

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

CA FLORIDA HOLDINGS, LLC,
Publisher of the PALM BEACH POST,

Plaintiff,

v.

CASE NO.: 19-CA-014681

DAVE ARONBERG, as State Attorney of
Palm Beach County, Florida; SHARON R.
BOCK, as Clerk and Comptroller of Palm
Beach County, Florida.

Defendants.

AFFIDAVIT OF ATTORNEYS' FEES

STATE OF FLORIDA
COUNTY OF NASSAU

BEFORE ME, the undersigned authority appeared Douglas A. Wyler, Esq., who, after
being first duly sworn, deposes and says:

1. Affiant is a partner of JACOBS, SCHOLZ & WYLER, LLC, counsel for
Defendant, DAVE ARONBERG, as State Attorney of Palm Beach County, Florida, ("Aronberg"),
as well as general counsel to the Florida Prosecuting Attorneys Association, ("FPAA"), and makes
this Affidavit of his own personal knowledge.
2. Affiant is licensed to practice law in the State of Florida, is an active member of
the Florida Bar in good standing and has engaged in the practice of law in the State of Florida since
2015.
3. As detailed herein, the services rendered by Affiant and his firm pertain to Affiant's
demand letter and motion for attorneys' fees sent to Plaintiff's counsel pursuant to § 57.105,
Florida Statutes, on June 8, 2020, in defending against Count I of Plaintiff's Amended Complaint

and Plaintiff's October 21, 2020 Notice of Dropping State Attorney, Dave Aronberg from the above-captioned lawsuit. *See, Exhibits "A" and "B" attached hereto.*

4. The total time Affiant's law firm has expended services rendered to date is **74.8 hours**, however, from the date of Defendant Aronberg's 57.105 demand, Affiant's law firm has expended a total of **42.2 hours**. Of the 42.2 hours expended since Defendant Aronberg's 57.105 demand was served, the Affiant

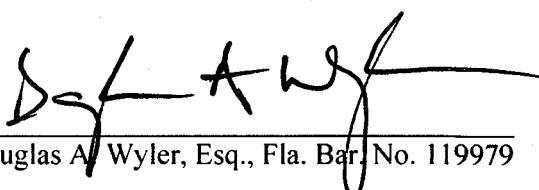
5. Of the 42.2 hours expended since Defendant Aronberg's 57.105 demand was served, the total time Affiant has expended services rendered to date is **35.4 hours** at the rate of **\$425.00 per hour**. Likewise, the total time Affiant's law partner, Arthur I. Jacobs, has expended services rendered to date is **6.8 hours** at the rate of **\$475.00 per hour**.

6. Accordingly, since Defendant Aronberg's 57.105 demand was served, Defendant Aronberg's counsel, JACOBS, SCHOLZ & WYLER, LLC, has rendered services in the amount of \$18,275.00, in conjunction with the defense of the instant action pursuant to § 57.105, Florida Statutes. *See, Exhibit "C" attached hereto.*

7. Affiant expects to incur an additional 4.0 hours at \$425.00 an hour in preparing for and attending the hearing on attorneys' fees. Thus, the total amount of hourly attorneys' fees the State Attorney is seeking is **46.2 hours** for a total of **\$19,975.00**. Additionally, the State Attorney seeks a multiplier of 2.0, which when applied makes the grand total attorneys' fees sought herein **\$39,950.00**.

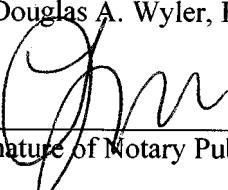
Dated this 9th day of November, 2020.

FURTHER AFFIANT SAYETH NOT.

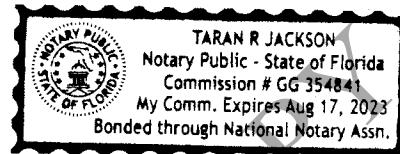

Douglas A. Wyler, Esq., Fla. Bar. No. 119979

STATE OF FLORIDA
COUNTY OF NASSAU

The foregoing instrument was acknowledged before me this 9th day of November, 2020,
by Douglas A. Wyler, Esquire, who is personally known to me and who did take an oath.


Signature of Notary Public – State of Florida

Taran R. Jackson
Name typed, printed or stamped



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of November, 2020, a copy of the foregoing has
been electronically filed with the Florida E-File Portal for e-service on all parties of record herein.

JACOBS SCHOLZ & WYLER, LLC

/s/ *Douglas A. Wyler*

Arthur I. Jacobs, Esq.
Fla. Bar No.: 10249
Richard J. Scholz, Esq.
Fla. Bar No.: 0021261
Douglas A. Wyler, Esq.
Fla. Bar No.: 119979
961687 Gateway Blvd., Suite 201-I
Fernandina Beach, Florida 32034
(904) 261-3693
(904) 261-7879 Fax
Primary: jacobsscholzlaw@comcast.net

Attorneys for Defendant, Dave Aronberg

EXHIBIT “A”

NOT A CERTIFIED COPY

EXHIBIT “A”

Subject: SERVICE OF COURT DOCUMENT; CASE NO. 2019-CA-014681; CA FLORIDA HOLDINGS, LLC V. DAVE ARONBERG ET AL.

