

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

Case No. 50 2009CA040800XXXXMB AG

JEFFREY EPSTEIN

Plaintiff,

v.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS,
individually, and L.M., individually,

Defendants.

**EPSTEIN'S SUPPLEMENTAL PRODUCTION PURSUANT
TO DEFENDANT'S REQUEST FOR PRODUCTION**

Plaintiff, JEFFREY EPSTEIN ("Epstein"), pursuant to Fla. R. Civ. P. 1.350, submits his first supplemental response to the March 18, 2010 Request to Produce served by Defendant, BRADLEY J. EDWARDS ("Edwards"), and states:

1. All documents upon which the Plaintiff does or may rely in support of his claim for damages against the Defendants, including but not limited to:
 - a. All agreements with attorneys, the payment of whose services are alleged as an element of damages;
 - b. All invoices for attorney services and costs alleged as an element of damages;
 - c. All time records reflecting services rendered, the payment for which is alleged as an element of damages;
 - d. Every cancelled check, receipt, ledger entry, and other document of whatever kind or description reflecting, referencing, evidencing, or relating to every

SHARON R. BUCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL / PROBATE
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FILED

expenditure by you or on your behalf which expenditure is alleged as an element of damages.

RESPONSE:

Objection: this request seeks documents and information protected by the attorney/client privilege and work product privilege, as well as documents that are irrelevant and/or duplicative of other requests. As to subsections (a) and (d), Epstein objects as the information is confidential and protected by attorney/client privilege, and also asserts his Fifth Amendment privilege. However, Epstein will be producing invoices in redacted form which contain substantially the same information requested in subsections (a) and (d). In addition, subsection (d) is unduly burdensome as it would require Epstein to cull through thousands of documents to determine which, if any, documents are responsive. Epstein also asserts his U.S. constitutional privileges under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution. Epstein asserts his Fifth Amendment privilege against self-incrimination. See DeLisi v. Bankers Ins. Company, 436 So.2d 1099 (Fla. 4th DCA 1983); Malloy v. Hogan, 84 S.Ct. 1489, 1495 (1964)(the Fifth Amendment's Self-Incrimination Clause applies to the states through the Due Process Clause of the Fourteenth Amendment - "[i]t would be incongruous to have different standards determine the validity of a claim of privilege based on the same feared prosecution, depending on whether the claim was asserted in state or federal court."). Without waiving the foregoing objections, Epstein will produce responsive

documents in redacted form pursuant to the Agreed Order entered on May 21, 2010. The undersigned will produce additional documents the week of May 31, 2010. See attached.

2. Any and all prescriptions for correctives lenses issued to you within the past five (5) years.

RESPONSE:

Documents responsive to this request have already been produced to Edwards.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 3 day of June, 2010:

Gary M. Farmer, Jr., Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
954-524-2820
954-524-2822 – fax
Attorneys for Defendant, L.M.

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
Fax: 561-835-8691
Co-Counsel for Defendant Jeffrey Epstein

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart &
Shipley, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
686-6300
383-9424 F
Attorneys for Defendant Edwards

Law Offices of Marc S. Nurik
Counsel to Scott Rothstein
One East Broward Boulevard, Suite 700
Fort Lauderdale, FL 33301
(954) 745-5849
(954) 745-3556

BURMAN, CRITTON, LUTTIER & COLEMAN, LLP

303 Banyan Boulevard, Suite 400

West Palm Beach, FL 33401

(561) 842-2820

(561) 253-0764 Fax

By: _____

Robert D. Critton, Jr.

