

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

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

Plaintiff,

v.

CASE NO.: 19-CA-014681

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

Defendants.

**AFFIDAVIT OF ATTORNEYS' FEES**

STATE OF FLORIDA  
COUNTY OF NASSAU

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

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

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

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

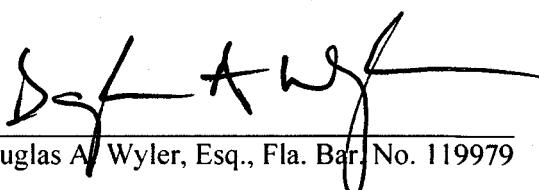
5. Of the 42.2 hours expended since Defendant Aronberg's 57.105 demand was served, the total time Affiant has expended services rendered to date is **35.4 hours** at the rate of **\$425.00 per hour**. Likewise, the total time Affiant's law partner, Arthur I. Jacobs, has expended services rendered to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

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

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

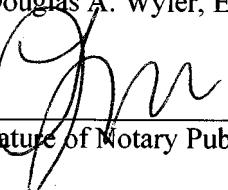
Dated this 9th day of November, 2020.

FURTHER AFFIANT SAYETH NOT.

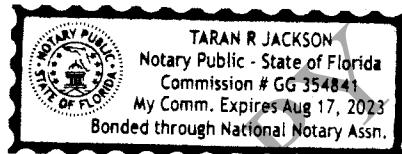
  
Douglas A. Wyler, Esq., Fla. Bar. No. 119979

STATE OF FLORIDA  
COUNTY OF NASSAU

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

  
Signature of Notary Public – State of Florida

Taran R. Jackson  
Name typed, printed or stamped



**CERTIFICATE OF SERVICE**

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

JACOBS SCHOLZ & WYLER, LLC

/s/ *Douglas A. Wyler*

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

*Attorneys for Defendant, Dave Aronberg*

**EXHIBIT “A”**

NOT A CERTIFIED COPY

**EXHIBIT “A”**

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

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

**From:** Douglas Wyler

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

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

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

Case No: Case No. 2020-CA-014681

Plaintiff: CA Florida Holdings, LLC

Defendant: Dave Aronberg

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

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

Sender's Name and Douglas Wyler  
Telephone Number: (904) 261-3693

Sincerely,

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

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

# JACOBS SCHOLZ & WYLER, LLC.

A LIMITED LIABILITY COMPANY OF PROFESSIONAL ASSOCIATIONS

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

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

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

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

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

June 8, 2020

**VIA ELECTRONIC & U.S. MAIL**

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

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

Dear Mr. Mendelsohn:

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

As you know, Section 57.105 provides:

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

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

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

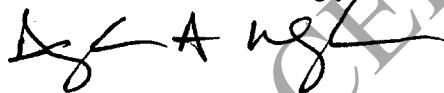
In addition to the foregoing material facts that negate the claims asserted in the Complaint, your claims are also not supported by the application of current law. Specifically, your action for declaratory relief fails based on the clear, unambiguous statutory language found in Section 905.27(2), Florida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

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

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

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

Please govern yourself accordingly,



Douglas A. Wyler, Esq.  
For the Firm

Encl.: Defendant's Motion for Attorneys' Fees

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

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

Plaintiff,

v.

CASE NO.: 19-CA-014681

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

Defendants.

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**DEFENDANT, DAVE ARONBERG'S MOTION FOR ATTORNEYS' FEES**

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

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

**CERTIFICATE OF SERVICE**

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

**JACOBS SCHOLZ & WYLER, LLC**

*/s/ Douglas A. Wyler*

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

*Attorneys for Defendant*

**EXHIBIT “B”**

NOT A CERTIFIED COPY

**EXHIBIT “B”**

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

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

Plaintiff,

v.

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

Defendants.

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

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

Respectfully submitted,

**GREENBERG TRAURIG, P.A.**

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

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

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

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

By: /s/ Nina D. Boyajian  
NINA D. BOYAJIAN  
(Admitted *Pro Hac Vice*)  
1840 Century Park East, Suite 1900  
Los Angeles California 90067  
Telephone: (310) 586-7700  
Facsimile: (310) 586-7800  
[boyajiann@gtlaw.com](mailto:boyajiann@gtlaw.com)  
[riveraal@gtlaw.com](mailto:riveraal@gtlaw.com)

**CERTIFICATE OF SERVICE**

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

/s/ Stephen A. Mendelsohn  
STEPHEN A. MENDELSON

ACTIVE 53317341v1

**EXHIBIT “C”**

NOT A CERTIFIED COPY

**EXHIBIT “C”**

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

**Jacobs Scholz & Wyler, LLC**

**Dave Aronberg**

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

**Aronberg (SAO15) adv. CA Florida Holdings, LLC**

**Time Entries**

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

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

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

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

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

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

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

Totals: **74.8** **\$32,440.00**

|                       |                    |
|-----------------------|--------------------|
| Time Entry Sub-Total: | \$32,440.00        |
| <b>Sub-Total:</b>     | <b>\$32,440.00</b> |
|                       |                    |
| <b>Total:</b>         | <b>\$32,440.00</b> |
| <b>Amount Paid:</b>   | <b>\$0.00</b>      |
|                       |                    |
| <b>Balance Due:</b>   | <b>\$32,440.00</b> |

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