Date: Monday, June 8, 2020 at 3:58:58 PM Eastern Daylight Time

From: Douglas Wyler

To: 'mendelsohns@gtlaw.com', smithl@gtlaw.com, flservice@gtlaw.com, BoyajianN@gtlaw.com, riveraal@gtlaw.com, GRYGIELM@gtlaw.com

Attachments: 2020-06-08 Aronberg 57.105 Demand and Motion for Attorneys' Fees.pdf

Court: Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida

Case No: Case No. 2020-CA-014681

Plaintiff: CA Florida Holdings, LLC

Defendant: Dave Aronberg

Title of Documents • Fla. Stat. § 57.105 Demand Letter

Served: • Defendant, Dave Aronberg's Motion for Attorneys' Fees

Sender's Name and Douglas Wyler

Telephone Number: (904) 261-3693

Sincerely,

Doug Wyler, Esq.
Jacobs, Scholz & Wyler, LLC
961687 Gateway Blvd., STE 201-I
Fernandina Beach, FL 32034
904-261-3693
904-261-7879 (fax)

Please be advised that this e-mail and any files transmitted with it are confidential attorney-client communication or may otherwise be privileged or confidential and are intended solely for the individual or entity to whom they are addressed. If you are not the intended recipient, please do not read, copy or retransmit this communication but destroy it immediately. Any unauthorized dissemination, distribution or copying of this communication is strictly prohibited.

JACOBS SCHOLZ & WYLER, LLC.

A LIMITED LIABILITY COMPANY OF PROFESSIONAL ASSOCIATIONS

THE LAW OFFICES OF
JACOBS & ASSOCIATES, P.A.
ARTHUR I. JACOBS

ATTORNEYS AT LAW
GATEWAY TO AMELIA
961687 GATEWAY BLVD., SUITE 201-I
FERNANDINA BEACH, FLORIDA 32034

RICHARD J. SCHOLZ, P.A.
RICHARD J. SCHOLZ

DOUGLAS A. WYLER, P.A.
DOUGLAS A. WYLER

TELEPHONE (904) 261-3693
FAX NO. (904) 261-7879

June 8, 2020

VIA ELECTRONIC & U.S. MAIL

Stephen A. Mendelsohn, Esq.
Greenburg Traurig, P.A.
5100 Town Center Circle, Suite 400
Boca Raton, FL 33486

**RE: CA Florida Holdings, LLC v. Dave Aronberg et al.
Palm Beach County, Case No.: 2019-CA-014681**

Dear Mr. Mendelsohn:

As you are aware our firm represents the interests of Dave Aronberg, as State Attorney of Palm Beach County, Florida, in the above referenced matter. The purpose of this letter is to demand the voluntary dismissal of your First Amended Complaint, (the "Complaint"), dated January 17, 2020. This demand is made pursuant to section 57.105, Florida Statutes.

As you know, Section 57.105 provides:

- (1) Upon the court's initiative or motion of any party, the court shall award a reasonable attorney's fee, including prejudgment interest, to be paid to the prevailing party in equal amounts by the losing party and the losing party's attorney on any claim or defense at any time during a civil proceeding or action in which the court finds that the losing party or the losing party's attorney knew or should have known that a claim or defense when initially presented to the court or at any time before trial:
 - a. Was not supported by the material facts necessary to establish the claim or defense; or
 - b. Would not be supported by the application of then-existing law to those material facts.

Today, Judge Marx granted, with prejudice, Defendant Aronberg's Motion to Dismiss Count II of the Plaintiff's Complaint. Pursuant to the Court's ruling, the Plaintiff's only remaining cause of action consists of Count I, for Declaratory Relief. Accordingly, we believe that the Complaint filed herein and its sole remaining Count for Declaratory Relief is not supported by the material facts necessary to establish the claims asserted, and that your claims are not supported by the application of current law to said material facts.

First and foremost, the Complaint is not supported by the material facts necessary to establish the claims asserted because neither Defendant Aronberg, nor The Office of the State Attorney for the Fifteenth Judicial Circuit is in custody or control of the 2006 grand jury materials sought therein. Simply put, the declaratory relief sought by the Plaintiff, seeks records from my client that are impossible for him or his office to produce. Accordingly, Defendant Aronberg is not a proper party to this action because no matter what, he and his office do not have possession, custody, or control of the requested materials.

