

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MASHAYILA SAYERS, BRITTNEY  
TINKER, JENNIFER MONACHINO,  
KIMBERLY MULLINS, HILDA MICHELLE  
MURPHREE, and AMANDA JIMENEZ, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

ARTSANA USA, INC.,

Defendant.

Case No. 7:21-cv-07933-VB

Hon. Vincent L. Briccetti

**DECLARATION OF ANTONIO VOZZOLO IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT OF AWARD OF  
ATTORNEYS' FEES AND EXPENSES, AND APPROVAL OF INCENTIVE AWARDS**

I, Antonio Vozzolo, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney at law licensed to practice in the State of New York. I am a member of the bar of this Court, and one of the Class Counsel appointed by this Court in its January 23, 2023 Order preliminarily approving the proposed settlement of this litigation. I actively participated in all aspects of this action since inception and am fully familiar with the proceedings being resolved. I am fully familiar with the facts contained herein based upon my personal knowledge and the books and records kept in the ordinary course of Vozzolo LLC's business and, if called as a witness, I could and would testify competently thereto.

2. I make this declaration in further support of Plaintiffs' Motion for Attorneys' Fees, Costs, Expenses, and Incentive Awards (Dkt. 62), filed on August 28, 2023, and the reply filed herewith.

3. Plaintiffs request a fee award of \$2,250,000, which is consistent with the Notice

provided to the Class. The Class Notice informed Class Members that Plaintiffs would make a motion to the Court for an award of Attorneys' Fees and Expenses in the Actions, not to exceed \$2,250,000, and that it would be the sole compensation paid by Artsana for Plaintiffs' Counsel. *See* Settlement, Ex. E, Class Notice § 20.

4. Class Counsel's requested fees and expenses represent at most approximately 9.1% of the total aggregate value of the Settlement, including the "total funds made available, whether claimed or not[.]" *Masters v. Wilhelmina Model Agency, Inc.*, 473 F.3d 423, 437 (2d Cir. 2007).

5. Class Counsel calculated this percentage using a conservative estimate of the total aggregate value obtained by Plaintiffs and Class Counsel on behalf of the Class through the Settlement. Class Counsel calculated total funds made available using only the \$25 benefit available to Class Members without proof of purchase, not the \$50 benefit available to Class Members with proof of purchase, even though proof of purchase is defined broadly under the Settlement.<sup>1</sup> Further, this calculation includes administration costs reported by the Settlement Administrator only through July 31, 2023 (*see* Dkt. 60, Declaration of Steven Weisbrot, Esq. Regarding Implementation of the Notice Plan, dated August 28, 2023 ("8/28/23 Weisbrot Decl."), ¶ 33), when under the Settlement the claims period continues to run for 60 days after final approval. Settlement ¶ 5. Further, the calculation makes no attempt to account for the value of non-monetary or equitable relief obtained through the Settlement. *See* Settlement ¶ 51.

6. Specifically, Class Counsel's calculation of the total aggregate value of the

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<sup>1</sup> Proof of purchase may include a valid receipt or retail rewards submission from an authorized retailer, product packaging, a picture of the Eligible Product showing a new or recently purchased product, evidence of the purchase in Artsana's records (either as a result of a direct purchase from Artsana or by registration of the Eligible Product with Defendant or the National Highway Traffic Safety Administration ("NHTSA")), or other physical evidence corroborating the Class Member's purchase claim (*e.g.*, a credit card statement or invoice showing the class member's purchase). Settlement ¶ 46.

Settlement includes: (1) the number of Eligible Products sold during the Class Period (874,538) multiplied by \$25 per Eligible Product, which amounts to \$21,863,450; (2) approximately \$612,753.20 for Notice and Administration Costs, (3) anticipated incentive awards to Plaintiffs totaling \$9,000, and (4) the requested \$2,250,000 for Attorneys' Fees and Expenses, which amounts to \$24,735,203.20.

7. In accordance with applicable standards,<sup>2</sup> in the memorandum of law supporting Plaintiffs' fee application Plaintiffs also included an estimate of the percentage valuation of the requested fee based on the number of claimed products preliminarily identified by Angeion as eligible for the \$25 benefit and filed as of only July 21, 2023.

8. On July 14, 2023, I emailed select individuals at Angeion requesting information called for in Paragraph 90 of the Settlement Agreement including: (a) the number of Settlement Class Members that submitted a claim (without identifying the claimants); (b) the number of submitted Claim Forms that are valid, and which are not; (c) the number of submitted Claim Forms the Settlement Administrator intends to treat as Approved Claims; and (d) the number of submitted Claim Forms the Settlement Administrator has denied and the reason(s) for the denials. Attached hereto as **Exhibit A**, is a true and correct copy of the July 14, 2023 email.

9. On August 18, 2023, in response to my July 14, 2023 email, Angeion reported to the Parties that 153,244 Eligible Products had been preliminarily identified as "Valid" as they were a "[m]atch on combination key, retailer name, serial number or login claim and not suspicious of fraud." Attached hereto as **Exhibit B**, is a true and correct copy of the August 18, 2023 email.

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<sup>2</sup> See, e.g., *Goldberger v. Integrated Res., Inc.*, 209 F.3d 43 (2d Cir. 2000); *Van Gemert v. Boeing Co.*, 590 F.2d 433, 441 (2d Cir. 1978) (en banc), *aff'd*, 444 U.S. 472 (1980) ("in determining fair compensation the judge may take into account the number of plaintiffs likely to claim [] but the claimed portion of the fund does not place a ceiling on the fee").

10. On August 28, 2023, Angeion similarly reported by declaration filed concurrently with Plaintiffs' motion for final approval and fee application (Dkt. 60, 8/28/23 Weisbrot Decl.) that it had preliminarily identified 153,244 eligible products from claims submitted up to July 21, 2023, which would be subject to final audits at the close of the claim filing period.

11. Accordingly, in their motion papers Class Counsel provided a good faith estimate that Plaintiffs' fee request was approximately 33.5% of the Settlement value based on claims made, calculated using available claims data as of August 28, 2023, for claims submitted only through July 21, 2023. Specifically, Class Counsel calculated this percentage as follows: (1) 153,244 claims as of July 21, 2023 multiplied by \$25 per claim = \$3,831,100; (2) estimated notice and administration expenses as of July 31, 2023: \$612,753.20; (3) anticipated incentive awards to Plaintiffs: \$9,000; (4) requested amount of fees, costs and expenses: \$2,250,000. Total:  $\$3,831,100 + \$612,753.20 + \$9,000 + 2,250,000 = \$6,702,853.20$ .  $\$2,250,000 / \$6,702,853.20 = 33.5\%$ .

12. Plaintiffs' calculation did not include any claims submitted with related documentation and thus potentially eligible for the \$50 proof of purchase benefit, including 2,517 products pending documentation review, nor did it include 1,901 eligible products pending review of a photograph provided. (*See* Dkt. 60, 8/28/23 Weisbrot Decl. ¶ 27.)

13. Further, at the time of Plaintiffs' filings on August 28, 2023, the earliest possible date on which the claims period could close was December 11, 2023 (60 days after the anticipated date of the fairness hearing, originally scheduled for October 12, 2023). Thus, the claims period would continue to run for over four months after the July 21, 2023 date for which claims data was available.

14. At no time have the number of products reported by Angeion as preliminarily

eligible exceeded—or come close to exceeding—the number of products sold by Artsana during the Class Period (874,538).

15. On September 20, 2023, Angeion reported by email to the Parties that further review of the 153,244 preliminarily eligible products from claims submitted up to July 21, 2023, had identified a revised total of 61,582 preliminarily valid products claimed as of July 21, 2023. *See also* Dkt. 81, 9/25/23 Weisbrot Decl. (reporting similarly).

16. Under the Settlement, the Settlement Administrator shall provide a further update reporting on claims data at least ten (10) days before the fairness hearing now scheduled for November 8, 2023. Settlement ¶ 90.

17. According to the Settlement Administrator, as the claims period continues to run, known Class Members are continuing to file claims. As of September 25, 2023, the Settlement Administrator reported that from September 1, 2023 to September 15, 2023, “148 claims were filed by login filers (known class members).” (*See* Dkt. 81, 9/25/23 Weisbrot Decl. ¶ 8.). Now that the fairness hearing has been rescheduled for November 8, 2023, under the Settlement the earliest date on which the claims period can close is not until January 7, 2024.

18. Class Counsel expect that known Class Members, as well as additional Class Members, will continue to file valid claims throughout the Class Period. Further, it is Class Counsel’s understanding that there is typically an increase in claims filing near the deadline to submit Claim Forms. (*See* Weisbrot 10/16/2023 Decl., ¶ 6).

19. In addition, pursuant to the Settlement there is a claims deficiency process through which the Settlement Administrator shall determine, after consultation with Class Counsel and Artsana’s Counsel, whether to allow a Class Member an opportunity to cure a deficient claim form. Settlement ¶ 87. Further, any Claimant who desires to contest a rejection of their claim form may

do so within ten (10) business days from receipt of the rejection. *Id.* Class Counsel intend to exercise all rights under the Settlement to challenge determinations that certain claims are not valid as is necessary and appropriate.

20. Based on available data I believe the value that will be paid directly to Class Members under the Settlement will be substantial.

21. Even using Defendant's estimated figure for total payments to be made directly to Class Members, Plaintiffs' fee would be only 44% of the Settlement value when calculated on that basis.<sup>3</sup>

22. Class Counsel began investigating this matter in December of 2020. Class Counsel carefully reviewed a December 10, 2020 Staff Report of the House of Representatives Subcommittee on Economic and Consumer Policy entitled: "Booster Seat Manufacturers Give Parents Dangerous Advice: Misleading Claims, Meaningless Safety Testing, and Unsafe Recommendations to Parents About When They Can Transition Their Children from Car Seats to Booster Seats," as part of a comprehensive pre-suit investigation. The December 2020 House Report is 32 pages long and relates to seven different booster seat manufacturers including Artsana. In addition, on July 14, 2021, counsel for Jimenez submitted a Freedom of Information Act request to the National Highway Traffic Safety Administration to uncover additional information related to Defendant's marketing and testing of the KidFit branded booster seats.

23. Artsana has claimed *Jimenez* counsel "copied and pasted" from the *Sayers* complaint. Def's Mem. at 4 (citing *Jimenez* Complaint, ¶¶ 80-87). The paragraphs of the *Jimenez*

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<sup>3</sup> Class Counsel calculate this percentage as follows: (1) \$2,209,375 Defendant estimates will be paid to Class Members (Def's Mem. at 19); (2) notice and administration expenses: \$612,753.20 as of only July 31, 2023 (Dkt. 60, 8/28/23 Weisbrot Decl., ¶ 33); (3) incentive awards: \$9,000; (4) requested fees, costs and expenses: \$2,250,000. Total: \$5,081,128.20.  $\$2,250,000/\$5,081,128.20 = 44.3\%$ .

complaint cited by Artsana are exclusively part of a subsection of the complaint reciting basic facts to support tolling of the statute of limitations. Counsel for Plaintiff Jimenez, Bursor & Fisher, P.A. and Vozzolo LLC, drafted a comprehensive complaint setting forth detailed allegations independently of *Sayers* counsel.

24. Artsana highlights a billing entry submitted by Vozzolo LLC described as “Fact research re potential new matter (3.10)” and asserts that it is unclear whether this research was relevant to this litigation. *See* Def’s Mem. at 8 (citing Dkt. 63-3 at 13). All attorneys at Vozzolo LLC categorize every billing entry by the matter to which it relates. This entry was accurately categorized as relating to the “Case Matter/Name” Artsana.

25. Artsana’s counsel is correct that much of the work in this matter related to the proposed Settlement as described in Plaintiffs’ initial papers in support of final approval and their fee application. However, no work was billed for fee related matters. For example, the detailed time records submitted by my firm note several fee related items, however, the time entries were zeroed out and accordingly not billed to the Class. *See* Dkt. 63-3. Below are screenshots of several detailed time entries from my firm illustrating such billing practices:

4/11/2022	Artsana	A Vozzolo	Corresp re potential fee mediation (0)	0.00
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4/20/2022	Artsana	A Vozzolo	Corresp re fee mediation (.00)	0.00
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3/7/2023	Artsana	A Vozzolo	Corresp with parties re mediation over fees (0.0); t/call A Clisura re settlement website (.10); review defendant's edits re settlement website (.20); t/call A Clisura re updated website and claim form (.40); review Corresp from A Clisura re claim form and website review (.10); t/call with A Clisura re comments to claim form/settlement website (.20); t/call with T Fisher re claim form, notice (.30)	1.30
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3/30/2023	Artsana	A Vozzolo	t/call with T Fisher, M Geer and Def re claims admin (.50); t/call wit A Clisura re claim form, claims, litigation strategy (.10); Review Corresp. from Def Re same (.10); Corresp[ with Co-counsel re fee mediation (0.0)	0.70
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8/18/2023	Artsana	A Clisura	Review recent 2d Cir decision re class settlements (.9); review recent approval order by J Briccetti (.1); review MOL ISO final approval and highlight areas for revision (1.2); begin review of MOL ISO atty fees (0); discuss various issues regarding claim processing with A Vozzolo (.5); review update from claims administrator re claims processing (.1)	2.80
8/19/2023	Artsana	A Clisura	Review and edit sections of motion for attorney fees, w focus on background and summary of settlement (0)	0.00
8/20/2023	Artsana	A Clisura	Continue to review and edit fee brief (0); review case law in connection with final approval papers (3.6)	3.60
8/21/2023	Artsana	A Clisura	Continue to review and revise fee brief (0); legal research in connection final approval, claims rates, claims admin review issues (5.6); review mediation term sheet (.1)	5.70

26. Substantial work, however, was required of Class Counsel to review, negotiate, revise and ultimately finalize the Settlement provisions. In particular, Class Counsel devoted many hours to ensuring Class Members who lack proof of purchase could meaningfully participate in the Settlement.

27. In Class Counsel's experience, Class Members in consumer protection class actions frequently do not retain proof of purchase for their retail products.

28. Moreover, as this Court acknowledged in *In re Scotts EZ Seed Litigation*, “[i]f proof of purchase was required . . . there would be no such thing as a consumer class action, especially with respect to low-cost products.” 304 F.R.D. 397, 407-08 (S.D.N.Y. 2015) (determining that class was ascertainable despite the fact that consumers were unlikely to have retained proof of purchase) (internal quotation marks and citation omitted).

29. Here, Class Members without proof of purchase can recover \$25 per booster seat if they are able to provide certain basic information about their purchase. This benefit equates to between 17% and 25% of the MSRP.

30. Class Counsel worked extensively to negotiate reasonable criteria for Class Members without proof of purchase to verify their claims. Under the Settlement, such Class



Members need to corroborate their purchase of a KidFit booster seat by satisfying at least two of the following four requirements: (1) identifying the serial number; (2) identifying the model of the Eligible Product they purchased and either the primary and/or secondary colors of the seat; (3) identifying the retailer from which they purchased, as well as the approximate month (or season) and year of purchase; or (4) if the Eligible Product was not purchased online, identifying the municipality and state in which the Eligible Product was purchased and attaching a picture of the Eligible Product. An incorrect response to the primary and/or secondary color question will not be counted against the Claimant. Settlement ¶ 47.

31. These criteria were agreed on by the Parties and Class Counsel believe they are sufficiently challenging to deter fraud while also providing a reasonable and not unduly burdensome means for Class Members to file a claim.

32. Further, Class Counsel worked extensively to ensure the paper and electronic Claim Forms were accessible, understandable, and not unduly burdensome for Class Members, including consulting with an expert to ensure the claim form accurately reflected the agreed upon verification criteria in a way that was clear and understandable to Class Members without proof of purchase.

33. For known Class Members identified from Artsana's records (either as a result of a direct purchase from Artsana or by registration of the Eligible Product with Defendant or the National Highway Traffic Safety Administration ("NHTSA")), the online claim form is pre-populated with applicable claims information to make filing a claim form as straightforward as possible.

34. Class Counsel tested and reviewed multiple iterations of the claim form and conferred at length with Angeion and Artsana about same.

35. As a result of those discussions, Class Counsel believe the verification criteria and

the claim form itself strike an appropriate balance between allowing legitimate participation in the Settlement and deterring false claims.

36. On March 7, 2023, shortly before the electronic claim form went live, Mr. Steven Weisbrot sent an email to the Parties, stating in part, “We believe that the current workflow [of the electronic claim form], Angeion’s prophylactic fraud detection measures—and if necessary, our back end claim review, will be extremely effective in catching fraud in a way that does not depress claims filing activity.” Attached hereto as **Exhibit C** is a true and correct copy of the March 7, 2023 email.

37. There were multiple rounds of negotiations regarding the claim form after it went live. In particular, Artsana repeatedly pushed to have the electronic claim form modified so that Class Members were asked to provide the serial number of their booster seat before being able to access the other three sets of verification criteria. Class Counsel believe the requested change could confuse Class Members and would suggest either that the serial number was required to file a claim or that the other three sets of verification criteria were not equivalent means of corroborating a Class Member’s purchase.

38. Class Counsel believe that many Class Members who lack proof of purchase also have not retained their booster seats and thus cannot supply the serial number. This is especially true due to the length of the Class Period, which begins on April 22, 2015 and the fact that consumers are instructed to discard their booster seats after the expiration date and/or if the seat has been involved in an accident. *See, e.g.*, <https://www.chiccousa.com/baby-talk/why-do-car-seats-expire/> (“How Should I Dispose of an Expired Car Seat? If your car seat has expired or was involved in an accident, it’s important to stop using it and throw it away.”); <https://www.chiccousa.com/baby-talk/top-5-car-seat-questions/> (“2. What should I do with my

expired car seat? Most importantly, do not use an expired car seat. To prevent use of an expired seat, Chicco recommends removing the seat cover, cutting the harness and writing TRASH or EXPIRED on the seat.”).

39. Ultimately, Class Counsel agreed to present the serial number question at the top of the 4-box matrix to encourage consumers who have the serial number to utilize this filing option. Class Counsel agreed to change the order of the 4-box claims matrix, on the condition that a valid serial number would qualify a claimant for \$25 without answering an additional verification question, a reasonable condition and one that further benefited Class Members.

40. Class Counsel also later agreed to move the attestation requiring claimants to submit their claim under penalty of perjury to the beginning of the claim form.

41. There is no evidence that the structure of the claim form (which accurately reflects agreed terms of the Settlement) has encouraged fraud. Class Counsel believe that, contrary to Defendant’s assertions, the claim form does not encourage fraud, but rather strikes a balance between deterring fraudulent filers and enabling legitimate participation. The Settlement terms do not require claimants to submit a serial number to make a \$25 claim and Defendant offers no evidence that separating the serial number question from the other 3 sets of verification criteria would reduce the number of fraudulent claims, especially those generated by “bots.”

42. Accordingly, Class Counsel’s significant and ongoing work to monitor the claims process does not support Defendant’s assertion of “unclean hands.”

43. Under the Settlement, Artsana agreed to participate in mediation to negotiate an amount of attorneys’ fees. Although Artsana agreed to mediate attorneys’ fees as part of the Settlement (Settlement ¶ 66), it has shown no intent to negotiate fees in good faith, opting instead to oppose attorneys’ fees all together.

44. Neither additional mediation session occurring on August 18 and August 28, 2023 involved any negotiations regarding attorneys' fees. Rather, they involved Defendant's gripes over the deficiency process.

45. Artsana's counsel appears to make a practice of refusing to agree on a reasonable amount of attorneys' fees, instead leaving the amount of fees for the Court to determine in its discretion under the settlement, but opposing the amount of fees sought. *See In re: Apple Inc. Device Performance Litig.*, No. 5:18-md-2827, Defendant's Opposition to Mot. for Attorneys' Fees (Dkt. 522) (N.D. Cal. Oct. 6, 2022), *Ramirez v. HB USA Holdings, Inc.*, No. 5:20-cv-01016, Defendant's Opposition to Mot. for Attorneys' Fees (Dkt. 60) (C.D. Cal. Feb. 28, 2022).

46. Defendant knew that Class Counsel would make an application to the Court for a maximum of \$2.25 million in attorneys' fees, costs, and expenses and agreed to notify the Class accordingly. *See Settlement*, Ex. E, Class Notice § 20.

47. Here, Artsana's position that it cannot be made to pay attorneys' fees because there is no basis to recover fees from Artsana rather than the Class is disingenuous and contrary to the plain language of the Settlement where Artsana agreed to pay any Attorneys' Fees and Expenses awarded by the Court. *See Settlement*, ¶ 59(d) ("The Long Form Notice shall...explain that the **fees and expenses awarded to Class Counsel...will be paid by Artsana**...in an amount to be determined by the Court."); *id.*, ¶ 66 ("Class Counsel will make a motion...for an award of Attorneys' Fees and Expenses..., which shall be the sole compensation **paid by Artsana for Plaintiffs' Counsel**."); *id.* ("If...the Parties do not agree on the amount of Attorneys' Fees and Expenses..., the amount...will be determined by the Court..., and in no event shall Artsana be obligated to pay any amount in excess of what the Court awards."); *id.*, ¶ 68 ("**Any Attorneys' Fees and Expenses awarded by the Court shall be paid directly by Artsana**.... This amount

shall be inclusive of all fees and costs of Class Counsel to be *paid by Artsana* in the Actions.”); *id.*, ¶ 69 (“**Any Attorneys’ Fees and Expenses awarded by the Court shall be paid by Artsana**”). (Emphasis added.) Artsana’s arguments cost Class Counsel substantial additional time briefing Plaintiffs’ reply in support of their fee petition when the argument that there is no legal or contractual basis for fees is meritless.

48. Defendant’s litigation tactics have increased the amount of time Class Counsel has expended on this matter considerably, including through their blanket opposition to attorneys’ fees and incentive awards that they agreed to pay as determined by the Court, as well as by creating a need to repeatedly revisit settled issues, including, but not limited to the criteria used to verify claims made without proof of purchase, and now the length of the claims period. Both of these issues were agreed upon terms set forth in the Settlement Agreement. Defendant’s counsel has been advised previously that the role of the Court is to approve or disapprove of the settlement as it stands. *See Ramirez v. HB USA Holdings, Inc.*, No. 20-cv-1016, Dkt. 87 (May 2, 2022 hearing transcript) (C.D. Cal. June 8, 2022).

