

**KIBBEY & WAGNER**  
— ATTORNEYS AT LAW —

May 14, 2019

*Via U.S. mail and electronic delivery*

*kstorey@martin.fl.us*

Krista Storey, Esq.

County Attorney

2401 SE Monterey Road

Stuart, FL 34996

RE: **State of Florida v. Sarah Heard**  
**2017-CF-0003744 & 2017-IN-000713**

Dear Ms. Storey:

I hope this letter finds you well. As you know, Commissioner Sarah Heard was charged with two criminal violations and one non-criminal violation of Florida Statutes Chapter 119 that were alleged to have come about during the course and scope of her duties as a Martin County Commissioner. On April 12, 2019, Commissioner Heard obtained an acquittal as to all charges that were levied against her.

As a public official, she is entitled to be reimbursed for the attorney fees and expenses incurred in defending herself. *Thornber v. City of Ft. Walton Beach*, 568 So. 2d 914, 917 (Fla. 1990); *Ellison v. Reid*, 397 So. 2d 352, 354 (Fla. 1<sup>st</sup> DCA 1981). See also *Lomelo v. City of Sunrise*, 423 So. 2d 974, 976 (Fla. 4<sup>th</sup> DCA 1984). This obligation arises independent of statute, ordinance, or charter, and it is not subject to the discretion of the keepers of the city coffers. *Id.*

Therefore, enclosed please find our firm's invoice for all work done on behalf of Commissioner Heard in defending her against these charges. The legal work was primarily performed by Barbara Kibbey Wagner, Esq. and Jordan R. Wagner, Esq.

Mrs. Wagner has been a practicing attorney going on 10 years, and has represented thousands of clients in the area of criminal defense. She has tried more than approximately 40 cases ranging from Attempted Murder and Capital Sexual Battery charges, to charges dealing with government officials and white-collar offenses. Her acquittal rate at trial is extremely high, and her abilities are well-recognized in the legal community. She has been named as one of the top 100 criminal defense lawyers in the State of Florida by the National Trial Lawyers and has been named a Rising Star by SuperLawyers Magazine.

Mr. Wagner has been a practicing lawyer for close to 15 years and has tried approximately 50 jury trials. He, too, has been named as one of the top 100 civil lawyers in the State of Florida by the National Trial Lawyers and has been named as a Rising Star by SuperLawyers Magazine for the last six consecutive years. Moreover, he is Board Certified in Civil Trial Law by the Florida Bar.

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**RICHARD D. KIBBEY, ESQ.   BARBARA KIBBEY WAGNER, ESQ.   JORDAN R. WAGNER, ESQ.**

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Given the attorneys' extensive experience and commendations, Commissioner Heard agreed to Mr. and Mrs. Wagner's customary fees of \$400 per hour. Any associate attorney time would be billed at \$250 an hour and paralegal time at \$100 an hour. Clearly, these rates are usual and customary and more than reasonable given the experience and expertise of the attorneys involved.

Also, this case was a highly complicated one. It stemmed from a civil case that spanned close to six years of litigation and hundreds of thousands of pages of documents. This criminal case, alone, produced well over 10,000 pages of documents between discovery and public records requests. More likely, that amount is well over 15,000 pages.

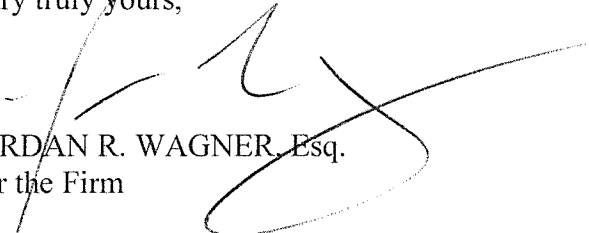
Furthermore, it involved a number of highly-trained experts to discuss computer issues such as: hacking, format of emails, source code of emails, and internet header information. Numerous depositions needed to be conducted and a tremendous amount of time needed to be expended to make sure every document was reviewed and understood by Commissioner Heard's trial team to ensure a just outcome on her behalf. By way of comparison, to show the level of complexity and work required on this case, the State Attorney's Office needed to have three of their most senior attorneys- Ryan Butler, Nita Denton and Anastasia Norman- working this file.

In addition to all of the above, this case was highly publicized and well-documented by the local media. This added an additional level of difficulty to the trial team to make sure Commissioner Heard received a fair trial, and, more importantly, to ensure that her name was cleared of any wrongdoing.

Given everything, it is our firm belief that there can be little disagreement regarding the reasonableness of the work performed and the hourly rates charged. Although we do not believe it is necessary at this point, please advise if you would like any affidavits from experts to testify as to same.

If any further information is needed, we will promptly get it to you. Likewise, if you have any questions or concerns, please do not hesitate to contact our office. Thank you for your attention to this matter and I look forward to hearing from you soon.

Very truly yours,



JORDAN R. WAGNER, Esq.  
For the Firm

JRW: dv

Enclosure: as stated



**Kibbey | Wagner, PLLC**  
416 SW Camden Ave  
Stuart, FL 34994  
United States  
(772) 286-0023

**Kibbey | Wagner, PLLC**

**Sarah Heard**  
4584 SE Williams Way  
Stuart, FL 34997

**Balance** \$450,363.57  
**Invoice #** 00741  
**Invoice Date** May 13, 2019  
**Payment Terms**  
**Due Date**

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**State of Florida v. Heard, Sarah 3744**

**Flat Fees**

| Date       | EE | Item     | Description                                   | Amount     |
|------------|----|----------|---|------------|
| 11/27/2017 | BW | Flat Fee | Flat Fee paid to prior counsel, Robert Watson | \$5,000.00 |

Flat Fee Total: **\$5,000.00**

**Time Entries**

| Date       | EE  | Activity         | Description   | Rate     | Hours | Line Total |
|------------|-----|------------------|---|----------|-------|------------|
| 11/28/2017 | BW  | Client meeting   | Initial Meeting with client, hired.   | \$400.00 | 1.0   | \$400.00   |
| 11/28/2017 | BW  | Court Hearing    | Prepared for and attended Court hearing / met with prosecutor(s)                    | \$400.00 | 2.4   | \$960.00   |
| 11/28/2017 | BW  | Correspondence   | Correspondence to media regarding retraction of incorrect information               | \$400.00 | 1.7   | \$680.00   |
| 11/28/2017 | RDK | Phone Conference | Phone conference with client  | \$400.00 | 0.3   | \$120.00   |
| 11/29/2017 | BW  | Research         | Research of legal issues and review of case   | \$400.00 | 0.7   | \$280.00   |
| 11/29/2017 | BW  | Correspondence   | Correspondence and communications to media regarding false information              | \$400.00 | 0.3   | \$120.00   |
| 11/29/2017 | RDK | Phone Conference | Phone conference with client  | \$400.00 | 0.4   | \$160.00   |
| 11/30/2017 | BW  | Correspondence   | Correspondence and communication to media regarding retraction of false information | \$400.00 | 0.4   | \$160.00   |
| 12/01/2017 | BW  | Client meeting   | Met with client   | \$400.00 | 0.6   | \$240.00   |
| 12/01/2017 | BW  | Attorney Work    | Receipt and review of transcripts provided by client                                | \$400.00 | 2.1   | \$840.00   |
| 12/02/2017 | BW  | Attorney Work    | Receipt and review of retraction from Martin County Currents                        | \$400.00 | 0.1   | \$40.00    |
| 12/04/2017 | BW  | Attorney Work    | Communication with media  | \$400.00 | 0.2   | \$80.00    |
| 12/06/2017 | BW  | Research         | Legal research regarding issues in case   | \$400.00 | 0.9   | \$360.00   |