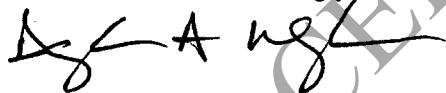
In addition to the foregoing material facts that negate the claims asserted in the Complaint, your claims are also not supported by the application of current law. Specifically, your action for declaratory relief fails based on the clear, unambiguous statutory language found in Section 905.27(2), Florida Statutes, which states:

When such disclosure is ordered by a court pursuant to subsection (1) for use in a civil case, it may be disclosed to all parties to the case and to their attorneys and by the latter to their legal associates and employees. However, the grand jury testimony afforded such persons by the court can only be used in the defense or prosecution of the civil or criminal case and for no other purpose whatsoever.

Moreover, even if the Plaintiff were to prevail in the declaratory action, Mr. Aronberg would be unable to comply with any court order granting disclosure of the requested documents because neither Mr. Aronberg nor The Office of the State Attorney for the Fifteenth Judicial Circuit have possession, custody, or control of the 2006 Epstein grand jury records.

Based on the foregoing, if the Complaint is not dismissed within 21 days of the service of this letter, the enclosed Motion for Attorney's Fees will be filed and we will seek as sanctions, from your client and your firm, recovery of the legal expenses incurred in defending this frivolous action.

Please govern yourself accordingly,



Douglas A. Wyler, Esq.
For the Firm

Encl.: Defendant's Motion for Attorneys' Fees

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

CA FLORIDA HOLDINGS, LLC,
Publisher of the PALM BEACH POST,

Plaintiff,

v.

CASE NO.: 19-CA-014681

DAVE ARONBERG, as State Attorney of
Palm Beach County, Florida; SHARON R.
BOCK, as Clerk and Comptroller of Palm
Beach County, Florida.

Defendants.

DEFENDANT, DAVE ARONBERG'S MOTION FOR ATTORNEYS' FEES

Defendant, DAVE ARONBERG, as State Attorney of Palm Beach County, Florida, by and through the undersigned attorneys, moves the Court, pursuant to Florida Statutes, Section 57.105, to award him reasonable attorneys' fees for the defense of Plaintiff's First Amended Complaint, (the "Complaint"), and as grounds therefor, would show that on June 8, 2020, Plaintiff was served a copy of this Motion, together with a letter from the undersigned attorney, in accordance with subsection (4) of the above Statute, demanding dismissal of the Complaint, at least 21 days prior to the filing of this Motion. In said letter, Defendant's attorney advised Plaintiff of the facts which establish that the Complaint is without support of the facts or the law.

WHEREFORE, Defendant, DAVE ARONBERG, as State Attorney of Palm Beach County, Florida, respectfully requests the Court enter an Order requiring Plaintiff and Plaintiff's attorneys to pay said Defendant's attorneys' fees incurred herein after service of this Motion.

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day ____, 2020, the foregoing was electronically filed via the Florida E-File Portal for electronic service on the parties of record herein.

JACOBS SCHOLZ & WYLER, LLC

/s/ Douglas A. Wyler

Arthur I. Jacobs, Esquire
Fla. Bar No.: 108249
Richard J. Scholz, Esquire
Fla. Bar No.: 0021261
Douglas A. Wyler, Esquire
Fla. Bar No.: 119979
961687 Gateway Blvd., Suite 201-I
Fernandina Beach, Florida 32034
(904) 261-3693
(904) 261-7879
jacobsscholzlaw@comcast.net

Attorneys for Defendant

EXHIBIT “B”

NOT A CERTIFIED COPY

EXHIBIT “B”

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

CA FLORIDA HOLDINGS, LLC,
Publisher of *THE PALM BEACH POST*,

Plaintiff,

v.

DAVE ARONBERG, as State Attorney of
Palm Beach County, Florida; SHARON R.
BOCK, as Clerk and Comptroller of Palm
Beach County, Florida,

Defendants.

**PLAINTIFF CA HOLDINGS, LLC'S
NOTICE OF DROPPING STATE ATTORNEY, DAVE ARONBERG**

Plaintiff, CA HOLDINGS, LLC, pursuant to Fla. R. Civ. P. 1250(b), hereby notifies the parties that
it has dropped State Attorney, Dave Aronberg from the above case.

Respectfully submitted,

GREENBERG TRAURIG, P.A.