Florida Bar #224162

Michael J. Pike

Florida Bar #617296

(Counsel for Defendant Jeffrey Epstein)

NOT A CERTIFIED COPY

LAW OFFICES OF
BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
303 BANYAN BOULEVARD, SUITE 400
WEST PALM BEACH, FLORIDA 33401

May 17, 2010



TRANSACTION DETAIL

Matter ID: 2008-029

Client ID: 3371

EPSTEIN, JEFFREY

Federal ID #



For Professional Services Rendered:

01/02/2009

01/05/2009

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Matter ID: 2008-029

Federal ID #

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01/08/2009

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01/08/2009	RHB	Legal research re: RICO; enterprise element, legislative history and purpose; conference with RDC	1.60 hr	\$480.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

01/12/2009	RHB	Review case and Statutory Law on RICO claim	1.10 hr	\$330.00
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01/12/2009

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01/13/2009	RHB	Finalize Motion to Dismiss and Strike Amended Complaint-Count IV, L. M. and E.W.	2.40 hr	\$720.00
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01/16/2009

Federal ID # [REDACTED]

01/19/2009				
01/19/2009	RDC	Review Rico cases	0.30 hr	\$150.00
01/19/2009				
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01/20/2009				
01/20/2009				
01/20/2009	RDC	[REDACTED]; LM - Edwards January 16 letter regarding FBI statement	0.20 hr	\$100.00
01/21/2009	RHB	Review Notice of Deposition Duces Tecum regarding E.W. case; compare with Jane Doe Duces Tecum	0.40 hr	\$120.00
01/21/2009	RHB	Conference with RDC regarding Motion to Stay, Motion to Quash E.W. Duces Tecum and Discovery (Doe 2-5)	0.25 hr	\$75.00
01/21/2009	RHB	Draft Motion to Quash E.W. Duces Tecum	1.60 hr	\$480.00
01/21/2009	RHB	Review prior Answers and Responses to Discovery in E.W. [REDACTED]	0.50 hr	\$150.00
01/21/2009	RHB	Draft memo to RDC regarding E.W. Motion to Quash Duces Tecum; prior discovery	0.10 hr	\$30.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

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01/23/2009	RDC	Review letter re:Tatum; FBI; e-mails and response	0.40 hr	\$200.00
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01/23/2009	RDC	Telephone conference with [REDACTED] re: Subpoena Duces Tecum; Brad; letter re: statement and depo	0.50 hr	\$250.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

01/27/2009

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01/28/2009

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01/28/2009	RDC	Receipt and review (Doe 2-7, BB, LM, EW) Responses to Interrogatories and Request to Produce on individual cases	1.20 hr	\$600.00
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Matter ID: 2008-029

Federal ID: [REDACTED]

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02/03/2009

02/03/2009

02/03/2009

02/03/2009

02/04/2009

02/04/2009

02/04/2009

02/04/2009

02/04/2009 MJP Confer with R. Budnyk regarding RICO claims

0.40 hr \$50.00

0.20 hr \$60.00

02/04/2009

02/04/2009

02/04/2009

02/05/2009

02/05/2009

02/05/2009

02/05/2009

02/06/2009

02/06/2009

02/06/2009 MJP Research regarding RICO and no recovery for personal injury type matters

3.70 hr \$1,110.00

02/07/2009

02/09/2009

02/09/2009 MJP Research regarding RICO, confer with R. Budnyk regarding damages issue

3.50 hr \$1,050.00

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Federal ID: [REDACTED]

For Professional Services Rendered:

02/09/2009

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02/10/2009	MJP	Research regarding RICO and meetings with R. Critton, Esq., regarding same and review legislative notes	2.50 hr	\$750.00
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02/10/2009

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02/10/2009	RDC	Review RICO with Pike and cases	0.50 hr	\$250.00
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Matter ID: 2008-029

Federal ID: [REDACTED]

For Professional Services Rendered:

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02/19/2009

02/19/2009	RDC	Conference with JMB; review RICO cases, [REDACTED]	1.10 hr	\$550.00
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02/19/2009

02/19/2009

02/19/2009	MJP	Meetings with R. Critton, Esq., regarding RICO and research regarding RICO	1.50 hr	\$450.00
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02/20/2009	RHB	Reviews responses to Motion to Dismiss in L.M. & E.W.	0.40 hr	\$120.00
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02/20/2009	RHB	Begin review of case law cited in Motions and responses -L.M. & E.W.	0.80 hr	\$240.00
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Matter ID: 2008-029

