

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

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 SUPERIOR COURT
 OF THE VIRGIN ISLANDS

IN THE MATTER OF THE ESTATE OF)	
JEFFREY E. EPSTEIN,)	PROBATE NO. ST-19-PB-80
)	
Deceased.)	ACTION FOR TESTATE
<hr/>)	ADMINISTRATION

**MOTION FOR APPROVAL OF
 HUGHES HUBBARD & REED LLP'S INTERIM PAY APPLICATION NO. 1
 AND INCORPORATED MEMORANDUM OF LAW**

COME NOW Co-Executors **DARREN K. INDYKE** and **RICHARD D. KAHN** (collectively, the "Executors") of the Estate of Jeffrey E. Epstein (the "Estate"), by and through **KELLERHALS FERGUSON KROBLIN PLLC**, and hereby move this Honorable Court for an order approving Hughes Hubbard & Reed LLP's invoices for payment for legal professional services rendered from August 22, 2019 through October 31, 2019.

I. BACKGROUND

After Decedent Jeffrey E. Epstein's death, Co-Executor Darren K. Indyke retained the law firm of Hughes Hubbard & Reed LLP ("HHR") to represent the Estate regarding (a) potential federal and state civil forfeiture actions, (b) other New York and Florida Estate matters, (c) Estate representation in Paris, France, and (d) establishment of a proposed voluntary claims resolution program (the "Epstein Victims' Compensation Program") for the purpose of resolving multiple sexual abuse claims against Mr. Epstein. See Affidavit of Marc A. Weinstein attached hereto as **EXHIBIT A**. The legal expenses for representing the Estate from August 22, 2019 to October 31, 2019 are in the amount of Three Hundred Seventy Thousand Eight Hundred Sixty-Three Dollars and Fifty-Six Cents (\$370,863.56), consisting of attorneys' fees in the amount of Three Hundred Fifty-Three Thousand Five Hundred Fourteen Dollars and Zero Cents (\$353,514.00), fiduciary

accountant fees in the amount of One Thousand Eight Hundred Seventy-Two Dollars and Zero Cents (\$1,872.00), paralegal fees in the amount of Four Hundred Forty-Two Dollars and Zero Cents (\$442.00), law clerk fees in the amount of Ten Thousand One Hundred Twenty Dollars and Zero Cents (\$10,120.00), and costs in the amount of Four Thousand Nine Hundred Fifteen Dollars and Fifty-Six Cents (\$4,915.56).

II. VIRGIN ISLANDS LAW RECOGNIZES ATTORNEYS' FEES AS A RECOVERABLE EXPENSE

“An executor or administrator shall be allowed . . . all necessary expenses incurred in the care, management, and settlement of the estate, including reasonable attorney's fees in any necessary litigation or matter requiring legal advice or counsel.” V.I. CODE ANN. tit. 15, § 568. In the Virgin Islands, “attorneys’ fees are one of many expenses of an administrator or executor.” *In Matter of Aubain*, No. ST-06-PB-31, 2011 WL 13055253, at *1 (V.I. Super. May 18, 2011). The administrator or executor must demonstrate to the Court that the attorneys' fees generated in administering the Estate were not only incurred in "necessary litigation or matter[s] requiring legal advice or counsel" but were also "reasonable" before they will be allowed in settlement of the account. *In the Matter of Estate of Smith*, Probate No. ST-02-PB-52, 2011 WL 13055153, at *1 (V.I. Super. Ct. Sept 7, 2011).

“The Virgin Islands law treats attorney’s fees like any other expense of administration in that they are an expense of the administrator or executor.” *In Matter of Aubain*, 2011 WL 13055253, at *1. Importantly, “[i]t is the duty of the personal representative to pay all the claims against the estate and the expenses of administration of the estate. . . .” *In the Matter of the Estate of Bonifacio Latalladi, Deceased*, 23 V.I. 353, 356 (Terr. Ct. 1988). Therefore, the administrator or executor is the one who must review the attorney’s fee sought to be recovered, find them

reasonable, and move the Court for payment. *Id.* “[U]nder appropriate circumstances and with Court approval, an administrator or executor may pay reasonable attorney’s fees from the estate’s assets.” *In the Matter of Estate of Smith*, 2011 WL 13055153, at *1.

In support of the instant Motion are the Executors’ respective affidavits, stating that HHR’s legal professional services fees were incurred in the necessary defense and protection of the Estate. The Executors carefully reviewed the legal invoices and deem the invoices reasonable given HHR’s significant experience, strong reputation, and ability to competently represent the Estate with potential stateside civil forfeiture matters, other stateside Estate matters, representation of the Estate in France, and establishment of the Epstein Victim Compensation Program. The Executors further affirm that the time expended was reasonable and necessary; and that the rates are charged at HHR’s standard rate and are well within the range of rates that are customary for such legal services. *See* Affidavits of Darren K. Indyke and Richard D. Kahn attached hereto as **EXHIBITS B & C**.

III. GIVEN THE ESTATE'S SIZE AND COMPLEXITY, REPRESENTATION WAS NECESSARY, AND THE FEES WERE NECESSARILY INCURRED

As fiduciaries, the Executors must preserve, protect and safeguard the Estate’s assets and owe a duty of undivided loyalty to the Estate. *See, e.g., Matter of Buggs*, No. P85/1993, 1998 WL 782025, at *1 (Terr. V.I. Oct. 29, 1998) (“[E]xecutor . . . ha[s] the duty to preserve and protect the Estate for the benefit of all interested parties . . .”). The need for HHR’s representation of the Estate arose because of potential civil forfeiture of the Estate’s assets (including in Paris), ongoing criminal investigations in the Southern District of New York and Paris related to Mr. Epstein, potential French litigation; French corporate, labor, and employment issues (including potential litigation); the need to identify, safeguard, and appraise property (real and personal) in various

jurisdictions, including New York, Miami, and Paris; the need to manage other non-U.S. Virgin Islands related Estate matters, and the importance of establishing a voluntary, confidential and non-adversarial alternative to civil litigation for individuals seeking to pursue claims of sexual abuse against the Estate. Co-Executor Darren K. Indyke properly exercised his duty to protect the Estate's interests and assets by retaining HHR, even before the Letters Testamentary were issued. *See generally, In re Timpano*, 50 N.Y.S.3d 28 (N.Y. Sur. 2016) (Under the law, a nominated executor has obligations to secure assets of an estate before formal appointment); *Matter of Estate of Donner*, 626 N.E.2d 922 (N.Y. 1993) (Decedent's attorney and personal financial adviser, as executors of decedent's estate, had duty to preserve assets of estate even before obtaining letters testamentary; given their relationship to decedent, executors had duty to safeguard assets of estate from moment of death to ensure that they were protected for persons or entities eventually entitled to receive them.).

Similarly, under French law an executor is to take "the necessary precautionary measures for the proper execution of the will." Article 1029 of the French Civil Code. As such, he may sell the furniture if there is insufficient cash to pay the urgent debts of the estate (same article) and even take legal action to ensure execution of the testator's last wishes (Cass. Civ. 1st, May 15, 2008). It is expressly provided that "the expenses incurred by the executor in the exercise of his mandate are to be borne by the estate." Article 1034 of the French Civil Code. Accordingly, provided that the fees are related to execution of the will and are necessary for the execution of the executor's mandate, no rule of French law therefore prevents their payment by the executor. Co-Executor Darren K. Indyke's diligent exercise of his duty and the high standard of care in retaining HHR to represent the Estate exemplifies his understanding of his responsibility as an Executor.

Accordingly, this Court should find that HHR's legal professional services are a necessary expense for the representation, defense, and protection of the Estate.

IV. HHR'S FEES ARE REASONABLE

Title 15, section 568 of the Virgin Islands Code does not set forth criteria for assessing the reasonableness of attorneys' fees. Generally, a request for attorneys' fees expended as part of a civil action is governed by 5 V.I.C. § 541. *See, e.g., Matter of Estate of Benjamin*, Probate No. ST 95 PB-53, 2019 WL 3219450, at *3 (V.I. Super. 2019) (quoting *Thomas v. V.I. Bd. of Land Use Appeals*, Super. Ct. No. 202/2018 (STT), — V.I. —, 2018 V.I. LEXIS 78, at *3 (V.I. Super. Ct. Aug. 8, 2018)). Attorney's fees are subject to the reasonableness standard of Virgin Islands Supreme Court Rule 211.1.5, which states:

- (a) A lawyer shall not make an agreement for, charge, or collect an unreasonable fee or an unreasonable amount for expenses. The factors to be considered in determining the reasonableness of a fee include the following:
 - (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly;
 - (2) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
 - (3) the fee customarily charged in the locality for similar legal services;
 - (4) the amount involved and the results obtained;
 - (5) the time limitations imposed by the client or by the circumstances;
 - (6) the nature and length of the professional relationship with the client;
 - (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and
 - (8) whether the fee is fixed or contingent.

V.I. S. CT. R. 211.1.5. In calculating the "lodestar" amount, courts consider the same factors as those identified in Rule 211.1.5. *See Yearwood Enterprises, Inc. v. Antilles Gas Corp.*, No. ST-17-CV-77, 2017 WL 6316625, at *2 (V.I. Super. Dec. 5, 2017), *aff'd*, 69 V.I. 863 (2018).

“Importantly, nothing in the statute purports to mandate that the Superior Court is precluded from granting the full amount of attorney's fees and costs requested.” *Hansen v. Bryan*, No. 2017-0050, 2018 WL 1901581, at *6 (V.I. Apr. 20, 2018).

Reasonable attorneys' fees may include charges for work that was “useful and of a type ordinarily necessary to secure the final result obtained from the litigation.” *Pennsylvania v. Delaware Valley Citizens' Council for Clean Air*, 478 U.S. 546, 561 (1986); *see also Gulfstream III Associates, Inc. v. Gulfstream Aerospace Corp.*, 995 F.2d 414, 420 (3d Cir. 1993) (noting that reasonable attorneys' fees may include charges for measures necessary to enforce district court judgments as well as other charges “reasonably expended” to advance the litigation).

Banco Popular de Puerto Rico v. Paradise Motors, Inc., Civil No. 2004–162, 2008 WL 4222085, *1 (D.V.I. 2008). “In determining whether to award attorney fees, the decision is informed by the Court's familiarity with the matter in litigation and the interest of justice.” *Afros S.p.A. v. Krauss-Maffei Corp.*, 671 F. Supp. 1402, 1441 (D. Del. 1987), *aff'd*, 848 F.2d 1244 (Fed. Cir. 1988); *see also Herbison v. Schwaner*, No. A-1-CA-34997, 2019 WL 1228072, at *4 (N.M. Ct. App. Feb. 4, 2019) (“the court can determine a reasonable fee based on the court's knowledge of the case and the pleading in the file”).

Finally, the Virgin Islands Supreme Court has noted that the Superior Court's determination of a motion for award of attorneys' fees must be supported by an explanation in order to allow for meaningful appellate review. *Mahabir v. Heirs of George*, 63 V.I. 651, 668 (V.I. 2015) (quoting *James v. Faust*, 62 V.I. 554, 559 (V.I. 2015)).

Under French law, courts essentially arrive at a similar reasonableness analysis by looking to two principles. The first is the principle of freedom in setting lawyers' fees, under which the client and lawyer have discretion to reach an agreement on fees but the lawyers' fees are to be based on certain criteria. Legal fees (for representation, consultation, assistance, advice, drafting of legal acts under private signature and pleadings) are to be fixed in an agreement with the client

within the framework of a written fee agreement. Art. 10 (1) 1, of French law no. 71-1130 of December 31, 1971. Lawyer's fees will be based, in particular, on each of the following elements in accordance with customary practice : the time devoted to the case, the research work, the nature and difficulty of the case, the importance of the interests involved, the impact of the costs and expenses of the firm to which he belongs, his reputation, qualifications, seniority, experience and specialization, the benefits and results obtained for the client through his work, as well as the service rendered to the client and the client's financial situation.

The second principle in France is that courts will look, in the absence of an agreement on fees, to several criteria to determine what fees would be reasonable. Art. 10 (4) of Law no. 71-1130 of December 31, 1971. These criteria are:

- The financial situation of the client: the client's financial situation may be one of the elements involved in determining fees. However, according to the commentators on the subject, this criterion is minor nowadays.
- The difficulty of the case: a case presenting particular difficulties will justify a higher fee. This is essentially a matter of taking into account the "added value" of the lawyer.
- The costs incurred by the lawyer: the costs and charges that can be taken into consideration include (but not exhaustively) so-called structural charges, linked to the existence of the business, which are generally stable (rental or acquisition of business premises, maintenance of premises, office equipment and furniture, secretarial services, payment of employees and associates, IT tools, etc.), and so-called operational charges, which vary according to the volume of activity (social security charges, office supplies, telephone, taxes, etc.).

- The reputation of the lawyer: the judge takes into account the seniority of the lawyer, the consideration he or she enjoys and the talent he or she displays.
- The diligence on the part of the lawyer: all diligence performed by the lawyer must be remunerated.

Additionally, the French Supreme Court held that a judge who has to assess the reasonableness of fees may further take into account the duration of the proceedings and their outcome for the client. Civ, 1, December 10, 2002, no. 99-12.842.

HHR's attorneys' fees incurred in representing the Estate through October 31, 2019 are Three Hundred Seventy Thousand Eight Hundred Sixty-Three Dollars and Fifty-Six Cents (\$370,863.56), consisting of attorneys' fees in the amount of Three Hundred Fifty-Three Thousand Five Hundred Fourteen Dollars and Zero Cents (\$353,514.00), fiduciary accountant fees in the amount of One Thousand Eight Hundred Seventy-Two Dollars and Zero Cents (\$1,872.00), paralegal fees in the amount of Four Hundred Forty-Two Dollars and Zero Cents (\$442.00), law clerk fees in the amount of Ten Thousand One Hundred Twenty Dollars and Zero Cents (\$10,120.00), and costs in the amount of Four-Thousand Nine Hundred Fifteen Dollars and Fifty-Six Cents (\$4,915.56), as set forth in the Affidavit of Marc A. Weinstein attached hereto as **EXHIBIT A**. HHR's fees for its professional legal services squarely meet each criterion set forth for reasonableness.

A. TIME AND LABOR INVOLVED, COMPLEXITY OF LITIGATION AND CLAIMS, HIGH SKILL REQUIRED, EXTENSIVE EXPERIENCE, REPUTATION AND SUPERIOR ABILITY OF COUNSEL SUPPORT REASONABLENESS OF FEES

“In determining the ‘lodestar,’ or initial valuation of an attorney's services,” the Court considers “the number of hours spent on the case and the reasonable hourly rate.” *Morcher v. Nash*, 32 F. Supp. 2d 239, 243 (D.V.I. 1998) (citing *Jo–Ann's Launder Ctr., Inc.*, 31 V.I. 226, 234, (D.V.I. 1995)). “When calculating the number of hours that are reasonably spent on a task for purposes of making an attorney's fee award, a [] court may look to its own familiarity with a case, its experience with that case, and its experience generally, as well as . . . arguments of the parties. *In re Smith*, 331 B.R. 622, 633 (Bankr. M.D. Pa. 2005); *see also Clarke v. Frank*, 960 F.2d 1146, 1153 (2d Cir. 1992).

HHR has provided competent legal representation. As demonstrated by the accompanying Affirmation of Marc A. Weinstein, HHR expended a total of 383.3 attorney hours, 5.2 hours fiduciary accountant hours, 1.5 paralegal hours, and 44 law clerk hours, on representing the vast Estate at a total labor cost of Three Hundred Sixty-Five Thousand Nine Hundred Forty-Eight Dollars (\$356,948.00)

Given the nature of the civil forfeiture matters, the proposed voluntary claims resolution program and its potential impact on other pending and threatened litigation, the ongoing criminal investigation, the other Estate matters in France, and non-U.S. Virgin Islands matters related to this complex Estate, HHR expended numerous hours reviewing documents, conducting extensive legal research, analysis and strategy, drafting legal briefs and memoranda, and meetings/conference calls with the Executors, counterparties and potential litigation adversaries. The time spent was necessary, and the rates charged are fair, reasonable and were incurred by the

Executors in defending and protecting the Estate for the benefit of all legitimate creditors and claimants and for the Estate's beneficiaries.

Considerable skill is required to represent the Estate, which is in excess of Five Hundred Million Dollars (\$500,000,000.00). HHR is required to have attorneys duly licensed to competently practice law in France, including corporate, labor and employment, tax, estate, criminal litigation, civil litigation, civil asset forfeiture, and practice and procedure before civil and commercial French courts. HHR is also required to have a strong understanding of civil asset forfeiture proceedings and criminal investigations in the United States, the ability to skillfully manage non-U.S. Virgin Islands Estate related matters, and knowledge regarding the establishment of a voluntary claims resolution program along the lines contemplated by the Executors in the proposed Epstein Victims' Compensation Program.

Regarding HHR's experience, reputation, and ability, HHR is a highly coveted, top-tier international law firm. *See* Hughes Hubbard & Reed LLP, www.hugheshubbard.com. HHR has been highly regarded by *The American Lawyer* as one of the top firms among the Nation's legal elite and recognized by *Chambers & Partners*, *The Legal 500*, *Global Investigations Review*, *Global Arbitration Review*, *Global Restructuring Review*, *Airfinance Journal*, and *Latin Finance* magazine. Also, HHR has been honored by the Cyrus Vance Center for International Justice and the Legal Aid Society. HHR has a strong history dating back two (2) centuries and multiple decades worth of legal experience. Hughes Hubbard & Reed LLP, *Firm History*, available at <https://www.hugheshubbard.com/culture/firm-history>. HHR's practice areas include corporate, tax and private client services, trusts and estates, finance restructuring and bankruptcy, intellectual property, international trade, litigation, international arbitration, white collar defense, and criminal and regulatory investigations.