*Attorneys for CA Florida Holdings, LLC, Publisher
of The Palm Beach Post*

Stephen A. Mendelsohn, Esq.
401 East Las Olas Boulevard Suite 2000
Boca Raton, Florida 33486
Telephone: (561) 955-7629
Facsimile: (561) 338-7099

By: /s/ Stephen A. Mendelsohn
STEPHEN A. MENDELSON
Florida Bar No. 849324
mendelsohns@gtlaw.com
smithl@gtlaw.com
FLService@gtlaw.com

By: /s/ Michael J Grygiel
MICHAEL J GRYGIEL
(Admitted *Pro Hac Vice*)
54 State St., 6th Floor
Albany, New York 12207
Telephone: (518) 689-1400
Facsimile: (518) 689-1499
grygielm@gtlaw.com

By: /s/ Nina D. Boyajian
NINA D. BOYAJIAN
(Admitted *Pro Hac Vice*)
1840 Century Park East, Suite 1900
Los Angeles California 90067
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Facsimile: (310) 586-7800
boyajian@gtlaw.com
riveraal@gtlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of October, 2020, a true and correct copy of the foregoing has been filed with the Clerk of the Court using the State of Florida e-filing system, which will send a notice of electronic service for all parties of record herein

/s/ Stephen A. Mendelsohn
STEPHEN A. MENDELSON

ACTIVE 53317341v1

EXHIBIT “C”

NOT A CERTIFIED COPY

EXHIBIT “C”

Jacobs Scholz & Wyler, LLC
 961687 Gateway Blvd., Suite 2011
 Fernandina Beach, FL 32034
 United States
 904-261-3693

Jacobs Scholz & Wyler, LLC

Dave Aronberg

Balance \$32,440.00
Invoice # 00307
Invoice Date November 6, 2020
Payment Terms
Due Date

Aronberg (SAO15) adv. CA Florida Holdings, LLC

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
11/26/2019	DW	Review	Initial review of summons and complaint.	\$425.00	1.5	\$637.50
11/26/2019	DW	Review	Reviewed motion for pro hac vice and Judge Hafele' order granting	\$425.00	0.2	\$85.00
11/26/2019	DW	Teleconference	Teleconference w/ Client, re: response to lawsuit	\$425.00	0.5	\$212.50
11/26/2019	DW	Draft	Drafted engagement letter and sent to client	\$425.00	0.3	\$127.50
11/26/2019	DW	Review	Reviewed 15th circuit local rules	\$425.00	1.0	\$425.00
11/26/2019	AIJ	Review	Initial review of complaint	\$475.00	1.0	\$475.00
11/26/2019	AIJ	Meeting	Meeting w/ DAW to discuss lawsuit and strategy	\$475.00	0.5	\$237.50
11/26/2019	DW	Meeting	Meeting w/ AIJ to discuss lawsuit and strategy	\$425.00	0.5	\$212.50
11/26/2019	AIJ	Teleconference	Teleconference w/ Client, re: response to lawsuit	\$475.00	0.5	\$237.50
12/02/2019	DW	Research & Preparation	Research and prep for Motion to dismiss	\$425.00	2.0	\$850.00
12/02/2019	DW	Draft	1st Draft motion to dismiss	\$425.00	1.0	\$425.00
12/02/2019	DW	Teleconference	Teleconference w/ Client, re: draft motion to dismiss	\$425.00	0.5	\$212.50
12/02/2019	AIJ	Review	Reviewed 1st Draft MTDismiss	\$475.00	0.3	\$142.50
12/02/2019	AIJ	Teleconference	Teleconference w/ client, re: draft motion to dismiss	\$475.00	0.5	\$237.50
12/03/2019	AIJ	Meeting	Meeting w/ DAW, re: motion to dismiss	\$475.00	0.2	\$95.00
12/03/2019	DW	Meeting	Meeting w/ AIJ, re: MTDismiss	\$425.00	0.2	\$85.00
12/06/2019	DW	Draft	Completed final draft of motion to dismiss; filed with Court	\$425.00	0.7	\$297.50
12/06/2019	DW	Teleconference	Spoke w/ client, re: final draft of motion to dismiss	\$425.00	0.5	\$212.50