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02/27/2009

03/01/2009

03/02/2009

03/02/2009

03/02/2009

03/02/2009

03/02/2009

03/02/2009

03/03/2009 MJP Meeting with R. Budnyk regarding RICO

0.30 hr

\$90.00

03/03/2009

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Matter ID: 2008-029

Federal ID # [REDACTED]

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03/06/2009

03/06/2009 RDC Finish prep for hearing on RICO; e-mails and conference regarding LM & EW 2.80 hr \$1,400.00

03/06/2009

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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

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03/10/2009 RDC Review AC and EW motions/responses re [REDACTED] 0.50 hr \$250.00

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03/13/2009	RDC	Order re: Rico; letter; reviewed transcript	0.20 hr	\$100.00
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03/13/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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03/15/2009	MJP	Weekend strategy meeting with R. Critton, Esq., regarding discovery, Motions to Transfer, 5th Amendment and getting up to speed with files	2.00 hr	\$600.00
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03/15/2009	MJP	Review and analysis of EW's Motion to Quash	0.40 hr	\$120.00
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03/16/2009		[REDACTED]		
03/16/2009		[REDACTED]		
03/16/2009	RHB	Legal research re: 5th Amended identification of witnesses	0.75 hr	\$225.00
03/16/2009		[REDACTED]		
03/16/2009	RHB	Conference(s) with Attorney Pike re: Motion to Transfer Issues; 5th Amended Issues, background	0.25 hr	\$75.00
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03/18/2009	MJP	Review and analysis of Fifth Amendment Privilege Information	0.90 hr	\$270.00
03/18/2009		[REDACTED]		
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Matter ID: 2008-029

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03/20/2009	MJP	Finalize research on 5th Amendment [REDACTED]	2.80 hr	\$840.00
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Federal ID # [REDACTED]

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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

[REDACTED]				
03/26/2009	MJP	Meeting with R. Critton, Esq., regarding personal injury and indirect injury type damages regarding Motion to Dismiss	0.40 hr	\$120.00
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/26/2009	RDC	Receipt and review Doe (Fed) First Interrogatories; First Request to Produce; 1st Request for Admissions	0.30 hr	\$150.00
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	\$2 [REDACTED]
03/26/2009	RHB	Conference with RDC, EW, and LM regarding Motions to Dismiss; SR/JD no private c/a	0.20 hr	\$60.00
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/26/2009	MJP	Draft/revise Motion for stay in Jane Doe, review discovery response in file regarding same, serve same	0.40 hr	\$120.00
03/26/2009	MJP	Preparing for Motion to Dismiss Hearing on Jane Doe	0.90 hr	\$270.00
03/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/27/2009	MJP	Research on Motion to Dismiss, confer with R. Critton, Esq., regarding same, research response in opposition	5.30 hr	\$1,590.00
03/27/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/27/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/27/2009	RDC	Conference with Pike re: Rico issues	0.70 hr	\$350.00
03/28/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/29/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/29/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/29/2009	MJP	Research and prepare for Motion to Dismiss, review and analysis of case law and RICO statement, review and analysis of RICO conspiracy	1.90 hr	\$570.00
03/30/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/30/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/30/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/30/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/30/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

03/30/2009	MJP	Draft Notice of Supplemental Authority	0.20 hr	\$60.00
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03/31/2009	RDC	Prepare for hearing; read Rico and motions/responses	3.50 hr	\$1,750.00
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03/31/2009				
03/31/2009	MJP	Meeting with R. Critton, Esq., re: preparing for Motion to Dismiss (JD), drafting Motions to Compel Discovery responses (JD), review and analysis of plea agreement to determine if [REDACTED]	2.40 hr	\$720.00
04/01/2009	RDC	Continued preparation for hearing	3.00 hr	\$1,500.00
04/01/2009		[REDACTED]	[REDACTED]	[REDACTED]
04/01/2009	RDC	Hearing with Marra; conference with Brad; conference with Jack	2.10 hr	\$1,050.00
04/01/2009		[REDACTED]	[REDACTED]	[REDACTED]
04/01/2009		[REDACTED]	[REDACTED]	[REDACTED]
04/01/2009		[REDACTED]	[REDACTED]	[REDACTED]
04/01/2009		[REDACTED]	[REDACTED]	[REDACTED]
04/01/2009	MJP	Prepare for and attend hearing on Motion to Dismiss, finalize case law and research cases excluding personal injury damages under RICO	4.20 hr	\$1,260.00
04/01/2009		[REDACTED]	[REDACTED]	[REDACTED]