HHR is comprised of sophisticated, experienced attorneys who possess considerable legal prowess. Daniel H. Weiner, a partner of HHR and head of its Commercial Litigation group, is a thirty-five (35) year seasoned trial lawyer who has first-chair experience in more than 30 litigations and arbitrations, including trusts and estate litigation. Attorney Weiner has been recognized by *Chambers USA*, *Chambers Global* and *The Legal 500*. **EXHIBIT D.** Marc Weinstein, a partner of HHR and Chair of its White Collar practice, represents corporate and individual clients at all stages of proceedings in federal and state court. **EXHIBIT E.** Attorney Weinstein has extensive trial and appellate practice experience, has been recognized by *Chambers USA* for eight consecutive years, and was a former federal prosecutor in the Southern District of New York. *Id.* Additionally, Attorney Weinstein was the recipient of the Department of Justice's John Marshall Award for Outstanding Legal Achievement for Asset Forfeiture, and has extensive experience in civil forfeiture matters. *Id.* Parker F. Taylor, a partner of HHR, focuses his practice primarily on tax law, and trusts and estates. **EXHIBIT F.** Attorney Taylor has extensive experience in estate administration and controversies, and regularly counsels high-net-worth individuals and families on estate matters. Attorney Taylor has extensive experience in evaluating complex federal and state gift and estate tax issues. Additionally, Attorney Taylor regularly prepares federal and state estate tax returns and federal gift tax returns as well as defends audited gift and estate tax returns. Given the estimated value of the estate and the multi-jurisdictional assets of the estate, it is anticipated that complex federal transfer tax issues will need to be evaluated and addressed by Attorney Taylor. *Id.* Because the Estate owns property in multiple jurisdictions, including Florida and New York, matters which affect the USVI administration also could impact administrations in mainland jurisdictions and Paris, France. Attorney Taylor's knowledge of Florida and New York probate laws is paramount to evaluating legal issues which may arise in those jurisdictions.

Fara Tabatabai, also a partner of HHR, is an experienced litigator and has served as trial counsel in numerous high-stakes domestic and international disputes. **EXHIBIT G.** In 2019, the *New York Journal* selected Attorney Tabatabai as one of the New York legal profession's "Rising Stars." *Id.* *Crain's New York Business Magazine* also selected Attorney Tabatabai was one of its "Notable Women in Law" for 2020. *Id.* Michael Huneke, a partner of HHR, has more than fifteen (15) years of due diligence and anti-corruption experience in Washington, DC and Paris, France, including extensive experience assisting France-based, multinational clients with investigating, analyzing, and addressing risks in complex onshore and offshore financial structures. **EXHIBIT H.** Attorney Huneke has been recognized by Washington, DC, *Super Lawyers* as a Rising Star, has co-authored an 800-page treatise published by Bloomberg/BNA, and regularly publishes articles and speaks at conferences or on webinars on these and related topics. *Id.*

Marie-Agnès Nicolas, counsel of HHR, is a member of HHR's Litigation Department, is proficient in French, and works from HHR's Paris, France office. **EXHIBIT I.** Attorney Nicolas has a decade of French criminal and civil litigation experience and has developed a strong understanding and extensive experience in advising clients on a variety of matters, including particularly French criminal investigations and criminal procedure. *Id.* Christian Belloin, senior counsel of HHR, has forty (40) years of extensive corporate experience and is highly competent in corporate commercial law, employment and unfair competition law, and real estate law (including regarding corporate vehicles used to hold real estate assets). **EXHIBIT J.** Attorney Belloin is proficient in French, works from HHR's Paris, France office, and has been recognized in *Best Lawyers in France*. *Id.* Ludmilla Balandine, an associate of HHR, in its Paris, France office, with nearly two decades of French civil litigation experience and experience representing clients in criminal matters. **EXHIBIT K.** Attorney Balandine's experience also includes

arbitration, banking and finance, corporate and contracts litigation. *Id.* Nadine Voisin, senior counsel of HR, in its Paris, France office, is a twenty-seven (27) year veteran attorney with extensive labor and employment law experience in France, including related to compliance with French registration and reporting requirements for employers. **EXHIBIT L.** Attorney Voisin has been recognized by *Best Lawyers in France*, *Décideurs Stratégie Finance Droit*, and *Décideurs Leadership & Management Capital Humain*. *Id.* Isabelle Benisty, an associate of HHR, in HHR's Paris, France office, has thirty-three (33) years of considerable litigation experience and in advising clients on important legal issues. **EXHIBIT M.** Attorney Benisty has experience regarding employee-employer litigation (or potential litigation). *Id.*

Justin S. Cohen, an associate of HHR, has experience working on tax, asset management, and financial matters. **EXHIBIT N.** John M. Kilgard, a litigation associate of HHR, has experience in federal court practice and procedure, and is proficient in French. **EXHIBIT O.** Vanessa Woods is an associate of HHR, and her practice focuses on estate planning and administration and administering complex trusts. **EXHIBIT P.** Each of these attorneys' extensive legal experience is more particularly detailed in their biographical profiles, attached hereto.

The complexity of this matter requires lawyers with HHR's experience and expertise. This legal representation concerns a high-profile Estate that is worth over half a billion dollars and that faces pending or threatened civil proceedings and asset forfeiture proceedings in the United States and France, as well as pending criminal investigations in various jurisdictions. Media coverage of the Estate and certain, high-profile public and private figures is unrelenting. The Estate consists of varied assets, real and personal across the United States, France and the U.S. Virgin Islands. Adequate defense and protection of the Estate, and the management of non-U.S. Virgin Islands-

related Estate administration issues require significant experience, effort, professionalism and attorney time. Accordingly, the fees proposed to the Court are reasonable under the circumstances.

B. NATURE AND LENGTH OF PROFESSIONAL RELATIONSHIP WITH DECEDENT AND TIME LIMITATIONS

HHR provided comprehensive legal services since shortly after Mr. Epstein's death. HHR immediately defended the Estate at the onset of potential civil asset forfeiture claims and the France litigation, and responded on behalf of the Estate to inquiries in the criminal investigation in the Southern District of New York. The time limitations imposed by these circumstances weighs heavily in favor of finding that the attorneys' fees and costs incurred are reasonable. HHR, with offices in, *inter alia*, New York, Miami, Florida and Paris, was one of a few select firms that could adequately and competently provide a broad array of required legal services in relevant jurisdictions, and that possessed the ability to quickly and effectively represent the Estate.

C. ATTORNEYS' RATES ARE REPRESENTATIVE OF CUSTOMARY RATES IN NEW YORK, = AND FRANCE FOR SIMILAR LEGAL SERVICES

To determine a reasonable hourly rate, the court considers "the reasonable market rate in light of the complexity of the services performed." *Anthony On Behalf of Lewis v. Abbott*, No. 1999-78, 2012 WL 2752154, at *2 (D.V.I. July 9, 2012). "To ascertain that community, [] courts 'are free to look to a national market, an area of specialization market, or any other market they believe appropriate to fairly compensate particular attorneys in individual cases.'" *Ford v. Fed.-Mogul Corp.*, No. 2:09-cv-14448, 2015 U.S. Dist. LEXIS 3399, at *2-3 (E.D. Mich. Jan. 7, 2015) (quoting *McHugh v. Olympia Entm't, Inc.*, 37 F. App'x 730, 740 (6th Cir. 2002)); *see also*, *Wayne v. Village of Sebring*, 36 F.3d 517, 533 (6th Cir. 1994) (a court has broad discretion in determining what constitutes a reasonable hourly rate).

In addition to the attorney's own affidavit, satisfactory evidence must be produced supporting that "the requested rates are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation." *Id.* (citing *Blum v. Stenson*, 465 U.S. 886, 896 (1984)); *see also*, *Garvey v. Estate of Moorhead*, No. SX-13-CV-210, 2016 WL 9503603, at *4 (V.I. Super. Ct. Aug. 1, 2016).

"The starting point in determining a reasonable hourly rate is the attorneys' usual billing rate." *Anthony On Behalf of Lewis*, 2012 WL 2752154, at *2. "[T]he actual billing arrangement certainly provides a strong indication of what private parties believe is the reasonable fee to be awarded." *Ross v. Congregation B'Nai Abraham Mordechai*, 814 N.Y.S.2d 837, 843 (Civ. Ct. 2006) (citing *Crescent Publ'g Grp., Inc. v. Playboy Enterprises, Inc.*, 246 F.3d 142, 151(2d Cir. 2001)); *Tri-Star Pictures, Inc. v. Unger*, 42 F.Supp.2d 296, 305 (S.D.N.Y. 1999) (a fee agreement is strong indication of reasonableness in determining reasonable fees.); *see also Prospect Capital Corp. v. Enmon*, No. 08 Civ. 3721(LBS), 2010 WL 2594633, at *4 (S.D.N.Y. June 23, 2010) ("Numerous courts have recognized that 'negotiation . . . of fees by sophisticated clients are solid evidence of their reasonableness in the market.'").

For legal services rendered in the representation of the Estate, the attorneys' fees were billed on an hourly basis under a retainer agreement. HHR's standard hourly rates for legal services typically range from Five Hundred Thirty Dollars (\$530.00) to One Thousand Two Hundred Fifty Dollars (\$1,250.00), depending on the attorney's experience and complexity of the matter. These rates are in line with rates customarily charged by equivalent law firms for similar services in New York, New York, the jurisdiction where the civil asset forfeiture matter is being managed, the location of some of the Estate's assets and sites of the proposed Epstein Victim Compensation Program. The rates are also in line with the rates customarily charged by equivalent law firms in

Paris, France (i.e., multinational law firms able to handle complex, cross-disciplinary matters in multiple languages). The Executors' and HHR partner Marc A. Weinstein's respective affidavits attest to the reasonableness of the hourly rates and the fact that those rates were deemed by the Executors, who must be considered sophisticated by virtue of the Executors' legal and financial backgrounds, and HHR to be reasonable. **EXHIBITS A, B, & C.** Moreover, HHR charges other such clients at the same or similar hourly rates.

1. ATTORNEY HOURLY RATES APPROVED IN NEW YORK

Importantly, New York courts have acknowledged that HHR's attorney hourly rates are reasonable even many years ago (legal fees typically increase market-wide on an annual basis). *See, e.g., Tessemæ's LLC v. Atlantis Capital LLC*, 18-CV-4902, 2019 WL 2635956, at *4 (S.D.N.Y. June 27, 2019) (collecting cases supporting reasonableness of "hourly rates ranging from Two Hundred Fifty Dollars (\$250) to One Thousand Sixty Dollars (\$1260) per hour" for partner-level attorneys' work"); *Kortright Capital Partners LP v. Investcorp Inv. Advisers Ltd.*, 392 F. Supp. 3d 382, 407-08 (S.D.N.Y. 2019) (approving hourly rate of One Thousand Two Hundred Dollars (\$1,200.00) for partner-level attorneys' work and an hourly rate of Six Hundred Fifty Dollars (\$650.00) for non-partner level attorneys); *Lyda v. Fremantlemedia N. Am.*, No. 10CV4773-DAB-FM, 2016 WL 4574390, at *3 (S.D.N.Y. July 11, 2016), *report and recommendation adopted sub nom. Lyda v. Freemantlemedia N. Am., Inc.*, No. 10-CV-4773 (DAB), 2016 WL 4581340 (S.D.N.Y. Aug. 31, 2016) (considering higher average rates in New York and finding attorney hourly rate at Six Hundred Seventy-Five Dollars (\$675.00) reasonable); *Raniere v. Citigroup Inc.*, 310 F.R.D. 211, 221-22 (S.D.N.Y. 2015) (counsel requested one-third (1/3) of settlement for attorneys' fee, indicating that the time expended on the case at its typical hourly rates of Six Hundred Fifty Dollars (\$650.00) to Nine Hundred Fifty Dollars (\$950.00) for

partners and Three Hundred Fifty Dollars (\$350.00) to Six Hundred Dollars (\$600.00) for associates would result in roughly the equivalent of the requested one-third (1/3) of the settlement, the Court deemed the request reasonable given the complexity of the case, the jurisdiction, and the reputation and skill of the plaintiff's counsel.); *Themis Capital v. Democratic Republic of Congo*, No. 09 Civ. 1652(PAE), 2014 WL 4379100, at *7 (S.D.N.Y. Sept. 4, 2014) (observing that "partner billing rates in excess of \$1000 an hour[] are by now not uncommon . . ."); *In re Vitamin C Antitrust Litig.*, No. 05-CV-453, 2013 WL 6858853, at *1 (E.D.N.Y. Dec. 30, 2013) (acknowledging, in addressing a motion for an award of attorneys' fees and costs, that a Six Hundred Fifty Dollar (\$650.00) per hour rate for complex cases is customarily charged); *Tyco Healthcare Grp. LP v. Ethicon Endo-Surgery, Inc.*, No. 3:10CV60 (JBA), 2012 WL 4092515, at *2 (D. Conn. Sept. 17, 2012) (applying New York rates and approving of Eight Hundred Fifty Dollar (\$850.00) per hour for partner); *Thai-Lao Lignite (Thailand) Co. v. Gov't of Lao People's Democratic Republic*, No. 10 CIV. 05256 KMW DF, 2012 WL 5816878, at *6 (S.D.N.Y. Nov. 14, 2012) (acknowledging that "some courts have awarded fees of more than \$700 [per hour] for highly experienced senior partners."); *Union of Orthodox Jewish Congregations of Am. v. Royal Food Distributors Liab. Co.*, 665 F. Supp. 2d 434, 437 (S.D.N.Y. 2009) (in awarding attorneys' fees and costs, finding that an attorney hourly rate at Seven Hundred Thirty-Five Dollars (\$735.00) reasonable). The District Court of the Virgin Islands has found reasonable and approved hourly rates as high as Eight Hundred Eighty Dollars (\$880.00). See Fee Auditor's Final Report entered in *In re Innovative Comm. Co. LLC*, Case. 3:07-bk-30012-JFK (D.V.I. Aug. 20, 2010) attached hereto as **EXHIBIT Q**.

In recent years, courts have recognized that "senior lawyers at top law firms routinely charge well over \$1,000 [an hour]." *In re Automotive Parts Antitrust Litigation*, Case 2:12-cv-

00103-MOB-MKM, D.E. 578, at 8 (E.D. Mich. July 10, 2017); *see also Themis Capital v. Democratic Republic of Congo*, No. 09 Civ. 1652(PAE), 2014 WL 4379100, at *7 (S.D.N.Y. Sept. 4, 2014) (observing that “partner billing rates in excess of \$1,000 an hour[] are by now not uncommon”). Additionally, legal professional publications, often cited by courts, recognize rates of up to Two Thousand Dollars (\$2,000.00) per hour as reasonable based on the type of legal services rendered. Sara Randazzo & Jacqueline Palank, *Legal Fees Cross New Mark: \$1,500 an Hour*, THE WALL ST. J., Feb. 16, 2016, available at <https://www.wsj.com/articles/legal-fees-reach-new-pinnacle-1-500-an-hour-1454960708> (In national markets, “partners routinely charge between \$1,200 and \$1,300 an hour, with top rates at several large law firms exceeding \$1,400.” In specialties such as “antitrust and high-stakes litigation and appeals . . . [f]or lawyers at the very top of those fields, hourly rates can hit \$1,800 or even \$1,950.”); Natalie Rodriguez, *Meet the \$2,000 An Hour Attorney: What it Takes to Earn Top Dollar in the Rate-Crunch Era*, LAW360, June 11, 2016, <https://www.law360.com/in-depth/articles/804421> (attorneys in the most complex fields charge Two Thousand Dollars (\$2,000.00) an hour). Accordingly, HHR’s hourly rate range for its attorneys are reasonable in New York.

2. APPROVED ATTORNEY HOURLY RATES IN PARIS, FRANCE

HHR’s rates for this matter are U.S. dollar-denominated rates set in New York for HHR attorneys in both the U.S. and France. These U.S. rates for HHR’s Paris-based attorneys working on this matter are determined by HHR based on each attorney’s relative seniority and experience vis-à-vis the U.S.-based HHR attorneys, and accordingly are reasonable from a U.S. perspective for the same reasons that the above U.S.-based attorney’s rates are reasonable. HHR has not had occasion for French courts to evaluate the reasonableness of its U.S. dollar-denominated rates in the Paris market; however, HHR’s peer New York firms have largely opened Paris offices as well,

and HHR believes that its U.S. dollar-denominated rates for its attorneys based in Paris are comparable to these peer firms' U.S. dollar-denominated rates.

3. CUSTOMARY AND REASONABLE PARAPROFESSIONAL HOURLY RATES IN NEW YORK, NEW YORK AND PARIS, FRANCE

Similarly, HHR's U.S. dollar-denominated hourly rate for its fiduciary accountant, paralegals and law clerks is reasonable. HHR's paralegals working on the various matters bill at the hourly rate of Two Hundred Ninety-Five Dollars (\$295.00), the fiduciary accountant bills at the hourly rate of Three Hundred Sixty Dollars (\$360.00), and the law clerks bill at the hourly rate of Two Hundred Thirty Dollars (\$230.00). **EXHIBIT A.**

In New York and Paris, this rate range is reasonable for U.S.-based law firms charging U.S.-dollar denominated rates. *See, e.g., Tabatznik v. Turner*, No. 14 CIV. 8135 (JFK), 2016 WL 1267792, at *12 (S.D.N.Y. Mar. 30, 2016) (suggesting that, in the Southern District of New York, paralegal fees range between One Hundred Dollars (\$100.00) and Two Hundred Eighty (\$280.00)); *Genger v. Genger*, No. 14 Civ. 5683 (KBF), 2015 WL 1011718, at *3 (S.D.N.Y. Mar. 9, 2015)(approving Two Hundred Sixty Dollars (\$260.00) to Two Hundred Eighty Dollars (\$280.00) paralegal rates); *Lucky Brand Dungarees, Inc. v. Ally Apparel Resources LLC*, No. 05 Civ. 6757, 2009 WL 466136, at *6 (S.D.N.Y. Feb. 25, 2009) (approving rates of Two Hundred Five Dollars (\$205.00) per hour to Two Hundred Thirty-Five Dollars (\$235.00) per hour for paralegals); *S.E.C. v. Goren*, 272 F. Supp. 2d 202, 208 (E.D.N.Y. 2003)(finding reasonable the hourly rate of Two Hundred Dollars (\$200.00) for accounting services provided by Deloitte and Touche, LLP and FTI Consulting, Inc.); *In re ICS Cybernetics, Inc.*, 97 B.R. 736, 740 (Bankr. N.D.N.Y. 1989)(approving accountant hourly rate of Two Hundred Ten Dollars (\$210.00)).