49. Over many months of investigating, litigating, and settling this matter I engaged in numerous phone conversations and email exchanges with my co-counsel L. Timothy Fisher, at Bursor & Fisher. Artsana suggests that because Mr. Fisher’s time records do not reflect as much time devoted to these regular communications, counsel’s time records are not reliable. However, these communications occurred and the fact that certain communications were inadvertently omitted from Bursor & Fisher’s time records inures to the benefit of Defendant, but does not negate the legitimacy of the time submitted.

50. Artsana complains Class Counsel’s entries are “vague” but the descriptions included in Class Counsel’s billing entries conform with accepted billing practices. For example,

while Defendant complains of entries describing the subject of communications as “re: litigation strategy,” a review of time records submitted in a different matter by Defendant’s counsel show Gibson Dunn uses virtually identical descriptions. Attached as **Exhibit D** is a true and correct copy of such time records submitted in *Social Life Network, Inc. v. Peak One Opportunity Fund, L.P., et al.*, No. 21-cv-21373, Dkt. 88, Def’s Mot. for Attorneys’ Fees and Expenses and Mem. of Law (S.D. Fla. May 9, 2023) (seeking fees for time billed by Gibson Dunn). In particular, a review of the time submissions shows over 30 time entries described as communications regarding “case strategy”. Likewise, other Gibson Dunn entries are described as communications regarding “next steps.” A few examples from Gibson Dunn’s time records are included here:

ID	Rate	Hours	Narrative
33503134	\$1,370.00	.5	Review motion to extend as filed, correspondence re next steps.
35250610	\$1,535.00	.5	Correspondence re settlement, next steps.
33396353	\$905.00	.3	Communicate with J. Goldstein re case strategy.
33490122	\$1,060.00	.1	Communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.
33726410	\$1,060.00	.1	Communicate with B. Richman regarding case strategy.
35271401	\$1,115.00	.3	Communicate with Gibson team regarding motion to dismiss extension and case strategy.

51. Class Counsel’s hours were recorded in a manner consistent with accepted billing practices and were reasonably expended on the litigation and in resolving this matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
October 17, 2023 in New City, New York.

/s/ Antonio Vozzolo  
Antonio Vozzolo

**EXHIBIT A**



## RE: Jimenez v Artsana USA | Weekly Status Report

Antonio Vozzolo <avozzolo@vozzolo.com>

Fri 7/14/2023 2:29 PM

To: Jenny Shawver <jshawver@angeiongroup.com>; Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com <aleslie@bursor.com>; Andrea Clisura <AClisura@vozzolo.com>; ltfisher@bursor.com <ltfisher@bursor.com>; Greg Coleman <gcoleman@milberg.com>  
Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>

Dear Jenny:

The settlement agreement states in Para. 90, that:

The Settlement Administrator shall provide weekly updates of claims information to the parties. In addition, **at least fifty (50) days before the filing of Class Counsel's motion for Attorneys' Fees and Expenses (i.e., at least sixty (60) days before the Opt-Out and Objection Deadline), the Settlement Administrator shall provide a spreadsheet to Class Counsel and Defense Counsel** that contains information sufficient to determine: (a) the number of Settlement Class Members that submitted a claim (without identifying the claimants); (b) the number of submitted Claim Forms that are valid, and which are not; (c) the number of submitted Claim Forms the Settlement Administrator intends to treat as Approved Claims; and (d) the number of submitted Claim Forms the Settlement Administrator has denied and the reason(s) for the denials. The Settlement Administrator shall provide an updated spreadsheet containing the same categories of information at least ten (10) days before the filing of Class Counsel's motion for Attorneys' Fees and Expenses (i.e., at least twenty (20) days before the Opt-Out and Objection Deadline).

Can you let us know when you expect to get us the spreadsheet, as our fee brief is due on 8/28.

Sincerely,

Best,

Antonio

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**From:** Jenny Shawver <jshawver@angeiongroup.com>

**Sent:** Wednesday, July 12, 2023 7:05 PM

**To:** Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com; Andrea Clisura <AClisura@vozzolo.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>

**Cc:** Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>

**Subject:** RE: Jimenez v Artsana USA | Weekly Status Report

Counsel,

Please find attached here v2 of the status report. It was pointed out to me that the "Total Claims" column wasn't adding all rows in the last version. This has been corrected in the attached.

Best,  
Jenny

**Jenny Shawver**

*Senior Project Manager*

Angeion Group

1650 Arch Street, Suite 2210

Philadelphia, PA 19103

267-996-3847 (D)

215-525-0209 (F)

[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)

[www.angeiongroup.com](http://www.angeiongroup.com)



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**From:** Jenny Shawver

**Sent:** Wednesday, July 12, 2023 2:54 PM

**To:** 'Martha Geer' <[mgeer@milberg.com](mailto:mgeer@milberg.com)>; 'Smith, Jeremy S.' <[JSSmith@gibsondunn.com](mailto:JSSmith@gibsondunn.com)>; 'Chorba, Christopher' <[CChorba@gibsondunn.com](mailto:CChorba@gibsondunn.com)>; 'Antonio Vozzolo' <[avozzolo@vozzolo.com](mailto:avozzolo@vozzolo.com)>; 'Rubin, Daniel M.' <[DRubin@gibsondunn.com](mailto:DRubin@gibsondunn.com)>; 'Jonathan Cohen' <[jcohen@milberg.com](mailto:jcohen@milberg.com)>; 'Katharine Batchelor' <[KBatchelor@milberg.com](mailto:KBatchelor@milberg.com)>; 'aleslie@bursor.com' <[aleslie@bursor.com](mailto:aleslie@bursor.com)>; 'Andrea Clisura' <[AClisura@vozzolo.com](mailto:AClisura@vozzolo.com)>; 'ltfisher@bursor.com' <[ltfisher@bursor.com](mailto:ltfisher@bursor.com)>; 'Greg Coleman' <[gcoleman@milberg.com](mailto:gcoleman@milberg.com)>

**Cc:** Lacey Rose <[LRose@angeiongroup.com](mailto:LRose@angeiongroup.com)>; Steven Weisbrot <[steve@angeiongroup.com](mailto:steve@angeiongroup.com)>

**Subject:** RE: Jimenez v Artsana USA I Weekly Status Report

Dear Counsel,

Please find attached the weekly status report for the *Jimenez v Artsana USA* settlement.

If you have any questions or need additional information, please let us know.

Best,  
Jenny

**Jenny Shawver**

*Senior Project Manager*

Angeion Group

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[www.angeiongroup.com](http://www.angeiongroup.com)



**EXHIBIT B**

**RE: "UPDATE" Jimenez v Artsana USA | Claims Preliminary Validations**

Jenny Shawver &lt;jshawver@angeiongroup.com&gt;

Fri 8/18/2023 1:19 AM

To: Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com <aleslie@bursor.com>; Andrea Clisura <AClisura@vozzolo.com>; Itfisher@bursor.com <Itfisher@bursor.com>; Greg Coleman <gcoleman@milberg.com>

Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>

Dear Counsel:

It came to our attention that the analysis we provided on the 26<sup>th</sup> of July was only considering "A-B" claims. We have re-run the analysis to factor in all possible combinations. As a result, you'll find more products claimed in this report than the prior one circulated on July 26. Revised numbers are as follows:

CLAIM VALIDATION AND FRAUD ANALYSIS RESULTS SUMMARY		
Status	Reason	Count
Valid	Match on combination key, retailer name, serial number or login claim and not suspicious of fraud	153,244
Pending	Not suspicious for fraud but require supporting documentation review (includes claims selecting Option D and claims with proof of purchase)	4,418
Invalid	Does not match on combination key ( No match on model, year and at least one color)	348,441
Invalid	Does not match on retailer (No retailer name or invalid retailer)	70,752
Invalid	Fraud	435,769
TOTAL		1,012,624

If you have any questions, please let us know.

Best,  
Jenny

**Jenny Shawver***Senior Project Manager*

Angeion Group

1650 Arch Street, Suite 2210

Philadelphia, PA 19103

267-996-3847 (D)

707-536-3156 (M)

215-525-0209 (F)

[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)[www.angeiongroup.com](http://www.angeiongroup.com)**From:** Jenny Shawver**Sent:** Wednesday, July 26, 2023 5:24 PM

**To:** Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com; Andrea Clisura <AClisura@vozzolo.com>; Itfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>

**Cc:** Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>

**Subject:** RE: Jimenez v Artsana USA | Claims Preliminary Validations

Dear Counsel:

Thank you again for your patience while we worked through this process. Below are the results for our preliminary analysis. The document review on the pending claims is not completed so these have no current status. Please review and let us know if you have any questions. We are happy to set up a call to discuss in more detail.

Best,  
Jenny

PRELIMINARY CLAIM VALIDATION AND FRAUD ANALYSIS RESULTS SUMMARY		
Status	Reason	Count
Valid	Match on combination key, match on retailer name and not suspicious for fraud	129,512
Pending	Not suspicious for fraud but require review (Claims with Supporting Documents)	2,202
Invalid	Does not match on combination key ( No match on model, year and at least one color)	349,995
Invalid	Does not match on retailer (No retailer name or invalid retailer)	66,123
Invalid	Grouping analysis (Fraud flag)	411,266
Invalid	Bot pattern detected (Fraud flag)	6,639
Invalid	Inconsistent location pattern (Fraud flag)	5,256
Invalid	Disposable or suspicious domain (Fraud flag)	17,015
TOTAL		988,008

SERIAL NUMBER VALIDATION SUMMARY	
Type	Count
Valid serial number	1,046
Invalid serial number	986,962
TOTAL	988,008

**Jenny Shawver**

*Senior Project Manager*

Angeion Group

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215-525-0209 (F)

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**From:** Martha Geer <[mgeer@milberg.com](mailto:mgeer@milberg.com)>

**Sent:** Tuesday, July 25, 2023 5:58 PM

**To:** Jenny Shawver <[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)>; Smith, Jeremy S. <[JSSmith@gibsondunn.com](mailto:JSSmith@gibsondunn.com)>; Chorba, Christopher <[CChorba@gibsondunn.com](mailto:CChorba@gibsondunn.com)>; Antonio Vozzolo <[avozzolo@vozzolo.com](mailto:avozzolo@vozzolo.com)>; Rubin, Daniel M. <[DRubin@gibsondunn.com](mailto:DRubin@gibsondunn.com)>; Jonathan Cohen <[jcohen@milberg.com](mailto:jcohen@milberg.com)>; Katharine Batchelor <[KBatchelor@milberg.com](mailto:KBatchelor@milberg.com)>; [aleslie@bursor.com](mailto:aleslie@bursor.com); Andrea Clisura <[AClisura@vozzolo.com](mailto:AClisura@vozzolo.com)>; [ltfisher@bursor.com](mailto:ltfisher@bursor.com); Greg Coleman <[gcoleman@milberg.com](mailto:gcoleman@milberg.com)>

**Cc:** Lacey Rose <[LRose@angeiongroup.com](mailto:LRose@angeiongroup.com)>; Steven Weisbrot <[steve@angeiongroup.com](mailto:steve@angeiongroup.com)>

**Subject:** RE: Jimenez v Artsana USA I Weekly Status Report

[EXTERNAL]

Thanks, Jenny. We appreciate it.

Martha A. Geer  
Partner



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Direct Line: (919) 600-5023  
[www.milberg.com](http://www.milberg.com)



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---

**From:** Jenny Shawver <[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)>

**Sent:** Tuesday, July 25, 2023 8:11 PM

**To:** Martha Geer <[mgeer@milberg.com](mailto:mgeer@milberg.com)>; Smith, Jeremy S. <[JSSmith@gibsondunn.com](mailto:JSSmith@gibsondunn.com)>; Chorba, Christopher <[CChorba@gibsondunn.com](mailto:CChorba@gibsondunn.com)>; Antonio Vozzolo <[avozzolo@vozzolo.com](mailto:avozzolo@vozzolo.com)>; Rubin, Daniel M. <[DRubin@gibsondunn.com](mailto:DRubin@gibsondunn.com)>; Jonathan Cohen <[jcohen@milberg.com](mailto:jcohen@milberg.com)>; Katharine Batchelor <[KBatchelor@milberg.com](mailto:KBatchelor@milberg.com)>; [aleslie@bursor.com](mailto:aleslie@bursor.com); Andrea Clisura <[AClisura@vozzolo.com](mailto:AClisura@vozzolo.com)>; [ltfisher@bursor.com](mailto:ltfisher@bursor.com); Greg Coleman <[gcoleman@milberg.com](mailto:gcoleman@milberg.com)>

**Cc:** Lacey Rose <[LRose@angeiongroup.com](mailto:LRose@angeiongroup.com)>; Steven Weisbrot <[steve@angeiongroup.com](mailto:steve@angeiongroup.com)>

**Subject:** Jimenez v Artsana USA I Weekly Status Report

Counsel,

Please find attached this week's status report for the *Jimenez v Artsana USA* settlement.

We are still working on the preliminary claim validation report and apologize for the delay. We should have this wrapped up tomorrow and I will keep you posted. Thank you for your patience.

Best,  
Jenny

**Jenny Shawver**  
*Senior Project Manager*  
Angeion Group  
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Philadelphia, PA 19103  
267-996-3847 (D)  
215-525-0209 (F)  
[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)  
[www.angeiongroup.com](http://www.angeiongroup.com)



**EXHIBIT C**

**RE: Jimenez v. Artsana - Website for Review**

Steven Weisbrot <steve@angeiongroup.com>

Tue 3/7/2023 5:55 PM

To: Jenny Shawver <jshawver@angeiongroup.com>; Lacey Rose <LRose@angeiongroup.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Martha Geer <mgeer@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Itfisher@bursor.com <Itfisher@bursor.com>; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com <aleslie@bursor.com>; Katharine Batchelor <KBatchelor@milberg.com>; Sean Litteral <slitteral@bursor.com>  
Cc: Jazminee Shumway <JShumway@angeiongroup.com>

All,

We have completed the revised site, which is now ready for your review. As previously pointed out, we have made every effort to ensure a good claimant workflow, including providing increased context for the class member, which was largely absent from the e-form. For instance, previously, there was no way for the class member to discern that they could have chosen two of the four columns to validate their non-previous purchase claim. Now, the e-version mirrors the physical form and provides much needed context for the class member. We also want to point out that we did not incorporate any of the changes that were communicated via Lacey's email to attempt to mitigate against fraudulent filing. We believe that the current workflow, Angeion's prophylactic fraud detection measures—and if necessary, our back end claim review, will be extremely effective in catching fraud in a way that does not depress claims filing activity.

With all of the notice components going live at various times tomorrow, the website must be live this evening. We apologize in advance for the urgent timing. We will have developers on standby to incorporate any necessary changes. Also, if we need to change anything after the site is already live, that is fine as well and can be accomplished quickly.

The site and log in information is below"

<http://ArtsanaBoosterSeatSettlement.AngeionTest.com>

Username: artsana

Password: eaAT2U8l

ABC00051  
ABC00052  
ABC00053  
ABC00054  
ABC00055  
ABC00056  
ABC00057  
ABC00058  
ABC00059  
ABC00060

CONFIRMATION CODE SAME FOR ALL: **12345**

If you have any questions or suggested edits, please let us know. And, again, we apologize for the fire drill and look forward to beginning the notice program.

Best,  
Steve

---

**From:** Steven Weisbrot

**Sent:** Monday, March 6, 2023 8:08 PM

**To:** Jenny Shawver <jshawver@angeiongroup.com>; Lacey Rose <LRose@angeiongroup.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Martha Geer <mgeer@milberg.com>; Rubin, Daniel M.



<DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Itfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Sean Litteral <slitteral@bursor.com>  
**Cc:** Jazminee Shumway <jshumway@angeiongroup.com>  
**Subject:** RE: Jimenez v. Artsana - Website for Review

All,

Thank you for your patience as we work through this. We are almost complete but given the importance of the claims workflow, we want to make sure we are comfortable with every detail before sharing the revised site and any suggestions. We need a bit more time to complete that work.

We will update the group tomorrow and provide the revised claim process tomorrow, which aims to clarify some context for the class member, but will not have many meaningful changes that would depress claims activity.

Thank you again for your patience.

Best,  
Steve

---

**From:** Jenny Shawver <[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)>

**Sent:** Friday, March 3, 2023 11:06 AM

**To:** Lacey Rose <[LRose@angeiongroup.com](mailto:LRose@angeiongroup.com)>; Antonio Vozzolo <[avozzolo@vozzolo.com](mailto:avozzolo@vozzolo.com)>; Martha Geer <[mgeer@milberg.com](mailto:mgeer@milberg.com)>; Rubin, Daniel M. <[DRubin@gibsondunn.com](mailto:DRubin@gibsondunn.com)>; Jonathan Cohen <[jcohen@milberg.com](mailto:jcohen@milberg.com)>; Smith, Jeremy S. <[JSSmith@gibsondunn.com](mailto:JSSmith@gibsondunn.com)>; Itfisher@bursor.com; Greg Coleman <[gcoleman@milberg.com](mailto:gcoleman@milberg.com)>; Andrea Clisura <[AClisura@vozzolo.com](mailto:AClisura@vozzolo.com)>; aleslie@bursor.com; Katharine Batchelor <[KBatchelor@milberg.com](mailto:KBatchelor@milberg.com)>; Sean Litteral <[slitteral@bursor.com](mailto:slitteral@bursor.com)>

**Cc:** Jazminee Shumway <[JShumway@angeiongroup.com](mailto:JShumway@angeiongroup.com)>; Steven Weisbrot <[steve@angeiongroup.com](mailto:steve@angeiongroup.com)>

**Subject:** RE: Jimenez v. Artsana - Website for Review

**[WARNING: External Email]**

Counsel,

I wanted to inform you that the email below was sent prior to Steve relaying the content of yesterday's call to the project management team and we are still considering the claims process. We will update you by Monday close of business.

Apologies for any confusion.

Best,  
Jenny

**Jenny Shawver**

*Senior Project Manager*

Angeion Group

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(267) 996-3847 (Direct)

(215) 525-0209 (Fax)

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**From:** Lacey Rose <[LRose@angeiongroup.com](mailto:LRose@angeiongroup.com)>

**Sent:** Thursday, March 2, 2023 2:52 PM

**To:** Antonio Vozzolo <[avozzolo@vozzolo.com](mailto:avozzolo@vozzolo.com)>; Martha Geer <[mgeer@milberg.com](mailto:mgeer@milberg.com)>; Rubin, Daniel M. <[DRubin@gibsondunn.com](mailto:DRubin@gibsondunn.com)>; Jonathan Cohen <[jcohen@milberg.com](mailto:jcohen@milberg.com)>; Smith, Jeremy S. <[JSSmith@gibsondunn.com](mailto:JSSmith@gibsondunn.com)>; [ltfisher@bursor.com](mailto:ltfisher@bursor.com); Greg Coleman <[gcoleman@milberg.com](mailto:gcoleman@milberg.com)>; Andrea Clisura <[AClisura@vozzolo.com](mailto:AClisura@vozzolo.com)>; [aleslie@bursor.com](mailto:aleslie@bursor.com); Katharine Batchelor <[KBatchelor@milberg.com](mailto:KBatchelor@milberg.com)>; Sean Litteral <[slitteral@bursor.com](mailto:slitteral@bursor.com)>

**Cc:** Jenny Shawver <[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)>; Jazminee Shumway <[JShumway@angeiongroup.com](mailto:JShumway@angeiongroup.com)>; Steven Weisbrot <[steve@angeiongroup.com](mailto:steve@angeiongroup.com)>

**Subject:** Jimenez v. Artsana - Website for Review

Counsel,

The website is ready for your review and testing. Please use the following to access the site. We are providing some test Notice ID and Confirmation Codes so that you can submit a claim as if you had received a Notice.

<http://ArtsanaBoosterSeatSettlement.AngeionTest.com>

Username: artsana

Password: eaAT2U8l

Test Logins:

Notice ID: TEST0001, Confirmation Code: 12345

Notice ID: TEST0002, Confirmation Code: 12345

Notice ID: TEST0003, Confirmation Code: 12345

Notice ID: TEST0004, Confirmation Code: 12345

Notice ID: TEST0005, Confirmation Code: 12345

Concurrently, Angeion is testing the claim portal but did not want to let that delay your review of the website. Feel free to provide any necessary feedback.

Best,

**Lacey Rose**

*Project Manager*

Angeion Group

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Philadelphia, PA 19103

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(215) 525-0209 (Fax)

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**EXHIBIT D**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 21-cv-21373-GAYLES/TORRES

**SOCIAL LIFE NETWORK, INC.,**

Plaintiff,

v.

**PEAK ONE OPPORTUNITY FUND,  
L.P., et al.,**

Defendants.

**DEFENDANTS' MOTION FOR ATTORNEYS' FEES AND EXPENSES  
AND INCORPORATED MEMORANDUM OF LAW**

Defendants Peak One Opportunity Fund, L.P., Peak One Investments, LLC, and Jason Goldstein (collectively, "Peak One") hereby move for an award of attorneys' fees and related expenses pursuant to Local Rule 7.3. Peak One seeks recovery of the attorneys' fees and expenses incurred in connection with its defense of claims made by Plaintiff Social Life Network, Inc. On March 10, 2023, the Court granted Peak One's Motion to Dismiss Social Life's Second Amended Complaint, Dkt. 78, thereby entitling Peak One to attorneys' fees and expenses under the terms of the parties' agreement and the Florida law Social Life brought this case under. In support of this motion, Peak One submits the incorporated memorandum of law and exhibits reflecting supporting information, including the rates charged, hours expended, and expenses incurred.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 21-cv-21373-GAYLES/TORRES

**SOCIAL LIFE NETWORK, INC.,**

Plaintiff,

v.

**PEAK ONE OPPORTUNITY FUND,  
L.P., et al.,**

Defendants.

**DEFENDANTS' INCORPORATED MEMORANDUM OF LAW  
IN SUPPORT OF ITS MOTION FOR ATTORNEYS' FEES AND EXPENSES**

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## INTRODUCTION

This is a textbook case for an award of attorneys’ fees pursuant to a contractual agreement between two parties. The parties’ agreement expressly provides that the prevailing party has a right to recover its legal fees and expenses. Defendants Peak One Opportunity Fund, L.P., Peak One Investments, LLC, and Jason Goldstein (collectively, “Peak One”) clearly prevailed. Dkt. 78. The Court dismissed all of Plaintiff Social Life Network, Inc.’s claims with prejudice. Under Federal Rule of Civil Procedure 54(d)(2) and Local Rule 7.3, Peak One may now recover the fees and expenses it is owed.