12/06/2019	DW	Teleconference	Spoke with Clerk's attorney, re: response	\$425.00	0.5	\$212.50
12/06/2019	AIJ	Review	Reviewed final draft MTDDismiss	\$475.00	0.2	\$95.00
12/06/2019	AIJ	Review	Reviewed Clerk's MTDDismiss	\$475.00	0.2	\$95.00
12/13/2019	DW	Review	Reviewed Clerk's Motion to Dismiss	\$425.00	0.5	\$212.50
01/16/2020	DW	Review	Reviewed Order Setting Hearing on Defendants' MTDDismiss	\$425.00	0.1	\$42.50
01/16/2020	DW	Review	Reviewed motion for pro hac vice	\$425.00	0.1	\$42.50
01/17/2020	DW	Review	Reviewed PI's Amended Complaint	\$425.00	1.0	\$425.00
01/17/2020	DW	Teleconference	Spoke with client, re: Amended Complaint	\$425.00	0.5	\$212.50
01/17/2020	DW	Review	Reviewed PI's notice of filing	\$425.00	0.1	\$42.50
01/20/2020	AIJ	Review	Reviewed PI's Am. Compl	\$475.00	0.3	\$142.50
01/21/2020	DW	Review	Reviewed Judge Marx's Order Cancelling MTDDismiss Hearing	\$425.00	0.1	\$42.50
01/21/2020	DW	Review	Reviewed PI's Objection to Defendants' MTDDismiss	\$425.00	0.2	\$85.00
01/21/2020	DW	Teleconference	Spoke with client, re: Amended complaint	\$425.00	0.5	\$212.50
01/21/2020	AIJ	Meeting	Meeting w/ DAW, re: response to Am. Compl.	\$475.00	0.2	\$95.00
01/21/2020	DW	Meeting	Meeting w/ AIJ, re: response to Am. Compl.	\$425.00	0.2	\$85.00
01/22/2020	DW	Review	Reviewed Order granting pro hac vice admission	\$425.00	0.1	\$42.50
01/22/2020	DW	Research & Draft	Researched and drafted response to Amended Complaint	\$425.00	1.0	\$425.00
01/23/2020	DW	Teleconference	Spoke with Clerk's attorney, re: response to amended complaint	\$425.00	0.2	\$85.00
01/24/2020	DW	Various	Completed Answer/MTDismiss Amended Complaint; filed with Court; sent copy to Client	\$425.00	1.0	\$425.00
01/24/2020	DW	Draft	Drafted and filed Notice of Unavailability	\$425.00	0.4	\$170.00
01/24/2020	AIJ	Review	Reviewed final Answer/MTDismiss	\$475.00	0.2	\$95.00
01/27/2020	DW	Review	Reviewed Clerk's Answer/MTDismiss	\$425.00	0.3	\$127.50
02/03/2020	DW	Review	Reviewed Order setting hearing on Defs' MTDDismiss	\$425.00	0.1	\$42.50
02/03/2020	DW	Teleconference	Spoke w/ client, re: order setting MTDDismiss hearing for March 24, 2020	\$425.00	0.5	\$212.50
03/13/2020	DW	Review	Reviewed PI's Opposition to Aronberg MTDDismiss & Clerk's MTDDismiss	\$425.00	1.5	\$637.50
03/13/2020	AIJ	Review	Reviewed PI's Opposition to Aronberg MTDDismiss & Clerk's MTDDismiss	\$475.00	0.7	\$332.50
03/18/2020	DW	Teleconference	Reviewed email from PI's counsel, re: motion to continue hearing	\$425.00	0.1	\$42.50
03/18/2020	DW	Review	Reviewed PI's unopposed motion for continuance	\$425.00	0.1	\$42.50
03/18/2020	DW	E-mail	Emails w/ Clerk's counsel, re: PI's request to continue hearing	\$425.00	0.2	\$85.00
03/19/2020	DW	E-mail	Reviewed email from PI, re: agreed order & responded	\$425.00	0.1	\$42.50
03/20/2020	DW	Review	Reviewed Court's agreed order continuing hearing	\$425.00	0.1	\$42.50