|            |     |                  |  |          |      |             |
|------------|-----|------------------|--|----------|------|-------------|
| 12/07/2017 | BW  | Client meeting   | Met with client and post-meeting review with attorneys   | \$400.00 | 1.3  | \$520.00    |
| 12/07/2017 | RDK | Phone Conference | Phone conference with Bruce Colton   | \$400.00 | 0.4  | \$160.00    |
| 12/08/2017 | BW  | Attorney Work    | Review of potential witnesses  | \$400.00 | 0.4  | \$160.00    |
| 12/11/2017 | BW  | Phone Conference | Phone conference with client   | \$400.00 | 0.6  | \$240.00    |
| 12/13/2017 | BW  | Attorney Work    | Receipt and review of correspondence from State Attorney regarding attendance at Grand Jury proceeding; research of public records and grand jury issues | \$400.00 | 1.1  | \$440.00    |
| 12/13/2017 | BW  | Attorney Work    | Review of waiver of presence   | \$400.00 | 0.1  | \$40.00     |
| 12/13/2017 | RDK | Phone Conference | Phone conference with Bruce Colton   | \$400.00 | 0.4  | \$160.00    |
| 12/15/2017 | BW  | Phone Conference | Attorney phone conference with client  | \$400.00 | 0.7  | \$280.00    |
| 12/15/2017 | BW  | Attorney Work    | Review of motion to invoke rule of civil procedure   | \$400.00 | 0.3  | \$120.00    |
| 12/17/2017 | BW  | Attorney Work    | Review of file and consideration of issues in preparation of docket call   | \$400.00 | 0.7  | \$280.00    |
| 12/17/2017 | BW  | Phone Conference | Phone conference with client   | \$400.00 | 0.1  | \$40.00     |
| 12/18/2017 | BW  | Court Hearing    | Prepared for and attended docket call  | \$400.00 | 1.3  | \$520.00    |
| 12/18/2017 | BW  | Attorney Work    | Review of correspondence and communication with attorneys regarding court hearing  | \$400.00 | 0.2  | \$80.00     |
| 12/19/2017 | BW  | Phone Conference | Phone conference with client   | \$400.00 | 0.2  | \$80.00     |
| 12/19/2017 | BW  | Attorney Work    | Research and review of request to produce  | \$400.00 | 0.6  | \$240.00    |
| 12/19/2017 | BW  | Attorney Work    | Research re motions for depositions request to the state   | \$400.00 | 0.2  | \$80.00     |
| 12/19/2017 | BW  | Attorney Work    | Draft of motions to produce and depositions  | \$400.00 | 0.7  | \$280.00    |
| 12/20/2017 | BW  | Attorney Work    | Review of Attorney Critton's emails with Ed De La Part   | \$400.00 | 0.6  | \$240.00    |
| 12/21/2017 | BW  | Attorney Work    | Review of plea negotiations with ASA Butler  | \$400.00 | 0.1  | \$40.00     |
| 12/21/2017 | RDK | Attorney Work    | Research of suspension of public officials by Governor   | \$400.00 | 1.1  | \$440.00    |
| 12/21/2017 | RDK | Attorney Work    | Review of case file and evidence and development of defense strategy regarding same  | \$400.00 | 2.2  | \$880.00    |
| 01/04/2018 | BW  | Phone Conference | Phone conference with client   | \$400.00 | 0.6  | \$240.00    |
| 01/04/2018 | BW  | Attorney Work    | Assisted client in arrest  | \$400.00 | 2.3  | \$920.00    |
| 01/04/2018 | BW  | Attorney Work    | Communications to the media re arrest  | \$400.00 | 0.3  | \$120.00    |
| 01/04/2018 | BW  | Attorney Work    | Communications with bondsman re arrest   | \$400.00 | 0.4  | \$160.00    |
| 01/04/2018 | RDK | Phone Conference | Phone conference with client   | \$400.00 | 0.4  | \$160.00    |
| 01/05/2018 | DV  | Paralegal Work   | Drafting of initial pleadings  | \$100.00 | 0.3  | \$30.00     |
| 01/05/2018 | BW  | Attorney Work    | Attorney review of paralegal draft   | \$400.00 | 0.1  | \$40.00     |
| 01/05/2018 | BW  | Attorney Work    | Review of pleadings received   | \$400.00 | 0.1  | \$40.00     |
| 01/08/2018 | RDK | Attorney Work    | Initial review of evidence and pleadings   | \$400.00 | 1.3  | \$520.00    |
| 01/11/2018 | JW  | Attorney Work    | Receipt and review of State's Initial Discovery (7,070 pages)  | \$400.00 | 35.4 | \$14,160.00 |



|            |    |                           |   |          |      |             |
|------------|----|---------------------------|---|----------|------|-------------|
| 01/11/2018 | BW | Attorney Work             | Receipt and review of State's Initial Discovery (7,070 pages)   | \$400.00 | 35.4 | \$14,160.00 |
| 01/19/2018 | JW | Discovery review          | Review of State's 1st supp response to discovery dated 1/18/18 -continued   | \$400.00 | 0.9  | \$360.00    |
| 01/19/2018 | BW | Phone Conference          | Phone conference with investigator  | \$400.00 | 0.1  | \$40.00     |
| 01/19/2018 | BW | Phone Conference          | Phone conference with Ginny Sherlock  | \$400.00 | 0.1  | \$40.00     |
| 01/19/2018 | BW | Attorney Work             | Attorney conference regarding case issues   | \$400.00 | 0.5  | \$200.00    |
| 01/20/2018 | BW | Discovery review          | Review of State's 1st supp discovery response dated 1/18/18   | \$400.00 | 2.3  | \$920.00    |
| 01/22/2018 | BW | Attorney Work             | Review of file and draft of status letter to client   | \$400.00 | 0.3  | \$120.00    |
| 01/22/2018 | JW | Attorney Work             | Research and review of file in preparation of Motion for Protective Order   | \$400.00 | 1.8  | \$720.00    |
| 01/22/2018 | BW | Phone Conference          | Phone conference with David Acton   | \$400.00 | 0.1  | \$40.00     |
| 01/22/2018 | BW | Phone Conference          | Phone conference with Ethan Loeb re: Motion for Protective Order  | \$400.00 | 0.3  | \$120.00    |
| 01/22/2018 | BW | Attorney Work             | Phone conference with Aaron Weiss   | \$400.00 | 0.2  | \$80.00     |
| 01/24/2018 | JW | Preparation Work/Research | Review of Lake Point v. Hurchalla case and consideration of issues relating to State v. Heard   | \$400.00 | 4.3  | \$1,720.00  |
| 01/24/2018 | BW | Attorney Work             | Review of pleading received   | \$400.00 | 0.1  | \$33.33     |
| 01/24/2018 | JW | Attorney Work             | Case law research   | \$400.00 | 0.3  | \$120.00    |
| 01/24/2018 | DV | Paralegal Work            | Email exchange with counsel   | \$100.00 | 0.1  | \$10.00     |
| 01/24/2018 | BW | Attorney Work             | Phone conference with Jan Henslee   | \$400.00 | 0.3  | \$120.00    |
| 01/24/2018 | DV | Paralegal Work            | Call to client  | \$100.00 | 0.1  | \$10.00     |
| 01/25/2018 | BW | Preparation Work/Research | Review of Lake Point v. Hurchalla case and consideration of issues relating to State v. Heard   | \$400.00 | 4.5  | \$1,800.00  |
| 01/25/2018 | JW | Attorney Work             | Review of State's 2nd supp discovery response   | \$400.00 | 0.2  | \$80.00     |
| 01/25/2018 | BW | Attorney Work             | Review of 2nd supp discovery received   | \$400.00 | 0.1  | \$40.00     |
| 01/25/2018 | JW | Attorney Work             | Review of file in preparation of hearing on Motion for Protective Order   | \$400.00 | 1.2  | \$480.00    |
| 01/25/2018 | BW | Attorney Work             | Review of file in preparation of hearing on Motion for Protective Order   | \$400.00 | 0.7  | \$280.00    |
| 01/25/2018 | DV | Paralegal Work            | Draft affidavit   | \$100.00 | 0.2  | \$20.00     |
| 01/25/2018 | JW | Attorney Work             | Affidavit review and edit   | \$400.00 | 0.1  | \$40.00     |
| 01/25/2018 | JW | Attorney Work             | Hearing - Judge Roby - Non party MPO  | \$400.00 | 0.8  | \$320.00    |
| 01/26/2018 | DV | Paralegal Work            | Efile Affidavit   | \$100.00 | 0.1  | \$10.00     |
| 01/26/2018 | BW | Attorney Work             | Receipt and review of letter from Krista Storey re: chain of custody and hard drive issues and consideration of issues regarding same.                                | \$400.00 | 0.4  | \$160.00    |
| 01/29/2018 | BW | Attorney Work             | Review of materials received by client  | \$400.00 | 0.4  | \$160.00    |
| 01/30/2018 | BW | Attorney Work             | Receipt and review of State's 3rd supplemental discovery (contained response from yahoo subpoena, copy of client's hard drive, and 680 responsive emails for review). | \$400.00 | 7.8  | \$3,120.00  |