## ARGUMENT

### PEAK ONE IS ENTITLED TO RECOVER FEES AND EXPENSES INCURRED IN DEFENDING THIS ACTION

#### **A. The Parties’ Agreement And Florida Law Independently Entitle Peak One To Attorneys’ Fees and Expenses.**

On March 10, 2023, this Court dismissed all of Social Life’s claims with prejudice and closed the case. Dkt. 78 at 4. The Court’s order entitles Peak One to an award of attorneys’ fees and expenses for two reasons. *First*, the plain language of the parties’ agreement expressly authorizes the prevailing party to recover attorneys’ fees and expenses. *See* Dkt. 54-4 at 6 (“The prevailing party shall be entitled to recover from the other party its reasonable attorney’s fees and costs.”); Dkt. 54-2 at 23 (“To the extent determined by the applicable court described above, the Company shall reimburse the Buyer for any reasonable legal fees and disbursements incurred by the Buyer in enforcement of or protection of any of its rights under any of the Transaction Documents.”); Dkt. 54-3 at 6 (“To the extent determined by such court, the Company shall reimburse the Holder for any reasonable legal fees and disbursements incurred by the Holder in enforcement of or protection of any of its rights under this Debenture or the Securities Purchase Agreement.”).

The parties' agreement is governed by Nevada law,<sup>1</sup> as the Court already found. Dkt. 75 at 2, 15-16 (Report & Recommendation); Dkt. 78 (adopting Report & Recommendation). And under Nevada law, "attorneys' fees are available by way of contract." *United States for Use & Benefit of Wells Cargo, Inc. v. Alpha Energy & Elec., Inc.*, 2023 WL 2570424, at \*5 (D. Nev. Mar. 20, 2023).<sup>2</sup> Here, Peak One is clearly the prevailing party under the agreement; the Court granted Peak One's motion to dismiss and dismissed all of Social Life's claims with prejudice. Dkt. 78. For this reason alone, Peak One is entitled to recover its attorneys' fees.

*Second*, Peak One is independently entitled to recover attorneys' fees under the Florida RICO statute Social Life sued under. That statute provides that a defendant in an action brought under Chapter 772 "shall be entitled to recover reasonable attorney's fees and court costs ... upon a finding that the claimant raised a claim which was without substantial fact or legal support." Fla. Stat. § 772.104(3). That standard is easily met here. This action was brought under Chapter 772. *See* Dkt. No. 54, ¶¶ 107-127. And under blackletter Florida law (as recognized by the Eleventh Circuit), a dismissal with prejudice—exactly what the Court ordered here, Dkt. 78 at 4—is "in and of itself ... sufficient to satisfy the requirements of" § 772.104(3). *Filippova v. Mogilevsky*, 2019 WL 1054256, at \*3 (S.D. Fla. Feb. 8, 2019); *accord, e.g., Johnson Enters. of Jacksonville, Inc. v. FPL Grp., Inc.*, 162 F.3d 1290, 1331 (11th Cir. 1998) ("[T]he Florida courts consistently have held that 'defendants are entitled to fees under section 772.104 where civil RICO counts were dismissed with prejudice.'"); *DJ Lincoln Enters. v. Google, LLC*, 2022 WL 3754182, at \*1 (S.D. Fla. Aug.

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<sup>1</sup> *See* Dkt. 54-2 § 9(b) (securities purchase agreement); Dkt. 54-3 § 9 (debenture agreement); Dkt. 54-4 § 10 (warrant agreement).

<sup>2</sup> Even if the agreement were governed by Florida law, "[u]nder Florida law, attorneys' fees may be awarded to the prevailing party pursuant to a contractual agreement authorizing their recovery." *Maraist Law Firm, P.A. v. Coates*, 2022 WL 18495554, at \*5 (S.D. Fla. Nov. 30, 2022), *adopted*, 2023 WL 1100768 (S.D. Fla. Jan. 30, 2023).

30, 2022) (“The Report and Recommendation cites well-reasoned caselaw standing for the proposition that achieving the dismissal with prejudice of a Florida RICO claim due to failure to state a claim *does* enable the defendant to collect attorneys’ fees under § 772.104(3).” (emphasis added)).

**B. Peak One’s Claimed Attorneys’ Fees Are Reasonable Under The Lodestar Method Applicable Here.**

To determine the amount of Peak One’s fees award, this Court utilizes the lodestar calculation method—the number of hours reasonably expended on the litigation multiplied by the reasonable hourly rate. *See Celsius Holdings, Inc. v. A SHOC Beverage, LLC*, 2022 WL 3568042, at \*4 (S.D. Fla. July 19, 2022). There is a “‘strong presumption’ that the lodestar figure is reasonable,” *Kennedy v. JNC Hospitality, LLC*, 2020 WL 13647027, at \*3 (S.D. Fla. Apr. 6, 2020), and adjustments should be made only in “rare” circumstances, *Larsen v. Commonwealth Fin. Sys., Inc.*, 2016 WL 245325, at \*1 (S.D. Fla. Jan. 21, 2016). Particularly where the results obtained are exceptional, the attorneys’ fees award should fully compensate the prevailing party. *Hensley v. Eckerhart*, 461 U.S. 424, 435 (1983).

Peak One undoubtedly obtained outstanding results here. Gibson, Dunn & Crutcher LLP represented Peak One in obtaining complete dismissal of Social Life’s case, defeating a total of 13 causes of action and \$15 million in claimed damages. *See* Dkt. 1, 54, 78. In total, the attorneys and paralegals at Gibson Dunn billed 431.6 hours litigating this case to judgment. *See* Richman Decl. ¶ 7. But, in the hopes of avoiding any further disputes and bringing an end finally to this particular litigation, Peak One has voluntarily limited this request to just the core timekeepers and tasks, excluding 15% of total hours billed, and reduced the requested rates by 38%-71% from what Peak One actually paid. Ex. 1 (Peak One’s invoices from Gibson Dunn). Peak One is also not seeking local counsel’s attorneys’ fee and expenses. Peak One’s request for \$222,224 in attorneys’ fees—just 1.48% of the claimed damages—is extremely reasonable, and should be awarded.

### 1. Rates Claimed By Peak One Are Reasonable.

The requested rates for Gibson Dunn’s attorneys are reasonable. “A reasonable hourly rate is the prevailing market rate in the relevant legal community for similar services by lawyers of reasonably comparable skills, experience, and reputation.” *Celsius Holdings, Inc. v. A SHOC Beverage, LLC*, 2022 WL 3568042, at \*4 (S.D. Fla. July 19, 2022).

There is a “powerful” presumption that the rates Peak One were billed and actually “paid” are the reasonable “market rate[s]” for the services rendered. *Dillard v. City of Greensboro*, 213 F.3d 1347, 1354-55 (11th Cir. 2000).<sup>3</sup> Nevertheless, in the hopes of avoiding further motions practice, Peak One is requesting even less than that. *See, e.g., Celsius*, 2022 WL 3568042, at \*4 n.4 (finding that the discounts applied to Gibson Dunn’s “customary rates actually charged to the client” “further supports” the “reasonableness” of the fees request); *Trump v. Clinton*, 2023 WL 333699, at \*22 (S.D. Fla. Jan. 19, 2023) (same for peer firms to Gibson Dunn). The discounted rates Peak One requests are below:

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<sup>3</sup> The terms of Peak One’s fee agreement provide that Peak One will be billed for legal services and reimbursable expenses on a monthly basis. Gibson Dunn charges for legal services at the hourly rates identified in the following chart and for computerized legal research (such as Lexis and Westlaw).

Timekeepers	Role	2021 Billed Rate	2022 Billed Rate	Requested Rate
Helgi Walker	Partner	\$1,370	\$1,535	\$950
Barry Goldsmith	Partner	\$1,475	\$1,595	\$950
M. Jonathan Seibald	Senior Assoc.	\$1,060	\$1,115	\$705
Brian Richman	Senior Assoc.	\$905	\$960	\$695
Andrew Shi	Assoc.	\$610	-	\$350
Angel Arias	Paralegal	\$595	-	\$175
Ariel Santamaria	Paralegal	\$505	-	\$175
Robyn DeLeo	Paralegal	\$495	\$520	\$175
Samuel Roeder	Paralegal	\$400	-	\$175

There is no question that the requested rates are reasonable for the work performed. This was a \$15,000,000 case, in which plaintiffs’ lawyers hurled (baseless) accusations of criminality. Peak One was justified in retaining “top-flight counsel.” *Orthopaedic Hosp. v. Encore Med., LP*, 2021 WL 5449041, at \*14 (S.D. Cal. Nov. 19, 2021) (describing “a peer firm of Gibson Dunn” (cleaned up)). Gibson Dunn is top-flight. It is a global law firm with over 1,400 lawyers in 20 offices worldwide. *See* Richman Decl. ¶ 2. The American Lawyer named Gibson Dunn its 2020 Litigation Department of the Year, and a Finalist in its 2021 Litigation Department of the Year competition. *Id.* That is the seventh time in a row that Gibson Dunn has been a finalist (with four wins)—an unprecedented achievement. *Id.* In 2022, both Chambers USA and U.S. News – Best Lawyers recognized Gibson Dunn as a top firm in securities litigation, and Benchmark Litigation US awarded the firm Tier 1 rankings for General Commercial and Securities litigation. *Id.* BTI Consulting Group also recognized Gibson Dunn as a Complex Commercial Litigation Powerhouse and a Securities and Finance Litigation Powerhouse in 2022. *Id.*

The Gibson Dunn team includes “some of the best [lawyers] in the country.” *Trump*, 2023 WL 333699, at \*22. “In their ranks are litigators that have argued, and won, several cases before the U.S. Supreme Court; served in positions of great significance in government; graduated from ... prestigious law schools; [and] clerked for federal district courts, circuit courts, and the U.S. Supreme Court ....” *Id.* Accordingly, the Gibson Dunn team reasonably “charge[s] top dollar (as evidenced by the rates actually paid by [Peak One]).” *Id.*

Barry Goldsmith is a partner at Gibson Dunn with more than 35 years of experience in the area of securities litigation and is one of the leading securities lawyers in the country. Richman Decl. ¶ 25. Prior to joining Gibson Dunn, Mr. Goldsmith was the top enforcement official at the National Association of Securities Dealers (now FINRA) and Chief Litigation Counsel at the SEC, where he was responsible for all enforcement litigation brought by the agency. *Id.* Mr. Goldsmith is consistently ranked as one of the top securities regulatory and enforcement lawyers in the nation by Chambers USA: America’s Leading Lawyers for Business and The Best Lawyers in America. *Id.* Best Lawyers named Mr. Goldsmith the New York City Securities Regulation “Lawyer of the Year” for 2015 and 2018. *Id.*

Helgi Walker is a partner at Gibson Dunn and is Co-Chair of the firm’s global litigation practice, a member of the firm’s executive committee, and Co-Chair of the Administrative Law and Regulatory Practice Group. Richman Decl. ¶ 24. Ms. Walker has 19 years of experience litigating complex regulatory and high-stakes litigation matters. *Id.* She has argued twice before the Supreme Court, most recently in 2021 in *FCC v. Prometheus Radio Project*, in which the Court unanimously ruled for Gibson Dunn’s clients. Richman Decl. ¶ 24. In the courts of appeals, Ms. Walker helped spearhead the challenge to a CFPB enforcement action in *PHH Corp. v. CFPB*, resulting in a historic separation of powers decision by the en banc D.C. Circuit ultimately

overturning a \$109 million regulatory penalty, 839 F.3d 1 (D.C. Cir. 2016), *reinstated in relevant part on reh'g en banc*, 881 F.3d 75. Ms. Walker is also well known for having argued and won both challenges to the FCC's first two "net neutrality" rules in *Comcast Corp. v. FCC*, 600 F.3d 642 (D.C. Cir. 2010), and *Verizon v. FCC*, 740 F.3d 623 (D.C. Cir. 2014), and was named The American Lawyer's Litigator of the Week for each victory. Richman Decl. ¶ 24.

M. Jonathan Seibald and Brian Richman are senior associates at Gibson Dunn. Mr. Seibald, a graduate of Harvard Law School, has 15 years of experience litigating securities and complex litigation matters, and has been recognized as "One to Watch" by *The Best Lawyers in America* in the area of securities litigation. Richman Decl. ¶ 26. Mr. Seibald was the lead associate in successfully defending an AIG subsidiary in litigation over bank-owned life insurance in which plaintiffs sought over \$1 billion in damages, but ultimately voluntarily dismissed their case with prejudice after extensive discovery and motion practice. *Id.* Mr. Seibald also played a leading role in successfully defending major investment banks and wealth management firms in regulatory investigations and securities litigation arising from some of the most significant events in the financial industry in the last 15 years—from the 2008 financial crisis through the 2021 meme stock market events. *Id.*

Mr. Richman, likewise, has significant experience in financial services, regulatory, and complex litigation matters. Richman Decl. ¶ 3. A former securities compliance officer at Goldman Sachs, Mr. Richman graduated from Yale Law School in 2016 and clerked for Judge Stephen F. Williams on the U.S. Court of Appeals for the District of Columbia Circuit. *Id.* Mr. Richman frequently speaks on securities regulation matters at industry and legal events. *Id.* And he has been the lead associate on a number of high-profile regulatory and litigation matters, *id.*; he was the principal drafter of a legal memorandum the Wall Street Journal credited with defeating a

controversial SEC rule proposal, *id.*; and he spearheaded the briefing in Amazon’s recent unanimous appellate victory over the New York Attorney General, *see People v. Amazon.com, Inc.*, 205 A.D.3d 485 (N.Y. App. Div. 2022).

The Gibson Dunn team was well-suited for this case in particular. Social Life’s counsel have created a cottage industry of suing investment funds on behalf of corporations to rescind securities the corporations sold years earlier. There is no question that the members of the Gibson Dunn team are the country’s leading experts on that specific issue. The four core members of the Gibson Dunn team represent parties or amici in a number of lawsuits concerning the same issues Social Life raises here<sup>4</sup>; represent the industry trade group in commenting on related matters before the SEC<sup>5</sup>; have published on the issue<sup>6</sup>; have been cited by the SEC itself<sup>7</sup>; and have served as counsel in a number of other lawsuits filed by Social Life’s counsel<sup>8</sup> and other plaintiffs’ lawyers.

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<sup>4</sup> *See, e.g.*, Brief of the Small Pub. Co. Coalition, Alternative Inv. Mgmt. Ass’n, & Nat’l Ass’n of Private Fund Managers as *Amici Curiae* Supporting Defendants-Appellants, *SEC v. Almagarby*, No. 21-13755 (11th Cir. July 8, 2022), 2022 WL 2763742; Defs.’ Br. in Support of Mot. to Dismiss, *SEC v. Fife*, No. 1:20-cv-5227 (N.D. Ill. Dec. 7, 2020), 2020 WL 9074910.

<sup>5</sup> *See, e.g.*, Comments of the Small Public Company Coalition on the Proposed Amendment to Rule 144, File No. S7-24-20 (Mar. 22, 2021), <https://bit.ly/3QAXn5C>; Letter from Helgi Walker, File No. S7-24-20 (Jan. 8, 2021), <https://bit.ly/3p9Bej1>; *see also* Letter from Mark Basile 7, SEC File No. S7-24-20 (Mar. 16, 2021), <https://bit.ly/3Acj4n1> (Social Life’s counsel acknowledging the “well written” letter from “a well-known big law attorney against the proposed rule changes”).

<sup>6</sup> *See* Helgi Walker, Barry Goldsmith, Jonathan Seibald, & Brian Richman, *Aggressive SEC Enforcement Actions Could Limit Small Business Recovery Resources*, Nat’l L.J., Aug. 20, 2020, available at <https://bit.ly/3Qgg1jn>.

<sup>7</sup> *See Rule 144 Holding Period*, 86 Fed. Reg. 5063, 5073 n.76 (Jan. 19, 2021) (citing Walker et al., *Aggressive SEC Enforcement Actions*, *supra* note 6).

<sup>8</sup> *See, e.g.*, *Social Life Network, Inc. v. LGH Invs., LLC*, No. 3:21-cv-00767-L-MDD (S.D. Cal.); *Vnue, Inc. v. Power Up Lending Grp., Ltd.*, No. 2:21-cv-5545 (E.D.N.Y.); *HPIL Holding v. Power Up Lending Grp., Ltd.*, No. 2:22-cv-2287 (E.D.N.Y.).



Other members of Gibson Dunn’s team are also highly qualified with outstanding credentials. Andrew Shi, a junior associate at Gibson Dunn, graduated in the top 1% of his class at Cornell University and obtained his J.D. from the University of Pennsylvania Law School. Richman Decl. ¶ 28. Paralegals Angel Arias, Robyn DeLeo, Samuel Roeder, and Ariel Santamaria have a combined 71 years of litigation experience (Arias (30 years), DeLeo (14 years), Roeder (5 years), and Santamaria (22 years)), and Ms. DeLeo and Mr. Roeder are themselves attorneys who are or were previously admitted in California and New York (DeLeo) or D.C. (Roeder). Richman Decl. ¶ 29.

The hourly rates requested for Gibson Dunn’s attorneys and paralegals are in line with the billing rates for attorneys and paralegals with similar qualifications in Southern Florida. In *CITGO Petroleum Corp. v. Petroleum Logistics Service USA, Inc.*, for example, the court approved rates for Jones Day and Willkie Farr partners (peer firms of Gibson Dunn) of between \$825 and \$850 per hour. *See* 2022 WL 17718802, at \*4-5 (S.D. Fla. Nov. 30, 2022). Likewise, the court approved a rate for a senior Jones Day associate (Andrew English) at \$700 per hour—right in the middle of what Peak One requests for Mr. Richman (\$695) and Mr. Seibald (\$705). *Id.* *CITGO* likewise confirms the reasonableness of the requested rates for junior associates (\$350) and paralegals (\$175). *See id.* (awarding a rate of \$300 (Douglas Kelly) and \$175 (Yarelis Cabrera) for a junior Willkie Farr associate and experienced Jones Day paralegal, respectively).

## **2. Hours Claimed By Peak One Are Reasonable.**

The hours expended by Peak One’s attorneys were reasonable, too.<sup>9</sup> *See* Ex. 2 (detailed time records for claimed hours). “[T]he measure of reasonable hours is determined by the

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<sup>9</sup> The detailed narrative and time descriptions included in the accompanying time records demonstrate the reasonableness of the tasks Peak One’s counsel completed. *See* Ex. 2. Certain entries did not break down the time spent on particular tasks, but the “thorough description[s]” of these “intertwined” and reasonable tasks “clarif[y] rather than obscure[] the record.” *Williams v. R.W. Cannon, Inc.*, 657 F. Supp. 2d 1302,

profession’s judgment of the time that may be conscionably billed and not the least time in which it might theoretically have been done.” *Norman v. Hous. Auth. of City of Montgomery*, 836 F.2d 1292, 1306 (11th Cir. 1988). “Sworn testimony that, in fact, it took the time claimed is evidence of considerable weight on the issue of the time required in the usual case.” *Perkins v. Mobile Hous. Bd.*, 847 F.2d 735, 738 (11th Cir. 1988). In general, a party who qualifies for a fee may recover “all hours reasonably expended if the relief obtained justified that expenditure of attorney time.” *Hensley v. Eckerhart*, 461 U.S. 424, 435 n.11 (1983) (emphasis added).

The hours expended by Peak One’s attorneys from Gibson Dunn were reasonable and necessary to successfully defend Peak One against Social Life’s numerous claims. Peak One’s legal team initially was required to conduct an extensive review and investigation of Social Life’s complaint. *See* Richman Decl. ¶ 16. As part of that investigation, Peak One’s counsel interviewed Peak One’s owner, Mr. Goldstein; reviewed email correspondence between Peak One and Social Life; analyzed the agreements at issue; investigated Social Life’s securities filings, along with the relationship between Social Life’s in-house counsel and litigation counsel; communicated with potential third-party witnesses; and corresponded with Social Life’s counsel regarding the claims. *Id.* The information discerned from this investigation was critical to an effective defense—and was efficiently accomplished in about 51 hours. *See* Ex. 2.

Peak One’s counsel then had to research and draft a motion to dismiss. *See* Richman Decl. ¶ 17. This was no small feat. Social Life’s initial complaint contained seven causes of action, with multiple causes of action attempting to state claims under *both* Florida and Nevada law. *See* Dkt. 1. Responding to all of these claims—and assessing Peak One’s potential counterclaims—required significant legal research, followed by careful and skilled drafting required to fit all of

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1312 (S.D. Fla. 2009) (recognizing that tasks may properly be grouped together when the entries “are not so vague or confusing that it makes it impossible to determine how the time was spent”).

Peak One's arguments into just twenty pages. *See* Richman Decl. ¶ 17. Given the multi-million dollar stakes, Peak One's lawyers performed all of this work in an extremely efficient manner. The partners, Ms. Walker and Mr. Goldsmith, developed the overall litigation strategy and supervised the work performed, but appropriately delegated to the associate and paralegal team the bulk of the work. *Id.* The associates and paralegals accounted for over 90% of the 85.7 hours billed in preparing a response to Social Life's first complaint (and handling other preliminary matters)—and achieved significant success. *Id.*; Ex. 2. After Peak One filed its first motion to dismiss, Social Life entirely abandoned all of its fraud claims and all of the claims arising under Nevada law. *Compare* Dkt. 1, *with* Dkt. 54.

Peak One's legal team was similarly efficient in preparing responses to Social Life's subsequent filings. The lawyers at Gibson Dunn: opposed Social Life's first motion to reopen the case (in 38 total hours); responded to Social Life's second motion to reopen the case and filed a related cross-motion for sanctions under 28 U.S.C. § 1927 (in 81.1 total hours) and reply brief (in 23 hours). *See* Richman Decl. ¶ 18; Ex. 2. After Social Life filed an amended complaint that included *new* claims and *new* parties, *see* Dkt. 54, Peak One's attorneys then researched and drafted a *new* motion to dismiss (in 37.1 hours) and reply brief (in 26.9 hours), and later notices of supplemental authority (in 7.6 hours), *see* Richman Decl. ¶ 18; Ex. 2. Peak One prevailed—in front of Chief Magistrate Judge Torres. *See* Dkt. 75. And the Gibson Dunn team then defended—and extended (to a full dismissal with prejudice)—that ruling in front of this Court (in 13.5 hours). *See* Dkt. 78.