04/21/2020	DW	Review	Reviewed order rescheduling hearing on Defs' MTDDismiss	\$425.00	0.1	\$42.50
04/21/2020	DW	Teleconference	Spoke w/ client, re: order rescheduling MTDDismiss hearing for June 3, 2020	\$425.00	0.3	\$127.50
04/21/2020	AIJ	Review	Reviewed Order rescheduling MTDDismiss hearing	\$475.00	0.1	\$47.50
05/22/2020	DW	Review	Reviewed order setting Zoom hearing, re: MTDDismiss	\$425.00	0.1	\$42.50
05/22/2020	DW	Teleconference	Spoke w/ client, re: hearing will be via Zoom	\$425.00	0.2	\$85.00
05/27/2020	DW	Review	Reviewed Clerk's filing: change of atty of record	\$425.00	0.1	\$42.50
05/27/2020	DW	Teleconference	Spoke with Clerk's new counsel, Nicole Fingerhut	\$425.00	0.2	\$85.00
05/28/2020	DW	E-mail	Reviewed PI's email, re: cases and authorities for MTDDismiss hearing; responded	\$425.00	0.1	\$42.50
05/29/2020	DW	Preparation	Began oral argument prep for 6/8 MTDDismiss hearing	\$425.00	1.0	\$425.00
06/01/2020	DW	E-mail	Reviewed email from Judge Marx's JA and responded	\$425.00	0.1	\$42.50
06/02/2020	DW	Various	Reviewed PI's 500+ page binder, re: MTDDismiss & prepped for hearing	\$425.00	3.0	\$1,275.00
06/02/2020	DW	E-mail	Drafted and sent email to client, re: MTD hearing tomorrow	\$425.00	0.1	\$42.50
06/03/2020	DW	Attend Hearing	Prepped for and attended MTDDismiss hearing via Zoom	\$425.00	1.5	\$637.50
06/03/2020	DW	Teleconference	Spoke w/ Client, re: debrief MTDDismiss hearing	\$425.00	0.5	\$212.50
06/03/2020	DW	E-mail	Emailed courtesy copies of Aronberg's Answer and MTDDismiss to Judge Marx	\$425.00	0.1	\$42.50
06/03/2020	DW	E-mail	Reviewed response from Client and replied	\$425.00	0.1	\$42.50
06/03/2020	AIJ	Attend Hearing	Attended MTDDismiss hearing via Zoom	\$475.00	1.0	\$475.00
06/03/2020	AIJ	Review	Reviewed order granting MTDDismiss w/ prejudice	\$475.00	0.3	\$142.50
06/08/2020	DW	Review	Reviewed Court's Order Granting Defendants MTDDismiss Count II w/ Prejudice	\$425.00	0.5	\$212.50
06/08/2020	DW	Various	Shared order w/ Client and spoke w/, re: result and plan going forward, re: 57.105	\$425.00	0.5	\$212.50
06/08/2020	DW	Various	Researched § 57.105 Fla. Stat.; drafted 57.105 demand letter and proposed motion for attorneys' fees/sanctions; Served PI's counsel with demand letter and proposed motion.	\$425.00	2.0	\$850.00
06/08/2020	AIJ	Meeting	Meeting w/ DAW, re: Order & 57.105	\$475.00	0.3	\$142.50
06/08/2020	DW	Meeting	Meeting w/ AIJ, re: Order & 57.105	\$425.00	0.3	\$127.50
06/08/2020	AIJ	Review	Reviewed 57.105 demand and proposed motion for sanction	\$475.00	0.2	\$95.00
06/10/2020	DW	Various	Reviewed notice of change of attorney, re: Clerk; called and spoke w/ new counsel Cynthia Guerra	\$425.00	0.3	\$127.50
06/23/2020	DW	Various	Reviewed PI's letter refusing to voluntarily dismiss amended complaint despite 57.105 demand; called and spoke w/ client, re: PI's refusal & next steps	\$425.00	1.0	\$425.00

06/23/2020	DW	E-mail	Sent client copy of PI's letter refusing to dismiss complaint	\$425.00	0.1	\$42.50
06/23/2020	AIJ	Review	Reviewed PI's letter refusing to dismiss Count I/Am. Compl.	\$475.00	0.1	\$47.50
07/01/2020	DW	Various	Spoke w/ client, re: filing of 57.105 motion for fees/sanctions; filed motion for attorneys' fees based on PI's failure to voluntarily dismiss amended complaint count 1	\$425.00	0.5	\$212.50
07/02/2020	DW	E-mail	Email to client, re: affidavit and summary judgment	\$425.00	0.1	\$42.50
07/08/2020	DW	Teleconference	Discussed w/ Client drafting and filing Motion for Summary Judgment and MSJ evidence	\$425.00	0.7	\$297.50
07/08/2020	AIJ	Teleconference	Discussed w/ Client drafting and filing Motion for Summary Judgment and MSJ evidence	\$475.00	0.7	\$332.50
07/10/2020	DW	Draft	Created 1st draft of Aronberg Affidavit; shared w/ client	\$425.00	1.0	\$425.00
07/10/2020	AIJ	Various	Reviewed draft affidavit and discussed w/ DAW	\$475.00	0.3	\$142.50
07/10/2020	DW	Meeting	Discussed draft affidavit w/ AIJ	\$425.00	0.2	\$85.00
07/13/2020	DW	Review	Reviewed PI's Request to Produce, re: Clerk	\$425.00	0.1	\$42.50
07/13/2020	DW	Teleconference	Spoke w/ Clerk's counsel, re: Request to Produce	\$425.00	0.2	\$85.00
07/27/2020	DW	Review	Reviewed PI's Amended Request to Produce, re: Clerk	\$425.00	0.1	\$42.50
07/27/2020	DW	Teleconference	Spoke w/ Clerk's counsel, re: Amended Request to Produce	\$425.00	0.1	\$42.50
07/28/2020	DW	Draft	Revised Aronberg affidavit	\$425.00	0.5	\$212.50
07/29/2020	DW	Draft	Finalized Aronberg Affidavit and sent to client	\$425.00	0.5	\$212.50
07/29/2020	DW	Research & Preparation	Research and prep for Motion for Summary Judgment	\$425.00	1.0	\$425.00
07/30/2020	DW	Various	Received executed Aronberg Affidavit	\$425.00	0.1	\$42.50
07/30/2020	DW	Draft	Began drafting Motion for Summary Judgment	\$425.00	2.0	\$850.00
08/05/2020	DW	Draft	Continued drafting Motion for Summary Judgment	\$425.00	1.0	\$425.00
08/07/2020	DW	Review	Reviewed email from Plaintiff attempting to set hearing on 57.105 motion for fees/sanctions	\$425.00	0.1	\$42.50
08/10/2020	DW	E-mail	Sent responsive email to PI's counsel	\$425.00	0.1	\$42.50
08/17/2020	DW	Meeting	Discussed draft MSJ w/ AIJ	\$425.00	0.2	\$85.00
08/17/2020	AIJ	Various	Reviewed draft MSJ and met w/ DAW to discuss	\$475.00	0.5	\$237.50
08/18/2020	DW	Draft	Finalized Motion for Summary Judgment; filed w/ court along with Aronberg affidavit	\$425.00	2.0	\$850.00
08/27/2020	DW	Teleconference	Spoke w/ Clerk's counsel, re: request to produce	\$425.00	0.1	\$42.50
09/01/2020	DW	Various	Reviewed PI's email and accepted conference call invite for 9/2/20	\$425.00	0.1	\$42.50
09/02/2020	DW	Review	Reviewed Clerk's response to request for production	\$425.00	0.2	\$85.00
09/02/2020	DW	Teleconference	Spoke w/ PI's counsel, re: dispute as to whether MSJ should be heard before 57.105 fee motion or vis versa - call was unsuccessful	\$425.00	0.5	\$212.50