|            |     |                  |  |          |      |            |
|------------|-----|------------------|--|----------|------|------------|
| 01/30/2018 | JW  | Attorney Work    | Receipt and review of State's 3rd supplemental discovery (contained response from yahoo subpoena, copy of client's hard drive, and 680 responsive emails for review).      | \$400.00 | 7.8  | \$3,120.00 |
| 01/30/2018 | JW  | Attorney Work    | Receipt and review of State's 4th supplemental discovery response  | \$400.00 | 0.1  | \$40.00    |
| 01/30/2018 | BW  | Attorney Work    | Receipt and review of State's 4th supplemental discovery response  | \$400.00 | 0.1  | \$40.00    |
| 02/01/2018 | DV  | Paralegal Work   | Email to court with attachments  | \$100.00 | 0.1  | \$10.00    |
| 02/01/2018 | RDK | Attorney Work    | Conferenced with attorneys regarding discovery and strategy regarding same.  | \$400.00 | 2.1  | \$840.00   |
| 02/06/2018 | BW  | Attorney Work    | Review of timeline received by client  | \$400.00 | 0.5  | \$200.00   |
| 02/06/2018 | BW  | Attorney Work    | Phone Conference with client   | \$400.00 | 0.4  | \$160.00   |
| 02/07/2018 | BW  | Meeting prep     | File review for statement of Jan Hanslee   | \$400.00 | 0.5  | \$200.00   |
| 02/07/2018 | BW  | Meeting          | Statement of Jan Henslee   | \$400.00 | 0.7  | \$280.00   |
| 02/08/2018 | BW  | Phone Conference | Phone conference with Mike Durham  | \$400.00 | 0.4  | \$160.00   |
| 02/11/2018 | BW  | Attorney Work    | Phone conference with client   | \$400.00 | 0.4  | \$160.00   |
| 02/11/2018 | DV  | Paralegal Work   | Call to witness  | \$100.00 | 0.2  | \$20.00    |
| 02/11/2018 | DV  | Paralegal Work   | PHC with witness   | \$100.00 | 0.1  | \$10.00    |
| 02/16/2018 | DV  | Paralegal Work   | PHC w client   | \$100.00 | 0.1  | \$10.00    |
| 02/16/2018 | BW  | Attorney Work    | Review of 5th supp discovery response by State - thumbdrive  | \$400.00 | 1.7  | \$680.00   |
| 02/16/2018 | JW  | Attorney Work    | Review of 5th supp discovery response by State - thumbdrive  | \$400.00 | 1.7  | \$680.00   |
| 02/23/2018 | BW  | Attorney Work    | Receipt and review of State's 6th supp discovery   | \$400.00 | 1.4  | \$560.00   |
| 02/23/2018 | JW  | Attorney Work    | Receipt and review of State's 6th supp discovery   | \$400.00 | 1.4  | \$560.00   |
| 02/25/2018 | BW  | Attorney Work    | 45 min phone conference with investigator re: PRR requests and discovery   | \$400.00 | 1.3  | \$520.00   |
| 02/25/2018 | BW  | Phone Conference | Phone conference with Client   | \$400.00 | 0.9  | \$360.00   |
| 02/26/2018 | BW  | Attorney Work    | Meeting with client  | \$400.00 | 1.1  | \$440.00   |
| 02/26/2018 | JW  | Meeting          | Meeting with client  | \$400.00 | 1.1  | \$440.00   |
| 02/28/2018 | BW  | Attorney Work    | Review of file and draft of status letter to client  | \$400.00 | 0.4  | \$160.00   |
| 03/01/2018 | BW  | Attorney Work    | Met with Brad Perron office and reviewed discovery and public records requests   | \$400.00 | 3.2  | \$1,280.00 |
| 03/12/2018 | BW  | Attorney Work    | Week of March 12: Met with Brad and Anthony regarding hard drive issues and PRR responses done by Barbara Clowdus, and conversations with County and State regarding same. | \$400.00 | 19.9 | \$7,960.00 |
| 03/13/2018 | BW  | Attorney Work    | Receipt and review of John Jorgensen deposition and exhibits from Lake Point case  | \$400.00 | 2.3  | \$920.00   |
| 03/23/2018 | BW  | Attorney Work    | Draft status letter to client  | \$400.00 | 0.4  | \$160.00   |
| 03/23/2018 | DV  | Paralegal Work   | Ltr to client encl. exhibits   | \$100.00 | 0.2  | \$20.00    |
| 03/23/2018 | JW  | Attorney Work    | Receipt and review of PRR #401872  | \$400.00 | 1.4  | \$560.00   |
| 03/23/2018 | BW  | Attorney Work    | Receipt and review of PRR #401872  | \$400.00 | 1.4  | \$560.00   |