<b>Gibson Dunn Timekeeper</b>	<b>Role</b>	<b>Activity</b>									<b>Total</b>
		Initial investigation & correspondence with Social Life	Resp. to 1st complaint	Opp'n to motion to reopen	Opp'n to 2d motion to reopen & cross § 1927 motion	Reply in support of § 1927 motion	2d motion to dismiss	Reply in support of 2d motion to dismiss	Supp. Auth.	Objections to Magistrate report	
Helgi Walker	Partner	2.5	5.8	3.2	2.7	0.8	3.0	1.9	0.8	1.0	21.7
Barry Goldsmith	Partner	0.4	0.6	1.9	0.7		1.1	0.3	0.2	0.4	5.6
M. Jonathan Seibald	Senior Assoc.	9.3	13.9	10.7	13.1	3.3	12.3	6.2	3.3	2.9	75.0
Brian Richman	Senior Assoc.	21.5	37.7	8.5	29.1	18.9	16.8	15.9	3.2	9.2	160.8
Andrew Shi	Assoc.	15.3	21.8	13.5	29.5						80.1
Angel Arias	Paralegal	2									2
Robyn DeLeo	Paralegal		0.9	0.2	0.3		3.9	2.6	0.1		8.0
Samuel Roeder	Paralegal		5								5
Ariel Santamaria	Paralegal				5.7						5.7
<b>Total</b>		51	85.7	38	81.1	23	37.1	26.9	7.6	13.5	363.9

All in all, the Gibson Dunn team defeated three complaints, \$15,000,000 in claimed damages, and 13 causes of action arising under federal, Florida, and Nevada law, in just 363.9 claimed hours. This already excludes over 13% of total hours billed by Gibson Dunn, and is more than reasonable for the complete victory the Gibson Dunn team obtained.

Despite the efficiency and success of Peak One's representation, Social Life objected to the vast majority of Peak One's claimed hours and its reduced billing rates, and refused to stipulate to an award of any attorneys' fees and costs unless Peak One agreed to stay the attorneys' fee motion while the case is on appeal without the need for any collateral to protect Peak One. *See Richman Decl.* ¶ 36.

\* \* \*

Based on the reasonable hours and reasonable rates explained above, Peak One has computed the lodestar to be \$222,224:

<b>Timekeepers</b>	<b>Role</b>	<b>Requested Rate</b>	<b>Requested Hours</b>	<b>Requested Fees</b>
Helgi Walker	Partner	\$950	21.7	\$20,615
Barry Goldsmith	Partner	\$950	5.6	\$5,320
M. Jonathan Seibald	Senior Assoc.	\$705	75.0	\$52,875
Brian Richman	Senior Assoc.	\$695	160.8	\$111,756
Andrew Shi	Assoc.	\$350	80.1	\$28,035
Angel Arias	Paralegal	\$175	2	\$350
Ariel Santamaria	Paralegal	\$175	5.7	\$998
Robyn DeLeo	Paralegal	\$175	8	\$1,400
Samuel Roeder	Paralegal	\$175	5	\$875
<b>Total</b>			363.9	\$222,224

### C. Peak One Is Entitled To Expenses.

Peak One is also entitled to recover its actually incurred electronic research (Westlaw) expenses. Dkt. 54-4 at 6 (“costs”); Dkt. 54-2 at 23 (“disbursements”); Dkt. 54-3 at 6 (“disbursements”). As the Eleventh Circuit has held, the expenses associated with online research may be recovered when reasonable. *See Terry Props., Inc. v. Standard Oil Co. (Ind.)*, 799 F.2d 1523, 1540 (11th Cir. 1986); *accord, e.g., Golf Clubs Away, LLC v. Hostway Corp.*, 2012 WL 2912709, at \*6 (S.D. Fla. July 16, 2012); *Arthur J. Gallagher Service Co. v. Egan*, 2015 WL 12130383, at \*7 (S.D. Fla. Feb. 18, 2015); *see also MKT Reps S.A. De C.V. v. Standard Chartered Bank Int'l (Americas) Ltd.*, 2013 WL 1289261, at \*3 (S.D. Fla. Mar. 28, 2013). Here, Peak One reasonably incurred (and paid) \$34,641.39 in Westlaw charges. *See* Ex. 3. But, again, Peak One has voluntarily reduced that amount in the hope of bringing this case to a prompt, efficient resolution. Accordingly, Peak One requests only \$15,000, well in line with other legal-research expenses courts have awarded. *See, e.g., Trump*, 2023 WL 333699, at \*21 (awarding \$14,292.39).

### CONCLUSION

For the foregoing reasons, Peak One respectfully requests that the Court award Peak One (1) \$222,224 in attorneys’ fees, (2) \$15,000 in expenses, and (3) the attorneys’ fees and expenses incurred in briefing this motion.

Dated: May 9, 2023

Barry Goldsmith\*  
M. Jonathan Seibald\*  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: 212.351.4000  
bgoldsmith@gibsondunn.com

Respectfully submitted,

/s/ Brian Richman  
Helgi Walker\*  
Brian Richman\*  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
Telephone: 202.955.8500  
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Aaron Rene Resnick (Fla. Bar No. 141097)  
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100 N. Biscayne Blvd  
Suite 1607  
Miami, FL 33132  
Telephone: 305.672.7495  
aresnick@thefirmmiami.com

*Counsel for Defendants*

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\* Admitted *pro hac vice*.

**LOCAL RULE 7.3 CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.3, I hereby certify that Defendants Peak One Opportunity Fund, L.P., Peak One Investments, LLC, and Jason Goldstein (collectively, “Peak One”), by and through its undersigned counsel, provided a draft of this motion and supporting papers to Plaintiff on April 7, 2023. Peak One counsel conferred via teleconference with Social Life counsel on April 28, 2023 and May 3, 2023 in a good faith effort to resolve Peak One’s anticipated motion for attorneys’ fees and expenses. The parties, however, were unable to reach an agreement regarding attorneys’ fees and expenses.

Date: May 9, 2023

/s/ Brian Richman  
Brian Richman  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
Telephone: 202.955.8500  
brichman@gibsondunn.com



**VERIFICATION PURSUANT TO LOCAL RULE 7.3**

Under penalty of perjury, I declare that I have reviewed Peak One's Motion for Attorneys' Fees and Expenses and Incorporated Memorandum of Law and that the facts alleged therein are true and correct to the best of my knowledge and belief.

Date: May 9, 2023

/s/ Brian Richman  
Brian Richman  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
Telephone: 202.955.8500  
brichman@gibsondunn.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of May, 2023, I electronically filed a copy of the foregoing document through the Court's CM/ECF System, which will send notifications of the filing to all counsel of record.

/s/ Aaron Resnick  
Aaron Rene Resnick (Fla. Bar No. 141097)  
AARON RESNICK LAW OFFICES  
100 N. Biscayne Blvd  
Suite 1607  
Miami, FL 33132  
Telephone: 305.672.7495  
aresnick@thefirmmiami.com

# Exhibit 1

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**May 10, 2021**

**Invoice No. 2021051360**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through April 30, 2021**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Lit	\$ 32,352.00	\$ 2,914.68	\$ 35,266.68
<b>Totals</b>	\$ 32,352.00	\$ 2,914.68	\$ 35,266.68
<b>Current Balance Due</b>			<u>\$ 35,266.68</u>
<b>Evergreen retainer received April 22, 2021</b>			<u>\$50,000.00</u>

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
 Please include the invoice number in the wire instructions.

**Remit By Mail To:**

Gibson, Dunn & Crutcher LLP  
 PO Box 840723  
 Los Angeles, CA 90084-0723

*Please enclose the remittance copy of  
 this invoice with your payment in the  
 enclosed Reply Envelope to ensure  
 proper credit.*

Please note that payments received after the invoice date are not reflected.  
 For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: May 10, 2021**

**Invoice No. 2021051360**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**May 10, 2021**

**Invoice No. 2021051360**

**REMITTANCE COPY**

**To ensure proper crediting, please send this copy in the enclosed envelope.**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through April 30, 2021**

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 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
 Please include the invoice number in the wire instructions.

**Remit By Mail To:**

Gibson, Dunn & Crutcher LLP  
 PO Box 840723  
 Los Angeles, CA 90084-0723

*Please enclose the remittance copy of  
 this invoice with your payment in the  
 enclosed Reply Envelope to ensure  
 proper credit.*

Please note that payments received after the invoice date are not reflected.  
 For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: May 10, 2021**

**Invoice No. 2021051360**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through April 30, 2021

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	2.50	\$1,370.00	\$ 3,425.00
BARRY R. GOLDSMITH	0.40	1,475.00	590.00
M. JONATHAN SEIBALD	7.60	1,060.00	8,056.00
BRIAN A. RICHMAN	12.40	905.00	11,222.00
ANGEL S. ARIAS	2.00	595.00	1,190.00
ANDREW A. SHI	12.90	610.00	<u>7,869.00</u>
<b>Total Services</b>			<b>\$ 32,352.00</b>

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
ON-LINE RESEARCH (WESTLAW)	\$ <u>2,914.68</u>
<b>Total Costs/Charges</b>	<b><u>2,914.68</u></b>
<b>Total Services, Costs/Charges</b>	<b>35,266.68</b>
<b>BALANCE DUE</b>	<b><u>\$ 35,266.68</u></b>

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

04/14/21	0.90	Seibald, M. Jonathan	Analyze documents relating to Social Life dispute; communicate with B. Richman regarding counterclaims, letter, and case strategy.
04/16/21	0.40	Goldsmith, Barry R	Review and revise draft letter to Social Life Network and emails re: same.
	0.30	Seibald, M. Jonathan	Analyze relevant documents.
	0.50	Richman, Brian A	Review securities purchase agreement and related documents and correspondence.
04/17/21	5.10	Richman, Brian A	Draft letter to counsel for plaintiff; review complaint; research re legal and factual responses.
04/18/21	1.50	Walker, Helgi C	Review and revise draft letter to opposing counsel; review edits of B. Goldsmith to same; correspondence with client re final draft.
	0.10	Seibald, M. Jonathan	Communicate with B. Goldsmith, H. Walker, and B. Richman regarding letter to Social Life Network.
	0.20	Richman, Brian A	Revise draft letter to counsel for plaintiff.
04/19/21	1.00	Walker, Helgi C	Review comments of J. Goldstein on draft letter and correspondence with a GDC team re implementation of same; review final letter as transmitted to opposing counsel; correspondence with client group re same.
	0.90	Seibald, M. Jonathan	Revise letter to Social Life counsel; communicate with client, B. Goldsmith, H. Walker, and B. Richman regarding letter to Social Life and case strategy; analyze case documents.
	1.60	Richman, Brian A	Telephone conference with J. Goldstein and A. Resnick; revise letter to opposing counsel; review J. Goldstein correspondence with Social Life Network; confer with J. Seibald re strategy.

1.40	Richman, Brian A	Telephone conferences with J. Goldstein and A. Resnick re Social Life Network litigation; revise letter to opposing counsel.
04/20/21		
1.90	Seibald, M. Jonathan	Analyze Peak One complaint and deal documents; communicate with B. Richman and client regarding complaint and case strategy.
04/21/21		
0.70	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy and pro hac vice motion; communicate with A. Resnick regarding pro hac vice motion.
0.40	Richman, Brian A	Telephone conference with [REDACTED] re [REDACTED]; confer with J. Seibald and A. Shi re same.
04/22/21		
1.40	Seibald, M. Jonathan	Communicate with B. Richman, A. Shi, and client regarding case strategy and research tasks; analyze documents for potential use in motions to dismiss or counterclaims.
1.50	Richman, Brian A	Telephone conference with J. Goldstein re case strategy; telephone conference with [REDACTED] re [REDACTED]; confer with J. Seibald and A. Shi re same; research re Nevada licensing law.
0.40	Shi, Andrew A	Call with J. Seibald re choice of law research.
04/23/21		
0.10	Seibald, M. Jonathan	Communicate with client and B. Richman regarding case strategy.
0.60	Shi, Andrew A	Analyze complaint.
04/24/21		
2.50	Shi, Andrew A	Research re choice of law issues.
04/25/21		
1.00	Shi, Andrew A	Research re choice of law issues.
04/26/21		
1.00	Seibald, M. Jonathan	Communicate with B. Richman and A. Shi regarding case strategy and choice of law issues; analyze choice of law memo.
1.20	Richman, Brian A	Research re choice of law analysis; confer with J. Seibald and A. Shi re same; research re same.
8.40	Shi, Andrew A	Research choice of law; draft analysis re choice of law.



04/27/21		
0.50	Richman, Brian A	Telephone conference with J. Goldstein re motion to dismiss.
04/29/21		
0.30	Seibald, M. Jonathan	Communicate with A. Arias regarding pro hac vice motion; revise pro hac vice motion.
2.00	Arias, Angel S	Access the court database for the status of the matter and information re new action; speak with J. Seibald re same and drafting of motion papers; work on same; review the SDFL court rules re same; forward drafts for final review.

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

On-Line Research (Westlaw)

04/26/21	2,575.05	RICHMAN,BRIAN	04/26/21	74426-00001	WESTLAW RESEARCH AND PRINTING CHARGES
04/27/21	339.63	RICHMAN,BRIAN	04/27/21	74426-00001	WESTLAW RESEARCH AND PRINTING CHARGES

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**June 23, 2021**

**Invoice No. 2021063961**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through May 31, 2021**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Lit	\$ 36,876.50	\$ 5,076.10	\$ 41,952.60
<b>Totals</b>	\$ 36,876.50	\$ 5,076.10	\$ 41,952.60
<b>Current Balance Due</b>			\$ 41,952.60
<b>Evergreen retainer received April 22, 2021</b>			\$ 50,000.00

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
 Please include the invoice number in the wire instructions.

**Remit By Mail To:**

Gibson, Dunn & Crutcher LLP  
 PO Box 840723  
 Los Angeles, CA 90084-0723

*Please enclose the remittance copy of this invoice with your payment in the enclosed Reply Envelope to ensure proper credit.*

Please note that payments received after the invoice date are not reflected.  
 For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: June 23, 2021**

**Invoice No. 2021063961**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**June 23, 2021**

**Invoice No. 2021063961**

**REMITTANCE COPY**

**To ensure proper crediting, please send this copy in the enclosed envelope.**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through May 31, 2021**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Lit	\$ 36,876.50	\$ 5,076.10	\$ 41,952.60
	<b>Totals</b>	\$ 36,876.50	\$ 5,076.10	\$ 41,952.60
	<b>Current Balance Due</b>			\$ 41,952.60
	<b>Evergreen retainer received April 22, 2021</b>			\$ 50,000.00

Invoice Date: June 23, 2021

**Due and Payable Upon Receipt**

Invoice No. 2021063961

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through May 31, 2021

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	1.50	\$1,370.00	\$ 2,055.00
BARRY R. GOLDSMITH	0.40	1,475.00	590.00
M. JONATHAN SEIBALD	6.10	1,060.00	6,466.00
BRIAN A. RICHMAN	15.50	905.00	14,027.50
ROBYN L. DELEO	0.40	495.00	198.00
SHEILA ENRIGHT	0.20	295.00	59.00
ANDREW A. SHI	22.10	610.00	<u>13,481.00</u>

**Total Services** \$ 36,876.50

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 0.50
ON-LINE RESEARCH (WESTLAW)	5,074.27
SPECIALIZED RESEARCH	<u>1.33</u>

**Total Costs/Charges** 5,076.10

**Total Services, Costs/Charges** 41,952.60

**BALANCE DUE** \$ 41,952.60

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

05/03/21		
0.10	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
0.30	Richman, Brian A	Telephone conference with [REDACTED] re [REDACTED].
05/04/21		
0.40	Seibald, M. Jonathan	Communicate with A. Resnick and B. Richman regarding pro hac vice motions and case strategy.
0.40	Richman, Brian A	Telephone conference with [REDACTED] re [REDACTED]; draft pro hac vice papers.
05/10/21		
0.10	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
5.20	Richman, Brian A	Prepare pro hac vice motions; correspond with A. Resnick re filing same; draft outline of motion to dismiss.
05/11/21		
0.50	Seibald, M. Jonathan	Revise initial disclosure; communicate with B. Richman, A. Shi, A. Resnick, and client regarding initial disclosures and pro hac vice motions.
3.00	Richman, Brian A	Draft outline of motion to dismiss; research re same; revise corporate disclosure statements; coordinate filing of same; communicate with J. Seibald and A. Shi re same; communicate with A. Shi re deal terms and research for motion to dismiss.
2.40	Shi, Andrew A	Draft corporate disclosure filings.
05/12/21		
0.30	Seibald, M. Jonathan	Draft pro hac vice motion; communicate with B. Goldsmith and B. Richman regarding pro hac vice motion.
05/13/21		
0.10	Seibald, M. Jonathan	Draft pro hac vice motion; communicate with A. Resnick regarding pro hac vice motion.
05/14/21		
0.20	Seibald, M. Jonathan	Communicate with B. Richman, A. Shi, and A. Resnick regarding pro hac vice motion and initial disclosures.
0.20	Richman, Brian A	Review correspondence from Social Life Network; communicate with J. Goldstein re same.

05/17/21	4.50 Shi, Andrew A	Conduct research for motion to dismiss.
05/18/21	1.20 Seibald, M. Jonathan	Analyze judicial notice research; communicate with client regarding case strategy; communicate with B. Richman and A. Shi regarding case strategy and research.
	2.20 Richman, Brian A	Draft outline of motion to dismiss and counterclaims; research re same.
05/19/21	1.40 Seibald, M. Jonathan	Revise motion to dismiss and counterclaim outline.
05/20/21	0.10 Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
	1.30 Richman, Brian A	Revise draft outline of motion to dismiss; communicate with A. Shi re research on scienter; communicate with J. Goldstein and J. Seibald re potential counterclaims.
	1.20 Shi, Andrew A	Research motion to dismiss argument.
05/21/21	0.10 Seibald, M. Jonathan	Analyze fraud claim research.
	2.10 Shi, Andrew A	Research motion to dismiss defense.
05/24/21	1.30 Shi, Andrew A	Research stay question.
05/25/21	0.80 Shi, Andrew A	Draft edits to outline.
05/26/21	1.50 Walker, Helgi C	Review and revise outline of motion to dismiss and counterclaims as circulated by B. Richman; correspondence with GDC team re same.
	0.40 Goldsmith, Barry R	Review and comment on memo re motion to dismiss and counterclaims.
	0.90 Seibald, M. Jonathan	Revise motion to dismiss and counterclaim outline; analyze discovery stay research; communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding outline.
	1.40 Richman, Brian A	Revise outline of motion to dismiss; confer with J. Goldstein and J. Seibald re same.
	5.70 Shi, Andrew A	Edit motion to dismiss outline; research discovery stay.

05/27/21		
0.20	Seibald, M. Jonathan	Communicate with B. Richman regarding motion to dismiss and counterclaims.
1.00	Richman, Brian A	Communicate with J. Goldstein and J. Seibald re revisions to outline of motion to dismiss and counterclaims.
0.20	Enright, Sheila	[REDACTED]
1.00	Shi, Andrew A	[REDACTED]
05/28/21		
0.50	Seibald, M. Jonathan	Communicate with B. Richman regarding motion to dismiss and counterclaims; research counterclaim procedures.
0.50	Richman, Brian A	[REDACTED]
0.40	DeLeo, Robyn L	Upload docket filings to shared drive per B. Richman; email Library re filing alert.
3.10	Shi, Andrew A	Research counterclaims.



SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

04/26/21	0.50	PACER Usage April 2021
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On-Line Research (Westlaw)

04/24/21	240.00	SHI,ANDREW A 04/24/21 00000-00000 WESTLAW RESEARCH AND PRINTING CHARGES
05/10/21	960.00	RICHMAN,BRIAN 05/10/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
05/11/21	2,902.85	RICHMAN,BRIAN 05/11/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
05/14/21	120.00	SHI,ANDREW A 05/14/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
05/17/21	120.00	SHI,ANDREW A 05/17/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
05/28/21	731.42	SHI,ANDREW A 05/28/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES

Specialized Research

05/10/21	1.33	Richman, Brian A. 05/10/2021 HeinOnline
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**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**July 14, 2021**

**Invoice No. 2021072491**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through June 30, 2021**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Lit	\$ 66,414.00	\$ 14,836.60	\$ 81,250.60
<b>Totals</b>	\$ 66,414.00	\$ 14,836.60	\$ 81,250.60
<b>Credit Applied - Overpayment on invoice 2021063961</b>			-47.40
<b>Current Balance Due</b>			\$ 81,203.20
<b>Evergreen retainer received April 22, 2021</b>			\$ 50,000.00

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
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 Los Angeles, CA 90084-0723

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For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: July 14, 2021**

**Invoice No. 2021072491**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**July 14, 2021**

**Invoice No. 2021072491**

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<b>Current Balance Due</b>			\$ 81,203.20
<b>Evergreen retainer received April 22, 2021</b>			\$ 50,000.00

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 Reply Envelope to ensure proper credit.*

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**Invoice Date: July 14, 2021**

**Invoice No. 2021072491**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through June 30, 2021

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	4.70	\$1,370.00	\$ 6,439.00
BARRY R. GOLDSMITH	0.20	1,475.00	295.00
M. JONATHAN SEIBALD	10.70	1,060.00	11,342.00
BRIAN A. RICHMAN	48.30	905.00	43,711.50
ROBYN L. DELEO	0.50	495.00	247.50
SAMUEL A. ROEDER	5.00	400.00	2,000.00
ANDREW A. SHI	3.90	610.00	<u>2,379.00</u>

**Total Services** \$ 66,414.00

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 29.12
ON-LINE RESEARCH (WESTLAW)	14,782.55
SPECIALIZED RESEARCH	<u>24.93</u>

**Total Costs/Charges** 14,836.60

**Total Services, Costs/Charges** 81,250.60

**Credit Applied** -47.40

**BALANCE DUE** \$ 81,203.20

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

06/01/21	0.20 Shi, Andrew A	Review research.
06/02/21	0.30 Seibald, M. Jonathan	[REDACTED]
	2.20 Richman, Brian A	Draft motion to dismiss; research re counterclaims.
06/03/21	5.50 Richman, Brian A	Draft motion to dismiss; research for same.
06/04/21	0.40 Seibald, M. Jonathan	Communicate with B. Richman and A. Shi regarding motion to dismiss and counterclaim strategy.
	8.30 Richman, Brian A	Draft motion to dismiss.
	1.00 Shi, Andrew A	Research counterclaim.
06/05/21	7.20 Richman, Brian A	[REDACTED]
	0.90 Shi, Andrew A	Research counterclaim.
06/06/21	2.00 Seibald, M. Jonathan	Revise motion to dismiss brief.
	4.50 Richman, Brian A	[REDACTED]
06/07/21	2.00 Walker, Helgi C	Review and revise draft motion to dismiss; correspondence with GDC team re further revisions to same; correspondence re counterclaims and review research re same.
	1.30 Seibald, M. Jonathan	Revise motion to dismiss brief; revise complaint; communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.
	3.70 Richman, Brian A	[REDACTED]
	0.70 Shi, Andrew A	Research counterclaim.

