review Notice of Appeal and assist with responding to the same.	\$500.00 hr	0.50	0.50	\$250.00
03/23/2021	Representation of Estate	Review draft response to notice of appeal and comments regarding the same as well as review of filing deadline issue.	\$500.00 hr	0.50	0.50	\$250.00
03/29/2021	Representation of Estate	Review finalized response to notice of appeal for filing.	\$500.00 hr	0.20	0.20	\$100.00
02/07/2022	Representation of Estate	Review of Order disposing of Government's appeal of orders of intervention and to freeze assets.	\$500.00 hr	0.30	0.30	\$150.00
			<b>Total Labor For Christopher Kroblin</b>	<b>34.20</b>	<b>34.20</b>	<b>\$17,100.00</b>
			<b>Total Expense For Christopher Kroblin</b>		<b>\$0.00</b>	<b>\$0.00</b>
			<b>Total For Christopher Kroblin</b>			<b>\$17,100.00</b>

#### Marjorie Whalen

01/24/2020	Representation of Estate	Researched intervention in probate matters and relevant Virgin Islands rules and statutes.	\$360.00 hr	2.20	2.20	\$792.00
01/26/2020	Representation of Estate	Researched law relating to opposition to Government's Motion to Intervene, including whether Estate may be named as party and whether Government may intervene in probate proceeding.	\$360.00 hr	4.30	4.30	\$1,548.00
01/27/2020	Representation of Estate	Continued drafting memorandum on Government's Motion to Intervene.	\$360.00 hr	0.90	0.90	\$324.00
01/27/2020	Representation of Estate	Researched case law for opposition to Government's Motion to Intervene.	\$360.00 hr	1.10	1.10	\$396.00
01/28/2020	Representation of Estate	Drafted Opposition to Motion to Intervene.	\$360.00 hr	5.00	5.00	\$1,800.00
01/28/2020	Representation of Estate	Began to prepare exhibits for February 4 hearing.	\$360.00 hr	0.20	0.20	\$72.00
01/29/2020	Representation of Estate	Reviewed Opposition to Government's Motion to Intervene.	\$360.00 hr	0.50	0.50	\$180.00
01/29/2020	Representation of Estate	Reviewed and revised Opposition to Motion to Intervene.	\$360.00 hr	0.90	0.90	\$324.00
01/30/2020	Representation of Estate	Edits to Opposition to Government's Motion to Intervene.	\$360.00 hr	0.50	0.50	\$180.00
02/01/2020	Representation of Estate	Prepared binders for February 4 hearing.	\$360.00 hr	5.00	5.00	\$1,800.00
02/08/2021	Representation of Estate	Reviewed citation in AG's emergency motion to title 15, "section 302(b)" and reviewed title 15 of the Virgin Islands Code.	\$360.00 hr	0.60	0.60	\$216.00
			<b>Total Labor For Marjorie Whalen</b>	<b>21.20</b>	<b>21.20</b>	<b>\$7,632.00</b>
			<b>Total Expense For Marjorie Whalen</b>		<b>\$0.00</b>	<b>\$0.00</b>
			<b>Total For Marjorie Whalen</b>			<b>\$7,632.00</b>

#### Shari D'Andrade

01/31/2020	Representation of Estate	Further Revised Opposition to Motion to Intervene	\$400.00 hr	1.20	1.20	\$480.00
02/01/2020	Representation of Estate	Corrected Opposition to GVI's Motion to Intervene; revised proposed agenda for February 3, 2020; reviewed pending motions	\$400.00 hr	2.20	2.20	\$880.00