09/02/2020	AIJ	Meeting	Discussed w/ DAW phone call w/ PI's counsel	\$475.00	0.2	\$95.00
09/02/2020	DW	Meeting	Discussed w/ AIJ phone call w/ PI's counsel	\$425.00	0.2	\$85.00
09/16/2020	DW	E-mail	Reviewed email from PI's counsel requested Aronberg to withdraw sanctions motion w/o prejudice	\$425.00	0.1	\$42.50
09/17/2020	DW	Meeting	Discussed w/ AIJ filing motion for CMC	\$425.00	0.1	\$42.50
09/17/2020	AIJ	Meeting	Discussed w/ DAW filing motion for CMC	\$475.00	0.1	\$47.50
09/18/2020	DW	Various	Drafted and filed motion to set case management conference; re: MSJ 1st or Fee hearing 1st	\$425.00	0.5	\$212.50
09/18/2020	DW	E-mail	Responded to PI's 9/16/20 email and refused to withdraw 57.105 motion; provided copy of motion to set CMC and available dates for hearing	\$425.00	0.1	\$42.50
09/18/2020	DW	E-mail	Reviewed PI's email insisting that 57.105 motion be withdrawn	\$425.00	0.1	\$42.50
09/18/2020	DW	E-mail	Replied to PI's counsel that the 57.105 motion for sanctions will not be withdrawn and asking for response, re: CMC	\$425.00	0.1	\$42.50
09/18/2020	DW	E-mail	Sent client copy of email exchange w/ PI's counsel; called and spoke w/ Client	\$425.00	0.5	\$212.50
09/22/2020	DW	Various	Drafted and filed Notice of Hearing on 10/15/20; set up Court Call; spoke w/ client, re: hearing date	\$425.00	0.7	\$297.50
10/02/2020	DW	Review	Reviewed PI's Memo of Law opposing Aronberg's 57.105 motion for fees/sanctions	\$425.00	0.7	\$297.50
10/02/2020	DW	Review	Reviewed PI's Response to Aronberg's request to schedule 57.105 motion for fees after MSJ	\$425.00	0.5	\$212.50
10/02/2020	AIJ	Review	Reviewed PI's Memo of Law opposing 57.105 motion	\$475.00	0.5	\$237.50
10/02/2020	AIJ	Review	Reviewed PI's Response to Aronberg's request to schedule 57.105 motion after MSJ	\$475.00	0.4	\$190.00
10/12/2020	DW	Research	Research caselaw & statutes, re: response to PI's Memo of Law	\$425.00	1.0	\$425.00
10/13/2020	DW	Research & Analyze	Continued researching caselaw, re: response to PI's memo of law	\$425.00	1.0	\$425.00
10/13/2020	DW	Draft	Created 1st draft of Response to PI's Memo of Law and shared w/ Client	\$425.00	4.0	\$1,700.00
10/13/2020	DW	Meeting	Discussed w/ AIJ caselaw and draft response to memo	\$425.00	0.5	\$212.50
10/13/2020	AIJ	Various	Reviewed draft MSJ, discussed draft w/ DAW and caselaw	\$475.00	0.7	\$332.50
10/14/2020	DW	Draft	Finalized and filed Response to PI's Memo of Law	\$425.00	1.0	\$425.00
10/14/2020	DW	Telephone	Spoke w/ client, re: memo of law	\$425.00	0.2	\$85.00
10/14/2020	DW	Telephone	Spoke w/ client again, re: response to memo of law	\$425.00	0.1	\$42.50
10/15/2020	DW	Attend Hearing	Attended hearing, re: Motion to Set CMC; called client to discuss	\$425.00	1.5	\$637.50
10/15/2020	DW	Various	Reviewed email and letter from PI, re: settlement. Sent copy to Client and called to discuss.	\$425.00	0.5	\$212.50