|            |    |                  |  |          |     |            |
|------------|----|------------------|--|----------|-----|------------|
| 03/27/2018 | JW | Attorney Work    | Review of State's 7th supp response to discover  | \$400.00 | 0.2 | \$80.00    |
| 03/29/2018 | BW | Attorney Work    | 7th supp discovery review & research   | \$400.00 | 0.8 | \$320.00   |
| 04/03/2018 | BW | Phone Conference | Phone conference with Ryan Butler  | \$400.00 | 0.2 | \$80.00    |
| 04/03/2018 | BW | Phone Conference | Phone conference with Bob Critton  | \$400.00 | 0.6 | \$240.00   |
| 04/18/2018 | BW | Attorney Work    | Review of pleadings received by State and research/drafting of counters  | \$400.00 | 3.2 | \$1,280.00 |
| 04/18/2018 | BW | Attorney Work    | Receipt and review of PRR #403288  | \$400.00 | 1.2 | \$480.00   |
| 04/18/2018 | JW | Attorney Work    | Receipt and review of PRR #403288  | \$400.00 | 1.2 | \$480.00   |
| 04/19/2018 | BW | Attorney Work    | 8th Discovery review   | \$400.00 | 1.5 | \$600.00   |
| 04/20/2018 | JW | Attorney Work    | State's 8th discovery review & research  | \$400.00 | 1.6 | \$640.00   |
| 04/24/2018 | BW | Attorney Work    | PHC w/ client  | \$400.00 | 0.3 | \$120.00   |
| 04/26/2018 | JW | Attorney Work    | Receipt and review of PRR #403589  | \$400.00 | 0.2 | \$80.00    |
| 04/26/2018 | BW | Attorney Work    | Receipt and review of PRR #403589  | \$400.00 | 0.2 | \$80.00    |
| 04/30/2018 | BW | Attorney Work    | BKW drafted and filed motions (2) for disco date cutoff and for taking depositions of the Yahoo Experts.   | \$400.00 | 4.2 | \$1,680.00 |
| 05/02/2018 | BW | Phone Conference | BKW discussed case w/ Brad Perron re the newest Martin County PRR answers and my motions   | \$400.00 | 0.9 | \$360.00   |
| 05/02/2018 | BW | Phone Conference | BKW pc to Sarah to discuss motions I emailed her and also her thoughts on the duties she had at 2012-2013 and the depositions of Yahoo. See notes.           | \$400.00 | 0.2 | \$80.00    |
| 05/02/2018 | BW | Attorney Work    | PHC w client   | \$400.00 | 0.4 | \$160.00   |
| 05/04/2018 | BW | Attorney Work    | State's 9th supp discovery response review and research  | \$400.00 | 1.7 | \$680.00   |
| 05/04/2018 | BW | Attorney Work    | Drafting and research of Motion for deposition   | \$400.00 | 1.8 | \$720.00   |
| 05/04/2018 | JW | Attorney Work    | Receipt and review of State's 9th supp discovery response  | \$400.00 | 1.8 | \$720.00   |
| 05/08/2018 | BW | Attorney Work    | Drafting of amended motions for deposition and MTN for CMC   | \$400.00 | 1.9 | \$760.00   |
| 05/08/2018 | BW | Attorney Work    | Receipt and review of States Response to Defendant's Motion to Dismiss and Amended Motion to Release Transcripts and consideration of issues regarding same. | \$400.00 | 1.4 | \$560.00   |
| 05/08/2018 | DV | Paralegal Work   | Preparation of affidavits and efile pleadings (Motion to conduct depositions)  | \$100.00 | 0.6 | \$60.00    |
| 05/08/2018 | JW | Attorney Work    | Receipt and review of States Response to Defendant's Motion to Dismiss and Amended Motion to Release Transcripts and consideration of issues regarding same. | \$400.00 | 1.3 | \$520.00   |
| 05/08/2018 | BW | Attorney Work    | Receipt and review of multiple responses from County to PRR #403326  | \$400.00 | 4.8 | \$1,920.00 |
| 05/08/2018 | JW | Attorney Work    | Receipt and review of multiple responses from County to PRR #403326  | \$400.00 | 4.8 | \$1,920.00 |
| 05/09/2018 | BW | Court Hearing    | Preparation and attendance of hearings on Defense Motions  | \$800.00 | 3.2 | \$2,560.00 |
| 05/09/2018 | JW | Court Hearing    | Preparation and attendance of hearings on Defense Motions  | \$400.00 | 3.2 | \$1,280.00 |



|            |     |                  |   |          |     |            |
|------------|-----|------------------|---|----------|-----|------------|
| 05/10/2018 | BW  | Attorney Work    | Receipt and review of State's 10th supp discovery response                      | \$400.00 | 3.8 | \$1,520.00 |
| 05/10/2018 | JW  | Attorney Work    | Receipt and review of State's 10th supp discovery response                      | \$400.00 | 3.8 | \$1,520.00 |
| 05/16/2018 | BW  | Phone Conference | Phone conference with client and Anthony Pullano                                | \$400.00 | 1.2 | \$480.00   |
| 05/18/2018 | DV  | Paralegal Work   | Letter to client with enclosures  | \$100.00 | 0.3 | \$30.00    |
| 05/22/2018 | BW  | Attorney Work    | BKW meeting w/ client, research/ work on file, pc w/ Brad and RDK               | \$400.00 | 2.0 | \$800.00   |
| 05/23/2018 | BW  | Phone Conference | PHC with Yahoo rep  | \$400.00 | 0.5 | \$200.00   |
| 05/24/2018 | BW  | Client meeting   | Meeting with client   | \$400.00 | 0.7 | \$280.00   |
| 05/24/2018 | DV  | Paralegal Work   | Ltr to client   | \$100.00 | 0.2 | \$20.00    |
| 06/07/2018 | BW  | Attorney Work    | Review and research of State's 11th supp response to discovery.                 | \$400.00 | 1.2 | \$480.00   |
| 06/08/2018 | JW  | Attorney Work    | Receipt and review of State's 11th supp response to discovery.                  | \$400.00 | 1.2 | \$480.00   |
| 06/13/2018 | BW  | Phone Conference | Phone conference with client  | \$400.00 | 0.2 | \$80.00    |
| 06/21/2018 | JW  | Attorney Work    | Receipt and review of Lake Point Public Records Trial transcript                | \$400.00 | 2.4 | \$960.00   |
| 06/21/2018 | BW  | Attorney Work    | Receipt and review of Lake Point Public Records Trial transcript                | \$400.00 | 2.4 | \$960.00   |
| 06/25/2018 | BW  | Attorney Work    | Review of transcript of December 10, 2014 hearing                               | \$400.00 | 2.6 | \$1,040.00 |
| 06/25/2018 | JRA | Attorney Work    | Multiple motions research   | \$250.00 | 3.2 | \$800.00   |
| 07/02/2018 | JW  | Attorney Work    | Receipt and review of Stacey Hetherington depo and exhibits                     | \$400.00 | 1.1 | \$440.00   |
| 07/02/2018 | BW  | Attorney Work    | Receipt and review of Stacey Hetherington depo and exhibits                     | \$400.00 | 1.1 | \$440.00   |
| 07/05/2018 | JRA | Attorney Work    | Research immunity   | \$300.00 | 2.1 | \$630.00   |
| 07/12/2018 | BW  | Phone Conference | Phone conference with client  | \$400.00 | 0.3 | \$120.00   |
| 07/12/2018 | BW  | Attorney Work    | Reciprocal Discovery Evidence Research and Assembly                             | \$400.00 | 1.8 | \$720.00   |
| 07/13/2018 | BW  | Attorney Work    | Reciprocal Discovery Evidence Research and Assembly                             | \$400.00 | 1.3 | \$520.00   |
| 07/15/2018 | BW  | Attorney Work    | Review of new timeline received by client/compare to old                        | \$400.00 | 0.4 | \$160.00   |
| 07/15/2018 | BW  | Attorney Work    | Review of materials received by client and research                             | \$400.00 | 1.4 | \$560.00   |
| 07/15/2018 | JW  | Attorney Work    | Review of materials received by client and research                             | \$400.00 | 1.4 | \$560.00   |
| 07/16/2018 | BW  | Attorney Work    | Defense Reciprocal Discovery Evidence Review and Assembly                       | \$400.00 | 2.1 | \$840.00   |
| 07/20/2018 | JW  | Attorney Work    | Meeting with Brad and Anthony in preparation of depositions                     | \$400.00 | 2.7 | \$1,080.00 |
| 07/23/2018 | JW  | Attorney Work    | Review of FL Sunshine Law Manuals   | \$400.00 | 3.4 | \$1,360.00 |
| 07/23/2018 | RDK | Attorney Work    | Attorney conference regarding upcoming depositions and strategy regarding same. | \$400.00 | 1.4 | \$560.00   |