02/04/2021	Representation of Estate	Calendared deadline for response to GVI's emergency motion; tried to gain access to court website for docket; called clerk's office to determine when GVI emergency motion was filed; communication w/team re strategy.	\$400.00 hr	1.80	1.80	\$720.00
02/08/2021	Representation of Estate	Researched re other probate cases and requests for injunctive relief; Reviewed Feb. 4 hearing transcript re AG's standing in probate for inclusion in opposition	\$400.00 hr	3.10	3.10	\$1,240.00
02/10/2021	Representation of Estate	Calendared in camera conference w/judge re GVI's Emergency Motion to Freeze Estate's Assets	\$400.00 hr	0.20	0.20	\$80.00
02/12/2021	Representation of Estate	Reviewed government's notice of complaint filing related to emergency motion to immediately freeze all estate assets and cash on hand.	\$400.00 hr	0.20	0.20	\$80.00
03/12/2021	Representation of Estate	Reviewed docket and Order denying GVI's motion to intervene	\$400.00 hr	0.20	0.20	\$80.00
03/23/2021	Representation of Estate	Researched computation of time for response to appeal; reviewed court docket; reviewed and commented on draft response to notice of appeal.	\$400.00 hr	1.20	1.20	\$480.00
04/07/2021	Representation of Estate	Reviewed and circulated to clients clerk's notice re docketed appeal; email communication to clerk of court re impact of notice and already filed Estate's response to notice of appeal; communication w/clients and legal team re judicial assignment	\$400.00 hr	0.60	0.60	\$240.00
<b>Total Labor For Shari D'Andrade</b>				<b>10.70</b>	<b>10.70</b>	<b>\$4,280.00</b>
<b>Total Expense For Shari D'Andrade</b>					<b>\$0.00</b>	<b>\$0.00</b>
<b>Total For Shari D'Andrade</b>						<b>\$4,280.00</b>

#### **Shauna Betz 2**

01/31/2020	Representation of Estate	Proofread/edit Supplemental Brief, Opposition to Motion to Intervene and Reply to Opposition to Claims Program; prepare same and First Quarter Account for filing with the Probate Court; hand deliver same; prepare mailing of all to Government; hand deliver to Post Office.	\$135.00 hr	2.50	2.50	\$337.50
02/03/2020	Representation of Estate	Proofread/edit/prepare Opposition to Claimants' Motion to Intervene and corrected Opposition to GVI's Motion to Intervene for filing with the Probate Court; hand deliver to Probate Court; hand deliver same to Probate Court; prepare mailings to counsel; receipt and review date stamped same.	\$135.00 hr	2.00	2.00	\$270.00
02/04/2020	Representation of Estate	Assist with copies for hearing	\$135.00 hr	0.50	0.50	\$67.50
02/28/2020	Representation of Estate	Receipt and review original GVI's Opposition to Emergency Motion for Order Releasing Funds; file in Client file folder.	\$135.00 hr	0.20	0.20	\$27.00
02/09/2021	Representation of Estate	Receipt, review, placed in file GVI's Emergency Motion to Immediately Freeze Assets.	\$135.00 hr	0.20	0.20	\$27.00

02/10/2021	Representation of Estate	Proofread/edit/prepare/e-file Opposition to AG's Emergency Motion to Freeze Assets.	\$135.00 hr	1.10	1.10	\$148.50
02/17/2021	Representation of Estate	Receipt, review, and place in file date stamped Opposition to Emergency Motion.	\$135.00 hr	0.30	0.30	\$40.50
03/18/2021	Representation of Estate	Receipt, review, and place in file AG's Notice of Appeal and Petition for Review.	\$135.00 hr	0.30	0.30	\$40.50
03/29/2021	Representation of Estate	Proofread/edit/prepare/e-file Opposition to Notice of Appeal.	\$135.00 hr	1.00	1.00	\$135.00
03/31/2021	Representation of Estate	Receipt, review, and place in file date stamped Response to Government's Notice of Appeal.	\$135.00 hr	0.40	0.40	\$54.00
			<b>Total Labor For Shauna Betz 2</b>	<b>8.50</b>	<b>8.50</b>	<b>\$1,147.50</b>
			<b>Total Expense For Shauna Betz 2</b>		<b>\$0.00</b>	<b>\$0.00</b>
			<b>Total For Shauna Betz 2</b>			<b>\$1,147.50</b>
			<b>Total Labor For *JEE - Estate of Jeffrey E. Epstein - Probate</b>			<b>\$42,246.50</b>
			<b>Grand Total Labor</b>	<b>93.30</b>	<b>93.30</b>	<b>\$42,246.50</b>