V. CONCLUSION

The Court should approve payment of HHR's invoices in the amount of Three Hundred Seventy Thousand Six Hundred Eighteen Dollars and Fifty-Six Cents (\$370,863.56), consisting of attorneys' fees in the amount of Three Hundred Fifty-Three Thousand Five Hundred Fourteen Dollars and Zero Cents (\$353,514.00), fiduciary accountant fees in the amount of One Thousand Eight Hundred Seventy-Two Dollars and Zero Cents (\$1,872.00), paralegal fees in the amount of Four Hundred Forty-Two Dollars and Zero Cents (\$442.00), law clerk fees in the amount of Ten Thousand One Hundred Twenty Dollars and Zero Cents (\$10,120.00), and costs in the amount of Four Thousand Nine Hundred Fifteen Dollars and Fifty-Six Cents (\$4,915.56). The litigation expenses incurred in representing, defending and protecting the Estate were necessary. The attorneys' fees are reasonable considering the size and nature of the Estate, with assets in the United States, the U.S. Virgin Islands, and France, the potential risk posed by the civil asset forfeiture claims (in the United States and France), the ongoing criminal investigation in France, the French labor and employment, corporate, and tax and estate matters, the potential for civil litigation in France, the immediacy in which HHR could provide such representation, the experience, caliber and reputation of the firm, customary hourly rates in New York and Paris, France for representing high-profile, complicated Estates, and the rate agreed upon by Co-Executor Darren K. Indyke. Each of the lodestar elements and the V.I. Supreme Court Rule 211.1.5 have been met.

WHEREFORE, it is respectfully requested that this Honorable Court grant this Motion for Approval of Hughes Hubbard & Reed LLP Interim Pay Application No. 1.

Dated: February 4, 2020

Respectfully,



CHRISTOPHER ALLEN KROBLIN, ESQ.

ANDREW W. HEYMANN, ESQ.

WILLIAM L. BLUM, ESQ.

SHARI N. D'ANDRADE, ESQ.

MARJORIE WHALEN, ESQ.

V.I. Bar Nos. 966, 266, 136, 1221 & R2019

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Email: ckroblin@kellfer.com

aheyman@solblum.com

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sdandrade@kellfer.com

mwhalen@kellfer.com

Attorneys for the Estate

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of February 2020, I caused a true and exact copy of the foregoing **Motion for Approval of Hughes Hubbard & Reed LLP's Interim Pay Application No. 1** to be served upon:

Via Electronic Mail by Agreement of the Parties:

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Via First-Class Mail, Postage Prepaid:

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Ariel M. Smith, Esq.
Chief, Civil Division
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Christiansted, St. Croix 00820

A handwritten signature in blue ink, appearing to read "J. Dema", is written over a horizontal line. The signature is stylized and cursive.

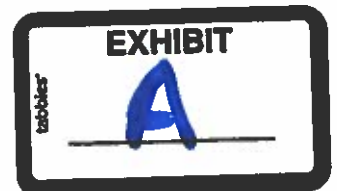
**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

IN THE MATTER OF THE ESTATE OF)	
JEFFREY E. EPSTEIN)	PROBATE NO. ST-19-PB-80
)	
Deceased.)	ACTION FOR TESTATE
<hr style="width:100%; border: 0.5px solid black;"/>)	ADMINISTRATION

AFFIDAVIT OF MARC A. WEINSTEIN

I, Marc A. Weinstein, being of lawful age and otherwise competent to make this Affidavit, and after having been duly sworn, depose and state:

1. I am a partner at Hughes Hubbard & Reed LLP (“HHR”), an international law firm comprised of experienced attorneys who are committed, collaborative and results-driven. HHR’s practice areas include litigation, trusts and estates, tax and private client services, regulatory matters, corporate, finance restructuring and bankruptcy, intellectual property, international trade, and international arbitration.
2. Darren K. Indyke, Co-Executor of the Estate of Jeffrey E. Epstein (“Estate”), engaged HHR to represent the Estate regarding (a) potential federal and state civil asset forfeiture actions in New York and Florida, (b) other New York and Florida Estate matters, (c) Estate representation in Paris, France, and (d) establishment of a proposed voluntary claims resolution program for the purpose of resolving multiple sexual abuse claims against the Decedent Jeffrey E. Epstein.
3. Legal services provided for the above-referenced matters include extensive legal research, legal analysis and strategy, and sound legal advice.
4. The work performed in representing the Estate is presented in the itemized spreadsheet of time and costs for the period of August 22, 2019 to October 31, 2019, attached hereto



as EXHIBIT 1¹ and as more fully explained in the Motion for Approval of Hughes Hubbard & Reed LLP's s Interim Pay Application No. 1 and Incorporated Memorandum of Law.

5. Based on my personal knowledge, review of the file, the underlying bills, and in consultation with partners, associates, and assistants of the firm who assisted in representing the Estate, the total amount of attorney time spent in this matter, which is sought herein and set forth in Exhibit 1, is as follows:

Civil Forfeiture Matters, and New York and Florida Related Estate Matters covering August 22, 2019-October 31, 2019

<u>Attorney</u>	<u>Hours</u>	<u>Rate(s)</u>	<u>Total Amount Charged</u>
Daniel H. Weiner	64.2	\$1,250.00	\$80,250.00
Fara Tabatabai	22.1	\$925.00	\$20,442.50
Marc Weinstein	41	\$1,100.00	\$45,100.00
Parker F. Taylor	89	\$950.00	\$84,550.00
Justin S. Cohen	6.3	\$775.00	\$4,882.50
John M. Kilgard	67.9	\$650.00	\$44,135.00
Vanessa A. Woods	16.2	\$750.00	\$12,150.00

<u>Fiduciary Accountant</u>	<u>Hours</u>	<u>Rate(s)</u>	<u>Total Amount Charged</u>
J. Boyle	5.2	\$360.00	\$1,872.00

<u>Paralegal</u>	<u>Hours</u>	<u>Rate(s)</u>	<u>Total Amount Charged</u>
N. Brenner	.8	\$295.00	\$236.00
M. Voizard	.5	\$295.00	\$147.00

<u>Costs</u>	<u>Total Amount Charged</u>
Filing Fees	\$88.32
Express Delivery	\$118.99
Westlaw	\$3,801.71

¹ Portions of the invoices are redacted to the protect attorney-client privilege and confidential information.

Lexis	\$215.58
Research Service	\$10.50
Airline Travel	\$680.46
Total Attorneys' Fees charged and sought:	\$291,510.00
Total Paralegal Fees charged and sought:	\$383.00
Total Fiduciary Accountant Fees charged and sought:	\$1,872.00
<u>Total Costs charged and sought:</u>	<u>\$4,915.56</u>
Total Fees & Costs Sought (Civil Forfeiture/Stateside Estate Rep):	\$298,680.56

Paris, France Matters covering September 20, 2019-October 31, 2019

<u>Attorney</u>	<u>Hours</u>	<u>Rate(s)</u>	<u>Total Amount Charged</u>
Michael H. Huneke	13.4	\$950.00	\$12,730.00
Marie-Agnès Nicolas	11.2	\$530.00	\$5,936.00
Christian Belloin	7.9	\$900.00	\$7,110.00
Ludmilla Balandine	29.3	\$785.00	\$23,000.50
Nadine Voisin	14.3	\$900.00	\$12,870.00
Isabelle Benisty	0.5	\$715.00	\$357.50

<u>Paralegal</u>	<u>Hours</u>	<u>Rate(s)</u>	<u>Total Amount Charged</u>
S. Robertson	0.2	\$295.00	\$59.00

<u>Law Clerk</u>	<u>Hours</u>	<u>Rate(s)</u>	<u>Total Amount Charged</u>
D. Tiron	40.8	\$230.00	\$9,384.00
S. Ramirez Reyes	3.2	\$230.00	\$736.00

<u>Costs</u>	<u>Total Amount Charged</u>
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Total Attorneys' Fees charged and sought:	\$62,004.00
Total Paralegal Fees charged and sought:	\$59.00
Total Law Clerk Fees charged and sought:	\$10,120.00
<u>Total Costs charged and sought:</u>	<u>\$0</u>
Total Fees & Costs Sought (Paris, France Matters):	\$72,183.00

Total Fees Sought for Interim Pay Application 1: \$365,948.00

Total Costs for Interim Pay Application 1: \$4,915.56

6. The above hourly rates are standard for the services provided, and HHR charges its other clients the same or similar rates.
7. All fees for legal services, costs, and expenses set forth within this Affidavit are correct. All fees for legal services, costs, and expenses have been reasonably and necessarily incurred in representing the Estate, and they were actually and necessarily performed.
8. The rates charged are charged at HHR's customary rates and are well within the range of rates that are customary for similar legal services performed in New York, New York and Paris, France by multinational law firms.
9. This Affidavit is submitted in support of the Motion for Approval of Hughes Hubbard & Reed LLP's Interim Pay Application No. 1.


I declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that the foregoing is true and correct.

Dated: Feb. 3, 2020



Marc A. Weinstein

SUBSCRIBED AND SWORN to before me
this 3rd day of February 2020.



NOTARY

ELAINE VELEZ
Notary Public, State of New York
No. 01VES066311
Qualified in New York County
Commission Expires 9, 2023

**Hughes
Hubbard
& Reed**

Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Office: +1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087071

November 15, 2019
[REDACTED]

August 2019

Re: Estate and Trust Administration

For professional services rendered for the above referenced matter:

Fees	\$	48,315.00
<u>Other Charges</u>		
Airline Travel Billed	\$	<u>680.46</u>
INVOICE TOTAL	\$	<u>48,995.46</u>

BILLS ARE DUE AND PAYABLE UPON RECEIPT
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING



ATTORNEY SUMMARY

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Weiner, D	Partner	1,250.00	5.40	6,750.00
Weinstein, M	Partner	1,100.00	9.60	10,560.00
Taylor, P	Partner	950.00	26.40	25,080.00
Woods, V	Associate	750.00	7.90	5,925.00
	Total		49.30	\$ 48,315.00

TIME DETAIL

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
08/22/19	Taylor, P	Meet with [REDACTED] regarding [REDACTED] (3.5). Review [REDACTED] related to [REDACTED] (1.3). Attention to emails to and from M. Weiner and D. Weinstein (0.2). Teleconference with [REDACTED] (0.5).	950.00	5.50	5,225.00
08/22/19	Weinstein, M	Meeting with [REDACTED]; review [REDACTED] and email [REDACTED] re same	1,100.00	3.20	3,520.00
08/23/19	Taylor, P	Teleconferences with [REDACTED] regarding [REDACTED] (1.0). Teleconference with [REDACTED] D. Weiner, and M. Weinstein (2.0). Review regarding [REDACTED] (1.5). Review of [REDACTED] (1.1).	950.00	5.60	5,320.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
08/23/19	Weiner, D	Communications with [REDACTED] (.20 hours); telephone conference with [REDACTED] re [REDACTED] (.30 hours); review [REDACTED] (1 hour); telephone conference with [REDACTED] re [REDACTED] (.40 hours); telephone conference with [REDACTED] (.80 hours); communication with client re [REDACTED] (10 hours).	1,250.00	2.80	3,500.00
08/23/19	Weinstein, M	Call with [REDACTED] and [REDACTED] re issues related to [REDACTED] (0.4); call with [REDACTED] re [REDACTED] (0.8); meet with D. Weiner re strategy for same (0.4); call with [REDACTED] (0.3); call with P. Taylor re [REDACTED] (0.5); review inquiries of [REDACTED] (0.3); review [REDACTED] (0.5).	1,100.00	3.20	3,520.00
08/24/19	Taylor, P	Teleconference with [REDACTED] (0.3). Teleconference with [REDACTED] (0.4).	950.00	0.70	665.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
08/25/19	Taylor, P	Attention to emails from [REDACTED] regarding [REDACTED].	950.00	0.30	285.00
08/26/19	Taylor, P	Attention to emails from [REDACTED] regarding [REDACTED] (0.1). Attention to emails from [REDACTED] (0.1). Attention to email from [REDACTED] (0.1). Teleconference with M. Weinstein regarding [REDACTED] (0.3). Teleconference with [REDACTED] (0.5).	950.00	1.10	1,045.00
08/26/19	Taylor, P	Review of [REDACTED] and [REDACTED] and consult with V. Woods re: same (1.2).	950.00	1.20	1,140.00
08/26/19	Weiner, D	Communications with [REDACTED] re [REDACTED] (.30 hours); communications with [REDACTED] re [REDACTED] (.30 hours).	1,250.00	0.60	750.00
08/26/19	Weinstein, M	Call with P. Taylor [REDACTED] [REDACTED] 0.2); review [REDACTED] re [REDACTED] [REDACTED] [REDACTED] (0.1).	1,100.00	0.30	330.00
08/27/19	Taylor, P	Teleconferences with [REDACTED] (0.2). Teleconferences with [REDACTED] (0.3). Teleconference with [REDACTED] (0.5). Review of [REDACTED] (0.8). Teleconference with V. Woods regarding same (0.1). Legal research regarding [REDACTED] (0.8). Attention to email from [REDACTED] (0.1).	950.00	2.80	2,660.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
08/27/19	Weinstein, M	Review [REDACTED] [REDACTED] (0.2); call with D. Weiner re [REDACTED] [REDACTED] (0.2).	1,100.00	0.40	440.00
08/27/19	Woods, V	Speak with Parker Taylor re: [REDACTED] (0.1); research and emails re [REDACTED] [REDACTED] (4.4).	750.00	4.50	3,375.00
08/28/19	Taylor, P	Status conference call (0.7). Attention to emails to and from M. Weinstein and D. Weiner (0.2). Review of F [REDACTED] [REDACTED] (1.0). Teleconference with [REDACTED] (0.6).	950.00	2.50	2,375.00
08/28/19	Weiner, D	Telephone conference with [REDACTED] re [REDACTED] [REDACTED] [REDACTED] [REDACTED] (.20 hours).	1,250.00	1.00	1,250.00
08/28/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED] [REDACTED]	1,100.00	1.30	1,430.00
08/28/19	Woods, V	Research re [REDACTED] [REDACTED].	750.00	3.40	2,550.00
08/29/19	Taylor, P	Teleconference regarding [REDACTED] (1.9). Attention to e-mail to [REDACTED] [REDACTED] (0.1). Teleconference with [REDACTED] (0.5).	950.00	2.50	2,375.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
08/29/19	Weiner, D	Review [REDACTED] (10 hours); communication with [REDACTED] re same (.30 hours).	1,250.00	0.40	500.00
08/29/19	Weinstein, M	Review [REDACTED]	1,100.00	0.10	110.00
08/30/19	Taylor, P	Attention to various matters regarding estate (0.8). Teleconference with [REDACTED] regarding [REDACTED] (2.3). Teleconferences with [REDACTED] (0.6). Teleconferences with D. Weiner and M. Weinstein (0.5).	950.00	4.20	3,990.00
08/30/19	Weiner, D	Review [REDACTED]	1,250.00	0.60	750.00
08/30/19	Weinstein, M	Call with P. Taylor and D. Weiner re [REDACTED] (0.5); call with D. Indyke re [REDACTED] (0.4); review advice re [REDACTED] (0.1); review [REDACTED] (0.1).	1,100.00	1.10	1,210.00
Total				<u>49.30</u>	<u>\$ 48,315.00</u>
INVOICE TOTAL					<u>\$ 48,995.46</u>

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Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087071

November 15, 2019
[REDACTED]

REMITTANCE PAGE

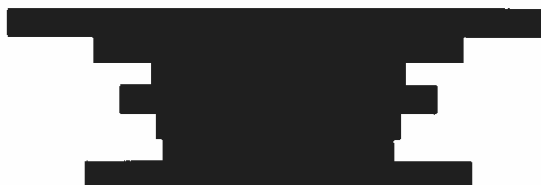
August 2019

Re: Estate and Trust Administration

For professional services rendered for the above referenced matter:

Fees	\$	48,315.00
<u>Other Charges</u>		
Airline Travel Billed	\$	<u>680.46</u>
INVOICE TOTAL	\$	<u>48,995.46</u>

**BILLS ARE DUE AND PAYABLE UPON RECEIPT
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING
PLEASE RETURN THIS COPY WITH YOUR PAYMENT**



**Hughes
Hubbard
& Reed**

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Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087673

November 27, 2019
[REDACTED]

September 2019

Re: Estate and Trust Administration

For professional services rendered for the above referenced matter:

Fees	\$	145,188.00
<u>Other Charges</u>		
Filing Fees	\$	34.00
Express Delivery	\$	118.99
Westlaw	\$	3,712.54
Lexis	\$	215.58
Research Service	\$	10.50
Total Other Charges	\$	<u>4,091.61</u>
<hr/>		
INVOICE TOTAL	\$	<u>149,279.61</u>

**BILLS ARE DUE AND PAYABLE UPON RECEIPT
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING**

[REDACTED]

ATTORNEY SUMMARY

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Weiner, D	Partner	1,250.00	27.40	34,250.00
Tabatabai, F	Partner	925.00	20.80	19,240.00
Weinstein, M	Partner	1,100.00	18.80	20,680.00
Taylor, P	Partner	950.00	30.50	28,975.00
Cohen, J	Associate	775.00	6.30	4,882.50
Kilgard, J	Associate	650.00	44.70	29,055.00
Woods, V	Associate	750.00	7.80	5,850.00
Brenner, N	Paralegal	295.00	0.80	236.00
Voizard, M	Legal Assistant	295.00	0.50	147.50
Boyle, J	Fiduciary Acct	360.00	5.20	1,872.00
Total			162.80	\$ 145,188.00