|            |     |                  |  |          |     |            |
|------------|-----|------------------|--|----------|-----|------------|
| 07/24/2018 | JW  | Attorney Work    | Preparation for Deposition   | \$400.00 | 2.1 | \$840.00   |
| 07/24/2018 | BW  | File review      | Review of documents received by Yahoo  | \$400.00 | 0.2 | \$80.00    |
| 07/26/2018 | JW  | Attorney Work    | Preparation and attendance of deposition of Ethan Loeb                             | \$400.00 | 8.7 | \$3,480.00 |
| 07/27/2018 | JW  | Attorney Work    | Preparation and attendance of the depositions of John Jorgensen and Santiago Ayala | \$400.00 | 7.6 | \$3,040.00 |
| 07/27/2018 | JW  | Phone Conference | Phone conference with client regarding depositions                                 | \$400.00 | 0.9 | \$360.00   |
| 08/01/2018 | JRA | Attorney Work    | Motion to Dismiss/Research   | \$250.00 | 2.7 | \$675.00   |
| 08/01/2018 | BW  | Attorney Work    | Review of FL Sunshine Law Manuals  | \$400.00 | 3.0 | \$1,200.00 |
| 08/14/2018 | JW  | Attorney Work    | Preparation and attendance of depositions of Denise Eldredge and Shaylank Aricla   | \$400.00 | 4.3 | \$1,720.00 |
| 08/17/2018 | JW  | Attorney Work    | Status ltr to client   | \$400.00 | 0.3 | \$120.00   |
| 08/31/2018 | BW  | Attorney Work    | Receipt and review of State's 12th supp discovery                                  | \$400.00 | 1.9 | \$760.00   |
| 08/31/2018 | BW  | Attorney Work    | Review of materials received by client   | \$400.00 | 0.1 | \$33.33    |
| 08/31/2018 | JW  | Attorney Work    | Receipt and review of State's 12th supp discovery                                  | \$400.00 | 1.9 | \$760.00   |
| 09/04/2018 | JW  | Attorney Work    | Prepared for and attended deposition of Paul Fresneda                              | \$400.00 | 1.3 | \$520.00   |
| 09/05/2018 | JW  | Attorney Work    | 12th supp discovery response review and re-search                                  | \$400.00 | 1.6 | \$640.00   |
| 09/17/2018 | BW  | Meeting          | Office meeting with client   | \$400.00 | 1.7 | \$680.00   |
| 09/17/2018 | JW  | Attorney Work    | Office meeting with client   | \$400.00 | 1.7 | \$680.00   |
| 10/04/2018 | DV  | Paralegal Work   | Preparation and efile of Notice of Hearing and subsequent NOH                      | \$100.00 | 0.6 | \$60.00    |
| 10/09/2018 | BW  | Phone Conference | PHC/Suzanne Philian  | \$400.00 | 0.5 | \$200.00   |
| 10/23/2018 | BW  | Attorney Work    | Review of draft motion to dismiss & research                                       | \$400.00 | 2.4 | \$960.00   |
| 10/23/2018 | BW  | Attorney Work    | Review of motion received by State   | \$400.00 | 0.3 | \$120.00   |
| 10/23/2018 | JW  | Attorney Work    | Draft and research re Memorandum of Law in support of MTD                          | \$400.00 | 1.3 | \$520.00   |
| 10/23/2018 | BW  | Attorney Work    | Research and draft Notice of Intent to Introduce Business Records                  | \$400.00 | 0.6 | \$240.00   |
| 10/23/2018 | DV  | Paralegal Work   | Final prep and efilng of MTD   | \$100.00 | 0.1 | \$10.00    |
| 10/24/2018 | BW  | Attorney Work    | Final review of MPO  | \$400.00 | 0.5 | \$200.00   |
| 10/24/2018 | DV  | Paralegal Work   | Efile MPO  | \$100.00 | 0.1 | \$10.00    |
| 11/01/2018 | BW  | Attorney Work    | Review of correspondence received by client  | \$400.00 | 0.1 | \$40.00    |
| 11/05/2018 | JRA | Attorney Work    | Memo and business records/drafting/research  | \$250.00 | 1.4 | \$350.00   |
| 11/07/2018 | JW  | Attorney Work    | Preparation and research for memo of law   | \$400.00 | 2.5 | \$1,000.00 |
| 11/08/2018 | BW  | Attorney Work    | Review of materials received by client   | \$400.00 | 0.5 | \$200.00   |
| 11/08/2018 | DV  | Paralegal Work   | Efile memorandum of law  | \$100.00 | 0.1 | \$10.00    |
| 11/12/2018 | BW  | Attorney Work    | File review and research/attorney strategy meeting                                 | \$400.00 | 2.0 | \$800.00   |
| 11/12/2018 | JW  | Attorney Work    | File review and research/attorney strategy meeting                                 | \$400.00 | 2.0 | \$800.00   |
| 11/21/2018 | DV  | Paralegal Work   | Efile notice of introducing of business records                                    | \$100.00 | 0.1 | \$10.00    |
| 11/28/2018 | DV  | Paralegal Work   | Efile Motion to continue   | \$100.00 | 0.1 | \$10.00    |



|            |     |                  |   |          |      |            |
|------------|-----|------------------|---|----------|------|------------|
| 11/28/2018 | BW  | Attorney Work    | Conference and draft of Motion to Continue  | \$400.00 | 0.3  | \$120.00   |
| 12/27/2018 | BW  | Phone Conference | Phone conference with client  | \$400.00 | 0.2  | \$80.00    |
| 01/03/2019 | BW  | Phone Conference | Phone conference with Anthony Pullano   | \$400.00 | 0.4  | \$160.00   |
| 01/04/2019 | BW  | Attorney Work    | State's 13th discovery response review and research   | \$400.00 | 0.7  | \$280.00   |
| 01/06/2019 | JW  | Attorney Work    | Receipt and review of State's supp 13th response to discovery   | \$400.00 | 0.5  | \$200.00   |
| 01/15/2019 | BW  | Meeting          | Office meeting with client  | \$400.00 | 0.7  | \$280.00   |
| 01/17/2019 | BW  | Attorney Work    | Reviewed file and drafted letter to Krista Storey   | \$400.00 | 0.4  | \$160.00   |
| 01/29/2019 | BW  | Attorney Work    | Review of materials and remarks received by client  | \$400.00 | 1.2  | \$480.00   |
| 02/04/2019 | BW  | Attorney Work    | Draft non-party MPO and research  | \$400.00 | 0.9  | \$360.00   |
| 02/05/2019 | BW  | Phone Conference | Phone conference with client  | \$400.00 | 0.8  | \$320.00   |
| 02/06/2019 | BW  | Attorney Work    | Review of State's 14th discovery response   | \$400.00 | 0.1  | \$33.33    |
| 02/06/2019 | JW  | Attorney Work    | Review of State's 14th discovery response   | \$400.00 | 0.1  | \$40.00    |
| 02/12/2019 | BW  | Phone Conference | Phone conference with client  | \$400.00 | 0.3  | \$120.00   |
| 02/12/2019 | BW  | Attorney Work    | Legal research regarding State threatening criminal charges during pendency of civil case and ethical issues regarding same | \$400.00 | 1.2  | \$480.00   |
| 02/12/2019 | JW  | Attorney Work    | Legal research regarding State threatening criminal charges during pendency of civil case and ethical issues regarding same | \$400.00 | 1.2  | \$480.00   |
| 02/13/2019 | JW  | Attorney Work    | Receipt and review of John Jorgensen deposition and exhibits from Lake Point case   | \$400.00 | 2.3  | \$920.00   |
| 02/13/2019 | JW  | Attorney Work    | Receipt and review of John Jorgensen deposition and exhibits from Lake Point case   | \$400.00 | 2.3  | \$920.00   |
| 02/14/2019 | JRA | Attorney Work    | Focus Group participation   | \$250.00 | 4.2  | \$1,050.00 |
| 02/14/2019 | JW  | Attorney Work    | Focus Group participation & prep  | \$400.00 | 4.8  | \$1,920.00 |
| 02/14/2019 | BW  | Attorney Work    | Focus Group participation and prep  | \$400.00 | 4.9  | \$1,960.00 |
| 02/14/2019 | DV  | Paralegal Work   | Efiling of MPO NOH  | \$100.00 | 0.1  | \$10.00    |
| 02/18/2019 | BW  | Phone Conference | Phone Conference with Dave Acton  | \$400.00 | 0.2  | \$80.00    |
| 02/18/2019 | BW  | Attorney Work    | Review of def. reply to MPO   | \$400.00 | 0.2  | \$80.00    |
| 02/18/2019 | JW  | Attorney Work    | Week of Feb 18th: Review of file and preparation for upcoming trial   | \$400.00 | 21.3 | \$8,520.00 |
| 02/19/2019 | BW  | Court Hearing    | Prepared for and attended hearing on Non-Party Protective Order in front of Judge Roby re: Justin Industries case           | \$400.00 | 1.4  | \$560.00   |
| 02/19/2019 | DV  | Drafting         | Drafted 68 witness trial subpoenas  | \$100.00 | 6.8  | \$680.00   |
| 02/19/2019 | DV  | Efile            | Efiled 68 trial subpoenas   | \$100.00 | 0.7  | \$70.00    |
| 02/20/2019 | RDK | Attorney Work    | Attorney conference regarding upcoming trial and strategy regarding same  | \$400.00 | 1.1  | \$440.00   |
| 02/22/2019 | JW  | Attorney Work    | Receipt and review of State's 15th supp discovery response  | \$400.00 | 0.2  | \$80.00    |