06/08/21		
0.30	Walker, Helgi C	[REDACTED]
0.50	Seibald, M. Jonathan	[REDACTED]
1.00	Richman, Brian A	Revise motion to dismiss; confer with H. Walker, B. Goldsmith, J. Seibald, and A. Shi re counterclaim strategy.
0.30	DeLeo, Robyn L	Upload docket entries to shared drive per B. Richman.
0.60	Shi, Andrew A	[REDACTED]
06/09/21		
0.40	Seibald, M. Jonathan	Communicate with B. Richman, A. Shi, and A. Resnick regarding motion to dismiss.
1.20	Richman, Brian A	Revise motion to dismiss; research re same; communicate with J. Goldstein and A. Resnick re same; draft H. Walker motion to appear pro hac vice.
0.30	Shi, Andrew A	Review motion to dismiss.
06/10/21		
1.00	Walker, Helgi C	Review and revise live draft motion to dismiss and correspondence with GDC team re same; review order granting pro hac motion.
2.60	Seibald, M. Jonathan	Revise motion to dismiss; communicate with B. Richman and A. Shi regarding motion to dismiss.
6.30	Richman, Brian A	Revise motion to dismiss; communicate with J. Goldstein, A. Resnick, and J. Seibald re same; coordinate cite check and proofread of draft.
2.00	Roeder, Samuel A	Review and edit motion to dismiss.
06/11/21		
1.00	Walker, Helgi C	Correspondence re finalization of motion to dismiss for filing; review same as filed; telephone conference with J. Seibald re status; telephone conference with J. Goldstein re same.
1.10	Seibald, M. Jonathan	Communicate with client, H. Walker, B. Richman, and A. Resnick regarding motion to dismiss and case strategy.
4.00	Richman, Brian A	Finalize and file motion to dismiss and supporting exhibits.
0.10	DeLeo, Robyn L	Upload docket entry per B. Richman.
3.00	Roeder, Samuel A	Review and edit motion to dismiss.

06/12/21		
0.20	Seibald, M. Jonathan	[REDACTED]
0.90	Richman, Brian A	Research re deadlines for scheduling conferences and other preliminary matters; correspond with J. Seibald re same.
06/14/21		
0.10	Walker, Helgi C	[REDACTED]
0.20	Seibald, M. Jonathan	[REDACTED]
0.20	Richman, Brian A	[REDACTED]
06/21/21		
0.30	Richman, Brian A	Communicate with J. Goldstein re case strategy.
0.20	Shi, Andrew A	[REDACTED]
06/26/21		
0.50	Seibald, M. Jonathan	Communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding strategy relating to plaintiffs' failure to file motion to dismiss opposition brief; research local practices relating to failure to file required brief.
1.30	Richman, Brian A	Communicate with J. Goldstein re plaintiff's non-opposition to motion to dismiss; research re default judgment on motion to dismiss.
06/27/21		
0.30	Seibald, M. Jonathan	Communicate with B. Goldsmith, H. Walker, and B. Richman regarding strategy relating to plaintiff failure to file opposition brief.
1.50	Richman, Brian A	Correspond with GDC team re plaintiff's non-opposition to motion to dismiss; draft notice of non-opposition re same.
06/28/21		
0.30	Walker, Helgi C	Review order granting motion to dismiss and correspondence re same; review plaintiffs' submission regarding intent to amend complaint and correspondence regarding same.
0.20	Goldsmith, Barry R	Attention to emails re: dismissal and amended complaint.
0.80	Seibald, M. Jonathan	Communicate with H. Walker, B. Goldsmith, B. Richman, and A. Shi regarding case strategy; analyze court filings relating to motion to dismiss and amended complaint; analyze local rules.
0.20	Richman, Brian A	Attention to filings re plaintiff's missed deadline.

- 0.10 DeLeo, Robyn L Upload order granting motion to dismiss to shared drive per B. Richman.
- 06/30/21
- 0.10 Seibald, M. Jonathan Communicate with B. Richman regarding case strategy.



SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

05/28/21	26.50	PACER Usage May 2021
05/31/21	2.62	VENDOR: COURTALERT.COM, INC. INVOICE#: 403843-2105 DATE: 5/31/2021 403843/Document Retrieval Service/Court alert for attorneys

On-Line Research (Westlaw)

06/02/21	2,276.12	RICHMAN,BRIAN 06/02/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/03/21	1,639.26	RICHMAN,BRIAN 06/03/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/04/21	600.00	RICHMAN,BRIAN 06/04/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/05/21	4,057.42	RICHMAN,BRIAN 06/05/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/09/21	1,914.86	RICHMAN,BRIAN 06/09/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/10/21	720.00	RICHMAN,BRIAN 06/10/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/11/21	240.00	RICHMAN,BRIAN 06/11/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/11/21	240.00	ROEDER,SAM 06/11/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/26/21	1,894.50	RICHMAN,BRIAN 06/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/27/21	832.77	RICHMAN,BRIAN 06/27/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
06/28/21	367.62	RICHMAN,BRIAN 06/28/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES

Specialized Research

06/03/21	24.93	Richman, Brian A. 06/03/2021 Practical Law US
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**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**August 10, 2021**

**Invoice No. 2021081819**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through July 31, 2021**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Lit	\$ 40,641.00	\$ 348.40	\$ 40,989.40
<b>Totals</b>	\$ 40,641.00	\$ 348.40	\$ 40,989.40
<b>Current Balance Due</b>			\$ 40,989.40
<b>Evergreen retainer received April 22, 2021</b>			\$ 50,000.00

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
 Please include the invoice number in the wire instructions.

**Remit By Mail To:**

Gibson, Dunn & Crutcher LLP  
 PO Box 840723  
 Los Angeles, CA 90084-0723

*Please enclose the remittance copy of  
 this invoice with your payment in the  
 enclosed Reply Envelope to ensure  
 proper credit.*

Please note that payments received after the invoice date are not reflected.

For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: August 10, 2021**

**Invoice No. 2021081819**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**August 10, 2021**

**Invoice No. 2021081819**

**REMITTANCE COPY**

**To ensure proper crediting, please send this copy in the enclosed envelope.**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through July 31, 2021**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Lit	\$ 40,641.00	\$ 348.40	\$ 40,989.40
<b>Totals</b>	\$ 40,641.00	\$ 348.40	\$ 40,989.40
<b>Current Balance Due</b>			\$ 40,989.40
<b>Evergreen retainer received April 22, 2021</b>			\$ 50,000.00

**Remit By Wire To:**

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 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
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**Invoice Date: August 10, 2021**

**Invoice No. 2021081819**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through July 31, 2021

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	3.40	\$1,370.00	\$ 4,658.00
BARRY R. GOLDSMITH	1.90	1,475.00	2,802.50
M. JONATHAN SEIBALD	13.90	1,060.00	14,734.00
BRIAN A. RICHMAN	10.50	905.00	9,502.50
ROBYN L. DELEO	0.20	495.00	99.00
ANDREW A. SHI	14.50	610.00	<u>8,845.00</u>
<b>Total Services</b>			<b>\$ 40,641.00</b>

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 108.40
ON-LINE RESEARCH (WESTLAW)	<u>240.00</u>
<b>Total Costs/Charges</b>	<b><u>348.40</u></b>

<b>Total Services, Costs/Charges</b>	<b>40,989.40</b>
<b>BALANCE DUE</b>	<b><u>\$ 40,989.40</u></b>

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

07/02/21			
0.50	Walker, Helgi C	Correspondence re contacts with opposing counsel re case reopening.	
0.50	Walker, Helgi C	Correspondence re motion to reopen, review same as filed; correspondence with GDC team re next steps.	
0.50	Goldsmith, Barry R	Attention to amended complaint and responses.	
1.20	Seibald, M. Jonathan	Analyze amended complaint and motion to reopen; draft correspondence to plaintiff's counsel; communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.	
2.40	Richman, Brian A	Correspond with plaintiff's counsel re motion to reopen; communicate with GDC team re same; review amended complaint and motion to reopen.	
07/03/21			
0.50	Walker, Helgi C	Further correspondence with GDC team re amended complaint and next steps.	
0.30	Goldsmith, Barry R	Attention to contemplated motions and emails re: same.	
0.10	Seibald, M. Jonathan	Communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.	
3.00	Richman, Brian A	Draft outline of motion for sanctions and opposition to motion to reopen.	
07/04/21			
0.30	Goldsmith, Barry R	Emails re: amended complaint and stay.	
1.00	Seibald, M. Jonathan	Communicate with B. Richman and client regarding case strategy.	
0.40	Richman, Brian A	Correspond with J. Goldstein re amended complaint and motion to stay and for sanctions.	
2.50	Shi, Andrew A	Draft response brief.	
07/05/21			
0.20	Walker, Helgi C	Correspondence with opposing counsel re motion to reopen.	
1.00	Seibald, M. Jonathan	Draft motion to extend time; communicate with B. Richman and A. Shi regarding motion.	

	0.80	Richman, Brian A	Revise motion to stay; communicate with GDC team re same.
	8.00	Shi, Andrew A	Draft motion to stay proceeding and extension of time; draft proposed order.
07/06/21	1.00	Walker, Helgi C	Review and revise motion to extend deadlines and correspondence re same; further correspondence re same.
	0.50	Goldsmith, Barry R	Attention to motion to extend time and amended complaint; attention to email exchange re: same.
	4.90	Seibald, M. Jonathan	Revise motion to extend time; communicate with B. Goldsmith, H. Walker, B. Richman, A. Shi, A. Resnick, J. Goldstein, opposing counsel, Darbie counsel, and Court regarding motion to extend time and motion to reopen.
	1.40	Richman, Brian A	Revise motion to extend time; correspond with plaintiff's counsel re same.
	2.50	Shi, Andrew A	Draft motion to extend filing deadline; call with J. Seibald re research questions.
07/07/21	0.50	Walker, Helgi C	Review motion to extend as filed, correspondence re next steps.
	0.90	Seibald, M. Jonathan	Revise proposed order on motion to extend time to respond; communicate with B. Richman, A. Resnick, and client regarding motions and case strategy; communicate with Darbie counsel regarding case background.
	0.10	DeLeo, Robyn L	Upload docket entry to shared drive per B. Richman.
07/08/21	0.30	Goldsmith, Barry R	Attention to court orders and responses.
	1.30	Seibald, M. Jonathan	Analyze Judge's orders; communicate with B. Goldsmith, H. Walker, B. Richman, A. Shi, A. Resnick, and client regarding Judge's orders and case strategy; communicate with Darbie counsel regarding Judge's orders.
	0.50	Richman, Brian A	Communicate with J. Goldstein and J. Seibald re court order dismissing amended complaint.
	0.10	DeLeo, Robyn L	Upload docket entries to shared drive per B. Richman.
07/09/21	0.20	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
07/10/21	0.10	Seibald, M. Jonathan	Communicate with client regarding case strategy.

07/22/21			
0.20	Walker, Helgi C	Correspondence re plaintiff's motion to clarify.	
1.90	Seibald, M. Jonathan	Communicate with B. Goldsmith, H. Walker, B. Richman regarding motion for leave to amend and case strategy; communicate with opposing counsel regarding motions; analyze motion for leave to amend and amended complaint.	
1.50	Richman, Brian A	Review motion for leave to file amended complaint; review amended complaint; research re shotgun pleadings; communicate with J. Goldstein and GDC team re opposition to motion and potential motion for sanctions.	
0.50	Shi, Andrew A	Review local rules.	
07/23/21			
1.20	Seibald, M. Jonathan	Communicate with client and B. Richman regarding opposition to motion for leave to amend, sanctions motion, and case strategy; communicate with Court regarding opposition to motion for leave to amend.	
0.30	Richman, Brian A	Communicate with J. Seibald re briefing schedule and strategy.	
07/25/21			
0.10	Seibald, M. Jonathan	Communicate with client, B. Richman, and A. Resnick regarding opposition to motion to reopen.	
07/26/21			
0.20	Richman, Brian A	Communicate with J. Goldstein and A. Resnick re briefing schedule.	
07/30/21			
1.00	Shi, Andrew A	Call with B. Richman re opposition to motion for leave to amend; research caselaw.	

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

06/04/21	6.00	06/04/2021 Shi, Andrew 74426.00001 PACER Usage June 2021
06/28/21	63.90	PACER Usage June 2021
06/30/21	38.50	VENDOR: COURTALENT.COM, INC. INVOICE#: 403843-2106 DATE: 6/30/2021 403843/Document Retrieval Service/CourtAlert alerts

On-Line Research (Westlaw)

07/06/21	120.00	SHI,ANDREW A 07/06/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
07/22/21	120.00	RICHMAN,BRIAN 07/22/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES



**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**September 7, 2021**

**Invoice No. 2021092127**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through August 31, 2021**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Lit	\$ 95,959.50	\$ 4,716.62	\$ 100,676.12
<b>Totals</b>	\$ 95,959.50	\$ 4,716.62	\$ 100,676.12

**Current Balance Due** \$ 100,676.12

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

<u>Matter</u>	<u>Invoice Date</u>	<u>Invoice No.</u>	<u>Services</u>	<u>Costs</u>	<u>Balance Due</u>
74426-00001	09/07/21	2021092127	\$ 85,528.50	\$ 4,716.62	\$ 90,245.12

**PREVIOUS BALANCE DUE** \$ 90,245.12

**TOTAL OUTSTANDING BALANCE DUE** \$ 190,921.24

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
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**Invoice Date: September 7, 2021**

**Invoice No. 2021092127**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**September 7, 2021**

**Invoice No. 2021092127**

**REMITTANCE COPY**

**To ensure proper crediting, please send this copy in the enclosed envelope.**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through August 31, 2021**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Lit	\$ 95,959.50	\$ 4,716.62	\$ 100,676.12
	<b>Totals</b>	\$ 95,959.50	\$ 4,716.62	\$ 100,676.12

**Current Balance Due** **\$ 100,676.12**

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

Matter	Invoice Date	Invoice No.	Services	Costs	Balance Due
74426-00001	09/07/21	2021092127	\$ 85,528.50	\$ 4,716.62	\$ 90,245.12

**PREVIOUS BALANCE DUE** **\$ 90,245.12**

**TOTAL OUTSTANDING BALANCE DUE** **\$ 190,921.24**

**Remit By Wire To:**

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 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
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 For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: September 7, 2021**

**Invoice No. 2021092127**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through August 31, 2021

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	3.30	\$1,370.00	\$ 4,521.00
BARRY R. GOLDSMITH	0.70	1,475.00	1,032.50
M. JONATHAN SEIBALD	13.20	1,060.00	13,992.00
BRIAN A. RICHMAN	46.00	905.00	41,630.00
ANDREW A. SHI	51.40	610.00	31,354.00
ROBYN L. DELEO	0.30	495.00	148.50
STEVEN RABER	1.30	310.00	403.00
ARIEL SANTAMARIA	5.70	505.00	<u>2,878.50</u>

**Total Services** \$ 95,959.50

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 64.30
ON-LINE RESEARCH (WESTLAW)	4,371.54
SPECIALIZED RESEARCH	<u>280.78</u>

**Total Costs/Charges** 4,716.62

**Total Services, Costs/Charges** 100,676.12

**BALANCE DUE** \$ 100,676.12

SOCIAL LIFE NETWORK LITIGATION  
74426-00001




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Detail Services:

08/01/21		
0.90	Richman, Brian A	Draft opposition to motion for leave to amend.
4.50	Shi, Andrew A	Research RICO claim.
08/02/21		
3.50	Richman, Brian A	Draft brief in opposition to motion for leave to amend and in support of motion for sanctions.
1.80	Shi, Andrew A	Research RICO issue.
08/03/21		
0.10	Seibald, M. Jonathan	Communicate with B. Richman regarding motion for leave to reopen opposition.
2.90	Richman, Brian A	Draft brief in opposition to motion for leave to amend and in support of motion for sanctions.
1.70	Shi, Andrew A	Research sanctions question.
08/04/21		
0.50	Walker, Helgi C	Initial review of opposition to motion for leave to amend and correspondence with GDC team re reorganization of same.
0.40	Goldsmith, Barry R	Review draft motion to dismiss and for sanctions; emails re: same.
2.40	Seibald, M. Jonathan	Draft brief in opposition to motion for leave to amend and in support of motion for sanctions; communicate with B. Goldsmith, H. Walker, and B. Richman regarding brief.
7.10	Richman, Brian A	Draft brief in opposition to motion to amend and in support of motion for sanctions; research re same.
08/05/21		
1.00	Walker, Helgi C	Review and revise draft opposition and correspondence re final revisions to same.
0.30	Goldsmith, Barry R	Attention to opposition motion for leave to amend and sanctions.

2.00	Seibald, M. Jonathan	Revise opposition to motion for leave to amend and motion papers in support of sanctions; communicate with B. Goldsmith, H. Walker, and B. Richman regarding motion for leave to amend and motion for sanctions; communicate with opposing counsel regarding sanctions motion.
7.80	Richman, Brian A	Finalize brief in opposition to motion for leave to amend and in support of sanctions; coordinate filing re same.
6.30	Shi, Andrew A	Revise opposition to motion to amend; revise motion for sanctions; prepare papers for filing.
1.30	Raber, Steven	[REDACTED]
5.70	Santamaria, Ariel	Per B. Richman, check citations in memorandum in opposition to motion for leave to amend for attorney review; prepare exhibits to memorandum in opposition to motion for leave to amend.
08/06/21		
0.10	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
0.10	Richman, Brian A	Correspond with GDC team and A. Resnick re proposed order for court.
0.50	Shi, Andrew A	Research local rule.
08/09/21		
0.20	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
08/12/21		
0.50	Walker, Helgi C	Review reply on motion for leave and correspondence re same.
0.80	Seibald, M. Jonathan	Analyze Social Life leave to amend reply brief; communicate with B. Richman regarding reply brief.
1.10	Richman, Brian A	Review reply in support of motion for leave to amend; research re same; correspond with GDC team and client re same.
08/13/21		
0.20	Seibald, M. Jonathan	Communicate with B. Richman and client regarding motion for leave to amend and case strategy.
1.10	Richman, Brian A	Communicate with A. Shi re research re plaintiff's reply in support of motion for leave to amend.
4.60	Shi, Andrew A	Research voidable question; call with B. Richman re research.

08/16/21			
1.10	Seibald, M. Jonathan	Communicate with client regarding [REDACTED]; communicate with B. Richman and A. Shi regarding sanctions motion, motion to dismiss, and case strategy; analyze motion to dismiss research.	
3.40	Shi, Andrew A	Research voidness question; call with B. Richman.	
08/17/21			
0.60	Seibald, M. Jonathan	Communicate with B. Richman, A. Shi, and client regarding litigation developments, case strategy, and motions for leave to amend and sanctions and potential motion to dismiss; analyze research for potential motion to dismiss.	
0.70	Shi, Andrew A	Analyze sanctions involving defendant's counsel.	
08/18/21			
0.30	Shi, Andrew A	Draft reply to motion for sanctions.	
08/19/21			
1.70	Seibald, M. Jonathan	Analyze sanctions motion opposition brief; communicate with B. Richman regarding sanctions motion opposition brief.	
1.50	Richman, Brian A	Review opposition to motion for sanctions; confer with J. Seibald re same; research re same.	
1.90	Shi, Andrew A	Draft outline to reply to motion for sanctions.	
08/20/21			
0.50	Walker, Helgi C	Review opposition to motion for sanctions and correspondence re same.	
0.70	Seibald, M. Jonathan	Communicate with client and B. Richman regarding sanctions motion and case strategy.	
1.10	Richman, Brian A	Communicate with A. Shi re drafting reply brief in support of motion for sanctions; research re same.	
2.80	Shi, Andrew A	Outline reply to motion for sanctions; call with B. Richman re outline.	
0.30	DeLeo, Robyn L	Upload docket entries to shared drive per B. Richman.	
08/21/21			
0.40	Richman, Brian A	Correspond with A. Shi re reply brief in support of motion for sanctions; research re same.	
10.30	Shi, Andrew A	[REDACTED]	

08/22/21		
0.30	Richman, Brian A	Research re reply brief in support of motion for sanctions; correspond with A. Shi re same.
9.10	Shi, Andrew A	
08/23/21		
0.10	Seibald, M. Jonathan	Communicate with B. Richman regarding sanctions motion.
2.00	Richman, Brian A	Revise reply brief in support of motion for sanctions.
1.20	Shi, Andrew A	
08/24/21		
4.50	Richman, Brian A	Draft reply brief in support of motion for sanctions.
08/25/21		
0.50	Walker, Helgi C	Review draft reply and correspondence re same.
1.90	Seibald, M. Jonathan	Revise sanctions motion reply brief; communicate with B. Richman regarding reply brief.
5.80	Richman, Brian A	Draft reply brief in support of motion for sanctions.
08/26/21		
0.30	Walker, Helgi C	Review further revisions to draft reply and correspondence re same.
1.30	Seibald, M. Jonathan	Revise sanctions motion reply brief; communicate with B. Goldsmith, H. Walker, B. Richman, and client regarding sanctions motion reply brief.
5.90	Richman, Brian A	Revise reply in support of motion for sanctions; finalize brief for filing.
2.30	Shi, Andrew A	

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

07/30/21	25.80	PACER Usage July 2021
07/31/21	38.50	VENDOR: COURTALERT.COM, INC. INVOICE#: 403843-2107 DATE: 7/31/2021 403843/Document Retrieval Service/Court alerts for attorneys

On-Line Research (Westlaw)

08/02/21	1,485.70	SHI,ANDREW A 08/02/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/13/21	120.00	RICHMAN,BRIAN 08/13/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/13/21	247.62	SHI,ANDREW A 08/13/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/16/21	615.23	SHI,ANDREW A 08/16/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/21/21	284.10	SHI,ANDREW A 08/21/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/22/21	439.26	RICHMAN,BRIAN 08/22/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/25/21	600.00	RICHMAN,BRIAN 08/25/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/26/21	360.00	RICHMAN,BRIAN 08/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
08/26/21	219.63	SHI,ANDREW A 08/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES

Specialized Research

08/05/21	280.78	Raber, Steven 08/05/2021 Cheetah
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**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**April 11, 2022**

**Invoice No. 2022042161**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through March 31, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 10,191.50	\$ 0.00	\$ 10,191.50
<b>Totals</b>	\$ 10,191.50	\$ 0.00	\$ 10,191.50
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>Current Balance Due</b>			\$ 10,191.50

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

Matter	Invoice Date	Invoice No.	Services	Costs	Balance Due
74426-00001	02/11/22	2022022102	\$ 446.00	\$ 0.00	\$ 446.00
<b>PREVIOUS BALANCE DUE</b>					\$ 446.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>					\$ 10,637.50

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
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 PO Box 840723  
 Los Angeles, CA 90084-0723

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 For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: April 11, 2022**

**Invoice No. 2022042161**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**April 11, 2022**

**Invoice No. 2022042161**

**REMITTANCE COPY**

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Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through March 31, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 10,191.50	\$ 0.00	\$ 10,191.50
<b>Totals</b>	\$ 10,191.50	\$ 0.00	\$ 10,191.50
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>Current Balance Due</b>			<u>\$ 10,191.50</u>

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

Matter	Invoice Date	Invoice No.	Services	Costs	Balance Due
74426-00001	02/11/22	2022022102	\$ 446.00	\$ 0.00	\$ 446.00
<b>PREVIOUS BALANCE DUE</b>					<u>\$ 446.00</u>
<b>TOTAL OUTSTANDING BALANCE DUE</b>					<u>\$ 10,637.50</u>

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
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 ABA No: 121000248  
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 Please include the invoice number in the wire instructions.