TIME DETAIL

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/03/19	Taylor, P	Attention to e-mails with M. Weinstein (0.2). Teleconferences with [REDACTED] (1.2). Teleconference with D. Weiner and M. Weinstein regarding [REDACTED] (0.4).	950.00	1.80	1,710.00
09/03/19	Weiner, D	Communications re [REDACTED] (.30); communications re [REDACTED] (.10).	1,250.00	0.30	375.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/03/19	Weinstein, M	Call with [REDACTED] [REDACTED] e [REDACTED] (3.9); call re [REDACTED] (.2); call with M. Salzman, D. Weiner, and P. Taylor re [REDACTED] (1.2); emails re [REDACTED] [REDACTED] (.1); review [REDACTED] re [REDACTED] (.1).	1,100.00	5.50	6,050.00
09/04/19	Weiner, D	Communications [REDACTED] re [REDACTED] [REDACTED] (.90); [REDACTED] (.90).	1,250.00	1.80	2,250.00
09/04/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED]	1,100.00	1.00	1,100.00
09/05/19	Taylor, P	Attention to e-mails to and from M. Weinstein regarding [REDACTED] (0.1). Teleconference with [REDACTED] [REDACTED] Teleconference with M. Weinstein, [REDACTED] [REDACTED] regarding [REDACTED] (1.2). Teleconferences with M. Weinstein regarding [REDACTED] (0.2). Attention to e-mail to [REDACTED] M. Weinstein, [REDACTED] regarding [REDACTED] (0.1).	950.00	1.60	1,520.00
09/05/19	Taylor, P	Review of [REDACTED] [REDACTED] (0.8). Research regarding [REDACTED] (0.9). Attention to email to D. Weiner and M. Weinstein regarding [REDACTED] (0.2).	950.00	1.90	1,805.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/05/19	Weiner, D	Revise [REDACTED] [REDACTED] re [REDACTED]	1,250.00	0.60	750.00
09/05/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED] (.7); review [REDACTED] [REDACTED] and draft [REDACTED] (.2); review [REDACTED] re [REDACTED] (.3); review [REDACTED] re [REDACTED] [REDACTED] (.3).	1,100.00	1.50	1,650.00
09/06/19	Taylor, P	Teleconference [REDACTED] M. Weinstein regarding [REDACTED] (1.6). Office meetings regarding [REDACTED] (0.2). Teleconference with M. Weinstein (0.1). Office meeting with D. Weiner (0.2). Attention to e-mails [REDACTED] (0.1).	950.00	2.20	2,090.00
09/06/19	Weiner, D	Communications [REDACTED] re [REDACTED] [REDACTED] (1.1); telecon [REDACTED] re [REDACTED] (.30).	1,250.00	1.40	1,750.00
09/06/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED] (.2); call with [REDACTED] re [REDACTED] (.5).	1,100.00	0.70	770.00
09/06/19	Weinstein, M	Emails with [REDACTED] re [REDACTED] [REDACTED] emails with D. Weiner re [REDACTED] [REDACTED]	1,100.00	0.10	110.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/07/19	Taylor, P	Teleconference with [REDACTED] regarding [REDACTED] (0.4). Attention to email to D. Weiner and M. Weinstein (0.1).	950.00	0.50	475.00
09/07/19	Weinstein, M	Review [REDACTED] re [REDACTED]	1,100.00	0.10	110.00
09/09/19	Brenner, N	[REDACTED]	295.00	0.50	147.50
09/09/19	Cohen, J	Research re: [REDACTED] and discussion with P. Taylor re: [REDACTED]	775.00	0.40	310.00
09/09/19	Kilgard, J	Conducting research [REDACTED]	650.00	1.30	845.00
09/09/19	Kilgard, J	Phone call with Fara Tabatabai regarding research [REDACTED]	650.00	0.20	130.00
09/09/19	Tabatabai, F	Reviewed [REDACTED] (1.2); discussed research regarding [REDACTED] with D. Weiner and J. Kilgard (0.4).	925.00	1.60	1,480.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/09/19	Taylor, P	Attention to e-mail [REDACTED] [REDACTED] (0.2). Teleconferences regarding [REDACTED] [REDACTED] (0.9). Draft and revisions [REDACTED] regarding [REDACTED] (1.3). Attention to e-mails [REDACTED] [REDACTED] (0.1). Teleconference with [REDACTED] regarding [REDACTED] (0.3). [REDACTED] (0.2). regarding [REDACTED] (0.4). Office meeting with D. Weiner and M. Weinstein regarding [REDACTED] (0.4).	950.00	3.80	3,610.00
09/09/19	Weiner, D	Communications with [REDACTED] re [REDACTED] [REDACTED] (.20); telcon with [REDACTED] [REDACTED] (.30); review [REDACTED] re [REDACTED] (.10); communications re [REDACTED] (.20).	1,250.00	0.90	1,125.00
09/09/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED] (0.5); meet with D. Weiner and P. Taylor re [REDACTED] [REDACTED] (.6); emails with [REDACTED] re [REDACTED] (.1); review [REDACTED] [REDACTED] (.1); review [REDACTED] re [REDACTED] (.5).	1,100.00	1.80	1,980.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/10/19	Boyle, J	Attention to email and discussion with V. Woods; [REDACTED]	360.00	0.90	324.00
09/10/19	Cohen, J	Research regarding [REDACTED] [REDACTED] Discussion and correspondence with P. Taylor re: [REDACTED]	775.00	5.60	4,340.00
09/10/19	Kilgard, J	Conducting research [REDACTED] [REDACTED] regarding [REDACTED]	650.00	1.80	1,170.00
09/10/19	Taylor, P	Office meeting with V. Woods regarding [REDACTED] [REDACTED] (0.2). Review [REDACTED] [REDACTED] (0.6). Attention to e-mail to M. Weinstein and D. Weiner regarding [REDACTED] (0.1). Teleconference with [REDACTED] regarding [REDACTED] (0.4). Teleconference with [REDACTED] regarding [REDACTED] (0.6). Draft [REDACTED] Office meeting with D. Weiner regarding [REDACTED] (0.2). Teleconferences with [REDACTED] regarding [REDACTED] (0.2). Teleconference with [REDACTED] regarding [REDACTED] (0.7). Review [REDACTED] (0.5). Teleconference with [REDACTED] regarding [REDACTED] (0.2). Attention to e-mail [REDACTED] regarding [REDACTED] (0.1). Attention to e-mail [REDACTED] regarding [REDACTED] (0.1). Teleconference regarding [REDACTED] (0.2). Attention to e-mail [REDACTED] regarding [REDACTED] (0.1).	950.00	5.20	4,940.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/10/19	Weiner, D	Communication [REDACTED] re [REDACTED] (.20); revise [REDACTED] .70); communications with [REDACTED] re [REDACTED] (.90); revise [REDACTED] (.20).	1,250.00	2.00	2,500.00
09/10/19	Weinstein, M	Emails re [REDACTED] [REDACTED]	1,100.00	0.10	110.00
09/10/19	Woods, V	Internal conference and emails re [REDACTED] [REDACTED]	750.00	3.40	2,550.00
09/10/19	Woods, V	[REDACTED] research [REDACTED] [REDACTED]	750.00	1.20	900.00
09/11/19	Boyle, J	Attention to [REDACTED] [REDACTED]	360.00	1.80	648.00
09/11/19	Brenner, N	Preparing [REDACTED] [REDACTED] per request of D. Weiner.	295.00	0.30	88.50
09/11/19	Cohen, J	Correspondence re: [REDACTED] [REDACTED]	775.00	0.30	232.50
09/11/19	Kilgard, J	Conducting legal research [REDACTED] [REDACTED] [REDACTED] [REDACTED]	650.00	3.40	2,210.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/11/19	Taylor, P	Teleconference [REDACTED] regarding [REDACTED]. Attention to email to [REDACTED] regarding [REDACTED] (.30). Attention to e-mails to and from V. Woods regarding [REDACTED] [REDACTED] (0.10). Legal research regarding [REDACTED] [REDACTED] (1.10). Teleconference with [REDACTED] regarding [REDACTED] (0.6). Attention to e-mails to and from [REDACTED] regarding [REDACTED] (0.1). Teleconference with [REDACTED] regarding [REDACTED] [REDACTED] (0.3). Review and revisions [REDACTED] [REDACTED]. Review [REDACTED] Office meeting with [REDACTED] regarding [REDACTED] (0.9). Attention to e-mails regarding [REDACTED] (0.2). Teleconference [REDACTED] regarding [REDACTED] [REDACTED] (0.4). Attention to emails [REDACTED] regarding [REDACTED] (0.3). Attention to emails [REDACTED] [REDACTED] [REDACTED] (0.1). Attention to emails [REDACTED] regarding [REDACTED] (0.3).	950.00	4.70	4,465.00
09/11/19	Weiner, D	Communications with [REDACTED] re [REDACTED] (.40); communications [REDACTED] re [REDACTED] (.20).	1,250.00	0.60	750.00
09/11/19	Weinstein, M	Review [REDACTED] [REDACTED]	1,100.00	0.10	110.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/11/19	Woods, V	Emails and internal conference P. Taylor re [REDACTED] [REDACTED] review and discuss research re [REDACTED] [REDACTED]	750.00	2.30	1,725.00
09/12/19	Kilgard, J	Conducting research [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	650.00	4.60	2,990.00
09/12/19	Taylor, P	Attention to [REDACTED] Attention to e-mails [REDACTED] [REDACTED] regarding (0.2). Teleconference with [REDACTED] regarding [REDACTED] (0.5). Teleconference with [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] (1.3). Attention to e-mail to M. Weinstein and D. Weiner regarding [REDACTED] (0.2). Review [REDACTED] [REDACTED] (0.2). Review [REDACTED] [REDACTED] Attention to e-mail [REDACTED] [REDACTED] regarding [REDACTED] (0.1)	950.00	2.90	2,755.00
09/12/19	Weiner, D	Communications with [REDACTED] [REDACTED] (1.3); communications [REDACTED] [REDACTED] re [REDACTED] (.50).	1,250.00	1.80	2,250.00
09/12/19	Weinstein, M	Review [REDACTED] and correspondence [REDACTED] [REDACTED] re [REDACTED] (.1); review [REDACTED] re [REDACTED] [REDACTED] (.1).	1,100.00	0.20	220.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/12/19	Woods, V	Research re [REDACTED] [REDACTED]	750.00	0.70	525.00
09/13/19	Boyle, J	Attention to [REDACTED] [REDACTED]	360.00	1.00	360.00
09/13/19	Kilgard, J	Researching [REDACTED] regarding [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	650.00	2.50	1,625.00
09/13/19	Tabatabai, F	Reviewed and commented on [REDACTED] regarding [REDACTED] [REDACTED]	925.00	0.40	370.00
09/13/19	Weiner, D	Communications [REDACTED] [REDACTED] re [REDACTED] (1.9); communications with [REDACTED] (.20).	1,250.00	2.10	2,625.00
09/13/19	Woods, V	Attention to [REDACTED] [REDACTED]	750.00	0.10	75.00
09/15/19	Kilgard, J	Conducting research [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	650.00	3.60	2,340.00
09/15/19	Weiner, D	Communications [REDACTED] [REDACTED]	1,250.00	0.60	750.00
09/16/19	Boyle, J	Attention to [REDACTED] [REDACTED] [REDACTED] [REDACTED]	360.00	1.20	432.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/16/19	Kilgard, J	Revising [REDACTED] regarding [REDACTED]	650.00	1.00	650.00
09/16/19	Tabatabai, F	Reviewed and commented on research regarding [REDACTED]	925.00	1.70	1,572.50
09/16/19	Taylor, P	Attention to e-mails [REDACTED] regarding [REDACTED] (0.1). Office meeting regarding [REDACTED] (0.1).	950.00	0.20	190.00
09/16/19	Weiner, D	Communications with [REDACTED] t re [REDACTED]	1,250.00	0.20	250.00
09/16/19	Woods, V	Attention to [REDACTED]	750.00	0.10	75.00
09/17/19	Boyle, J	Attention to [REDACTED]	360.00	0.30	108.00
09/17/19	Tabatabai, F	Continued reviewing research regarding [REDACTED] (4.5); reviewed and revised [REDACTED] (0.8).	925.00	5.30	4,902.50
09/17/19	Weiner, D	Communications with [REDACTED] re [REDACTED]	1,250.00	0.30	375.00
09/17/19	Weinstein, M	Emails with [REDACTED] re [REDACTED]	1,100.00	0.10	110.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/18/19	Kilgard, J	<p>Conducting research [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] 3.3); call with F. Tabatabai to discuss [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] (0.3); conducting research [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] (1.4).</p>	650.00	5.00	3,250.00
09/18/19	Tabatabai, F	<p>Reviewed additional research regarding [REDACTED]</p> <p>[REDACTED] (3.8); discussed [REDACTED]</p> <p>[REDACTED] with J. Kilgard (0.2).</p>	925.00	4.00	3,700.00
09/18/19	Taylor, P	<p>Attention to e-mail [REDACTED] regarding [REDACTED] (0.1).</p> <p>Attention to e-mails to and from [REDACTED] regarding [REDACTED]. Review [REDACTED] (0.1).</p> <p>Teleconference with [REDACTED] regarding [REDACTED] s (0.2), Office meeting with D. Weiner regarding [REDACTED] (0.4).</p>	950.00	0.60	570.00
09/18/19	Weiner, D	<p>Communications [REDACTED] re [REDACTED]</p> <p>[REDACTED]</p>	1,250.00	0.80	1,000.00
09/19/19	Kilgard, J	<p>Conducting research [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	650.00	2.30	1,495.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/19/19	Taylor, P	Teleconferences with [REDACTED] regarding [REDACTED] (0.3). Office meeting with D. Weiner regarding [REDACTED] (0.2). Attention to e-mails to and from M. Weinstein regarding [REDACTED] (0.1).	950.00	0.60	570.00
09/19/19	Weiner, D	Communications with [REDACTED] (.40); communications re [REDACTED] (.60).	1,250.00	1.00	1,250.00
09/19/19	Weinstein, M	Review [REDACTED] (.8); call with [REDACTED] re [REDACTED] (.2); call with M. Weinberg [REDACTED] re [REDACTED] (.5); emails with [REDACTED] re [REDACTED] (.1).	1,100.00	1.60	1,760.00
09/20/19	Kilgard, J	Meet with M. Weinstein to [REDACTED]	650.00	0.40	260.00
09/20/19	Tabatabai, F	Reviewed and commented [REDACTED] (0.2); revised [REDACTED] research regarding [REDACTED] (0.8).	925.00	1.00	925.00
09/20/19	Taylor, P	Office meeting with M. Weinstein regarding [REDACTED] (0.6). Teleconference with [REDACTED] regarding [REDACTED] (0.1). Attention to e-mail [REDACTED] regarding [REDACTED] (0.1). Office meeting with M. Salzman and M. Weinstein regarding [REDACTED] (1.0).	950.00	1.80	1,710.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/20/19	Weiner, D	Communications with [REDACTED] re [REDACTED] (.70); telephone interview [REDACTED] (2.1); communications [REDACTED] (.30).	1,250.00	3.10	3,875.00
09/20/19	Weinstein, M	Call with [REDACTED] (4); call with D. Weiner re [REDACTED] (2); call with [REDACTED] re [REDACTED] (.7); meet with [REDACTED] re [REDACTED] (3); call with D. Indyke re [REDACTED] (3); review documents [REDACTED] (1.2).	1,100.00	3.10	3,410.00
09/21/19	Kilgard, J	Conducting research [REDACTED] (0.8);	650.00	0.80	520.00
09/21/19	Kilgard, J	Conducting research [REDACTED] (2.5).	650.00	2.50	1,625.00
09/21/19	Tabatabai, F	Reviewed comments from D. Weiner on memo [REDACTED]	925.00	0.20	185.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/21/19	Weiner, D	Communications with [REDACTED] (.70); revise [REDACTED] re [REDACTED] (.90).	1,250.00	1.60	2,000.00
09/22/19	Weiner, D	Communications with [REDACTED] (.20); revise [REDACTED] (.30).	1,250.00	0.50	625.00
09/23/19	Kilgard, J	Revising memorandum [REDACTED] from D. Weiner (1.5); revising [REDACTED] comments from D. Weiner (.7); conducting research into [REDACTED] pursuant to comments from D. Weiner and [REDACTED] (2.0); conducting research [REDACTED] (0.4).	650.00	4.60	2,990.00
09/23/19	Taylor, P	Teleconference with [REDACTED] regarding [REDACTED] (0.3). Office meeting with D. Weiner regarding [REDACTED] (0.1). Office meeting with M. Weinstein regarding [REDACTED] (0.1). Legal research regarding [REDACTED] (0.3). Teleconference [REDACTED] regarding [REDACTED] (0.1). Attention to e-mail to [REDACTED] regarding [REDACTED] (0.1).	950.00	0.90	855.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/23/19	Voizard, M	Research [REDACTED] [REDACTED]	295.00	0.50	147.50
09/23/19	Weiner, D	Communications re [REDACTED] [REDACTED]	1,250.00	0.20	250.00
09/23/19	Weinstein, M	Review [REDACTED] [REDACTED]	1,100.00	0.20	220.00
09/24/19	Kilgard, J	Conducting research [REDACTED] [REDACTED] and drafting memo regarding [REDACTED]	650.00	2.10	1,365.00
09/24/19	Taylor, P	Attention to email [REDACTED] [REDACTED] regarding (0.1). Research regarding [REDACTED] (0.4). Attention to email [REDACTED] regarding [REDACTED] (0.1).	950.00	0.60	570.00
09/24/19	Weiner, D	Communications regarding [REDACTED] (.90); communications regarding [REDACTED] (.20).	1,250.00	1.10	1,375.00
09/25/19	Kilgard, J	Conducting research [REDACTED] [REDACTED]	650.00	0.50	325.00
09/25/19	Weiner, D	Communications [REDACTED] [REDACTED] (.80); communications with regarding [REDACTED] [REDACTED] (.20).	1,250.00	1.00	1,250.00
09/25/19	Weinstein, M	Call with D. Weiner re [REDACTED] [REDACTED] (0.1); review research and cases [REDACTED] [REDACTED] (1.5).	1,100.00	1.60	1,760.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/26/19	Kilgard, J	Revising [REDACTED] regarding [REDACTED] to comments from D. Weiner.	650.00	3.50	2,275.00
09/26/19	Weiner, D	Interview [REDACTED]	1,250.00	1.80	2,250.00
09/27/19	Kilgard, J	Revising memorandum concerning [REDACTED] regarding [REDACTED] (1.5); meeting with M. Weinstein regarding [REDACTED] (0.4).	650.00	1.90	1,235.00
09/27/19	Tabatabai, F	Reviewed [REDACTED] research regarding [REDACTED] (5.1); reviewed and revised [REDACTED] (0.4).	925.00	5.50	5,087.50
09/27/19	Taylor, P	Office meeting with M. Weinstein regarding [REDACTED] (1.0). Attention to e-mails regarding [REDACTED] (0.1).	950.00	1.10	1,045.00
09/27/19	Weiner, D	Teleconferences [REDACTED] regarding [REDACTED] communications regarding [REDACTED]	1,250.00	3.10	3,875.00
09/27/19	Weinstein, M	Meet with J. Kilgard re [REDACTED]	1,100.00	0.40	440.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/28/19	Weiner, D	Revise and transmit memorandum regarding [REDACTED]	1,250.00	0.40	500.00
09/29/19	Kilgard, J	Conducting analysis [REDACTED]	650.00	2.70	1,755.00
09/29/19	Tabatabai, F	Reviewed research regarding [REDACTED] [REDACTED] drafted response regarding [REDACTED]	925.00	1.10	1,017.50
09/29/19	Weiner, D	Respond to [REDACTED] re [REDACTED]	1,250.00	0.20	250.00
09/30/19	Taylor, P	Attention to emails [REDACTED] regarding [REDACTED]	950.00	0.10	95.00
09/30/19	Weinstein, M	Review [REDACTED]	1,100.00	0.70	770.00
Total				<u>162.80</u>	<u>\$ 145,188.00</u>
INVOICE TOTAL					<u>\$ 149,279.61</u>