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Federal ID: [REDACTED]

For Professional Services Rendered:

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04/02/2009

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04/02/2009

04/02/2009

04/02/2009 RHB Review Plaintiff's Response to Motion to Quash based on 5th Amendment (E.W.)

0.50 hr

\$150.00

04/02/2009 RHB Review Motion to Quash (EW)

0.20 hr

\$60.00

04/02/2009 RHB Draft memo/e-mail cover regarding issues to address in EW Response to Motion to Quash

0.20 hr

\$60.00

04/02/2009

04/03/2009

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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

04/09/2009

04/09/2009

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04/09/2009

04/09/2009	MJP	Confer regarding supplement to RICO Motion to Dismiss, review same	0.30 hr	\$90.00
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04/09/2009

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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

04/13/2009

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04/13/2009

04/13/2009

04/13/2009 MJP Review and analysis of Jane Doe's Response in Opposition to Motion to Stay

[REDACTED] 0.30 hr \$90.00

04/14/2009 RDC [REDACTED] Response to Stay

0.30 hr \$150.00

04/14/2009 [REDACTED]

04/14/2009 RDC Conference with Rita re: Response to Quash in S.R.

0.10 hr \$50.00

04/14/2009

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Federal ID # [REDACTED]

04/15/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/15/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/15/2009	RHB	Legal research regarding case law in Plaintiff's Response to Motion to Quash	1.10 hr	\$330.00
04/15/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/15/2009	RHB	EW - Draft Reply to Response to Motion to Quash	2.30 hr	\$690.00
04/15/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

04/16/2009

04/17/2009

Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

04/22/2009

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04/22/2009	RHB	Review House bills/reports and history on 18 USC Statute 2255; legal research	1.50 hr	\$450.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

05/11/2009

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05/11/2009	MJP	Confer with R. Budnyk regarding 2255	0.20 hr	\$60.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

05/08/2009

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05/10/2009

05/10/2009	MJP	Review and analysis of CMA and Jane Does Responses in Opposition to Motion for Stay	0.60 hr	\$180.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

05/13/2009

05/13/2009	MJP	Finalize Replies to Stay Opposition in Jane Doe and CMA	1.50 hr	\$450.00
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For Professional Services Rendered:

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05/26/2009	MJP	Telephone conference with B. Edwards regarding Subpoenas	0.20 hr	\$60.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

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06/01/2009

06/01/2009

06/01/2009 RDC E-mails, memo to [REDACTED] etc. re: NPA, 2255; review NPA

06/01/2009

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[REDACTED]

[REDACTED]

1.10 hr \$550.00

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Federal ID # [REDACTED]

For Professional Services Rendered:

06/10/2009

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06/11/2009	MJP	Drafting Epstein's Motion to Dismiss Jane Doe (SR) Amended Complaint, research and analysis of case law re: same, meeting with R. Critton, re: same, research and analysis of enterprise theory, common purpose under RICO and personal injury damages not awarded under RICO	11.30hr	\$3,390.00
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06/11/2009 [REDACTED]

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Federal ID #

For Professional Services Rendered:

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06/12/2009	MJP	Finalize Epstein's Motion to Dismiss Jane Doe (SR) Amended Complaint, telephone conference with B. Edwards	7.40 hr	\$2,220.00
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06/14/2009

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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

Date	Description	Hours	Amount
06/29/2009	[REDACTED]		
06/29/2009	[REDACTED]		
06/29/2009	DY Perform research on fraudulent transfer issues for response to Motion for Injunction, Receiver and Bond	2.10 hr	\$525.00
06/29/2009	[REDACTED]		
06/30/2009			
06/30/2009			
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Federal ID # [REDACTED]