|            |     |                  |   |          |     |            |
|------------|-----|------------------|---|----------|-----|------------|
| 02/22/2019 | BW  | Attorney Work    | Receipt and review of State's 15th supp discovery response  | \$400.00 | 0.2 | \$80.00    |
| 02/23/2019 | BW  | Research         | Prepared for and attended depositions of David Arthur Deposition and Adam Weiss   | \$400.00 | 4.1 | \$1,640.00 |
| 02/25/2019 | BW  | Review           | Review and research re States MIL   | \$400.00 | 0.8 | \$320.00   |
| 02/25/2019 | BW  | Attorney Work    | Deposition of David Arthur and Aaron Weiss  | \$400.00 | 2.4 | \$960.00   |
| 02/25/2019 | JW  | Attorney Work    | Meeting with vendor regarding exhibit boards  | \$400.00 | 0.4 | \$160.00   |
| 02/26/2019 | JRA | Attorney Work    | Motion in Limine drafting/research  | \$250.00 | 2.5 | \$625.00   |
| 02/26/2019 | JW  | Attorney Work    | Receipt and Review of correspondence from Judge Metzger advising no jurors have been summoned in advance of March 4th trial date. | \$400.00 | 0.1 | \$40.00    |
| 02/26/2019 | BW  | Attorney Work    | Receipt and Review of correspondence from Judge Metzger advising no jurors have been summoned in advance of March 4th trial date. | \$400.00 | 0.1 | \$40.00    |
| 02/27/2019 | JW  | Attorney Work    | Preparation and attendance of update deposition of John Jorgensen   | \$400.00 | 3.2 | \$1,280.00 |
| 02/28/2019 | JW  | Attorney Work    | Trial preparation/exhibit review  | \$400.00 | 2.8 | \$1,120.00 |
| 02/28/2019 | BW  | Attorney Work    | Trial preparation/exhibit review  | \$400.00 | 3.0 | \$1,200.00 |
| 02/28/2019 | JW  | Phone Conference | Phone conference with client regarding deposition of John Jorgensen   | \$400.00 | 0.3 | \$120.00   |
| 03/01/2019 | DV  | Paralegal Work   | Email exchange with OC  | \$100.00 | 0.1 | \$10.00    |
| 03/01/2019 | JW  | Attorney Work    | Trial preparation & research  | \$400.00 | 2.5 | \$1,000.00 |
| 03/01/2019 | BW  | Attorney Work    | Trial preparation   | \$400.00 | 3.5 | \$1,400.00 |
| 03/02/2019 | BW  | Attorney Work    | Discovery review of 16th supp response by State (videos)  | \$400.00 | 6.5 | \$2,600.00 |
| 03/02/2019 | JW  | Attorney Work    | Discovery review of State's 16th supp response (videos)   | \$400.00 | 6.5 | \$2,600.00 |
| 03/02/2019 | BW  | Attorney Work    | Trial preparation   | \$400.00 | 4.6 | \$1,840.00 |
| 03/02/2019 | JW  | Attorney Work    | Trial preparation   | \$400.00 | 2.9 | \$1,160.00 |
| 03/03/2019 | JW  | Attorney Work    | Trial preparation/roundtable with BKW re trial outline  | \$400.00 | 3.5 | \$1,400.00 |
| 03/03/2019 | BW  | Attorney Work    | Trial preparation with BKW  | \$400.00 | 4.0 | \$1,600.00 |
| 03/04/2019 | BW  | Attorney Work    | Draft MTC & MIL research  | \$400.00 | 2.5 | \$1,000.00 |
| 03/07/2019 | JRA | Attorney Work    | Motion to Hold over trial subpoenas   | \$250.00 | 0.2 | \$50.00    |
| 03/08/2019 | JW  | Attorney Work    | Review of 17th supp discovery response  | \$400.00 | 0.9 | \$360.00   |
| 03/08/2019 | BW  | Attorney Work    | Discovery review of 17h supp discovery response   | \$400.00 | 1.0 | \$400.00   |
| 03/08/2019 | BW  | Attorney Work    | Receipt and review of State's 18th discovery  | \$400.00 | 0.2 | \$80.00    |
| 03/09/2019 | BW  | Attorney Work    | Receipt and review of State's 18th supp discovery   | \$400.00 | 0.2 | \$80.00    |
| 03/12/2019 | JRA | Attorney Work    | Research/objection of business records  | \$250.00 | 0.5 | \$125.00   |
| 03/12/2019 | BW  | Attorney Work    | Case law research   | \$400.00 | 0.6 | \$240.00   |
| 03/12/2019 | JW  | Attorney Work    | Receipt and review of deposition exhibits of updated John Jorgensen deposition  | \$400.00 | 1.8 | \$720.00   |