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Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087673

November 27, 2019
[REDACTED]

REMITTANCE PAGE

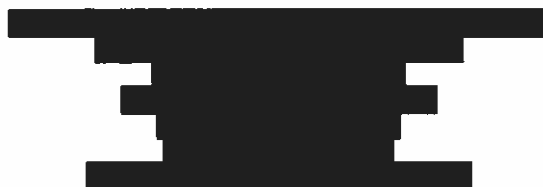
September 2019

Re: Estate and Trust Administration

For professional services rendered for the above referenced matter:

Fees	\$	145,188.00
<u>Other Charges</u>		
Filing Fees	\$	34.00
Express Delivery	\$	118.99
Westlaw	\$	3,712.54
Lexis	\$	215.58
Research Service	\$	10.50
Total Other Charges	\$	<u>4,091.61</u>
<hr/>		
INVOICE TOTAL	\$	<u>149,279.61</u>

**BILLS ARE DUE AND PAYABLE UPON RECEIPT
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Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087674

November 27, 2019
[REDACTED]

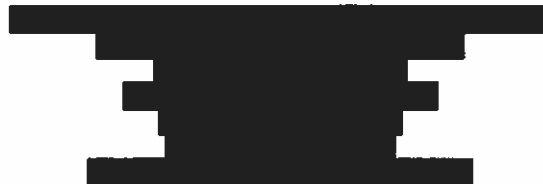
October 2019

Re: Estate and Trust Administration

For professional services rendered for the above referenced matter:

Fees	\$	100,262.50
<u>Other Charges</u>		
Paris Filing Fees	\$	54.32
Westlaw	\$	89.17
Total Other Charges	\$	<u>143.49</u>
INVOICE TOTAL	\$	<u>100,405.99</u>

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ATTORNEY SUMMARY

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Weiner, D	Partner	1,250.00	31.40	39,250.00
Tabatabai, F	Partner	925.00	1.30	1,202.50
Weinstein, M	Partner	1,100.00	12.60	13,860.00
Taylor, P	Partner	950.00	32.10	30,495.00
Kilgard, J	Associate	650.00	23.20	15,080.00
Woods, V	Associate	750.00	0.50	375.00
	Total		101.10	\$ 100,262.50

TIME DETAIL

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/01/19	Taylor, P	Office meeting with [REDACTED] [REDACTED] Attention to e-mail [REDACTED] [REDACTED] regarding [REDACTED] (0.3). Review [REDACTED] and attention to e-mails [REDACTED] [REDACTED] (1.0).	950.00	1.30	1,235.00
10/02/19	Kilgard, J	Revising memorandum [REDACTED] [REDACTED] [REDACTED]	650.00	0.80	520.00
10/02/19	Kilgard, J	Conducting research [REDACTED] [REDACTED] [REDACTED]	650.00	0.40	260.00
10/02/19	Tabatabai, F	Reviewed [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] emails with D. Weiner and J. Kilgard regarding [REDACTED]	925.00	0.40	370.00
10/02/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED] [REDACTED]	1,100.00	0.30	330.00
10/03/19	Kilgard, J	Participating in call with [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] [REDACTED]	650.00	1.00	650.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/03/19	Tabatabai, F	Call with [REDACTED] regarding [REDACTED] (0.5); discussed call with J. Kilgard (0.1); reviewed and revised summary of call [REDACTED] (0.3).	925.00	0.90	832.50
10/03/19	Taylor, P	Prepare for call regarding [REDACTED] (0.2). Teleconference regarding [REDACTED] (1.0). Legal research regarding [REDACTED] (0.3). Attention to e-mail [REDACTED] regarding [REDACTED] (0.1). Teleconference with [REDACTED] regarding [REDACTED] (1.1).	950.00	2.70	2,565.00
10/03/19	Weiner, D	Revise [REDACTED] re [REDACTED]	1,250.00	2.10	2,625.00
10/03/19	Weinstein, M	Review [REDACTED] call with D. Weiner re [REDACTED]	1,100.00	0.20	220.00
10/03/19	Woods, V	Research re [REDACTED]	750.00	0.50	375.00
10/04/19	Weiner, D	Meeting [REDACTED] (1.5); communications [REDACTED] re [REDACTED] (.60).	1,250.00	2.10	2,625.00
10/06/19	Taylor, P	Attention to emails [REDACTED] regarding [REDACTED]	950.00	0.10	95.00
10/07/19	Taylor, P	Attention to e-mail [REDACTED] regarding [REDACTED] (0.1). Teleconference with [REDACTED] regarding [REDACTED] (0.5). Review and revisions [REDACTED] (0.3).	950.00	0.90	855.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/07/19	Weiner, D	Review [REDACTED] [REDACTED] (.10 hours); communications [REDACTED] re [REDACTED] (.10 hours).	1,250.00	0.20	250.00
10/08/19	Taylor, P	Teleconferences with [REDACTED] [REDACTED] regarding [REDACTED] (0.2). Review [REDACTED] (1.0). Teleconference [REDACTED] [REDACTED] regarding [REDACTED] (1.0). Attention to e-mails [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] (0.1).	950.00	2.30	2,185.00
10/08/19	Weiner, D	Telephone conference with [REDACTED] [REDACTED] re [REDACTED] [REDACTED] communications with [REDACTED] re [REDACTED]	1,250.00	0.90	1,125.00
10/10/19	Taylor, P	Attention to e-mail [REDACTED] [REDACTED] regarding [REDACTED] (0.1). Review [REDACTED] [REDACTED] 0.3).	950.00	0.40	380.00
10/10/19	Weiner, D	Communications [REDACTED] re [REDACTED] [REDACTED]	1,250.00	0.30	375.00
10/10/19	Weinstein, M	Review summary re [REDACTED] [REDACTED] and emails with [REDACTED] [REDACTED] D. Weiner re [REDACTED] [REDACTED]	1,100.00	0.20	220.00
10/11/19	Taylor, P	Review [REDACTED] [REDACTED] (1.90). Teleconference with [REDACTED] [REDACTED] regarding [REDACTED] s (1.8).	950.00	3.70	3,515.00
10/11/19	Weiner, D	Communications with [REDACTED] [REDACTED] re [REDACTED] [REDACTED]	1,250.00	0.80	1,000.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/11/19	Weinstein, M	Review [REDACTED] [REDACTED]	1,100.00	0.10	110.00
10/13/19	Taylor, P	Attention to email from [REDACTED] [REDACTED] i regarding [REDACTED]	950.00	0.20	190.00
10/13/19	Taylor, P	Review of memorandum regarding [REDACTED] [REDACTED]. Attention to email to [REDACTED] [REDACTED] regarding [REDACTED]	950.00	0.80	760.00
10/13/19	Weiner, D	Communications re [REDACTED] [REDACTED]	1,250.00	0.40	500.00
10/14/19	Taylor, P	Teleconference with [REDACTED] [REDACTED] regarding [REDACTED] (1.2). Teleconference with [REDACTED] regarding [REDACTED] [REDACTED] (0.9). Teleconference with [REDACTED] regarding [REDACTED] [REDACTED] Attention to e-mail [REDACTED] [REDACTED] regarding [REDACTED] (0.2). Review [REDACTED] [REDACTED] (0.4).	950.00	2.70	2,565.00
10/14/19	Weiner, D	Revise [REDACTED] [REDACTED]	1,250.00	0.30	375.00
10/15/19	Taylor, P	Teleconference with [REDACTED] regarding [REDACTED] [REDACTED] [REDACTED] attention to e-mail [REDACTED] [REDACTED] [REDACTED] regarding [REDACTED] (0.7)	950.00	0.70	665.00
10/15/19	Weiner, D	Revise [REDACTED] [REDACTED]	1,250.00	0.50	625.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/16/19	Kilgard, J	Conducting [REDACTED] and drafting memorandum [REDACTED]	650.00	4.50	2,925.00
10/16/19	Weiner, D	Meeting with [REDACTED] re [REDACTED] (3.3 hours); review [REDACTED] (.30 hours).	1,250.00	3.60	4,500.00
10/16/19	Weinstein, M	Call with [REDACTED] re [REDACTED] (.2); call with [REDACTED] re [REDACTED] (.1)	1,100.00	0.30	330.00
10/17/19	Kilgard, J	Conducting research [REDACTED]	650.00	1.00	650.00
10/17/19	Taylor, P	Attention to e-mail from [REDACTED] Attention to e-mail from [REDACTED]	950.00	0.10	95.00
10/17/19	Weinstein, M	Call with [REDACTED] re [REDACTED] (.5); call with [REDACTED] re [REDACTED] (.1); call with [REDACTED] re [REDACTED] (.2); meet with D. Weiner re [REDACTED] (.4); review [REDACTED] (.3)	1,100.00	1.50	1,650.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/18/19	Taylor, P	Teleconference with [REDACTED] [REDACTED] [REDACTED] regarding [REDACTED] (2.2). [REDACTED] (0.1). Review [REDACTED] (0.4). Review [REDACTED] (0.1). Attention to e-mail regarding [REDACTED] [REDACTED] (0.2).	950.00	3.00	2,850.00
10/18/19	Weiner, D	Update telcon re [REDACTED] [REDACTED]	1,250.00	0.40	500.00
10/18/19	Weiner, D	Communications with [REDACTED] [REDACTED] re [REDACTED] [REDACTED]	1,250.00	0.20	250.00
10/18/19	Weinstein, M	Call with [REDACTED] [REDACTED] re [REDACTED] [REDACTED] [REDACTED] (1.1); call with [REDACTED] re [REDACTED] [REDACTED] (.3)	1,100.00	1.40	1,540.00
10/19/19	Weinstein, M	Review [REDACTED] [REDACTED] (.1); call with [REDACTED] [REDACTED] re [REDACTED] [REDACTED] (.5)	1,100.00	0.60	660.00
10/20/19	Kilgard, J	Conducting research [REDACTED] [REDACTED] [REDACTED]	650.00	3.30	2,145.00
10/20/19	Weiner, D	Communication [REDACTED] re [REDACTED] [REDACTED] [REDACTED]	1,250.00	0.30	375.00
10/20/19	Weinstein, M	Emails with [REDACTED] [REDACTED] re [REDACTED] [REDACTED]	1,100.00	0.10	110.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/21/19	Kilgard, J	Meeting with D. Weiner to discuss [REDACTED]	650.00	0.50	325.00
10/21/19	Weiner, D	Telcon with [REDACTED] re [REDACTED] consultation with [REDACTED] re [REDACTED]	1,250.00	0.60	750.00
10/21/19	Weinstein, M	Call with [REDACTED] re [REDACTED] (2); call with [REDACTED] re [REDACTED] (1)	1,100.00	0.30	330.00
10/22/19	Taylor, P	Attention to e-mails to [REDACTED] regarding [REDACTED] (0.1). Review [REDACTED] (5.1).	950.00	5.20	4,940.00
10/22/19	Weiner, D	Communications [REDACTED] re [REDACTED]	1,250.00	0.50	625.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/23/19	Weinstein, M	Call with [REDACTED] [REDACTED] re [REDACTED] [REDACTED] (.4), and consideration of and drafting [REDACTED] [REDACTED] (.2); call re [REDACTED] [REDACTED] (.3); call with re [REDACTED] (.2); call with [REDACTED] s (1.1); call with [REDACTED] re [REDACTED] [REDACTED] (.5)	1,100.00	2.70	2,970.00
10/24/19	Kilgard, J	Reviewing [REDACTED] [REDACTED]	650.00	0.80	520.00
10/24/19	Taylor, P	Teleconference with [REDACTED] regarding [REDACTED] [REDACTED] (1.6). Review [REDACTED] (0.8). Teleconference [REDACTED] [REDACTED] (0.2). Review of memorandum [REDACTED] regarding [REDACTED] [REDACTED] (0.6).	950.00	3.20	3,040.00
10/24/19	Weinstein, M	Calls with [REDACTED] re [REDACTED] [REDACTED] (.2); analysis [REDACTED] [REDACTED] (.2)	1,100.00	0.40	440.00
10/25/19	Kilgard, J	Drafting memorandum and revising [REDACTED] [REDACTED] and [REDACTED] [REDACTED]	650.00	4.20	2,730.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/25/19	Taylor, P	Teleconference with [REDACTED] [REDACTED] regarding [REDACTED] (1.50). Teleconference with [REDACTED] regarding [REDACTED] (0.3). Attention to e-mails regarding [REDACTED] (0.1). Teleconference with D. Weiner and M. Weinstein regarding [REDACTED] (0.3).	950.00	2.20	2,090.00
10/25/19	Weiner, D	Communications [REDACTED] regarding [REDACTED] [REDACTED] revise draft memorandum [REDACTED] revise [REDACTED]	1,250.00	4.20	5,250.00
10/25/19	Weinstein, M	Call with [REDACTED] re [REDACTED] (4); call with D. Weiner re [REDACTED] (3)	1,100.00	0.70	770.00
10/26/19	Taylor, P	Review [REDACTED] Attention to email to D. Weiner and M. Weinstein.	950.00	0.30	285.00
10/27/19	Weiner, D	Revise [REDACTED] (2.9 hours); communications with [REDACTED] e [REDACTED] (.70 hours); revise [REDACTED] (.30 hours).	1,250.00	3.90	4,875.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/28/19	Kilgard, J	Reviewing materials related to [REDACTED]	650.00	0.40	260.00
10/28/19	Taylor, P	Attention to emails [REDACTED] (0.1). Teleconference with [REDACTED] regarding [REDACTED] (0.1).	950.00	0.20	190.00
10/28/19	Taylor, P	Review [REDACTED]. Attention to email from D. Weiner regarding [REDACTED] (0.3).	950.00	0.30	285.00
10/28/19	Weiner, D	Telephone conferences with [REDACTED] re claims [REDACTED] (1.6 hours); revise [REDACTED] re [REDACTED] (1.8 hours); communications re [REDACTED] (.30 hours).	1,250.00	3.70	4,625.00
10/28/19	Weinstein, M	Call with J. Kilgard re [REDACTED] (.1); review revised [REDACTED] and emails with [REDACTED] re [REDACTED] (.1)	1,100.00	0.20	220.00
10/29/19	Kilgard, J	Reviewing [REDACTED] and [REDACTED]	650.00	5.90	3,835.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/29/19	Taylor, P	Attention to e-mail [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED]	950.00	0.10	95.00
10/29/19	Weiner, D	Telephone conference with [REDACTED] [REDACTED] re [REDACTED] [REDACTED] (.90 hours); revise [REDACTED] [REDACTED] (1.1 hours).	1,250.00	2.00	2,500.00
10/29/19	Weinstein, M	Call with [REDACTED] [REDACTED] re [REDACTED] [REDACTED]	1,100.00	0.20	220.00
10/30/19	Kilgard, J	Revising [REDACTED] [REDACTED] [REDACTED] [REDACTED]	650.00	0.40	260.00
10/30/19	Taylor, P	Attention to emails regarding [REDACTED] Review and comment [REDACTED] [REDACTED] Teleconference with [REDACTED] [REDACTED] regarding [REDACTED] Teleconference with [REDACTED] regarding [REDACTED] Attention to emails [REDACTED] [REDACTED]	950.00	1.70	1,615.00
10/30/19	Weiner, D	Revise [REDACTED] [REDACTED] (.20 hours); communications [REDACTED] e [REDACTED] [REDACTED] [REDACTED] (1.3 hours); revise [REDACTED] (1.3	1,250.00	2.80	3,500.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/30/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED] (.5); calls with [REDACTED] [REDACTED] [REDACTED] (2.2); [REDACTED] (4)	1,100.00	3.10	3,410.00
10/31/19	Weiner, D	Communications [REDACTED] re [REDACTED] (1.2 hours); and communications [REDACTED] [REDACTED] re [REDACTED] (.40 hours).	1,250.00	1.60	2,000.00
10/31/19	Weinstein, M	Call with [REDACTED] re [REDACTED] [REDACTED]	1,100.00	0.20	220.00
10/31/19	Weinstein, M	Review and revise [REDACTED] [REDACTED]	1,100.00	0.10	110.00
Total				<u>101.10</u>	<u>\$ 100,262.50</u>
INVOICE TOTAL					<u>\$ 100,405.99</u>

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Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087674

November 27, 2019
[REDACTED]

REMITTANCE PAGE

October 2019

Re: Estate and Trust Administration

For professional services rendered for the above referenced matter:

Fees	\$	100,262.50
<u>Other Charges</u>		
Paris Filing Fees	\$	54.32
Westlaw	\$	89.17
Total Other Charges	\$	<u>143.49</u>
INVOICE TOTAL	\$	<u>100,405.99</u>

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Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087679

November 27, 2019
[REDACTED]

September 2019

Re: Estate and Trust re Paris Issues

For professional services rendered for the above referenced matter:

Fees	\$	20,630.00
INVOICE TOTAL	\$	<u>20,630.00</u>

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[REDACTED]