10/15/2020	DW	Telephone	Spoke w/ PI's counsel, re: settlement	\$425.00	0.1	\$42.50
10/15/2020	DW	Telephone	Spoke w/ client, re: PI's settlement proposal	\$425.00	0.2	\$85.00
10/15/2020	AIJ	Various	Attended hearing, re: motion to set CMC; discussed w/ client	\$475.00	1.0	\$475.00
10/15/2020	AIJ	Various	Discussed PI's settlement proposal w/ DAW and then w/ Client	\$475.00	0.4	\$190.00
10/15/2020	DW	Meeting	Discussed PI's settlement proposal w/ AIJ	\$425.00	0.2	\$85.00
10/16/2020	DW	Various	Drafted and shared proposed order w/ PI's counsel	\$425.00	0.5	\$212.50
10/16/2020	DW	Telephone	Spoke w/ PI's counsel, re: settlement	\$425.00	0.2	\$85.00
10/16/2020	DW	Telephone	Spoke w/ client, re: PI's settlement proposal	\$425.00	0.5	\$212.50
10/16/2020	DW	Meeting	Discussed PI's settlement proposal w/ AIJ	\$425.00	0.2	\$85.00
10/16/2020	AIJ	Meeting	Discussed PI's settlement proposal w/ DAW	\$475.00	0.2	\$95.00
10/19/2020	DW	Various	Uploaded proposed order, re: CMC for Judge Hafele	\$425.00	0.1	\$42.50
10/19/2020	DW	Telephone	Spoke w/ client, re: PI's settlement proposal	\$425.00	0.2	\$85.00
10/19/2020	DW	Telephone	Spoke w/ PI's counsel, re: settlement	\$425.00	0.1	\$42.50
10/19/2020	AIJ	Meeting	Discussed PI's settlement proposal w/ DAW	\$475.00	0.2	\$95.00
10/19/2020	DW	Meeting	Discussed PI's settlement proposal w/ AIJ	\$425.00	0.2	\$85.00
10/20/2020	DW	Various	Reviewed email from PI, re: settlement; sent copy to Client and called to discuss	\$425.00	0.5	\$212.50
10/20/2020	DW	Telephone	Spoke w/ client, re: settlement	\$425.00	0.4	\$170.00
10/20/2020	DW	Telephone	Spoke w/ PI's counsel, re: settlement	\$425.00	0.1	\$42.50
10/20/2020	DW	Telephone	Spoke w/ client, re: settlement	\$425.00	0.1	\$42.50
10/20/2020	DW	Meeting	Discussed PI's settlement proposal w/ AIJ	\$425.00	0.2	\$85.00
10/20/2020	AIJ	Meeting	Discussed PI's settlement proposal w/ DAW	\$475.00	0.2	\$95.00
10/21/2020	DW	Various	Drafted and filed Motion to Set Hearing on Aronberg MSJ; drafted proposed order granting motion to set; checked court availability; emailed PI's counsel, re: choose date for hearing	\$425.00	1.0	\$425.00
10/21/2020	DW	Review	Reviewed Order, re: CMC unnecessary	\$425.00	0.1	\$42.50
10/21/2020	DW	Telephone	Spoke w/ client, re: media response	\$425.00	0.2	\$85.00
10/21/2020	DW	Telephone	Spoke w/ client, re: media response	\$425.00	0.1	\$42.50
10/21/2020	DW	Telephone	Spoke w/ client, re: media response	\$425.00	0.1	\$42.50
10/21/2020	DW	Telephone	Spoke w/ client, re: media response	\$425.00	0.1	\$42.50
10/21/2020	DW	Telephone	Spoke w/ client, re: media response	\$425.00	0.1	\$42.50
10/21/2020	DW	E-mail	Sent email w/ Aronberg statement to media	\$425.00	0.1	\$42.50
10/21/2020	AIJ	Meeting	Discussed media response w/ DAW	\$475.00	0.3	\$142.50
10/21/2020	DW	Meeting	Discussed media response w/ AIJ	\$425.00	0.3	\$127.50
10/22/2020	DW	Various	Reviewed PI's Notice of Dropping Aronberg as party; spoke w/ Client and AIJ, re: notice and next steps	\$425.00	0.5	\$212.50

10/22/2020	AIJ	Various	Reviewed PI's Notice of Dropping Aronberg as party; spoke w/ Client and DAW, re: notice and next steps	\$475.00	0.5	\$237.50
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Totals: **74.8** **\$32,440.00**

Time Entry Sub-Total:	\$32,440.00
Sub-Total:	\$32,440.00
Total:	\$32,440.00
Amount Paid:	\$0.00
Balance Due:	\$32,440.00

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