|            |     |                |  |          |      |             |
|------------|-----|----------------|--|----------|------|-------------|
| 03/12/2019 | BW  | Attorney Work  | Receipt and review of deposition exhibits of updated John Jorgensen deposition         | \$400.00 | 1.8  | \$720.00    |
| 03/13/2019 | BW  | Review         | Review and research regarding State's MIL  | \$400.00 | 0.8  | \$320.00    |
| 03/13/2019 | JW  | Research       | Research & strategy meeting with BKW   | \$400.00 | 0.5  | \$200.00    |
| 03/13/2019 | JRA | Research       | Research and strategy meeting  | \$250.00 | 0.5  | \$125.00    |
| 03/14/2019 | DV  | Paralegal Work | Prepare exhibits and e-file notice of filing   | \$100.00 | 0.3  | \$30.00     |
| 03/14/2019 | DV  | Paralegal Work | Draft notice of filing and efile with exhibits   | \$100.00 | 0.3  | \$30.00     |
| 03/15/2019 | BW  | Attorney Work  | 19th supp discovery review and research  | \$400.00 | 1.6  | \$640.00    |
| 03/15/2019 | JW  | Attorney Work  | Discovery summary preparation  | \$400.00 | 1.8  | \$720.00    |
| 03/15/2019 | JW  | Attorney Work  | Prepared for and attended hearings on multiple State and Defense Motions               | \$400.00 | 6.2  | \$2,480.00  |
| 03/15/2019 | BW  | Attorney Work  | Prepared for and attended hearings on multiple State and Defense Motions               | \$400.00 | 5.9  | \$2,360.00  |
| 03/15/2019 | DV  | Paralegal Work | Prepared disc for state with 4th supp discovery response                               | \$100.00 | 0.5  | \$50.00     |
| 03/15/2019 | DV  | Paralegal Work | Drafted and efiled 3d supplemental discovery response after attorney approval of draft | \$100.00 | 0.3  | \$30.00     |
| 03/15/2019 | JW  | Attorney Work  | Receipt and review of State's 19th supp discovery                                      | \$400.00 | 1.6  | \$640.00    |
| 03/15/2019 | BW  | Attorney Work  | research and pick of exhibits; review of discovery pleading drafted                    | \$400.00 | 0.8  | \$320.00    |
| 03/15/2019 | BW  | Attorney Work  | Receipt and review of PRR #415648  | \$400.00 | 0.7  | \$280.00    |
| 03/15/2019 | JW  | Attorney Work  | Receipt and review of PRR #415648  | \$400.00 | 0.7  | \$280.00    |
| 03/18/2019 | BW  | Attorney Work  | Week of Feb 18th: Review of file and preparation for upcoming trial                    | \$400.00 | 26.7 | \$10,680.00 |
| 03/18/2019 | JW  | Attorney Work  | Week of March 18th: Preparation for trial  | \$400.00 | 10.1 | \$4,040.00  |
| 03/18/2019 | BW  | Attorney Work  | Week of March 18th: Preparation for trial  | \$400.00 | 22.4 | \$8,960.00  |
| 03/19/2019 | JW  | Attorney Work  | Receipt and review of PRR #415645  | \$400.00 | 0.7  | \$280.00    |
| 03/19/2019 | BW  | Attorney Work  | Receipt and review of PRR #415645  | \$400.00 | 0.7  | \$280.00    |
| 03/21/2019 | BW  | Attorney Work  | State's 21st discovery response review   | \$400.00 | 1.7  | \$680.00    |
| 03/21/2019 | JW  | Attorney Work  | Review of State's 21st supp discovery  | \$400.00 | 1.1  | \$440.00    |
| 03/25/2019 | DV  | Paralegal Work | Email to OC with proposed orders   | \$100.00 | 0.1  | \$10.00     |
| 03/25/2019 | JW  | Attorney Work  | Week of March 25th: Preparation for trial  | \$400.00 | 18.2 | \$7,280.00  |
| 03/25/2019 | BW  | Attorney Work  | Week of March 25th: Preparation for trial  | \$400.00 | 21.1 | \$8,440.00  |
| 03/26/2019 | BW  | Attorney Work  | Email to opposing counsel re Pullano depo  | \$400.00 | 0.1  | \$40.00     |
| 03/26/2019 | DV  | Paralegal Work | Draft of letters to trial witnesses with new trial order and date @ 64                 | \$100.00 | 2.5  | \$250.00    |
| 03/26/2019 | JW  | Attorney Work  | Receipt and review of PRR #417732 and 417803   | \$400.00 | 1.7  | \$680.00    |
| 03/26/2019 | BW  | Attorney Work  | Receipt and review of PRR #417732 and 417803   | \$400.00 | 1.7  | \$680.00    |
| 03/27/2019 | BW  | Attorney Work  | Drafting stipulated motion   | \$400.00 | 0.2  | \$80.00     |
| 04/01/2019 | JW  | Attorney Work  | Week of April 1: Preparation for trial   | \$400.00 | 27.3 | \$10,920.00 |
| 04/01/2019 | BW  | Attorney Work  | Week of April 1st: Preparation for trial   | \$400.00 | 28.6 | \$11,440.00 |



|            |     |                  |  |          |     |            |
|------------|-----|------------------|--|----------|-----|------------|
| 04/02/2019 | BW  | Meeting          | Meeting with trial witness - Donna Melzer                                    | \$400.00 | 1.0 | \$400.00   |
| 04/02/2019 | BW  | Attorney Work    | Review and research of def. 2 motions  | \$400.00 | 0.6 | \$240.00   |
| 04/02/2019 | BW  | Attorney Work    | Review and research regarding State's Motions received                       | \$400.00 | 0.5 | \$200.00   |
| 04/02/2019 | BW  | Attorney Work    | Receipt and review of PRR #416233  | \$400.00 | 0.8 | \$320.00   |
| 04/02/2019 | JW  | Attorney Work    | Receipt and review of PRR #416233  | \$400.00 | 0.8 | \$320.00   |
| 04/04/2019 | BW  | Phone Conference | Phone conference with witness Hurchalla                                      | \$400.00 | 0.7 | \$280.00   |
| 04/04/2019 | BW  | Attorney Work    | Non party motion review  | \$400.00 | 0.1 | \$40.00    |
| 04/04/2019 | RDK | Attorney Work    | Conference regarding trial strategy  | \$400.00 | 1.8 | \$720.00   |
| 04/05/2019 | BW  | Client meeting   | Trial prep with client   | \$400.00 | 2.0 | \$800.00   |
| 04/05/2019 | BW  | Deposition       | Prepared for and attended deposition of Anthony Pullano                      | \$400.00 | 2.8 | \$1,120.00 |
| 04/05/2019 | JW  | Deposition       | Prepared for and attended deposition of Anthony Pullano                      | \$400.00 | 2.3 | \$920.00   |
| 04/05/2019 | BW  | Attorney Work    | Receipt and review of State's 22nd supp discovery                            | \$400.00 | 1.4 | \$560.00   |
| 04/05/2019 | JW  | Attorney Work    | Trial prep with client   | \$400.00 | 2.0 | \$800.00   |
| 04/05/2019 | JW  | Attorney Work    | Receipt and review of State's 22nd supp discovery response                   | \$400.00 | 1.4 | \$560.00   |
| 04/05/2019 | JW  | Attorney Work    | Receipt and review of State's 23rd supp discovery                            | \$400.00 | 0.6 | \$240.00   |
| 04/05/2019 | BW  | Attorney Work    | Receipt and review of State's 23rd supp discovery                            | \$400.00 | 0.6 | \$240.00   |
| 04/05/2019 | JW  | Attorney Work    | Receipt and review PRR #418297   | \$400.00 | 0.6 | \$240.00   |
| 04/05/2019 | BW  | Attorney Work    | Receipt and review PRR #418297   | \$400.00 | 0.6 | \$240.00   |
| 04/08/2019 | JW  | Trial            | 1st day of trial - JRW   | \$400.00 | 9.0 | \$3,600.00 |
| 04/08/2019 | BW  | Trial            | 1st day of trial - BKW   | \$400.00 | 9.0 | \$3,600.00 |
| 04/08/2019 | JW  | Trial prep       | Document review - trial prep   | \$400.00 | 4.0 | \$1,600.00 |
| 04/08/2019 | BW  | Trial prep       | Document analysis - trial prep   | \$400.00 | 4.0 | \$1,600.00 |
| 04/08/2019 | BW  | Attorney Work    | Review of 24th supp discovery response                                       | \$400.00 | 0.3 | \$120.00   |
| 04/08/2019 | JW  | Attorney Work    | 24th discovery response review   | \$400.00 | 0.4 | \$160.00   |
| 04/09/2019 | JW  | Trial            | 2nd day of trial - JRW   | \$400.00 | 9.0 | \$3,600.00 |
| 04/09/2019 | BW  | Trial            | 2nd day of trial - BKW   | \$400.00 | 9.0 | \$3,600.00 |
| 04/09/2019 | JW  | Trial prep       | Document review, research and trial prep                                     | \$400.00 | 4.0 | \$1,600.00 |
| 04/09/2019 | BW  | Trial prep       | Document review, research and trial prep                                     | \$400.00 | 4.0 | \$1,600.00 |
| 04/09/2019 | JRA | Attorney Work    | Research/witness threats - Ethan Loeb  | \$250.00 | 2.2 | \$550.00   |
| 04/10/2019 | JW  | Trial            | 3rd day of trial - JRW   | \$400.00 | 9.0 | \$3,600.00 |
| 04/10/2019 | BW  | Trial            | 3rd day of trial - BKW   | \$400.00 | 9.0 | \$3,600.00 |
| 04/10/2019 | JW  | Trial            | Document review, research and trial prep                                     | \$400.00 | 4.0 | \$1,600.00 |
| 04/10/2019 | BW  | Trial            | Document review, research and trial prep                                     | \$400.00 | 4.0 | \$1,600.00 |
| 04/10/2019 | JRA | Attorney Work    | Tech support, deliver documents/books/witness prep/research/discovery review | \$250.00 | 1.6 | \$400.00   |
| 04/11/2019 | JW  | Trial            | 4th day of trial - JRW   | \$400.00 | 9.0 | \$3,600.00 |