**Remit By Mail To:**

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**Invoice Date: April 11, 2022**

**Invoice No. 2022042161**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through March 31, 2022

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	2.00	\$1,535.00	\$ 3,070.00
BARRY R. GOLDSMITH	0.50	1,595.00	797.50
M. JONATHAN SEIBALD	3.20	1,115.00	3,568.00
BRIAN A. RICHMAN	2.60	960.00	2,496.00
ROBYN L. DELEO	0.50	520.00	<u>260.00</u>
<b>Total Services</b>			\$ 10,191.50

**Total Services, Costs/Charges** 10,191.50

**BALANCE DUE** \$ 10,191.50

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

03/02/22		
0.20	WALKER, HELGI C	CORRESPONDENCE RE CASE UPDATES, REVIEW ORDERS.
1.30	SEIBALD, M. JONATHAN	ANALYZE COURT ORDERS; ANALYZE JUDGE GAYLES' LOCAL RULES; COMMUNICATE WITH B. GOLDSMITH, H. WALKER, B. RICHMAN, CLIENT, AND DARBIE COUNSEL REGARDING COURT ORDERS AND CASE STRATEGY.
0.10	DELEO, ROBYN L	
03/03/22		
0.40	SEIBALD, M. JONATHAN	COMMUNICATE WITH DARBIE COUNSEL REGARDING WAIVER OF SERVICE AND MOTION TO DISMISS; COMMUNICATE WITH B. RICHMAN REGARDING MOTION TO DISMISS AND POTENTIAL RESOLUTION.
0.40	RICHMAN, BRIAN A	COMMUNICATE WITH J. GOLDSTEIN RE COURT RULING ON OPPOSITION TO MOTION FOR LEAVE TO FILE AMENDED COMPLAINT.
03/04/22		
0.10	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN REGARDING RESOLUTION STRATEGY.
0.40	RICHMAN, BRIAN A	COMMUNICATE WITH COUNSEL FOR PLAINTIFF RE SETTLEMENT.
03/05/22		
0.50	WALKER, HELGI C	CORRESPONDENCE RE SETTLEMENT, NEXT STEPS.
03/07/22		
0.20	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN, DARBIE COUNSEL, AND CLIENT REGARDING MOTION TO AMENDED COMPLAINT AND MOTION TO DISMISS.

	0.10	RICHMAN, BRIAN A	REVIEW SECOND AMENDED COMPLAINT; CORRESPOND WITH J. GOLDSTEIN AND J. SEIBALD RE SAME.
03/08/22	0.30	WALKER, HELGI C	CORRESPONDENCE RE EXTENSION OF TIME WITH GDC TEAM AND OPPOSING COUNSEL.
	0.20	GOLDSMITH, BARRY R	REVIEW DRAFT EMAIL TO OPPOSING COUNSEL RE SECOND AMENDED TO COMPLAINT.
	0.30	SEIBALD, M. JONATHAN	COMMUNICATE WITH GIBSON TEAM REGARDING MOTION TO DISMISS EXTENSION AND CASE STRATEGY.
	0.40	RICHMAN, BRIAN A	COMMUNICATE WITH CLIENT AND OPPOSING COUNSEL RE SERVICE AND BRIEFING SCHEDULE.
03/09/22	0.30	SEIBALD, M. JONATHAN	REVISE EXTENSION MOTION; COMMUNICATE WITH GIBSON TEAM AND DARBIE COUNSEL REGARDING EXTENSION MOTION.
	0.60	RICHMAN, BRIAN A	DRAFT MOTION FOR EXTENSION OF TIME; EXECUTE WAIVER OF SERVICE FORM.
03/10/22	0.10	SEIBALD, M. JONATHAN	ANALYZE SOCIAL LIFE SETTLEMENT LETTER; COMMUNICATE WITH B. RICHMAN REGARDING SETTLEMENT LETTER.
	0.20	RICHMAN, BRIAN A	REVISE MOTION FOR EXTENSION; CORRESPOND WITH A. RESNICK RE SAME.
	0.10	DELEO, ROBYN L	UPLOAD DOCKET ENTRIES TO SHARED DRIVE.
03/11/22	0.50	WALKER, HELGI C	CORRESPONDENCE RE SETTLEMENT OFFER AND RESPONSE.
	0.20	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN REGARDING SETTLEMENT STRATEGY AND RESPONSE.

0.40	RICHMAN, BRIAN A	CORRESPOND WITH OPPOSING COUNSEL RE SETTLEMENT OFFER.
0.10	DELEO, ROBYN L	UPLOAD DOCKET ENTRIES TO SHARED DRIVE.
03/14/22		
0.50	WALKER, HELGI C	CORRESPONDENCE RE SETTLEMENT RESPONSE AND REVIEW SAME; REVIEW NOTICE RE WAIVER OF SERVICE.
0.30	GOLDSMITH, BARRY R	ATTENTION TO SETTLEMENT DISCUSSIONS AND EMAILS RE SAME.
0.30	SEIBALD, M. JONATHAN	ANALYZE DARBIE WAIVER OF SERVICE AND MAGISTRATE SCHEDULING ORDER; COMMUNICATE WITH GIBSON TEAM REGARDING SETTLEMENT NEGOTIATIONS AND MOTION TO DISMISS.
0.10	RICHMAN, BRIAN A	CORRESPOND WITH CLIENT AND OPPOSING COUNSEL RE SETTLEMENT.
0.10	DELEO, ROBYN L	UPLOAD DOCKET FILING TO SHARED DRIVE.
03/15/22		
0.10	DELEO, ROBYN L	UPLOAD DOCKET ENTRY TO SHARED DRIVE.

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**May 12, 2022**

**Invoice No. 2022052423**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through April 30, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 <b>Social Life Network Litigation</b>	\$ 2,976.00	\$ 2,049.13	\$ 5,025.13
<b>Totals</b>	\$ 2,976.00	\$ 2,049.13	\$ 5,025.13
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>Current Balance Due</b>			<u>\$ 5,025.13</u>

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**Invoice Date: May 12, 2022**

**Invoice No. 2022052423**

**Due and Payable Upon Receipt**

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

<u>Matter</u>	<u>Invoice Date</u>	<u>Invoice No.</u>	<u>Services</u>	<u>Costs</u>	<u>Balance Due</u>
74426-00001	02/11/22	2022022102	\$ 446.00	\$ 0.00	\$ <u>446.00</u>
<b>PREVIOUS BALANCE DUE</b>					\$ <u>446.00</u>
<b>TOTAL OUTSTANDING BALANCE DUE</b>					\$ <u>5,471.13</u>



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**1050 Connecticut Avenue, N.W.**  
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**May 12, 2022**

**Invoice No. 2022052423**

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 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through April 30, 2022**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Litigation	\$ 2,976.00	\$ 2,049.13	\$ 5,025.13
	<b>Totals</b>	\$ 2,976.00	\$ 2,049.13	\$ 5,025.13
	<b>Evergreen retainer received April 22, 2021</b>			50,000.00
	<b>Current Balance Due</b>			<u>\$ 5,025.13</u>

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**Invoice No. 2022052423**

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**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

<u>Matter</u>	<u>Invoice Date</u>	<u>Invoice No.</u>	<u>Services</u>	<u>Costs</u>	<u>Balance Due</u>
74426-00001	02/11/22	2022022102	\$ 446.00	\$ 0.00	\$ <u>446.00</u>
<b>PREVIOUS BALANCE DUE</b>					\$ <u>446.00</u>
<b>TOTAL OUTSTANDING BALANCE DUE</b>					\$ <u>5,471.13</u>

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through April 30, 2022

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
BRIAN A. RICHMAN	3.10	\$ 960.00	\$ <u>2,976.00</u>
<b>Total Services</b>			\$ 2,976.00

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 8.30
ON-LINE RESEARCH (WESTLAW)	2,036.93
SPECIALIZED RESEARCH	<u>3.90</u>
<b>Total Costs/Charges</b>	<u>2,049.13</u>

<b>Total Services, Costs/Charges</b>	5,025.13
<b>BALANCE DUE</b>	<u>\$ 5,025.13</u>

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

Detail Services:

04/30/22

3.10 RICHMAN, BRIAN A

DRAFT MOTION TO DISMISS SECOND AMENDED  
COMPLAINT.

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

Detail Costs/Charges:

Document Retrieval Service

03/02/22 7.70 PACER USAGE MARCH 2022

03/31/22 0.60 PACER USAGE MARCH 2022

On-Line Research (Westlaw)

04/30/22 2,036.93 RICHMAN,BRIAN 04/30/22 74426-00001 WESTLAW  
RESEARCH AND PRINTING CHARGES

Specialized Research

04/30/22 3.90 RICHMAN, BRIAN A. 04/30/2022 PACER

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**Federal Taxpayer ID #95-1611234**

**June 6, 2022**

**Invoice No. 2022060900**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through May 31, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 53,970.50	\$ 2,755.16	\$ 56,725.66
<b>Totals</b>	\$ 53,970.50	\$ 2,755.16	\$ 56,725.66
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>			<u>\$ 56,725.66</u>

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**Invoice No. 2022060900**

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**June 6, 2022**

**Invoice No. 2022060900**

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 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through May 31, 2022**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Litigation	\$ 53,970.50	\$ 2,755.16	\$ 56,725.66
	<b>Totals</b>	\$ 53,970.50	\$ 2,755.16	\$ 56,725.66
	<b>Evergreen retainer received April 22, 2021</b>			50,000.00
	<b>TOTAL OUTSTANDING BALANCE DUE</b>			<b>\$ 56,725.66</b>

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 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through May 31, 2022

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	3.40	\$1,535.00	\$ 5,219.00
BARRY R. GOLDSMITH	0.90	1,595.00	1,435.50
M. JONATHAN SEIBALD	15.30	1,115.00	17,059.50
BRIAN A. RICHMAN	27.00	960.00	25,920.00
ROBYN L. DELEO	6.10	520.00	3,172.00
ALEXANDER B. JORDAN	1.70	685.00	<u>1,164.50</u>
<b>Total Services</b>			<b>\$ 53,970.50</b>


<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 3.90
ON-LINE RESEARCH (WESTLAW)	2,749.36
SPECIALIZED RESEARCH	<u>1.90</u>
<b>Total Costs/Charges</b>	<b><u>2,755.16</u></b>
<b>Total Services, Costs/Charges</b>	<b>56,725.66</b>
<b>BALANCE DUE</b>	<b><u>\$ 56,725.66</u></b>





SOCIAL LIFE NETWORK LITIGATION  
74426-00001


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## Detail Services:

05/01/22	2.00	RICHMAN, BRIAN A	DRAFT MOTION TO DISMISS SECOND AMENDED COMPLAINT.
05/04/22	0.30	GOLDSMITH, BARRY R	REVIEW MOTION TO DISMISS.
	4.70	SEIBALD, M. JONATHAN	DRAFT MOTION TO DISMISS SECOND AMENDED COMPLAINT; COMMUNICATE WITH GIBSON TEAM, CLIENT, AND DARBIE COUNSEL REGARDING MOTION TO DISMISS.
	3.80	RICHMAN, BRIAN A	DRAFT MOTION TO DISMISS SECOND AMENDED COMPLAINT.
05/05/22	0.20	SEIBALD, M. JONATHAN	ANALYZE COMMENTS ON MOTION TO DISMISS; COMMUNICATE WITH B. RICHMAN REGARDING MOTION TO DISMISS.
05/06/22	0.50	WALKER, HELGI C	WORK ON AUDIT.
	0.50	WALKER, HELGI C	REVIEW DRAFT MOTION TO DISMISS SECOND AMENDED COMPLAINT AND CORRESPONDENCE RE SAME.
	2.40	SEIBALD, M. JONATHAN	DRAFT MOTION TO DISMISS; COMMUNICATE WITH GIBSON TEAM AND DARBIE COUNSEL REGARDING MOTION TO DISMISS.
	3.50	DELEO, ROBYN L	
05/07/22	0.10	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN REGARDING MOTION TO DISMISS.

0.10	RICHMAN, BRIAN A	REVIEW ARGUMENT SECTIONS FROM J.H. DARBIE.
05/08/22		
0.10	SEIBALD, M. JONATHAN	EMAIL CORRESPONDENCE WITH B. RICHMAN REGARDING MOTION TO DISMISS.
2.30	RICHMAN, BRIAN A	REVISE MOTION TO DISMISS BASED ON J.H. DARBIE COMMENTS.
05/09/22		
0.50	WALKER, HELGI C	REVIEW REVISED DRAFT MOTION TO DISMISS AND CORRESPONDENCE RE FINALIZATION OF SAME FOR FILING.
0.30	GOLDSMITH, BARRY R	REVIEW AND COMMENT ON MOTION TO DISMISS.
1.60	SEIBALD, M. JONATHAN	REVISE MOTION TO DISMISS BRIEF; COMMUNICATE WITH B. RICHMAN, A. RESNICK, AND DARBIE COUNSEL REGARDING MOTION TO DISMISS.
2.90	RICHMAN, BRIAN A	REVISE MOTION TO DISMISS; PREPARE MOTION TO DISMISS FOR FILING; COORDINATE WITH COUNSEL FOR J.H. DARBIE.
0.50	JORDAN, ALEXANDER B	
05/12/22		
0.20	WALKER, HELGI C	REVIEW NOTICES OF MOTIONS RE APPEARANCES, PRO HAC VICES FOR DARBIE.
05/17/22		
0.20	WALKER, HELGI C	CORRESPONDENCE RE NEW BASILE COUNSEL; CORRESPONDENCE WITH OPPOSING COUNSEL.
0.10	DELEO, ROBYN L	UPLOAD DOCKET ENTRY TO SHARED DRIVE.
05/20/22		
0.20	JORDAN, ALEXANDER B	

05/23/22			
1.00	WALKER, HELGI C	REVIEW OPPOSITION TO MOTION TO DISMISS AS FILED AND CORRESPONDENCE RE SAME.	
0.60	SEIBALD, M. JONATHAN	ANALYZE SOCIAL LIFE OPPOSITION BRIEF.	
0.20	RICHMAN, BRIAN A	REVIEW OPPOSITION TO MOTION TO DISMISS.	
05/24/22			
0.80	SEIBALD, M. JONATHAN	ANALYZE MOTION TO DISMISS OPPOSITION BRIEF; COMMUNICATE WITH B. RICHMAN REGARDING OPPOSITION BRIEF.	
1.50	RICHMAN, BRIAN A	REVIEW RESPONSE TO MOTION TO DISMISS; RESEARCH FOR REPLY BRIEF.	
05/27/22			
0.10	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN REGARDING REPLY BRIEF.	
05/28/22			
2.20	RICHMAN, BRIAN A	DRAFT REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS; COMMUNICATE WITH A. RESNICK RE SAME.	
05/29/22			
1.80	RICHMAN, BRIAN A	DRAFT REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS; COMMUNICATE WITH J. GOLDSTEIN RE SAME.	
05/30/22			
2.10	SEIBALD, M. JONATHAN	REVISE MOTION TO DISMISS REPLY BRIEF; COMMUNICATE WITH B. RICHMAN REGARDING MOTION TO DISMISS REPLY BRIEF.	
8.10	RICHMAN, BRIAN A	DRAFT REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS; REVISE BRIEF; CORRESPOND WITH GDC TEAM RE SAME.	
05/31/22			
0.50	WALKER, HELGI C	REVIEW DRAFT REPLY AND CORRESPONDENCE RE SAME, EDITS TO SAME.	

0.30	GOLDSMITH, BARRY R	REVIEW REPLY MOTION TO DISMISS AND MULTIPLE EMAILS RE SAME.
2.60	SEIBALD, M. JONATHAN	REVISE REPLY BRIEF; COMMUNICATE WITH B. GOLDSMITH, H. WALKER, AND B. RICHMAN REGARDING REPLY BRIEF.
2.10	RICHMAN, BRIAN A	REVISE REPLY BRIEF; CORRESPOND WITH COUNSEL FOR J.H. DARBIE; COMMUNICATE WITH J. GOLDSTEIN RE REVISIONS AND STRATEGY; COORDINATE CITE CHECK; FINALIZE BRIEF FOR FILING.
2.50	DELEO, ROBYN L	CITE CHECK DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS SECOND AMENDED COMPLAINT PER B. RICHMAN.
1.00	JORDAN, ALEXANDER B	

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

Detail Costs/Charges:

Document Retrieval Service

04/30/22 3.90 PACER USAGE APRIL 2022

On-Line Research (Westlaw)

05/01/22 1,013.84 RICHMAN,BRIAN 05/01/22 74426-00001 WESTLAW  
RESEARCH AND PRINTING CHARGES

05/04/22 895.52 RICHMAN,BRIAN 05/04/22 74426-00001 WESTLAW  
RESEARCH AND PRINTING CHARGES

05/08/22 840.00 RICHMAN,BRIAN 05/08/22 74426-00001 WESTLAW  
RESEARCH AND PRINTING CHARGES

Specialized Research

05/04/22 1.90 SEIBALD, M. JONATHAN 05/04/2022 PACER

**GIBSON, DUNN & CRUTCHER LLP**  
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**Federal Taxpayer ID #95-1611234**

**August 5, 2022**

**Invoice No. 2022081061**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through July 31, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 6,180.50	\$ 0.00	\$ 6,180.50
<b>Totals</b>	\$ 6,180.50	\$ 0.00	\$ 6,180.50
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>			<u>\$ 6,180.50</u>

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**Invoice Date: August 5, 2022**

**Invoice No. 2022081061**

**Due and Payable Upon Receipt**

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**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**August 5, 2022**

**Invoice No. 2022081061**

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 Jason C. Goldstein  
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 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through July 31, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 6,180.50	\$ 0.00	\$ 6,180.50
<b>Totals</b>	\$ 6,180.50	\$ 0.00	\$ 6,180.50
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>			<b>\$ 6,180.50</b>

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For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: August 5, 2022**

**Invoice No. 2022081061**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through July 31, 2022

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	0.50	\$1,535.00	\$ 767.50
BARRY R. GOLDSMITH	0.20	1,595.00	319.00
M. JONATHAN SEIBALD	2.80	1,115.00	3,122.00
BRIAN A. RICHMAN	2.00	960.00	1,920.00
ROBYN L. DELEO	0.10	520.00	<u>52.00</u>

**Total Services** \$ 6,180.50

**Total Services, Costs/Charges** 6,180.50

**BALANCE DUE** \$ 6,180.50



SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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## Detail Services:

07/13/22		
0.30	SEIBALD, M. JONATHAN	COMMUNICATE WITH CLIENT REGARDING LGH DECISION AND NOTICE OF SUPPLEMENTAL AUTHORITY.
07/14/22		
0.20	WALKER, HELGI C	REVIEW AND REVISE NOTICE OF SUPPLEMENTAL AUTHORITY AND CORRESPONDENCE RE SAME.
0.20	GOLDSMITH, BARRY R	REVIEW NOTICE OF SUPPLEMENTAL AUTHORITY.
1.40	SEIBALD, M. JONATHAN	DRAFT NOTICE OF SUPPLEMENTAL AUTHORITY; COMMUNICATE WITH CLIENT, GIBSON TEAM, AND DARBIE COUNSEL REGARDING NOTICE OF SUPPLEMENTAL AUTHORITY.
0.50	RICHMAN, BRIAN A	ATTENTION TO NOTICE OF SUPPLEMENTAL AUTHORITY.
07/15/22		
0.30	WALKER, HELGI C	CORRESPONDENCE RE NOTICE OF SUPPLEMENTAL AUTHORITY AND REVIEW SAME AS FILED.
1.10	SEIBALD, M. JONATHAN	REVISE NOTICE OF SUPPLEMENTAL AUTHORITY; COMMUNICATE WITH GIBSON TEAM, CLIENT, A. RESNICK,, AND DARBIE COUNSEL REGARDING NOTICE OF SUPPLEMENTAL AUTHORITY.
1.50	RICHMAN, BRIAN A	COMMUNICATE WITH CLIENT RE NOTICE OF SUPPLEMENTAL AUTHORITY; REVISE SAME.
0.10	DELEO, ROBYN L	UPLOAD DOCKET ENTRY TO SHARED DRIVE.