For Professional Services Rendered:

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07/01/2009

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07/01/2009

07/02/2009

07/02/2009

07/02/2009 DY Continue research re Epstein's Response to Injunction Motion - injunction, fraudulent transfer, receiver, accounting, bond (Jane Doe)

2.50 hr

\$625.00

07/02/2009 [REDACTED]

07/02/2009 [REDACTED]

07/02/2009 [REDACTED] 2

07/02/2009 [REDACTED]

[REDACTED]

Matter ID: 2008-029

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For Professional Services Rendered:

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07/03/2009

07/04/2009	DY	Prepare Memorandum of Law in Opposition to Injunction Motion; Research elements of injunction and hearsay	3.40 hr	\$850.00
07/05/2009	RDC	Review e-mails	0.10 hr	\$50.00
07/06/2009	DY	Research elements of accounting and hearsay; prepare Memorandum of Law in Opposition to Injunction Motion; review and revise Memorandum of Law (Jane Doe)	8.60 hr	\$2,150.00

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07/07/2009

07/07/2009

07/07/2009	DY	Review and revise Memo of Law in Opposition to Injunction Motion; telephone conference with Martin Reeder to revisions to Memo of Law; review e-mail from Martin Reeder [REDACTED] (Jane Doe)	4.60 hr	\$1,150.00
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For Professional Services Rendered:

07/10/2009

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07/10/2009

07/10/2009	DY	Review and revise Memorandum of Law in Opposition to Injunction Motion; review and respond to e-mail from Martin Reeder re: revised memorandum; prepare final draft of Memorandum of Law in Opposition to Injunction Motion (Jane Doe)	3.50 hr	\$0.00
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07/13/2009

Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

[REDACTED]

07/13/2009	DY	Review and revise Memo of Law in Opposition to Injunction Motion; prepare final version of Memo of Law	0.50 hr	\$125.00
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Federal ID # [REDACTED]

For Professional Services Rendered:

07/22/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/22/2009	[REDACTED]	[REDACTED]	0.10 hr	[REDACTED]
07/22/2009	[REDACTED]	[REDACTED]	0.10 hr	[REDACTED]
07/23/2009	MJP	Confer with D. Yarema regarding network discovery	0.20 hr	\$60.00
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Matter ID: 2008-029

Federal ID # [REDACTED]

For Professional Services Rendered:

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07/24/2009	DY	Review and analyze Plaintiff's Reply to Injunction Motion; review and compare Response to Injunction Motion; review cases cited in Response and Reply (Jane Doe)	2.40 hr	\$600.00
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07/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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07/27/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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07/27/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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07/27/2009	MJP	Research and analysis of case law regarding preemption of state law by federal law in connection with RICO [REDACTED] (Jane Doe), research regarding legislative intent under RICO, meeting with R. Critton, Esq., re: same,	4.40 hr	\$1,320.00
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Federal ID # [REDACTED]

For Professional Services Rendered:

07/27/2009	[REDACTED]		0.30 hr	\$3.00
07/27/2009	[REDACTED]		2.20 hr	\$1,100.00
07/27/2009	[REDACTED]		1.20 hr	\$600.00
07/27/2009	[REDACTED]		1.20 hr	\$600.00
07/27/2009	[REDACTED]		0.30 hr	\$150.00
07/27/2009	[REDACTED]		0.50 hr	\$250.00
07/27/2009	[REDACTED]		0.70 hr	\$350.00
07/27/2009	DY	Office conference with [REDACTED] Reply to Motion to Dismiss re RICO; [REDACTED]	0.50 hr	\$125.00
07/27/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/27/2009	MJP	Drafting Reply to Opposition to Motion to Dismiss in Jane Doe, research regarding same	1.20 hr	\$360.00
07/28/2009				
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07/28/2009				
07/28/2009	MJP	Research and analysis of case law regarding federal courts construing state statutes along side federal acts and statutes, drafting Reply to Opposition to Motion to Dismiss, update RICO research, meeting with M. Burman, Esq., regarding [REDACTED] on Rico, research re: legislative history, telephone conference with B. Edwards - All relating to Jane Doe (SR)	6.70 hr	\$2,010.00
07/28/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/28/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/29/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/29/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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For Professional Services Rendered:

08/04/2009

08/05/2009

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08/05/2009	DY	Prepare Response in Opposition to Motion to Supplement Injunction Motion with Recently-Obtained Affidavit of [REDACTED]	1.40 hr	\$350.00
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Matter ID: 2008-029

Federal ID #: [REDACTED]

For Professional Services Rendered:

08/24/2009

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08/25/2009	MJP	Drafting Responses to New Worth Discovery, meeting with RDC and confer with [REDACTED] re: same, research regarding punitive damages and limitations for producing information	7.40 hr	\$2,220.00
08/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/26/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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For Professional Services Rendered:

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10/02/2009

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10/02/2009	MJP	Jane Doe - Review and analysis of Motion to Compel Interrogatories, Request for Production and Requests for Admissions relative to Epstein's objections under the 5th, 6th and 14th Amendments, review and analysis of case law cited therein, update 5th Amendment research, begin drafting Response in Opposition to Jane Doe's Motion to Compel Requests for Production	9.10 hr	\$2,730.00
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For Professional Services Rendered:

10/03/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/03/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/03/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/03/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/04/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/04/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/04/2009	MJP	Jane Doe - continue Response in Opposition to Jane Doe's Motion to Compel Requests for Production, research 5th Amendment issues, e-mails with [REDACTED], begin drafting Response in Opposition to Jane Doe's Motion to Compel Interrogatories	5.80 hr \$1,740.00
10/05/2009			
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10/05/2009	MJP	Jane Doe - continue Response in Opposition to Jane Doe's Motion to Compel Interrogatories, research 5th Amendment issues relative to requests for admissions, e-mails with [REDACTED] confer with [REDACTED], begin drafting Response in Opposition to Jane Doe's Motion to Compel Requests for Admissions	9.60 hr \$2,880.00
10/05/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/05/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/06/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/06/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/06/2009	DY	Attend deposition of Larry Eugene Morrison	3.10 hr \$775.00
10/06/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/06/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/06/2009	[REDACTED]	[REDACTED]	[REDACTED]
10/06/2009	[REDACTED]	[REDACTED]	[REDACTED]

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10/06/2009	MJP	Finalize All Responses in Opposition to Motions to Compel Requests for Production, Interrogatories and Requests for Admissions relative to all 5th Amendment Issues, file same in Jane Doe (80893), conferences with [REDACTED]	8.10 hr	\$2,430.00
10/07/2009		[REDACTED]		
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10/12/2009	RDC	Prepare for and conference with David Rogers - LM	2.30 hr	\$1,150.00
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10/12/2009	f			
10/12/2009	f			
10/12/2009	f			
10/12/2009	l			
10/12/2009	l			
10/12/2009	l			
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10/13/2009				
10/13/2009	RDC	Attend Rogers depo - LM	3.20 hr	\$1,600.00
10/13/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/13/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/13/2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/13/2009	RDC	Memo and Interrogatories re: LM	0.40 hr	\$200.00
		Conference with attorneys and Jess [REDACTED]		

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10/13/2009

10/14/2009 RDC Prepare for and conference with Larry V - LM

1.50 hr

\$750.00

10/14/2009

10/14/2009

10/14/2009

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For Professional Services Rendered:

11/05/2009

11/05/2009

11/05/2009	DY	Review Motion for Leave to Supplement Injunction Motion with New Discovered Evidence - Deposition of Larry Visoski and prepare Motion to Strike same (Jane Doe)	3.10 hr	\$775.00
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11/05/2009	DY	Review Order denying Injunction Motion; office conference with R. Critton re: Order (Jane Doe)	0.20 hr	\$50.00
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11/10/2009 MJP Case No. 7 Research and analysis and update case law regarding abuse of process and RICO (RRA Case) 1.90 hr \$570.00

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