|            |     |                |  |          |       |             |
|------------|-----|----------------|--|----------|-------|-------------|
| 04/11/2019 | BW  | Trial          | 4th day of trial - BKW                     | \$400.00 | 9.0   | \$3,600.00  |
| 04/11/2019 | JW  | Attorney Work  | Document review, research and trial prep   | \$400.00 | 4.0   | \$1,600.00  |
| 04/11/2019 | BW  | Trial          | Document review, research and trial prep   | \$400.00 | 4.0   | \$1,600.00  |
| 04/11/2019 | JRA | Attorney Work  | JOA research. Print. Deliver               | \$250.00 | 1.2   | \$300.00    |
| 04/12/2019 | JW  | Trial          | last day of trial - JRW                    | \$400.00 | 6.0   | \$2,400.00  |
| 04/12/2019 | BW  | Trial          | last day of trial - BKW                    | \$400.00 | 6.0   | \$2,400.00  |
| 04/15/2019 | JRA | Attorney Work  | 92 emails drafted, received and reviewed   | \$250.00 | 9.2   | \$2,300.00  |
| 04/15/2019 | BW  | Attorney Work  | 1443 emails drafted, received and reviewed | \$400.00 | 144.3 | \$57,720.00 |
| 04/15/2019 | JW  | Attorney Work  | 922 emails drafted, received and reviewed  | \$400.00 | 92.2  | \$36,880.00 |
| 04/15/2019 | DV  | Paralegal Work | 607 emails drafted, received and reviewed. | \$100.00 | 60.7  | \$6,070.00  |

Totals: 1086.7 \$408,489.99

## Expenses

| Date       | EE | Activity          | Description   | Cost       | Quantity | Line Total |
|------------|----|-------------------|---|------------|----------|------------|
| 02/05/2018 | JW | Records           | Slender Legal Solutions Transcript of Hearing                           | \$100.05   | 1.0      | \$100.05   |
| 02/27/2018 | JW | Transcription fee | Hearing on Motion for Protective Order                                  | \$100.05   | 1.0      | \$100.05   |
| 03/19/2018 | JW | Records           | Public Records Request  | \$221.88   | 1.0      | \$221.88   |
| 06/21/2018 | KA | Process Server    | Rock Legal served John Jorgensen  | \$60.00    | 1.0      | \$60.00    |
| 06/25/2018 | KA | Process Server    | Rock Legal served Ethan Loeb  | \$60.00    | 1.0      | \$60.00    |
| 07/13/2018 | JW | Process Server    |   | \$60.00    | 1.0      | \$60.00    |
| 07/13/2018 | JW | Process Server    |   | \$60.00    | 1.0      | \$60.00    |
| 07/13/2018 | KA | Process Server    | Rock Legal served Santiago Ayala  | \$120.00   | 1.0      | \$120.00   |
| 07/27/2018 | KA | Court Reporter    | Attendance and Depositions of John Jorgensen and Santiago Ayala         | \$260.00   | 1.0      | \$260.00   |
| 08/06/2018 | JW | Court Reporter    | Depo of Loeb  | \$184.17   | 1.0      | \$184.17   |
| 08/06/2018 | JW | Court Reporter    | Depos of Jorgensen and Ayala  | \$130.00   | 1.0      | \$130.00   |
| 08/14/2018 | KA | Transcription fee | Imperial Court Reporting transcript of Jorgensen and Ayala and exhibits | \$347.50   | 1.0      | \$347.50   |
| 09/14/2018 | KA | Court Reporter    | Esquire Reporting attendance of Fresneda Depo 9.4.18                    | \$105.00   | 1.0      | \$105.00   |
| 11/27/2018 | KA | Transcription fee | Esquire Reporting transcript of Paul Fresneda Deposition                | \$171.50   | 1.0      | \$171.50   |
| 04/23/2019 | JW | Court Reporter    | Update depo of John Jorgensen   | \$474.50   | 1.0      | \$474.50   |
| 04/23/2019 | JW | Expert Fees       | Depo of Jorgensen   | \$577.50   | 1.0      | \$577.50   |
| 04/23/2019 | JW | Transcription fee | In-trial transcripts  | \$1,773.93 | 1.0      | \$1,773.93 |
| 04/23/2019 | JW | Expert Fees       | Consultation with Steve Burgess   | \$1,100.00 | 1.0      | \$1,100.00 |
| 04/23/2019 | JW | Meeting           | Focus Group   | \$55.95    | 10.0     | \$559.50   |
| 04/23/2019 | JW | Process Server    |   | \$78.00    | 1.0      | \$78.00    |
| 04/23/2019 | JW | Process Server    |   | \$766.00   | 1.0      | \$766.00   |
| 04/23/2019 | JW | Process Server    |   | \$49.00    | 1.0      | \$49.00    |



|            |    |              |                                   |             |     |             |
|------------|----|--------------|-----------------------------------|-------------|-----|-------------|
| 05/01/2019 | JW | Investigator | Investigative Support Specialists | \$9,015.00  | 1.0 | \$9,015.00  |
| 05/13/2019 | JW | Expert Fees  | Fairfield Investigation           | \$20,500.00 | 1.0 | \$20,500.00 |

Expense Total: **\$36,873.58**

|                       |                     |
|-----------------------|---------------------|
| Flat Fee Sub-Total:   | \$5,000.00          |
| Time Entry Sub-Total: | \$408,489.99        |
| Expense Sub-Total:    | \$36,873.58         |
| <b>Sub-Total:</b>     | <b>\$450,363.57</b> |
| <b>Total:</b>         | <b>\$450,363.57</b> |
| <b>Amount Paid:</b>   | <b>\$0.00</b>       |
| <b>Balance Due:</b>   | <b>\$450,363.57</b> |