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**October 5, 2022**

**Invoice No. 2022101201**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through September 30, 2022**

	Services Rendered	Costs/ Charges	Totals
74426-00001 <b>Social Life Network Litigation</b>	\$ 223.00	\$ 0.00	\$ 223.00
<b>Totals</b>	\$ 223.00	\$ 0.00	\$ 223.00
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>			<u>\$ 223.00</u>

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
 ABA No: 121000248  
 Attn: Treasury Department  
 Please include the invoice number in the wire instructions.

**Remit By Mail To:**

Gibson, Dunn & Crutcher LLP  
 PO Box 840723  
 Los Angeles, CA 90084-0723

*Please enclose the remittance copy of  
 this invoice with your payment in the  
 enclosed Reply Envelope to ensure  
 proper credit.*

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**Invoice Date: October 5, 2022**

**Invoice No. 2022101201**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**October 5, 2022**

**Invoice No. 2022101201**

**REMITTANCE COPY**

**To ensure proper crediting, please send this copy in the enclosed envelope.**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through September 30, 2022**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Litigation	\$ 223.00	\$ 0.00	\$ 223.00
	<b>Totals</b>	\$ 223.00	\$ 0.00	\$ 223.00
	<b>Evergreen retainer received April 22, 2021</b>			50,000.00
	<b>TOTAL OUTSTANDING BALANCE DUE</b>			<b>\$ 223.00</b>

**Remit By Wire To:**

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 333 South Grand Avenue  
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**Invoice Date: October 5, 2022**

**Invoice No. 2022101201**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through September 30, 2022

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
M. JONATHAN SEIBALD	0.20	\$1,115.00	\$ <u>223.00</u>
<b>Total Services</b>			\$ 223.00
<b>Total Services, Costs/Charges</b>			223.00
<b>BALANCE DUE</b>			<u>\$ 223.00</u>

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

09/15/22		
0.20	SEIBALD, M. JONATHAN	ANALYZE SUPPLEMENTAL AUTHORITY FOR POTENTIAL FILING WITH COURT; COMMUNICATE WITH B. RICHMAN REGARDING POTENTIAL FILING OF NOTICE OF SUPPLEMENTAL AUTHORITY.

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**February 15, 2023**

**Invoice No. 2023022724**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through January 31, 2023**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 2,367.00	\$ 241.10	\$ 2,608.10
<b>Totals</b>	\$ 2,367.00	\$ 241.10	\$ 2,608.10
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>Current Balance Due</b>			\$ 2,608.10

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

Matter	Invoice Date	Invoice No.	Services	Costs	Balance Due
74426-00001	10/05/22	2022101201	\$ 223.00	\$ 0.00	\$ 223.00
<b>PREVIOUS BALANCE DUE</b>					\$ 223.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>					\$ 2,831.10

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
 Account No: 4600-146039  
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**Invoice Date: February 15, 2023**

**Invoice No. 2023022724**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**February 15, 2023**

**Invoice No. 2023022724**

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Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through January 31, 2023**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Litigation	\$ 2,367.00	\$ 241.10	\$ 2,608.10
	<b>Totals</b>	\$ 2,367.00	\$ 241.10	\$ 2,608.10
	<b>Evergreen retainer received April 22, 2021</b>			50,000.00
	<b>Current Balance Due</b>			<u>\$ 2,608.10</u>

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

Matter	Invoice Date	Invoice No.	Services	Costs	Balance Due
74426-00001	10/05/22	2022101201	\$ 223.00	\$ 0.00	\$ 223.00
	<b>PREVIOUS BALANCE DUE</b>				<u>\$ 223.00</u>
	<b>TOTAL OUTSTANDING BALANCE DUE</b>				<u>\$ 2,831.10</u>

Invoice Date: February 15, 2023

**Due and Payable Upon Receipt**

Invoice No. 2023022724

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through January 31, 2023

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	0.30	\$1,785.00	\$ 535.50
M. JONATHAN SEIBALD	0.30	1,265.00	379.50
BRIAN A. RICHMAN	1.20	1,210.00	<u>1,452.00</u>
<b>Total Services</b>			\$ 2,367.00

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
ON-LINE RESEARCH (WESTLAW)	\$ 240.00
SPECIALIZED RESEARCH	<u>1.10</u>
<b>Total Costs/Charges</b>	<u>241.10</u>

<b>Total Services, Costs/Charges</b>	2,608.10
<b>BALANCE DUE</b>	<u>\$ 2,608.10</u>



SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

01/17/23	0.30	RICHMAN, BRIAN A	ATTENTION TO [REDACTED] AND POTENTIAL NOTICE OF SUPPLEMENTAL AUTHORITY.
01/18/23	0.20	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN AND CLIENT REGARDING NOTICE OF SUPPLEMENTAL AUTHORITY.
	0.20	RICHMAN, BRIAN A	CORRESPOND WITH CLIENT RE NOTICE OF SUPPLEMENTAL AUTHORITY RE SDNY DECISION.
01/20/23	0.20	WALKER, HELGI C	CORRESPONDENCE RE DRAFT NOTICE OF SUPPLEMENTAL AUTHORITY AND REVIEW SAME.
	0.10	SEIBALD, M. JONATHAN	REVISE NOTICE OF SUPPLEMENTAL AUTHORITY; COMMUNICATE WITH GIBSON TEAM REGARDING NOTICE OF SUPPLEMENTAL AUTHORITY.
	0.50	RICHMAN, BRIAN A	DRAFT NOTICE OF SUPPLEMENTAL AUTHORITY.
01/23/23	0.10	WALKER, HELGI C	REVIEW NOTICE OF SUPPLEMENTAL AUTHORITY AS FILED.
	0.20	RICHMAN, BRIAN A	COMMUNICATE WITH COUNSEL FOR J.H. DARBIE RE NOTICE OF SUPPLEMENTAL AUTHORITY; FINALIZE NOTICE FOR FILING.

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

On-Line Research (Westlaw)

01/20/23	240.00	RICHMAN,BRIAN	01/20/23	74426-00001	WESTLAW
RESEARCH AND PRINTING CHARGES					

Specialized Research

01/18/23	1.10	SEIBALD, M. JONATHAN	01/18/2023	PACER
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**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**March 17, 2023**

**Invoice No. 2023033198**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through February 28, 2023**

	Services Rendered	Costs/ Charges	Totals
74426-00001 Social Life Network Litigation	\$ 17,311.50	\$ 2,234.46	\$ 19,545.96
<b>Totals</b>	\$ 17,311.50	\$ 2,234.46	\$ 19,545.96
<b>Evergreen retainer received April 22, 2021</b>			50,000.00
<b>TOTAL OUTSTANDING BALANCE DUE</b>			<u>\$ 19,545.96</u>

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
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 ABA No: 121000248  
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**Invoice Date: March 17, 2023**

**Invoice No. 2023033198**

**Due and Payable Upon Receipt**

**GIBSON, DUNN & CRUTCHER LLP**  
**1050 Connecticut Avenue, N.W.**  
**Washington, D.C. 20036-5306**

**Federal Taxpayer ID #95-1611234**

**March 17, 2023**

**Invoice No. 2023033198**

**REMITTANCE COPY**

**To ensure proper crediting, please send this copy in the enclosed envelope.**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

**For Services Rendered and Costs/Charges Advanced Through February 28, 2023**

		Services Rendered	Costs/ Charges	Totals
74426-00001	Social Life Network Litigation	\$ 17,311.50	\$ 2,234.46	\$ 19,545.96
	<b>Totals</b>	\$ 17,311.50	\$ 2,234.46	\$ 19,545.96
	<b>Evergreen retainer received April 22, 2021</b>			50,000.00
	<b>TOTAL OUTSTANDING BALANCE DUE</b>			<u>\$ 19,545.96</u>

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**Invoice Date: March 17, 2023**

**Invoice No. 2023033198**

**Due and Payable Upon Receipt**

Peak One Opportunity Fund, LP  
 Jason C. Goldstein  
 333 S Hibiscus Drive  
 Miami Beach, FL 33139

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through February 28, 2023

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
HELGI C. WALKER	1.00	\$1,785.00	\$ 1,785.00
BARRY R. GOLDSMITH	0.40	1,815.00	726.00
M. JONATHAN SEIBALD	2.90	1,265.00	3,668.50
BRIAN A. RICHMAN	9.20	1,210.00	11,132.00
<b>Total Services</b>			<b>\$ 17,311.50</b>

<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 2.40
ON-LINE RESEARCH (WESTLAW)	<u>2,232.06</u>
<b>Total Costs/Charges</b>	<b><u>2,234.46</u></b>

**Total Services, Costs/Charges** 19,545.96

**BALANCE DUE** \$ 19,545.96

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

## Detail Services:

02/13/23			
0.50	WALKER, HELGI C	CORRESPONDENCE RE MAGISTRATE REPORT AND REVIEW.	
0.80	SEIBALD, M. JONATHAN	ANALYZE MAGISTRATE MOTION TO DISMISS DECISION; COMMUNICATE WITH B. RICHMAN AND CLIENT REGARDING MOTION TO DISMISS DECISION AND STRATEGY FOR NEXT STEPS.	
0.50	RICHMAN, BRIAN A	REVIEW MAGISTRATE REPORT AND RECOMMENDATION.	
02/14/23			
0.40	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN REGARDING STRATEGY FOR OBJECTIONS TO MAGISTRATE'S MOTION TO DISMISS REPORT; ANALYZE LOCAL RULES RELATING TO OBJECTIONS TO MAGISTRATE'S REPORT.	
0.80	RICHMAN, BRIAN A	COMMUNICATE WITH J. GOLDSTEIN RE MAGISTRATE REPORT AND RECOMMENDATIONS AND STRATEGY RE SAME.	
02/25/23			
3.40	RICHMAN, BRIAN A	DRAFT OBJECTIONS TO MAGISTRATE REPORT AND RECOMMENDATION; RESEARCH RE LEAVE TO AMEND PREVIOUSLY ABANDONED CLAIMS.	
02/26/23			
0.50	SEIBALD, M. JONATHAN	REVISE OBJECTIONS TO MAGISTRATE'S REPORT; COMMUNICATE WITH B. RICHMAN REGARDING OBJECTIONS TO MAGISTRATE'S REPORT.	
2.60	RICHMAN, BRIAN A	DRAFT OBJECTIONS TO MAGISTRATE REPORT AND RECOMMENDATION; RESEARCH RE LEAVE TO AMEND PREVIOUSLY ABANDONED CLAIMS.	

02/27/23

0.50 WALKER, HELGI C

CORRESPONDENCE RE RESPONSE TO MAGISTRATE  
JUDGE REPORT AND RECOMMENDATIONS AND  
REVIEW SAME, GDC TEAM EDITS TO SAME

0.40 GOLDSMITH, BARRY R

ATTENTION TO OBJECTIONS TO MAGISTRATE  
DECISION

1.20 SEIBALD, M. JONATHAN

REVISE OBJECTIONS TO MAGISTRATE'S REPORT;  
ANALYZE SOCIAL LIFE'S OBJECTIONS TO  
MAGISTRATE'S REPORT; COMMUNICATE WITH B.  
RICHMAN REGARDING OBJECTIONS.

1.90 RICHMAN, BRIAN A

COMMUNICATE WITH CLIENT RE OBJECTIONS TO  
MAGISTRATE REPORT; REVISE DRAFT OBJECTIONS.

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

01/18/23 1.80 PACER USAGE JANUARY 2023

01/20/23 0.60 PACER USAGE JANUARY 2023

On-Line Research (Westlaw)

02/25/23 996.03 RICHMAN,BRIAN 02/25/23 74426-00001 WESTLAW  
RESEARCH AND PRINTING CHARGES

02/26/23 1,236.03 RICHMAN,BRIAN 02/26/23 74426-00001 WESTLAW  
RESEARCH AND PRINTING CHARGES



# Exhibit 2

Date	ID	Timekeeper	Client	Matter	Rate	Billed Amt	Billed Hrs	Narrative
4/14/2021	32882369	Seibald, M. Jonathan	74426	1	\$1,060.00	\$954.00	0.9	Analyze documents relating to Social Life dispute; communicate with B. Richman regarding counterclaims, letter, and case strategy.
4/16/2021	32899758	Seibald, M. Jonathan	74426	1	\$1,060.00	\$318.00	0.3	Analyze relevant documents.
4/16/2021	32906779	Richman, Brian A.	74426	1	\$905.00	\$452.50	0.5	Review securities purchase agreement and related documents and correspondence.
4/16/2021	32909750	Goldsmith, Barry R.	74426	1	\$1,475.00	\$590.00	0.4	Review and revise draft letter to Social Life Network and emails re: same.
4/17/2021	32906806	Richman, Brian A.	74426	1	\$905.00	\$4,615.50	5.1	Draft letter to counsel for plaintiff; review complaint; research re legal and factual responses.
4/18/2021	32906770	Richman, Brian A.	74426	1	\$905.00	\$181.00	0.2	Revise draft letter to counsel for plaintiff.
4/18/2021	32909147	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Goldsmith, H. Walker, and B. Richman regarding letter to Social Life Network.
4/18/2021	32910985	Walker, Helgi C.	74426	1	\$1,370.00	\$2,055.00	1.5	Review and revise draft letter to opposing counsel; review edits of B. Goldsmith to same; correspondence with client re final draft.
4/19/2021	32908591	Richman, Brian A.	74426	1	\$905.00	\$1,448.00	1.6	Telephone conference with J. Goldstein and A. Resnick; revise letter to opposing counsel; review J. Goldstein correspondence with Social Life Network; confer with J. Seibald re strategy.
4/19/2021	32919988	Walker, Helgi C.	74426	1	\$1,370.00	\$1,370.00	1	Review comments of J. Goldstein on draft letter and correspondence with a GDC team re implementation of same; review final letter as transmitted to opposing counsel; correspondence with client group re same.
4/19/2021	32927160	Seibald, M. Jonathan	74426	1	\$1,060.00	\$954.00	0.9	Revise letter to Social Life counsel; communicate with client, B. Goldsmith, H. Walker, and B. Richman regarding letter to Social Life and case strategy; analyze case documents.
4/19/2021	32933757	Richman, Brian A.	74426	1	\$905.00	\$1,267.00	1.4	Telephone conferences with J. Goldstein and A. Resnick re Social Life Network litigation; revise letter to opposing counsel.
4/20/2021	32929572	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,014.00	1.9	Analyze Peak One complaint and deal documents; communicate with B. Richman and client regarding complaint and case strategy.
4/21/2021	32937086	Seibald, M. Jonathan	74426	1	\$1,060.00	\$742.00	0.7	Communicate with B. Richman regarding case strategy and pro hac vice motion; communicate with A. Resnick regarding pro hac vice motion.
4/21/2021	32952800	Richman, Brian A.	74426	1	\$905.00	\$362.00	0.4	Telephone conference with [REDACTED] re [REDACTED]; confer with J. Seibald and A. Shi re same.
4/22/2021	32947237	Shi, Andrew A.	74426	1	\$610.00	\$244.00	0.4	Call with J. Seibald re choice of law research.

Date	ID	Timekeeper	Client	Matter	Rate	Billed Amt	Billed Hrs	Narrative
4/22/2021	32949738	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,484.00	1.4	Communicate with B. Richman, A. Shi, and client regarding case strategy and research tasks; analyze documents for potential use in motions to dismiss or counterclaims.
4/22/2021	32952778	Richman, Brian A.	74426	1	\$905.00	\$1,357.50	1.5	Telephone conference with J. Goldstein re case strategy; telephone conference with [REDACTED] re [REDACTED]; confer with J. Seibald and A. Shi re same; research re Nevada licensing law.
4/23/2021	32954185	Shi, Andrew A.	74426	1	\$610.00	\$366.00	0.6	Analyze complaint.
4/23/2021	32959409	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with client and B. Richman regarding case strategy.
4/24/2021	32956921	Shi, Andrew A.	74426	1	\$610.00	\$1,525.00	2.5	Research re choice of law issues.
4/25/2021	32957478	Shi, Andrew A.	74426	1	\$610.00	\$610.00	1	Research re choice of law issues.
4/26/2021	32961357	Shi, Andrew A.	74426	1	\$610.00	\$5,124.00	8.4	Research choice of law; draft analysis re choice of law.
4/26/2021	32961454	Richman, Brian A.	74426	1	\$905.00	\$1,086.00	1.2	Research re choice of law analysis; confer with J. Seibald and A. Shi re same; research re same.
4/26/2021	32979568	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,060.00	1	Communicate with B. Richman and A. Shi regarding case strategy and choice of law issues; analyze choice of law memo.
4/27/2021	32978846	Richman, Brian A.	74426	1	\$905.00	\$452.50	0.5	Telephone conference with J. Goldstein re motion to dismiss.
4/29/2021	33001402	Seibald, M. Jonathan	74426	1	\$1,060.00	\$318.00	0.3	Communicate with A. Arias regarding pro hac vice motion; revise pro hac vice motion.
4/29/2021	33008413	Arias, Angel S.	74426	1	\$595.00	\$1,190.00	2	Access the court database for the status of the matter and information re new action; speak with J. Seibald re same and drafting of motion papers; work on same; review the SDFL court rules re same; forward drafts for final review.
5/3/2021	33036281	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding case strategy.
5/3/2021	33037048	Richman, Brian A.	74426	1	\$905.00	\$271.50	0.3	Telephone conference with [REDACTED] re [REDACTED].
5/4/2021	33037061	Richman, Brian A.	74426	1	\$905.00	\$362.00	0.4	Telephone conference with [REDACTED] re [REDACTED]; draft pro hac vice papers.
5/4/2021	33045596	Seibald, M. Jonathan	74426	1	\$1,060.00	\$424.00	0.4	Communicate with A. Resnick and B. Richman regarding pro hac vice motions and case strategy.
5/10/2021	33077259	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding case strategy.
5/10/2021	33085944	Richman, Brian A.	74426	1	\$905.00	\$4,706.00	5.2	Prepare pro hac vice motions; correspond with A. Resnick re filing same; draft outline of motion to dismiss.
5/11/2021	33079554	Shi, Andrew A.	74426	1	\$610.00	\$1,464.00	2.4	Draft corporate disclosure filings.

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5/11/2021	33085494	Seibald, M. Jonathan	74426	1	\$1,060.00	\$530.00	0.5	Revise initial disclosure; communicate with B. Richman, A. Shi, A. Resnick, and client regarding initial disclosures and pro hac vice motions.
5/11/2021	33108338	Richman, Brian A.	74426	1	\$905.00	\$2,715.00	3	Draft outline of motion to dismiss; research re same; revise corporate disclosure statements; coordinate filing of same; communicate with J. Seibald and A. Shi re same; communicate with A. Shi re deal terms and research for motion to dismiss.
5/12/2021	33092213	Seibald, M. Jonathan	74426	1	\$1,060.00	\$318.00	0.3	Draft pro hac vice motion; communicate with B. Goldsmith and B. Richman regarding pro hac vice motion.
5/13/2021	33103010	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Draft pro hac vice motion; communicate with A. Resnick regarding pro hac vice motion.
5/14/2021	33108212	Richman, Brian A.	74426	1	\$905.00	\$181.00	0.2	Review correspondence from Social Life Network; communicate with J. Goldstein re same.
5/14/2021	33111401	Seibald, M. Jonathan	74426	1	\$1,060.00	\$212.00	0.2	Communicate with B. Richman, A. Shi, and A. Resnick regarding pro hac vice motion and initial disclosures.
5/17/2021	33114922	Shi, Andrew A.	74426	1	\$610.00	\$2,745.00	4.5	Conduct research for motion to dismiss.
5/18/2021	33128049	Richman, Brian A.	74426	1	\$905.00	\$1,991.00	2.2	Draft outline of motion to dismiss and counterclaims; research re same.
5/18/2021	33131597	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,272.00	1.2	Analyze judicial notice research; communicate with client regarding case strategy; communicate with B. Richman and A. Shi regarding case strategy and research.
5/19/2021	33146629	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,484.00	1.4	Revise motion to dismiss and counterclaim outline.
5/20/2021	33148131	Shi, Andrew A.	74426	1	\$610.00	\$732.00	1.2	Research motion to dismiss argument.
5/20/2021	33151275	Richman, Brian A.	74426	1	\$905.00	\$1,176.50	1.3	Revise draft outline of motion to dismiss; communicate with A. Shi re research on scieneter; communicate with J. Goldstein and J. Seibald re potential counterclaims.
5/20/2021	33152833	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding case strategy.
5/21/2021	33155666	Shi, Andrew A.	74426	1	\$610.00	\$1,281.00	2.1	Research motion to dismiss defense.
5/21/2021	33161330	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Analyze fraud claim research.
5/24/2021	33166332	Shi, Andrew A.	74426	1	\$610.00	\$793.00	1.3	Research stay question.
5/25/2021	33181934	Shi, Andrew A.	74426	1	\$610.00	\$488.00	0.8	Draft edits to outline.
5/26/2021	33184100	Shi, Andrew A.	74426	1	\$610.00	\$3,477.00	5.7	Edit motion to dismiss outline; research discovery stay.
5/26/2021	33186399	Richman, Brian A.	74426	1	\$905.00	\$1,267.00	1.4	Revise outline of motion to dismiss; confer with J. Goldstein and J. Seibald re same.
5/26/2021	33193628	Walker, Helgi C.	74426	1	\$1,370.00	\$2,055.00	1.5	Review and revise outline of motion to dismiss and counterclaims as circulated by B. Richman; correspondence with GDC team re same.