ATTORNEY SUMMARY

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Huneke, M	Partner	950.00	1.70	1,615.00
Nicolas, M	Counsel	530.00	9.80	5,194.00
Belloin, C	Senior Counsel	900.00	0.90	810.00
Balandine, L	Associate	785.00	13.00	10,205.00
Tiron, D	Law Clerk	230.00	10.50	2,415.00
Ramirez Reyes, S	Law Clerk	230.00	1.70	391.00
	Total		37.60	\$ 20,630.00

TIME DETAIL

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/20/19	Balandine, L	Review [REDACTED] and prepare [REDACTED] [REDACTED] same.	785.00	2.00	1,570.00
09/24/19	Balandine, L	Review [REDACTED] and prepare [REDACTED] [REDACTED]	785.00	0.40	314.00
09/24/19	Nicolas, M	Review [REDACTED] [REDACTED] and prepare analysis [REDACTED] [REDACTED]	530.00	2.80	1,484.00
09/25/19	Balandine, L	Conduct legal researches regarding [REDACTED] [REDACTED] further review regarding [REDACTED]	785.00	2.80	2,198.00
09/25/19	Tiron, D	Conduct [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	230.00	7.50	1,725.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/26/19	Balandine, L	Attention to [REDACTED] regarding [REDACTED] attention with [REDACTED]	785.00	3.00	2,355.00
09/26/19	Belloin, C	Attention to preliminary research and analysis regarding [REDACTED]	900.00	0.50	450.00
09/26/19	Nicolas, M	With L. Balandine [REDACTED] and [REDACTED] advice [REDACTED]	530.00	2.00	1,060.00
09/26/19	Tiron, D	Conduct legal research [REDACTED]	230.00	3.00	690.00
09/27/19	Balandine, L	Review and synthesizes [REDACTED] (0.5); analyze [REDACTED] (including internal meetings) (0.5); analyze [REDACTED] including legal research and internal meetings) (3.8).	785.00	4.80	3,768.00
09/27/19	Belloin, C	Review team's research and [REDACTED] regarding [REDACTED]	900.00	0.40	360.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
09/27/19	Huneke, M	Attention to review of [REDACTED] [REDACTED] provide same [REDACTED] (0.6); Attention to correspondence [REDACTED] and D. Weiner, regarding [REDACTED] [REDACTED] (0.3); Attention to [REDACTED] [REDACTED] [REDACTED] regarding [REDACTED] (0.2).	950.00	1.10	1,045.00
09/27/19	Nicolas, M	Analyze [REDACTED] [REDACTED] (including legal research and internal meetings) (3.8); analyze [REDACTED] [REDACTED] (including internal meetings) (0.5); review and synthesis [REDACTED] [REDACTED] (0.5).	530.00	4.80	2,544.00
09/27/19	Ramirez Reyes, S	Research on [REDACTED] [REDACTED] [REDACTED]	230.00	1.70	391.00
09/28/19	Nicolas, M	Attention to [REDACTED] [REDACTED] [REDACTED]	530.00	0.20	106.00
09/30/19	Huneke, M	Attention to [REDACTED] [REDACTED] [REDACTED]	950.00	0.60	570.00
Total				<u>37.60</u>	<u>\$ 20,630.00</u>
INVOICE TOTAL					<u>\$ 20,630.00</u>

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& Reed**

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hugheshubbard.com

Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087679

November 27, 2019
[REDACTED]

REMITTANCE PAGE

September 2019

Re: Estate and Trust re Paris Issues

For professional services rendered for the above referenced matter:

Fees	\$	20,630.00
INVOICE TOTAL	\$	<u>20,630.00</u>

**BILLS ARE DUE AND PAYABLE UPON RECEIPT
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING
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Hubbard
& Reed**

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Fax: +1 (212) 422-4726
hugheshubbard.com

Darren Indyke, Esq.
[REDACTED]

Invoice No. 2087076

December 13, 2019
[REDACTED]

October 2019

Re: Estate and Trust re Paris Issues

For professional services rendered for the above referenced matter:

Fees	\$	51,553.00
INVOICE TOTAL	\$	<u>51,553.00</u>

**BILLS ARE DUE AND PAYABLE UPON RECEIPT
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING**

[REDACTED]

ATTORNEY SUMMARY

<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Huneke, M	Partner	950.00	11.70	11,115.00
Nicolas, M	Counsel	530.00	1.40	742.00
Belloin, C	Senior Counsel	900.00	7.00	6,300.00
Voisin, N	Senior Counsel	900.00	14.30	12,870.00
Benisty, I	Associate	715.00	0.50	357.50
Balandine, L	Associate	785.00	16.30	12,795.50
Robertson, S	Paralegal	295.00	0.20	59.00
Tiron, D	Law Clerk	230.00	30.30	6,969.00
Ramirez Reyes, S	Law Clerk	230.00	1.50	345.00
	Total		83.20	\$ 51,553.00

TIME DETAIL

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/04/19	Balandine, L	Review and summarize [REDACTED]	785.00	0.50	392.50
10/09/19	Balandine, L	Review and analysis [REDACTED] regarding [REDACTED]	785.00	1.50	1,177.50
10/09/19	Huneke, M	Attention to [REDACTED]	950.00	0.10	95.00
10/09/19	Nicolas, M	Attention to review and synthesis of [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/19	Balandine, L	Review and analysis of [REDACTED]	785.00	0.10	78.50
10/11/19	Huneke, M	Attention to preparing [REDACTED]	950.00	0.20	190.00
10/16/19	Balandine, L	Assist C. Belloin regarding [REDACTED]	785.00	0.70	549.50
10/16/19	Belloin, C	Follow-up on [REDACTED]	900.00	0.10	90.00
10/16/19	Huneke, M	Follow-up regarding [REDACTED]	950.00	0.20	190.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/17/19	Balandine, L	Attention to ██████ requested by M. Huneke ██████	785.00	0.30	235.50
10/17/19	Belloin, C	Attention to ██████	900.00	0.20	180.00
10/17/19	Nicolas, M	Attention to ██████ regarding ██████	530.00	0.50	265.00
10/17/19	Voisin, N	Attention to ██████ in coordination with M. Huneke; confer with C. Bellion regarding ██████	900.00	0.40	360.00
10/21/19	Balandine, L	Attention to ██████ regarding ██████ with ██████ assist N. Voisin with ██████ provided by M. Huneke.	785.00	0.50	392.50
10/21/19	Huneke, M	Attention to ██████ regarding ██████	█████	█████	█████
█████ 21/19	Voisin, N	Attention to ██████ per M. Huneke communication.	900.00	0.30	270.00
10/22/19	Balandine, L	Review and analysis of ██████ regarding ██████ (2.3); attention to ██████ correspondence with M. Huneke (0.3); meet with C. Belloin, N. Voisin, and D. Tiron regarding ██████	785.00	3.00	2,355.00
10/22/19	Belloin, C	Attention to ██████ regarding ██████	900.00	0.80	720.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/22/19	Huneke, M	Attention to [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	950.00	1.40	1,330.00
10/22/19	Ramirez Reyes, S	Research on [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	230.00	1.50	345.00
10/22/19	Voisin, N	Meeting with L. Balandine, C. Belloin and D. Tiron [REDACTED] [REDACTED]	900.00	0.80	720.00
10/23/19	Balandine, L	Finish and provide to M. Huneke draft memorandum [REDACTED] (0.4); follow-up with [REDACTED] regarding [REDACTED] (0.3); [REDACTED] (0.2); attention to [REDACTED] (0.2).	785.00	1.10	863.50
10/23/19	Belloin, C	Review [REDACTED] [REDACTED]	900.00	0.30	270.00
10/23/19	Huneke, M	Attention to [REDACTED] regarding [REDACTED] [REDACTED] attention to [REDACTED] preparing [REDACTED] [REDACTED]	950.00	0.50	475.00
10/23/19	Robertson, S	Review of [REDACTED] [REDACTED] for L. Balandine.	295.00	0.20	59.00
10/23/19	Tiron, D	Meet with C. Belloin and N. Voisin regarding [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/23/19	Voisin, N	Review and provide [REDACTED] [REDACTED] Attention to D. Tiron regarding [REDACTED] [REDACTED] (0.4); [REDACTED] (0.1).	900.00	0.50	450.00
10/24/19	Balandine, L	Review M. Huneke [REDACTED] [REDACTED] and [REDACTED] regarding [REDACTED]	785.00	0.40	314.00
10/24/19	Belloin, C	Email [REDACTED] regarding [REDACTED] [REDACTED] (0.1); [REDACTED] (0.1).	900.00	0.20	180.00
10/24/19	Huneke, M	Conference call with [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] [REDACTED] (0.4); [REDACTED] regarding [REDACTED] [REDACTED] (0.9).	950.00	1.30	1,235.00
10/24/19	Tiron, D	[REDACTED] [REDACTED] [REDACTED] research [REDACTED] [REDACTED] [REDACTED]	230.00	7.50	1,725.00
10/24/19	Voisin, N	Review and analyze [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] [REDACTED] follow-up [REDACTED] [REDACTED] regarding [REDACTED]	900.00	0.50	450.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/25/19	Balandine, L	<p>Draft email to M. Huneke re: [REDACTED] (0.5). Liaise with C. Belloin and N. Voisin regarding [REDACTED] (0.3). meet with M. Huneke, N. Voisin, C. Belloin and D. Tiron [REDACTED] (0.7); confer with D. Tiron further regarding [REDACTED] (0.3); research [REDACTED] (1.00). [REDACTED] M. Huneke (0.4).</p>	785.00	3.20	2,512.00
10/25/19	Belloin, C	<p>Conference call with [REDACTED] (0.7); conference call [REDACTED] (0.8); conference call [REDACTED] (1.3); review draft email [REDACTED] (0.8); attention to [REDACTED] (0.8);</p>	900.00	5.40	4,860.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/25/19	Huneke, M	Meet with Paris colleagues [REDACTED] [REDACTED] [REDACTED] (0.4); review Paris colleagues' [REDACTED] [REDACTED] [REDACTED] (0.7); review Paris colleagues' [REDACTED] [REDACTED] [REDACTED] (0.7); review colleagues' [REDACTED] [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED] [REDACTED] same (2.6); attention to [REDACTED] [REDACTED] [REDACTED] same (0.2).	950.00	4.60	4,370.00
10/25/19	Tiron, D	Conference call [REDACTED] [REDACTED] same (1.0); regarding [REDACTED] (1.0) [REDACTED] (1.3); meet with M. Huneke, et al. regarding [REDACTED] [REDACTED] (0.5); (3.0); meet with C. Belloin and N. Voisin regarding [REDACTED] [REDACTED] [REDACTED] [REDACTED] (4.5).	230.00	11.30	2,599.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/25/19	Voisin, N	Meet with M. Huneke, et al. regarding [REDACTED] (0.5); call with [REDACTED] (0.3); call with [REDACTED] (0.7); regarding [REDACTED] (1.3); [REDACTED] (1.3); [REDACTED] (0.3).	900.00	4.60	4,140.00
10/28/19	Balandine, L	Attention to M. Huneke 's update [REDACTED] (0.2); Liaise with C. Belloin and N. Voisin regarding same (0.2); confer with N. Voisin regarding [REDACTED] (0.3).	785.00	0.70	549.50
10/28/19	Huneke, M	Call with [REDACTED] (0.2); regarding [REDACTED] (0.2); Confer with N. Voisin and C. Belloin regarding [REDACTED] (0.2).	950.00	0.60	570.00
10/28/19	Voisin, N	Attention to emails [REDACTED] (0.4); draft email [REDACTED] (0.4); attention to [REDACTED] (0.3).	900.00	1.10	990.00
10/29/19	Balandine, L	Conference call with [REDACTED] (0.5); meet with N. Voisin regarding same (0.3); [REDACTED] (1.1); [REDACTED] (0.1).	785.00	2.00	1,570.00

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/29/19	Huneke, M	Attention to updates from Paris team [REDACTED] regarding [REDACTED]	950.00	0.10	95.00
10/29/19	Voisin, N	Attention to [REDACTED] (0.5); call with [REDACTED] (0.5); call regarding [REDACTED] (0.3).	900.00	1.30	1,170.00
10/30/19	Balandine, L	Attention to [REDACTED] (1.5); call with [REDACTED] (0.5); attention to [REDACTED] between N. Voisin [REDACTED] (0.3).	785.00	1.90	1,491.50
10/30/19	Benisty, I	Attention to [REDACTED] and discussion with N. Voisin.	715.00	0.50	357.50
10/30/19	Huneke, M	Receive input from colleagues regarding [REDACTED] drafted by D. Tiron (0.6); [REDACTED] (0.2).	950.00	0.80	760.00
10/30/19	Tiron, D	Review of [REDACTED]	230.00	6.00	1,380.00
10/30/19	Voisin, N	Call with [REDACTED] (0.5); email regarding [REDACTED] (0.4); [REDACTED] (0.4); review [REDACTED] (0.4).	900.00	1.70	1,530.00
10/31/19	Balandine, L	Attention to emails from Mike Huneke and Nadine Voisin. Email to Nadine Voisin.	785.00	0.40	314.00


<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/31/19	Huneke, M	Weekly France status call with [REDACTED] (N. Voisin participated) (0.9); call with [REDACTED] regarding [REDACTED] (0.2); follow-up, including with N. Voisin, [REDACTED] (0.4); begin review [REDACTED] (0.1).	950.00	1.60	1,520.00
10/31/19	Voisin, N	Call with M. Huneke [REDACTED] regarding [REDACTED] (0.8); call to [REDACTED] (0.7); [REDACTED] (0.7); [REDACTED] (0.5); regarding [REDACTED] (0.4).	900.00	3.10	2,790.00
Total				<u>83.20</u>	<u>\$ 51,553.00</u>
INVOICE TOTAL					<u>\$ 51,553.00</u>

**Hughes
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& Reed**

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Fax: +1 (212) 422-4726
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Darren Indyke, Esq.


Invoice No. 2087076

December 13, 2019


REMITTANCE PAGE

October 2019

Re: Estate and Trust re Paris Issues

For professional services rendered for the above referenced matter:

Fees	\$	51,553.00
INVOICE TOTAL	\$	<u>51,553.00</u>

**BILLS ARE DUE AND PAYABLE UPON RECEIPT
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**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

IN THE MATTER OF THE ESTATE OF)	
JEFFREY E. EPSTEIN)	PROBATE NO. ST-19-PB-80
)	
)	
Deceased.)	ACTION FOR TESTATE
<hr style="width: 100%;"/>)	ADMINISTRATION

AFFIDAVIT OF DARREN K. INDYKE

I, Darren K. Indyke, being of lawful age and otherwise competent to make this Affidavit, and after having been duly sworn, depose and state:

1. By Letters Testamentary dated September 6, 2019, I am the duly appointed Co-Executor of the Estate of Jeffrey E. Epstein. Additionally, I am authorized to administer the Estate of Jeffrey E. Epstein (the "Estate"), along with Co-Executor Richard D. Kahn ("Kahn").
2. After the Decedent's death, I, as Co-executor, retained the law firm Hughes Hubbard & Reed LLP to represent the Estate regarding (a) potential federal and state civil forfeiture actions in New York, Florida and elsewhere, (b) other New York and Florida Estate matters, (c) Estate representation in Paris, France, and (d) establishment of a proposed voluntary claims resolution program (the "Epstein Victims' Compensation Program") for the purpose of resolving multiple sexual abuse claims against the Decedent Jeffrey E. Epstein.
3. I have reviewed HHR's invoices covering the period August 22, 2019 to October 31, 2019, for legal professional services including: legal analysis and strategy, extensive legal research, providing sound legal advice, and legal representation of the Estate concerning potential federal and state civil forfeiture actions, potential litigation in Paris, France, other New York and Florida Estate matters, and the Epstein Victims' Compensation Program.



4. I find HHR's invoices to be reasonable given HHR's extensive experience and strong reputation in the legal community, both nationally and internationally, and the complexity of the potential federal and state civil forfeiture actions, potential litigation in Paris, France, and New York and Florida Estate matters. Furthermore, the legal expenses were incurred in the necessary defense and protection of the Estate.
5. The rates charges are, as I understand it, charged at HHR's standard rates and are well within the range of rates that are customary for similar legal services performed in New York, New York and Paris, France.
6. That this Affidavit is submitted in support of the Motion for Approval of Hughes Hubbard & Reed LLP's Interim Pay Application No. 1 and Incorporated Memorandum of Law.

I declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that the foregoing is true and correct.

Dated: February 3, 2020

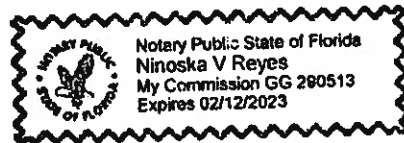

Darren K. Indyke

SUBSCRIBED AND SWORN to before me

this 3rd day of February 2020.



NOTARY



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

IN THE MATTER OF THE ESTATE OF)	
JEFFREY E. EPSTEIN)	PROBATE NO. ST-19-PB-80
)	
)	
Deceased.)	ACTION FOR TESTATE
<hr style="width:40%; margin-left:0;"/>)	ADMINISTRATION

AFFIDAVIT OF RICHARD D. KAHN

I, Richard D. Kahn, being of lawful age and otherwise competent to make this Affidavit, and after having been duly sworn, depose and state:

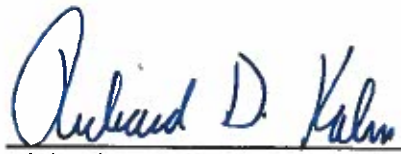
1. By Letters Testamentary dated September 6, 2019, I am the duly appointed Co-Executor of the Estate of Jeffrey E. Epstein. I am authorized to administer the Estate of Jeffrey E. Epstein (the "Estate"), along with Co-Executor Darren K. Indyke ("Indyke").
2. After the Decedent's death, Indyke, as Co-Executor, retained the law firm Hughes Hubbard & Reed LLP to represent the Estate concerning (a) potential federal and state civil forfeiture actions in New York, Florida and elsewhere, (b) other New York and Florida Estate matters, (c) Estate representation in Paris, France, and (d) establishment of a proposed voluntary claims resolution program (the "Epstein Victims' Compensation Program") for the purpose of resolving multiple sexual abuse claims against the Decedent Jeffrey E. Epstein.
3. I have reviewed HHR's invoices covering the period August 22, 2019 to October 31, 2019, for legal professional services including: legal analysis and strategy, extensive legal research, sound legal advice, and legal representation of the Estate concerning potential federal and state civil forfeiture actions, potential litigation in Paris, France, other New York and Florida Estate matters, and the Epstein Victims' Compensation Program.



4. I find HHR's invoices to be reasonable given HHR's extensive experience and strong reputation in the legal community, both nationally and internationally, and the complexity of the potential federal and state civil forfeiture actions, potential litigation in Paris, France, and New York and Florida Estate matters. Furthermore, the legal expenses were incurred in the necessary defense and protection of the Estate.
5. The rates charges are, as I understand it, charged at HHR's standard rates and are well within the range of rates that are customary for similar legal services performed in New York, New York, Miami, Florida, and Paris, France.
6. That this Affidavit is submitted in support of the Motion for Approval of Hughes Hubbard & Reed LLP's Interim Pay Application No. 1 and Incorporated Memorandum of Law.

I declare, certify, verify, and state under penalty of perjury under the laws of the United States Virgin Islands that the foregoing is true and correct.

Dated: 2/3/2020


Richard D. Kahn

SUBSCRIBED AND SWORN to before me
this 03rd day of FEBRUARY, 2020.


NOTARY

NURALLAH NAZERALI
Notary Public, State of New York
No 01NA6227598
Qualified in New York County
Term Expires: September 7, 2022

Hughes Hubbard & Reed

Daniel H. Weiner

Partner

New York City

+1 (212) 837-6874

daniel.weiner@hugheshubbard.com

LinkedIn



Daniel H. Weiner is head of Hughes Hubbard & Reed's Complex Business Disputes practice, and a partner in the International & Domestic Arbitration and Intellectual Property Disputes groups. Dan is a seasoned trial lawyer who has first-chair experience in more than 30 litigations and arbitrations. He has been recognized as a leading international arbitration lawyer by Chambers USA and Chambers Global, and ranked in The Legal 500 United States as one of the top product liability and mass tort defense lawyers for pharmaceuticals and medical devices.

Professional Activities

- Firm governance: Head, Complex Business Disputes practice; Member, Executive Committee
- Member of the Art Law Committee of the Association of the Bar of the City of New York, 1995 – 1998; 2003 – 2006; 2009 – 2011; 2015 – 2017
- Member of The Maritime Law Association, 2012 – present
- Member of the Committee on International Commercial Disputes of the Association of the Bar of the City of New York, 2011 – 2013
- Fellow, David Rockefeller Fellows Program of the Partnership for New York City, 2008 – 2009
- Deputy special counsel, United States Senate Judiciary Committee, Subcommittee on Terrorism, Technology and Government Information, Fall 1995 – Summer 1996

Recognition



- Listed in American Lawyer Media's The Best Lawyers in America for International Arbitration-Commercial, 2007 – 2020 and Art Law, 2018-2020
- Recognized in New York Super Lawyers Business Litigation, 2007 – 2018
- Listed in The Legal 500 United States as one of the top international arbitration lawyers, 2013
- Ranked in The Legal 500 United States as one of the top product liability and mass tort defense lawyers (pharmaceuticals and medical devices), 2012
- Listed as a leading International Arbitration lawyer by Chambers USA, 2005 and 2006 editions, and Chambers Global, 2007 edition

Highlighted Publications

- Co-author, "Joint Ventures," Chap. 50 in Successful Partnering Between Inside and Outside Counsel, edited by Robert L. Haig, Thomson Reuters Westlaw and the Association of Corporate Counsel, 2014 – 2017

Highlighted Lectures

- "Tell Me No Secrets: Privilege as it Applies to In-House Counsel," Continuing Legal Education lecture presented to 45 Fortune 100 companies, 2004 – 2018

Court Admissions

- United States District Court for the Southern District of New York, 1985
- United States District Court for the Eastern District of New York, 1986
- United States Court of Appeals for the Second Circuit, 1989
- United States Court of Appeals for the Fourth Circuit, 1994
- United States Tax Court, 1994
- United States Supreme Court, 1995
- United States Court of International Trade, 2005
- United States Court of Appeals for the First Circuit, 2005
- United States District Court for the Middle District of Florida, 2010
- United States District Court for the Northern District of Florida, 2011

Education

New York University School of Law, J.D., 1984

Princeton University, A.B., 1981, cum laude

Bar Admissions

Florida, 2009

New York, 1985

Areas of Focus

Arbitration

Art Law

Complex Business Disputes

Life Sciences

Litigation

Media, Technology & Commercial

Transactions

Not-for-Profit

Product Liability

Regulatory Compliance

Securities Litigation

White Collar & Regulatory Defense

Hughes Hubbard & Reed

Marc A. Weinstein

Partner

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marc.weinstein@hugheshubbard.com

[LinkedIn](#)



Marc A. Weinstein is chair of the White Collar & Regulatory Defense group and a partner in the Securities Fraud Litigation and Professional Liability groups.

Marc represents corporate and individual clients at all stages of proceedings with federal and state law enforcement authorities and numerous regulatory agencies including the Department of Justice (DOJ), the Securities and Exchange Commission (SEC), the US Commodity Futures Trading Commission (CFTC) and the Public Company Accounting Oversight Board (PCAOB). Marc has extensive trial and appellate experience, including a recent acquittal on behalf of a pro bono client in New York State Supreme Court, and has litigated numerous asset forfeiture matters. Marc has negotiated corporate deferred prosecution and plea agreements with the Department of Justice. Marc was recently ranked by Chambers USA 2019 as a leading lawyer in White Collar Crime & Government Investigations for the eighth straight year.

Marc honed his trial skills while serving as an assistant United States attorney in the Southern District of New York for more than eight years, during which he was the chief of the Major Crimes Unit, a member of the Securities and Commodities Fraud Task Force, a founding member of the Computer Hacking and Intellectual Property Crimes Unit, and a member of the Asset Forfeiture Unit. In his role as chief of the Major Crimes Unit, Marc supervised the prosecution of complex white-collar offenses, including investment fraud, violations of the FCPA, health care fraud, computer crimes, and tax and money laundering offenses.

Professional Activities

- Member, Federal Criminal Practice Committee, Federal Bar Council
- Member, board of directors of the Fund for Modern Courts



Previous Experience

- Assistant United States Attorney, United States District Court for the Southern District of New York, 1998 – 2007
- Federal prosecutor with extensive trial experience in complex financial crimes. Served as co-chief of the Major Crimes Unit, supervising prosecution of corporate, FCPA, computer, health care, insurance, intellectual property, money laundering and tax offenses. As member of the Securities and Commodities Fraud Unit, he prosecuted numerous cases in financial markets, including nation's largest undercover operation in foreign currency markets, as well as market manipulation and accounting fraud. Briefed and argued numerous appeals before the 2nd Circuit
- Law clerk, the Honorable Mary Johnson Lowe, United States District Court for the Southern District of New York, 1996 – 1998

Recognition

- Recipient of the Department of Justice's John Marshall Award for Outstanding Legal Achievement for Asset Forfeiture
- Ranked by Chambers USA as one of the leading White-Collar Crime & Government Investigations lawyers in the United States
- Recognized by The Legal 500 United States as one of the top Securities Litigation – Defense lawyers

Highlighted Publications & Panel Presentations

- Elizabeth Prewitt, Marc Weinstein and Jeffrey Goldberg, "Questions Following Prevezon Money Laundering Settlement," Law360 (May 25, 2017)
- Former contributing editor on FCPA matters for Latin Lawyer.com
- National Association of Securities Dealers (NASD) 2004 White-Collar Crime Roundtable: Operation Wooden Nickel
- Intellectual Property Owners Association 2001 Annual Meeting: Digital Rights and the First 48 Hours After An Industrial Espionage Theft

Court Admissions

- United States District Court for the Southern District of New York
- United States District Court for the Eastern District of New York
- United States Court of Appeals for the Second Circuit

Education

University of Pennsylvania Law School, J.D., 1993

Duke University, B.A., 1990, cum laude

Bar Admissions

New York, 1994

Areas of Focus

Anti-Corruption & Internal
Investigations

Antitrust & Competition

Complex Business Disputes

Professional Services

Securities Enforcement

Securities Litigation

White Collar & Regulatory Defense

Hughes Hubbard & Reed

Parker F. Taylor

Partner

New York City, Miami

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LinkedIn



Parker F. Taylor is the head of Hughes Hubbard's Private Client Services group. Parker focuses his practice primarily on tax law, wealth management, and trusts and estates. He regularly counsels high-net-worth individuals and family entities on estate, gift, generation-skipping transfer and income tax matters. Parker's work also includes estate administration, the drafting of prenuptial and postnuptial agreements and all aspects of tax controversy, including dealing with IRS examinations and appeals.

Areas of Concentration

- Multigenerational wealth transfer planning
- Business succession planning
- International estate and pre-immigration planning
- Estate, trust and guardianship administration and controversies
- Estate, gift and generation-skipping tax controversies
- Prenuptial and postnuptial agreements

Lectures & Publications

- Quoted, "Trump Calls Florida Home. There May Be (Tax) Hurdles," Barron's, November 4, 2019
- Quoted, "Trump to New York: I Love You, but You're Bringing Me Down," WealthManagement.com, November 1, 2019



- Presenter, "More than Moving: How Changing Domicile Properly Can Reduce Taxes," PLI, July 30, 2019
- Co-author, "Current Estate and Gift Tax Proposals in Congress," Willamette Management Associates' Insights magazine, Summer 2019
- Co-author, "Estate Planning with Cryptocurrency," Probate & Property, July/August 2019
- Presenter, "Changing Domicile to Save on Taxes," Martin County Estate Planning Council's 36th Annual Estate and Tax Planning Seminar, May 17, 2019
- Co-author, "Changing Domiciles to Save on Taxes," Trusts & Estates magazine, April 2019
- Co-author, "Changing Domiciles to Save on Taxes," Wealth Management.com, March 21, 2019
- Co-author, "Recent Changes to the Federal Estate and Gift Tax Law," Client Advisory, January 2, 2018
- Co-presenter, "Family Office Primer-Estate and Business Succession Planning," Family Business and Family Office Education series, February 8, 2017
- Co-author, "After Budget Deal-Donor's Remorse," Private Wealth E-newsletter, January 11, 2013
- Co-author, "Transfer Tax Exemptions Using Spousal Lifetime Access Trusts," Wealth Strategies Journal, October 26, 2012

Professional & Community Activities

- Co-organizer, Pro Bono Estate Planning Clinics for Holocaust Survivors, 2015-Present
- Board Member, Barton G Kids Hear Now, 2014-Present
- Graduate, Glass Leadership Institute, Anti-Defamation League, 2009

Court Admissions

- U.S. Tax Court

Awards and Recognitions

- Named "Rising Star," Florida Super Lawyers, 2014-2018

Education

New York University School of Law, LL.M., 2005

George Washington University Law School, J.D., 2004, Thurgood Marshall Scholar, Fall, 2002

Emory University, B.S., 2000, Dean's List

Bar Admissions

Florida, 2007

1/10/2020

Parker F. Taylor | Partner at Hughes Hubbard & Reed

New York, 2005

Areas of Focus

Private Client Services

Tax

Hughes Hubbard & Reed

Fara Tabatabai

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New York City

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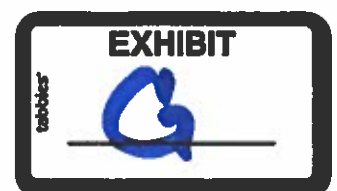
Fara Tabatabai is a partner and experienced litigator in Hughes Hubbard & Reed's New York office. Her practice focuses on complex commercial and products liability litigation and arbitration. She represents U.S., Canadian, European, and Asian clients in a variety of industries and has served as litigation and trial counsel in numerous high-stakes domestic and international disputes. She has particular experience in cross-border disputes and acted as counsel to the European debtors of the Nortel Networks enterprise in the first U.S.-Canadian cross-border trial in history. In 2019, the New York Law Journal selected Ms. Tabatabai as one of the New York legal profession's "Rising Stars." Crain's New York Business Magazine also selected Ms. Tabatabai as one of its "Notable Women in Law" for 2020.

Ms. Tabatabai is also committed to providing quality pro bono legal services. She has received several awards for her pro bono work, including two Legal Aid Society awards for her role in litigation against New York State to increase housing subsidies for low-income families and a Commitment to Justice Award for her work on an immigration case for Her Justice, an organization that provides legal services to low-income women.

Ms. Tabatabai currently serves as President of the Iranian American Bar Association's New York Chapter and as a Member of the Corporate Leadership Committee of the New York Women's Foundation.

Professional Activities

- President of Iranian American Bar Association, New York Chapter
- Member, Corporate Leadership Committee, New York Women's Foundation



Court Admissions

- United States District Court for the Southern District of New York
- United States District Court for the Eastern District of New York
- United States Court of Appeals for the Second Circuit
- United States Court of Appeals for the Ninth Circuit

Education

Fordham University School of Law, J.D., 2006, cum laude, Notes & Articles Editor, Fordham Law Review, Associate Kaufman Editor, Moot Court Board

University of British Columbia, B.A., 2003, English & International Relations, magna cum laude

Bar Admissions

New York, 2007

Languages

French

Areas of Focus

Appellate

Arbitration

Class Actions

Complex Business Disputes

Employment & Unfair Competition

Litigation

Product Liability

Regulatory Compliance

Securities Litigation

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Michael H. Huneke is a partner in the Anti-Corruption & Internal Investigations practice group at Hughes Hubbard & Reed. He advises clients in matters involving the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, corporate governance and compliance, World Bank and other international financial institution matters, international trade controls, securities and accounting investigations, and government contracts.

The Legal 500 has recognized Mike as a "voice of reason when it comes to compliance matters."

He performs anti-corruption investigations and due diligence efforts around the globe, including in connection with US Department of Justice, US Securities and Exchange Commission, UK Serious Fraud Office, World Bank and African Development Bank inquiries. This experience includes conducting corporate compliance monitorships and compliance program evaluations. He has assisted US, European and Asian clients in designing, administering and maintaining anti-corruption, integrity compliance and corporate governance programs. Mike's experience also includes US Congress and US inspector general inquiries.

In connection with his anti-corruption work, Mike has traveled extensively, including to Argentina, Bahrain, Brazil, China, Colombia, Czech Republic, Denmark, France, Germany, Ghana, India, Jordan, Lebanon, Malaysia, Mexico, Morocco, Netherlands, Norway, Peru, Qatar, Romania, Russia, Saudi Arabia, Singapore, South Africa, South Korea, Spain, Switzerland, Thailand, Togo, Tunisia, United Arab Emirates and the UK.

Previous Experience



- Associate, white-collar group at the Washington, DC, office of an international law firm, 2005 – 2006 and 2007 – 2010
- Clerk, the Honorable Henry Coke Morgan Jr., senior US district judge for the Eastern District of Virginia, 2006 – 2007

Recognition

- Recognized in Legal 500 EMEA- France: Compliance as a Recommended Lawyer, 2018
- Recognized in Washington, DC, Super Lawyers as a Rising Star, 2014 – 2015
- 2015 Capital Pro Bono Honor Roll, sponsored by the District of Columbia Court of Appeals and the Superior Court of the District of Columbia

Published Treatises

- [Anti-Corruption Law and Compliance: Guide to the FCPA and Beyond](#) (Bloomberg BNA, 2014) (with Kevin Abikoff and John Wood) (updated 2017)

Other Highlighted Publications

- "SCOTUS News: Limits on Immunity for Multilateral Development Banks Should Spur Increased Anti-Corruption Efforts," The FCPA Blog, May 28, 2019 (with Ayoka Akinosi)
- FCPA Update: Third-Party Risks and Enforcement Actions, The Review of Securities & Commodities Regulation, vol. 51 no. 1 (January 2018) (with Ashley Hodges)
- Quoted in "Five Stages of Corruption and Myriad Internal Controls Failures: Compliance Takeaways From the VimpelCom Settlement," The FCPA Report, March 9, 2016
- Quoted in "VimpelCom Settlement Highlights US Government's New Holistic Approach to Anti-Corruption Enforcement," The FCPA Report, Feb. 24, 2016
- Quoted in "The Multimillion Dollar Question: When to Self-Report?" Compliance Week, April 28, 2015
- "NY Financial Compliance Landscape May Get Treacherous," Law360, April 22, 2015 (with John Wood)
- Quoted in "Global Reach of US Enforcement Collides with Domestic Pressure to Charge Individuals," Main Justice, April 8, 2015
- Contributor, Lissack & Horlick on Bribery (LexisNexis, 2nd ed.) (Ch. 12, The International Perspective: Lessons from US Authorities' Enforcement of the Foreign Corrupt Practices Act) (with Kevin Abikoff, John Wood and Ed Little)
- "How the Proposed Amendments to the Organizational Sentencing Guidelines Will Affect Corporate Compliance and Ethics Programs," 11 Engage vol. 2 (September 2010)
- "When Does an ADR Program Give US Authorities FCPA Jurisdiction over a Foreign Issuer?" 4 Int'l Crim. L. Comm. Newsletter 2:10 (May 2010) (with Patrick O. Hunnius)
- "U.S. Sentencing Commission Holds Public Hearing on Proposed Amendments to the Organizational Guidelines," The Federalist Society for Law and Public Policy Studies, New Federal Initiatives Project (April 15, 2010)

- "International Legal Developments in Review: 2008, International Criminal Law," 43 The Int'l Lawyer 473, 2009 (with Don Shaver and Elizabeth Bingold)

Highlighted Anti-Corruption Lectures

- "Significant FCPA Trends and Developments: Bolstering Your Compliance Program," The Knowledge Group, webinar, September 23, 2019
- "Anti-Bribery and Anti-Corruption Compliance: Trends, Developments and Best Practices in 2019," The Knowledge Group, webinar, July 10, 2019
- "Responding to Investigations by the World Bank and Other Multilateral Development Banks," Hughes Hubbard & Reed, webinar, July 3, 2019
- Moderator, "Data Compliance: How Industry Has Updated Policies for Data Collection, Transfers, and Retention," C5's 3rd Advanced Conference on Anti-Corruption, Zurich, Switzerland, April 3, 2019
- "Third-Party Due Diligence Best Practices: Uncovering the Things You Need to Know," The Knowledge Group, webinar, February 26, 2019
- "East Asian Legal Studies Lunchtime Talk Series: Pursuing a Career in Global Anti-Corruption Law," Harvard Law School, Cambridge, MA, February 21, 2019
- "The 2019 Anti-Bribery Landscape: Trends, Developments and Updates," The Knowledge Group, webinar, January 8, 2019
- "How DPAs are Affecting Companies' Compliance Function and Compliance Initiatives," C5's 6th Conference on Anti-Corruption, Paris, France, October 16, 2018
- "Corruption Scandals: Practitioner-led Case Study," UC Berkeley Law Compliance Academy, Paris, France, July 25, 2018
- "US & EU: Conducting and Evaluating Complex Anti-Corruption Investigations with FCPA and Bribery Act," The Knowledge Group, webinar, May 2, 2018
- "White Collar Enforcement in 2018: Navigating Recent Changes and Clearing Uncertainties," The Knowledge Group, webinar, March 1, 2018
- "Managing and Mitigating Third-Party Fraud and Corruption Risks: Your Guide for 2017 and Beyond," The Knowledge Group, webinar, December 1, 2017
- "FCPA Enforcement Actions: Highlighting the Importance of Implementing and Monitoring Effective Compliance Programs," The Knowledge Group, webinar, September 18, 2017
- "Anti-Corruption Compliance: Trends and Developments in 2017," The Knowledge Group, webinar, August 21, 2017
- "Trends and Developments in International Anti-Corruption Enforcement," Clear Law Institute, webinar, June 29, 2017
- "The A-Z's of Anti-Corruption Compliance: What You Need to Know in 2016 and Beyond," The Knowledge Group, webinar, Feb. 16, 2016
- "Mitigate Potential Whistleblower Violations Amidst Increased SEC Investigations," The Knowledge Group, webinar Dec. 10, 2015
- "Anti-Corruption Outlook for 2016: China, Brazil, the UK and Other Enforcement Hot-Spots," Bloomberg BNA, webinar Dec. 2, 2015

- "Best Trends and Practices in Responding to Corporate Whistleblower Reports Explored!" The Knowledge Group, webinar panel discussion, May 1, 2015
- "The US Foreign Corrupt Practices Act (FCPA) and International Anti-Bribery Compliance," (part of the US State Department International Visitor Leadership Program's Regional Program on "Transparency and Accountability," administered by the Meridian International Center, Washington, DC, Feb. 26, 2015)
- "Compliance Programs for Government Contractors in 2015 Explored," The Knowledge Group, webinar Feb. 5, 2015
- "The World Bank's Expectations and Debarment Powers," C-5 Southern Africa Anti-Corruption Summit 2014, Johannesburg, South Africa, Nov. 18, 2014
- "Global Anti-Corruption Compliance and Enforcement: Strategies for Managing the Risks Posed by Third Parties, Business Combinations, and Allegations or Evidence of Misconduct," Bloomberg BNA, webinar, Oct. 29, 2014
- "Minimizing Third Party Risks: How to Apply the Right Level of Due Diligence When Monitoring Your Agents, Distributors, Brokers, and CROs," American Conference Institute's 7th Advanced Forum on FCPA & Anti-Corruption for the Life Sciences Industry, New York, May 14, 2013
- "Negotiating, Drafting and Executing Robust Contracts with Third Parties to Protect your Organisation from Corruption and Bribery Risks," C-5 Second Forum on Anti-Corruption Southern Africa, Cape Town, South Africa, Sept. 18 – 19, 2012)
- "Anti-Corruption Risk Assessments & Third-Party Due Diligence," on behalf of Kevin Abikoff (GCM Parker, 2nd Annual Business Ethics Anti-Corruption & Fraud Prevention Strategies in CEE, SEE & CIS, Prague, Czech Republic, March 24, 2011)

Court Admissions

- United States Court of Appeals for the Fourth Circuit
- United States District Courts for the District of Columbia, Eastern District of Virginia, and Western District of Virginia
- District of Columbia Court of Appeals
- Supreme Court of Virginia

Education

Harvard Law School, J.D., 2005

University of Virginia, B.A., 2002, with High Distinction, Phi Beta Kappa

Bar Admissions

District of Columbia, 2006

Virginia, 2005

Languages

English

Areas of Focus

Anti-Corruption & Internal

Investigations

Defense Industry

Litigation

White Collar & Regulatory Defense

Hughes Hubbard & Reed

Marie-Agnès Nicolas

Counsel

Paris

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Marie-Agnès Nicolas is a member of Hughes Hubbard's Anti-Corruption & Internal Investigations Group and Litigation Department.

In connection with her anti-corruption work, Marie-Agnès Nicolas advises large multinational companies on a range of anti-corruption issues in connection with the U.S. Department of Justice (DOJ) and the French anti-corruption agency (AFA). Among other things, she has assisted a variety of the firm's clients in designing anti-corruption policies and programs, performing compliance audits, and conducting internal investigations and due diligence reviews on third party agents and joint venture or business partners around the world.

As part of her litigation practice, she has developed a particular expertise advising banks and other financial institutions on a wide range of contentious matters relating to a variety of investment products, including derivatives and structured products, as well as with respect to financial regulatory issues.

Professional Activities

- European Law Network, editorial committee member (2007)
- Sciences Po's Jurists Association, member (2006 – 2007)

Highlighted Publications

- "Première audience de la Commission des sanctions de l'AFA : Dans quelle mesure la Commission des sanctions va-t-elle sanctionner la loi ?" ("First Hearing of the Sanction Commission of the Fr



- Anticorruption Agency: To What Extent the Sanction Commission Will Sanction the Terms of the Law”, *International Review of Compliance and Business Ethics* (August 2019) [in French]
- “Première audience de la Commission des sanctions de l’AFA : Récit d’une passe d’armes sur ce qu’il convient d’attendre d’un programme de conformité anticorruption” (“First Hearing of the Sanction Commission of the French Anticorruption Agency: Story of a Sparring Match Over What is to be Expected from a Compliance Program”), *International Review of Compliance and Business Ethics* (August 2019) (article co-authored with Nicolas Tollet) [in French]
 - “Les lignes directrices du PNF et de l’AFA sur la mise en œuvre de la CJIP” (“PNF and AFA Guidelines on the CJP, the French DPA”), *La Semaine Juridique – Entreprise et Affaires* (August 2019) [in French]
 - “Conformité et assurabilité : rime suffisante mais rime hésitante,” (“Compliance and Insurance: An Approximate Rhyme”), *Option Finance / Droit & Affaires* (April 2019) [in French]
 - “Agence Française Anti-corruption (...) : Lumière sur ses premiers contrôles et réflexions sur sa mission préventive” (“French Anti-Corruption Agency (...): Light and Reflection on the AFA’s First Controls”), *International Review of Compliance and Business Ethics* (September 2018) (Also published in *Cahiers de Droit de l’Entreprise* in October-November 2018) [in French]
 - “Le déroulement des contrôles de l’AFA – Scénographie tirée des premiers contrôles” (“Operation of the AFA’s controls – Scenography Drawn for the AFA’s First Controls”), *International Review of Compliance and Business Ethics* (September 2018) (article co-authored with Nicolas Tollet) (Also published in *Cahiers de Droit de l’Entreprise* in October-November 2018) [in French]
 - “Opposabilité du secret professionnel aux agents de l’AFA dans le cadre de leurs contrôles – La méthode Coué de l’AFA : Percée stratégique ou Stratégie percée ?” (“Opposability of the Attorney Legal Privilege - The AFA’s Coué method on French Legal Privilege: Strategic Drilling or Drilled Strategy”), *International Review of Compliance and Business Ethics* (September 2018) (article co-authored with Ludmilla Balandine) (Also published in *Cahiers de Droit de l’Entreprise* in October-November 2018) [in French]
 - “Les premiers rapports de contrôle de l’AFA – La révolution préventive se confirme : Impossible ne saurait être français” (“Lessons Learned from the AFA’s First Controls: Nothing is Impossible for the French”), *International Review of Compliance and Business Ethics* (September 2018) (article co-authored with Anne Gaustad) (Also published in *Cahiers de Droit de l’Entreprise* in October-November 2018) [in French]
 - “France Issues Inaugural Convention Judiciaire d’Intérêt Public,” *International Review of Compliance and Business Ethics* (March 2018) (article co-authored with Laura Perkins) [in English]
 - “How Far Do Your Arms Reach? A Brief Case Study on the Extraterritoriality of Anti-Bribery Laws,” *International Review of Compliance and Business Ethics* (March 2018) (article co-authored with Bryan Sillaman, Leon Ioannou and Bernardo Viana) [in English]
 - “Lessons Learned from the First-Ever French Convention Judiciaire d’Intérêt Public Concluded with HSBC,” *The Anti-Corruption Report*, Vol. 7, No. 2 (January 2018) (article co-authored with Bryan Sillaman) [in English]
 - “Loi Sapin 2, FCPA, UKBA, CCA : Comment ne pas se perdre dans le dédale de la conformité?” (“Loi Sapin 2, FCPA, UKBA, CCA: How Do You Not Get Lost in the Maze of Compliance?”), *Cahiers de Droit de l’Entreprise* (March-April 2017) (article co-authored with Anne Hukkelaas Gaustad) [in French]
 - “La Convention Judiciaire d’Intérêt Public : Quelle compatibilité entre intérêt public de la Société et intérêt privé des sociétés ?” (“The Judicial Public Interest Agreement: Is the Public Interest Compatible

with Companies' Private Interest?"), Cahiers de Droit de l'Entreprise n° 2 (March-April 2017) (article co-authored with Anne Gaustad) [in French]

- "L'Agence Française Anti-corruption et la corruption : Vaccin, antidote ou placebo ?" ("The French Anti-Corruption Agency: Vaccine, Antidote or Placebo?"), International Review of Compliance and Business Ethics (March 2017) (article co-authored with Anne Gaustad) [in French]

Highlighted Lectures

- Speaker, "Update on U.S. Enforcement Policy," 10th Annual Business Ethics Anti-Corruption Compliance & Fraud Prevention Strategies in CEE, SEE & CIS Conference, Czech Republic, March 22, 2019
- Tutor, "No Bribes in your Electric Scooter: Fighting Corruption in DRC Through the Cobalt Supply Chain," Tutoring Program, Sciences-Po Paris Clinic, September 2018 – May 2019
- Lecturer, "CSR and Preventing Corruption," Academic Seminar, Ecole de droit Sciences-Po, Paris, France, March 2018 and February 2019
- Speaker, "One Year of Controls by the French Anti-Corruption Agency: Appraisal and Perspectives," Conference, Cercle Montesquieu, Paris, France, September 19, 2018
- Speaker, "Recent Developments in French Anti-Corruption Law," 9th Annual Business Ethics Anti-Corruption Compliance & Fraud Prevention Strategies in CEE, SEE & CIS Conference, Prague, Czech Republic, March 23, 2018
- Speaker, "Lessons Learned from the First Round of Audits Conducted by the New French Anti-Corruption Agency," Cercle France Amérique, Paris, France, January 25, 2018
- Speaker, "The New French Settlement Tool: The Judicial Public Interest Agreement," Hughes Hubbard & Reed LLP, Paris, France, November 22, 2017
- Speaker, "The Right to be Free from Arbitrary Detention: Perspectives of the Victims and Their Representatives," Commemorative Event for the 25th Anniversary of the Working Group on Arbitrary Detention, U.N. Headquarters, Geneva, Switzerland, November 28, 2016

Quotes & Interviews

- Quoted in "Loi Sapin II : Il est urgent de se mettre en conformité" (Loi Sapin II: Becoming Compliant is a Priority"), DAF magazine n° 39 (June 2019) [in French]
- Quoted in "Les rencontres d'experts d'Option Droit & Affaires - Insuffler une culture éthique dans l'entreprise," (Meeting with Experts – Instilling an Integrity Culture Within the Company"), Option Finance / Droit & Affaires (April 2019) [in French]
- Quoted in "Détenu pendant 17 ans au Cameroun, il réclame réparation," ("Detained for 17 Years in Cameroon, He Claims Compensation"), Le Point (November 30, 2016) [in French]
- Quoted in "Emprisonné dix-sept ans sans motif valable, Michel Thierry Atangana attend réparation du Cameroun," ("Imprisoned for Seventeen Years Without Valid Ground, Michel Thierry Atangana Seeks Redress from Cameroon"), Le Monde (November 29, 2016) [in French]

Professional Activities

- Editorial Committee Member, European Law Network (2007)
- Member, Sciences Po's Jurists Association (2006 – 2007)

Education

Université de Paris I - Panthéon-Sorbonne, Postgraduate Degree, Corporate Finance and Capital Markets Law, 2008

Sciences Po Paris (Institut d'Etudes Politiques de Paris), J.D., Global Business Law, 2007

Université de Paris I - Panthéon-Sorbonne, Maîtrise, International Business Law, 2006

Université de Paris XII, B.A., European Law, 2006, Honors

Bar Admissions

France (Paris), 2010

Languages

English

French

Areas of Focus

Anti-Corruption & Internal

Investigations

Litigation

Hughes Hubbard & Reed

Christian Belloin

Senior Counsel

Paris

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Areas of Concentration

- Corporate commercial law, concentrating on mergers and acquisitions, project finance, and restructuring/reorganization transactions for listed and non-listed companies
- Employment law, including individual and collective issues, concentrating on litigation, consultation, and assisting with reorganization and/or redundancy plans
- Real estate, including acquisitions, sales, leasing, securitization, guaranteed loans, and investments, both in France and overseas

Professional Activities

- "Marketing UCITS in France," Fir Publications
- "Money laundering in France," Butterworths
- Contributor to supplements of "Doing Business in France" (Matthew Bender)
- Lecturer, University of Paris II Assas, 1990 – 1992, seminars on international trade law in "maitrise" with Professor Philippe Fouchard
- Lecturer, Ecole des Hautes Etudes Commerciales (HEC), 1987 – 1989, introduction to law for first-year students and case studies for third-year students

Recognition

- Recognized in Best Lawyers in France for Corporate and Insolvency Reorganization (2012)



Education

Tulane Law School, LL.M., 1980

Université de Paris I - Panthéon-Sorbonne, DEA, 1979

Université de Paris I - Panthéon-Sorbonne, Maîtrise, 1977

Bar Admissions

France (Paris), 1980

Languages

English

French

Areas of Focus

Antitrust & Competition

Corporate

Corporate Reorganization &

Bankruptcy

Employment & Unfair Competition

Life Sciences

Litigation

Mergers & Acquisitions

Private Equity

Real Estate

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Ludmilla Balandine joined the dispute resolution practice at the Paris office of Hughes Hubbard & Reed in March 2009 after practicing in an international top-tier law firm for several years.

She focuses on business litigation and has developed a particular expertise in banking and finance law, company law, and contracts.

She represents credit institutions and investment service providers in legal proceedings where their civil (sometimes in the context of class actions) or criminal liability is sought before the courts as well as before regulatory authorities. She also acts in litigation involving the liability of companies and their officers or shareholders.

Finally, Ludmilla regularly works alongside the Firm's anti-corruption and internal investigations department.

Professional Activities

- Association Française en Faveur de L'Institution Consulaire

Highlighted Publications

- AMF – Contrôle de la documentation commerciale de certains produits financiers à destination des particuliers, ("The French Securities and Exchange Commission – Auditing commercial documentation concerning certain financial products for private individuals"), Oct. 2018



- Opposabilité du secret professionnel aux agents de l'AFA dans le cadre de leurs contrôles - La méthode Coué de l'AFA : Percée stratégique ou Stratégie percée ? ("Enforcing professional secrecy against French Anti-Corruption Agents during their audits - The French Anti-Corruption Agency and its methods of self-persuasion: a strategic breakthrough or breakthrough strategy? "), article published in the special edition "Les contrôles de l'Agence Française Anticorruption : Lumière sur ses premiers contrôles et réflexions sur sa mission préventive" (« Audits by the French Anti-Corruption Agency: Focus on its first audits and reflections on its preventive mission") of the Revue Internationale de la Compliance et de l'Ethique des Affaires, Sept. 2018, (article co-authored with Marie-Agnès Nicolas)
- Revirement – Conséquences de la résolution de la vente sur le crédit-bail l'ayant financée – Cass. Mixte, 13 avril 2018, n° 16.21-345 et 16-21.947) ("Reversal of precedent - Consequences of the cancellation of the sale on the leasing that financed it – Cass. Mixte, 13 avril 2018, n° 16.21-345 et 16-21.947"), May 2018
- Pas d'obligation de mise en garde du banquier prêteur de deniers en cas de recours à un intermédiaire en opérations de banque, ("No obligation to warn the lending bank when using a banking intermediary"), Feb. 2018
- Secret bancaire et communication de pièces – A propos de Com. 29 novembre 2017 (n° 16-220.60) ("Banking secrecy and communication of exhibits – the ruling Com. November 29, 2017 (no. 16-220.60)"), Dec. 2017
- Produits structurés et éligibilité à l'assurance-vie : une victoire pour les assureurs ("Structured products and life insurance eligibility: a victory for insurers"), Nov. 2017

Education

ESCP Europe (Business School), LL.M., International Business Management, 1999

Université de Paris I - Panthéon-Sorbonne, DEA, Private Law, 1998, cum laude, (Pr. Ghestin)

Université de Paris X La Défense, Maîtrise, Private Law, 1997, cum laude

Bar Admissions

France (Paris), 2001

Languages

English

Areas of Focus

Arbitration

Litigation



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Biography

Selected Matters

Education

Institut Français des
Administrateurs,
Certificate, 2013

Université de Paris II,
DEA, European Law, 1979

Université de Paris II,
Maîtrise in Business Law,
1978

Bar Admissions

France (Paris), 1993

Areas of Focus

Employment & Unfair

Previous Experience

- Hughes Hubbard & Reed, Paris office, September 1999 – present
- Partnership with Thierry Brézillon, 1998 – 1999
- Moisand Boutin & Associés, Paris, 1997 – 1998
- Nauta Dutilh, Paris, 1981 – 1997

Recognition

- Recognized in Best Lawyers in France for labor and employment law,
- Décideurs Stratégie Finance Droit, 2014
- Décideurs Leadership & Management Capital Humain, 2014