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5/26/2021	33194144	Seibald, M. Jonathan	74426	1	\$1,060.00	\$954.00	0.9	Revise motion to dismiss and counterclaim outline; analyze discovery stay research; communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding outline.
5/26/2021	33197237	Goldsmith, Barry R.	74426	1	\$1,475.00	\$590.00	0.4	Review and comment on memo re motion to dismiss and counterclaims.
5/27/2021	33196342	Richman, Brian A.	74426	1	\$905.00	\$905.00	1	Communicate with J. Goldstein and J. Seibald re revisions to outline of motion to dismiss and counterclaims.
5/27/2021	33206002	Seibald, M. Jonathan	74426	1	\$1,060.00	\$212.00	0.2	Communicate with B. Richman regarding motion to dismiss and counterclaims.
5/28/2021	33203228	Shi, Andrew A.	74426	1	\$610.00	\$1,891.00	3.1	Research counterclaims.
5/28/2021	33207216	DeLeo, Robyn L.	74426	1	\$495.00	\$198.00	0.4	Upload docket filings to shared drive per B. Richman; email Library re filing alert.
5/28/2021	33210728	Seibald, M. Jonathan	74426	1	\$1,060.00	\$530.00	0.5	Communicate with B. Richman regarding motion to dismiss and counterclaims; research counterclaim procedures.
6/1/2021	33227076	Shi, Andrew A.	74426	1	\$610.00	\$122.00	0.2	Review research.
6/2/2021	33241128	Richman, Brian A.	74426	1	\$905.00	\$1,991.00	2.2	Draft motion to dismiss; research re counterclaims.
6/3/2021	33266177	Richman, Brian A.	74426	1	\$905.00	\$4,977.50	5.5	Draft motion to dismiss; research for same.
6/4/2021	33261569	Shi, Andrew A.	74426	1	\$610.00	\$610.00	1	Research counterclaim.
6/4/2021	33265881	Seibald, M. Jonathan	74426	1	\$1,060.00	\$424.00	0.4	Communicate with B. Richman and A. Shi regarding motion to dismiss and counterclaim strategy.
6/4/2021	33266182	Richman, Brian A.	74426	1	\$905.00	\$7,511.50	8.3	Draft motion to dismiss.
6/5/2021	33263211	Shi, Andrew A.	74426	1	\$610.00	\$549.00	0.9	Research counterclaim.
6/6/2021	33265930	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,120.00	2	Revise motion to dismiss brief.
6/7/2021	33275357	Shi, Andrew A.	74426	1	\$610.00	\$427.00	0.7	Research counterclaim.
6/7/2021	33277043	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,378.00	1.3	Revise motion to dismiss brief; revise complaint; communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.
6/7/2021	33277834	Walker, Helgi C.	74426	1	\$1,370.00	\$2,740.00	2	Review and revise draft motion to dismiss; correspondence with GDC team re further revisions to same; correspondence re counterclaims and review research re same.
6/8/2021	33290676	DeLeo, Robyn L.	74426	1	\$495.00	\$148.50	0.3	Upload docket entries to shared drive per B. Richman.
6/8/2021	33293912	Richman, Brian A.	74426	1	\$905.00	\$905.00	1	Revise motion to dismiss; confer with H. Walker, B. Goldsmith, J. Seibald, and A. Shi re counterclaim strategy.
6/9/2021	33292569	Shi, Andrew A.	74426	1	\$610.00	\$183.00	0.3	Review motion to dismiss.
6/9/2021	33294025	Richman, Brian A.	74426	1	\$905.00	\$1,086.00	1.2	Revise motion to dismiss; research re same; communicate with J. Goldstein and A. Resnick re same; draft H. Walker motion to appear pro hac vice.

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6/9/2021	33295542	Seibald, M. Jonathan	74426	1	\$1,060.00	\$424.00	0.4	Communicate with B. Richman, A. Shi, and A. Resnick regarding motion to dismiss.
6/10/2021	33296100	Richman, Brian A.	74426	1	\$905.00	\$5,701.50	6.3	Revise motion to dismiss; communicate with J. Goldstein, A. Resnick, and J. Seibald re same; coordinate cite check and proofread of draft.
6/10/2021	33301976	Roeder, Samuel A.	74426	1	\$400.00	\$800.00	2	Review and edit motion to dismiss.
6/10/2021	33302252	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,756.00	2.6	Revise motion to dismiss; communicate with B. Richman and A. Shi regarding motion to dismiss.
6/10/2021	33316466	Walker, Helgi C.	74426	1	\$1,370.00	\$1,370.00	1	Review and revise live draft motion to dismiss and correspondence with GDC team re same; review order granting pro hac motion.
6/11/2021	33305396	Richman, Brian A.	74426	1	\$905.00	\$3,620.00	4	Finalize and file motion to dismiss and supporting exhibits.
6/11/2021	33306524	DeLeo, Robyn L.	74426	1	\$495.00	\$49.50	0.1	Upload docket entry per B. Richman.
6/11/2021	33309442	Roeder, Samuel A.	74426	1	\$400.00	\$1,200.00	3	Review and edit motion to dismiss.
6/11/2021	33311746	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,166.00	1.1	Communicate with client, H. Walker, B. Richman, and A. Resnick regarding motion to dismiss and case strategy.
6/11/2021	33317531	Walker, Helgi C.	74426	1	\$1,370.00	\$1,370.00	1	Correspondence re finalization of motion to dismiss for filing; review same as filed; telephone conference with J. Seibald re status; telephone conference with J. Goldstein re same.
6/21/2021	33396353	Richman, Brian A.	74426	1	\$905.00	\$271.50	0.3	Communicate with J. Goldstein re case strategy.
6/26/2021	33419091	Seibald, M. Jonathan	74426	1	\$1,060.00	\$530.00	0.5	Communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding strategy relating to plaintiffs' failure to file motion to dismiss opposition brief; research local practices relating to failure to file required brief.
6/26/2021	33423186	Richman, Brian A.	74426	1	\$905.00	\$1,176.50	1.3	Communicate with J. Goldstein re plaintiff's non-opposition to motion to dismiss; research re default judgment on motion to dismiss.
6/27/2021	33420539	Seibald, M. Jonathan	74426	1	\$1,060.00	\$318.00	0.3	Communicate with B. Goldsmith, H. Walker, and B. Richman regarding strategy relating to plaintiff failure to file opposition brief.
6/27/2021	33423193	Richman, Brian A.	74426	1	\$905.00	\$1,357.50	1.5	Correspond with GDC team re plaintiff's non-opposition to motion to dismiss; draft notice of non-opposition re same.
6/28/2021	33427528	DeLeo, Robyn L.	74426	1	\$495.00	\$49.50	0.1	Upload order granting motion to dismiss to shared drive per B. Richman.
6/28/2021	33430591	Richman, Brian A.	74426	1	\$905.00	\$181.00	0.2	Attention to filings re plaintiff's missed deadline.

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6/28/2021	33436013	Walker, Helgi C.	74426	1	\$1,370.00	\$411.00	0.3	Review order granting motion to dismiss and correspondence re same; review plaintiffs' submission regarding intent to amend complaint and correspondence regarding same.
6/28/2021	33439484	Seibald, M. Jonathan	74426	1	\$1,060.00	\$848.00	0.8	Communicate with H. Walker, B. Goldsmith, B. Richman, and A. Shi regarding case strategy; analyze court filings relating to motion to dismiss and amended complaint; analyze local rules.
6/28/2021	33442751	Goldsmith, Barry R.	74426	1	\$1,475.00	\$295.00	0.2	Attention to emails re: dismissal and amended complaint.
6/30/2021	33453008	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding case strategy.
7/2/2021	33478247	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,272.00	1.2	Analyze amended complaint and motion to reopen; draft correspondence to plaintiff's counsel; communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.
7/2/2021	33483497	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Correspondence re contacts with opposing counsel re case reopening.
7/2/2021	33483533	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Correspondence re motion to reopen, review same as filed; correspondence with GDC team re next steps.
7/2/2021	33492942	Goldsmith, Barry R.	74426	1	\$1,475.00	\$737.50	0.5	Attention to amended complaint and responses.
7/2/2021	33498328	Richman, Brian A.	74426	1	\$905.00	\$2,172.00	2.4	Correspond with plaintiff's counsel re motion to reopen; communicate with GDC team re same; review amended complaint and motion to reopen.
7/3/2021	33477535	Richman, Brian A.	74426	1	\$905.00	\$2,715.00	3	Draft outline of motion for sanctions and opposition to motion to reopen.
7/3/2021	33483549	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Further correspondence with GDC team re amended complaint and next steps.
7/3/2021	33490122	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Goldsmith, H. Walker, B. Richman, and A. Shi regarding case strategy.
7/3/2021	33492888	Goldsmith, Barry R.	74426	1	\$1,475.00	\$442.50	0.3	Attention to contemplated motions and emails re: same.
7/4/2021	33478972	Shi, Andrew A.	74426	1	\$610.00	\$1,525.00	2.5	Draft response brief.
7/4/2021	33490500	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,060.00	1	Communicate with B. Richman and client regarding case strategy.
7/4/2021	33492904	Goldsmith, Barry R.	74426	1	\$1,475.00	\$442.50	0.3	Emails re: amended complaint and stay.
7/4/2021	33498558	Richman, Brian A.	74426	1	\$905.00	\$362.00	0.4	Correspond with J. Goldstein re amended complaint and motion to stay and for sanctions.
7/5/2021	33480140	Shi, Andrew A.	74426	1	\$610.00	\$4,880.00	8	Draft motion to stay proceeding and extension of time; draft proposed order.
7/5/2021	33483596	Walker, Helgi C.	74426	1	\$1,370.00	\$274.00	0.2	Correspondence with opposing counsel re motion to reopen.

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7/5/2021	33490588	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,060.00	1	Draft motion to extend time; communicate with B. Richman and A. Shi regarding motion.
7/5/2021	33498452	Richman, Brian A.	74426	1	\$905.00	\$724.00	0.8	Revise motion to stay; communicate with GDC team re same.
7/6/2021	33483225	Shi, Andrew A.	74426	1	\$610.00	\$1,525.00	2.5	Draft motion to extend filing deadline; call with J. Seibald re research questions.
7/6/2021	33492500	Seibald, M. Jonathan	74426	1	\$1,060.00	\$5,194.00	4.9	Revise motion to extend time; communicate with B. Goldsmith, H. Walker, B. Richman, A. Shi, A. Resnick, J. Goldstein, opposing counsel, Darbie counsel, and Court regarding motion to extend time and motion to reopen.
7/6/2021	33492700	Walker, Helgi C.	74426	1	\$1,370.00	\$1,370.00	1	Review and revise motion to extend deadlines and correspondence re same; further correspondence re same.
7/6/2021	33492970	Goldsmith, Barry R.	74426	1	\$1,475.00	\$737.50	0.5	Attention to motion to extend time and amended complaint; attention to email exchange re: same.
7/6/2021	33498432	Richman, Brian A.	74426	1	\$905.00	\$1,267.00	1.4	Revise motion to extend time; correspond with plaintiff's counsel re same.
7/7/2021	33496383	DeLeo, Robyn L.	74426	1	\$495.00	\$49.50	0.1	Upload docket entry to shared drive per B. Richman.
7/7/2021	33502626	Seibald, M. Jonathan	74426	1	\$1,060.00	\$954.00	0.9	Revise proposed order on motion to extend time to respond; communicate with B. Richman, A. Resnick, and client regarding motions and case strategy; communicate with Darbie counsel regarding case background.
7/7/2021	33503134	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Review motion to extend as filed, correspondence re next steps.
7/8/2021	33503572	DeLeo, Robyn L.	74426	1	\$495.00	\$49.50	0.1	Upload docket entries to shared drive per B. Richman.
7/8/2021	33511011	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,378.00	1.3	Analyze Judge's orders; communicate with B. Goldsmith, H. Walker, B. Richman, A. Shi, A. Resnick, and client regarding Judge's orders and case strategy; communicate with Darbie counsel regarding Judge's orders.
7/8/2021	33514643	Richman, Brian A.	74426	1	\$905.00	\$452.50	0.5	Communicate with J. Goldstein and J. Seibald re court order dismissing amended complaint.
7/8/2021	33517012	Goldsmith, Barry R.	74426	1	\$1,475.00	\$442.50	0.3	Attention to court orders and responses.
7/9/2021	33521635	Seibald, M. Jonathan	74426	1	\$1,060.00	\$212.00	0.2	Communicate with B. Richman regarding case strategy.
7/10/2021	33521678	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with client regarding case strategy.
7/22/2021	33614596	Shi, Andrew A.	74426	1	\$610.00	\$305.00	0.5	Review local rules.
7/22/2021	33619768	Richman, Brian A.	74426	1	\$905.00	\$1,357.50	1.5	Review motion for leave to file amended complaint; review amended complaint; research re shotgun pleadings; communicate with J. Goldstein and GDC team re opposition to motion and potential motion for sanctions.
7/22/2021	33621639	Walker, Helgi C.	74426	1	\$1,370.00	\$274.00	0.2	Correspondence re plaintiff's motion to clarify.



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7/22/2021	33624568	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,014.00	1.9	Communicate with B. Goldsmith, H. Walker, B. Richman regarding motion for leave to amend and case strategy; communicate with opposing counsel regarding motions; analyze motion for leave to amend and amended complaint.
7/23/2021	33620016	Richman, Brian A.	74426	1	\$905.00	\$271.50	0.3	Communicate with J. Seibald re briefing schedule and strategy.
7/23/2021	33625346	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,272.00	1.2	Communicate with client and B. Richman regarding opposition to motion for leave to amend, sanctions motion, and case strategy; communicate with Court regarding opposition to motion for leave to amend.
7/25/2021	33636720	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with client, B. Richman, and A. Resnick regarding opposition to motion to reopen.
7/26/2021	33635939	Richman, Brian A.	74426	1	\$905.00	\$181.00	0.2	Communicate with J. Goldstein and A. Resnick re briefing schedule.
7/30/2021	33671223	Shi, Andrew A.	74426	1	\$610.00	\$610.00	1	Call with B. Richman re opposition to motion for leave to amend; research caselaw.
8/1/2021	33676858	Shi, Andrew A.	74426	1	\$610.00	\$2,745.00	4.5	Research RICO claim.
8/1/2021	33679801	Richman, Brian A.	74426	1	\$905.00	\$814.50	0.9	Draft opposition to motion for leave to amend.
8/2/2021	33680922	Shi, Andrew A.	74426	1	\$610.00	\$1,098.00	1.8	Research RICO issue.
8/2/2021	33693436	Richman, Brian A.	74426	1	\$905.00	\$3,167.50	3.5	Draft brief in opposition to motion for leave to amend and in support of motion for sanctions.
8/3/2021	33696468	Richman, Brian A.	74426	1	\$905.00	\$2,624.50	2.9	Draft brief in opposition to motion for leave to amend and in support of motion for sanctions.
8/3/2021	33700195	Shi, Andrew A.	74426	1	\$610.00	\$1,037.00	1.7	Research sanctions question.
8/3/2021	33706480	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding motion for leave to reopen opposition.
8/4/2021	33712534	Richman, Brian A.	74426	1	\$905.00	\$6,425.50	7.1	Draft brief in opposition to motion to amend and in support of motion for sanctions; research re same.
8/4/2021	33715473	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Initial review of opposition to motion for leave to amend and correspondence with GDC team re reorganization of same.
8/4/2021	33715871	Goldsmith, Barry R.	74426	1	\$1,475.00	\$590.00	0.4	Review draft motion to dismiss and for sanctions; emails re: same.
8/4/2021	33716843	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,544.00	2.4	Draft brief in opposition to motion for leave to amend and in support of motion for sanctions; communicate with B. Goldsmith, H. Walker, and B. Richman regarding brief.
8/5/2021	33711578	Shi, Andrew A.	74426	1	\$610.00	\$3,843.00	6.3	Revise opposition to motion to amend; revise motion for sanctions; prepare papers for filing.

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8/5/2021	33720057	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,120.00	2	Revise opposition to motion for leave to amend and motion papers in support of sanctions; communicate with B. Goldsmith, H. Walker, and B. Richman regarding motion for leave to amend and motion for sanctions; communicate with opposing counsel regarding sanctions motion.
8/5/2021	33720250	Walker, Helgi C.	74426	1	\$1,370.00	\$1,370.00	1	Review and revise draft opposition and correspondence re final revisions to same.
8/5/2021	33720926	Richman, Brian A.	74426	1	\$905.00	\$7,059.00	7.8	Finalize brief in opposition to motion for leave to amend and in support of sanctions; coordinate filing re same.
8/5/2021	33731362	Santamaria, Ariel	74426	1	\$505.00	\$2,878.50	5.7	Per B. Richman, check citations in memorandum in opposition to motion for leave to amend for attorney review; prepare exhibits to memorandum in opposition to motion for leave to amend.
8/5/2021	33732345	Goldsmith, Barry R.	74426	1	\$1,475.00	\$442.50	0.3	Attention to opposition motion for leave to amend and sanctions.
8/6/2021	33722597	Shi, Andrew A.	74426	1	\$610.00	\$305.00	0.5	Research local rule.
8/6/2021	33726410	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding case strategy.
8/6/2021	33728540	Richman, Brian A.	74426	1	\$905.00	\$90.50	0.1	Correspond with GDC team and A. Resnick re proposed order for court.
8/9/2021	33742989	Seibald, M. Jonathan	74426	1	\$1,060.00	\$212.00	0.2	Communicate with B. Richman regarding case strategy.
8/12/2021	33764017	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Review reply on motion for leave and correspondence re same.
8/12/2021	33765762	Richman, Brian A.	74426	1	\$905.00	\$995.50	1.1	Review reply in support of motion for leave to amend; research re same; correspond with GDC team and client re same.
8/12/2021	33768331	Seibald, M. Jonathan	74426	1	\$1,060.00	\$848.00	0.8	Analyze Social Life leave to amend reply brief; communicate with B. Richman regarding reply brief.
8/13/2021	33764830	Shi, Andrew A.	74426	1	\$610.00	\$2,806.00	4.6	Research voidable question; call with B. Richman re research.
8/13/2021	33772587	Seibald, M. Jonathan	74426	1	\$1,060.00	\$212.00	0.2	Communicate with B. Richman and client regarding motion for leave to amend and case strategy.
8/13/2021	33773567	Richman, Brian A.	74426	1	\$905.00	\$995.50	1.1	Communicate with A. Shi re research re plaintiff's reply in support of motion for leave to amend.
8/16/2021	33776564	Shi, Andrew A.	74426	1	\$610.00	\$2,074.00	3.4	Research voidness question; call with B. Richman.
8/16/2021	33788937	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,166.00	1.1	Communicate with client regarding [REDACTED]; communicate with B. Richman and A. Shi regarding sanctions motion, motion to dismiss, and case strategy; analyze motion to dismiss research.
8/17/2021	33783542	Shi, Andrew A.	74426	1	\$610.00	\$427.00	0.7	Analyze sanctions involving defendant's counsel.

Date	ID	Timekeeper	Client	Matter	Rate	Billed Amt	Billed Hrs	Narrative
8/17/2021	33795862	Seibald, M. Jonathan	74426	1	\$1,060.00	\$636.00	0.6	Communicate with B. Richman, A. Shi, and client regarding litigation developments, case strategy, and motions for leave to amend and sanctions and potential motion to dismiss; analyze research for potential motion to dismiss.
8/18/2021	33796533	Shi, Andrew A.	74426	1	\$610.00	\$183.00	0.3	Draft reply to motion for sanctions.
8/19/2021	33805472	Richman, Brian A.	74426	1	\$905.00	\$1,357.50	1.5	Review opposition to motion for sanctions; confer with J. Seibald re same; research re same.
8/19/2021	33806724	Shi, Andrew A.	74426	1	\$610.00	\$1,159.00	1.9	Draft outline to reply to motion for sanctions.
8/19/2021	33813172	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,802.00	1.7	Analyze sanctions motion opposition brief; communicate with B. Richman regarding sanctions motion opposition brief.
8/20/2021	33809177	Shi, Andrew A.	74426	1	\$610.00	\$1,708.00	2.8	Outline reply to motion for sanctions; call with B. Richman re outline.
8/20/2021	33813235	DeLeo, Robyn L.	74426	1	\$495.00	\$148.50	0.3	Upload docket entries to shared drive per B. Richman.
8/20/2021	33818011	Seibald, M. Jonathan	74426	1	\$1,060.00	\$742.00	0.7	Communicate with client and B. Richman regarding sanctions motion and case strategy.
8/20/2021	33818855	Richman, Brian A.	74426	1	\$905.00	\$995.50	1.1	Communicate with A. Shi re drafting reply brief in support of motion for sanctions; research re same.
8/20/2021	33821819	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Review opposition to motion for sanctions and correspondence re same.
8/21/2021	33823145	Richman, Brian A.	74426	1	\$905.00	\$362.00	0.4	Correspond with A. Shi re reply brief in support of motion for sanctions; research re same.
8/22/2021	33823155	Richman, Brian A.	74426	1	\$905.00	\$271.50	0.3	Research re reply brief in support of motion for sanctions; correspond with A. Shi re same.
8/23/2021	33831068	Richman, Brian A.	74426	1	\$905.00	\$1,810.00	2	Revise reply brief in support of motion for sanctions.
8/23/2021	33832955	Seibald, M. Jonathan	74426	1	\$1,060.00	\$106.00	0.1	Communicate with B. Richman regarding sanctions motion.
8/24/2021	33831183	Richman, Brian A.	74426	1	\$905.00	\$4,072.50	4.5	Draft reply brief in support of motion for sanctions.
8/25/2021	33848229	Seibald, M. Jonathan	74426	1	\$1,060.00	\$2,014.00	1.9	Revise sanctions motion reply brief; communicate with B. Richman regarding reply brief.
8/25/2021	33849140	Richman, Brian A.	74426	1	\$905.00	\$5,249.00	5.8	Draft reply brief in support of motion for sanctions.
8/25/2021	33858180	Walker, Helgi C.	74426	1	\$1,370.00	\$685.00	0.5	Review draft reply and correspondence re same.
8/26/2021	33857236	Richman, Brian A.	74426	1	\$905.00	\$5,339.50	5.9	Revise reply in support of motion for sanctions; finalize brief for filing.
8/26/2021	33858333	Walker, Helgi C.	74426	1	\$1,370.00	\$411.00	0.3	Review further revisions to draft reply and correspondence re same.
8/26/2021	33862410	Seibald, M. Jonathan	74426	1	\$1,060.00	\$1,378.00	1.3	Revise sanctions motion reply brief; communicate with B. Goldsmith, H. Walker, B. Richman, and client regarding sanctions motion reply brief.

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3/2/2022	35232134	Seibald, M. Jonathan	74426	1	\$1,115.00	\$1,449.50	1.3	Analyze Court orders; analyze Judge Gayles' local rules; communicate with B. Goldsmith, H. Walker, B. Richman, client, and Darbie counsel regarding Court orders and case strategy.
3/2/2022	35236267	Walker, Helgi C.	74426	1	\$1,535.00	\$307.00	0.2	Correspondence re case updates, review orders.
3/3/2022	35234158	Richman, Brian A.	74426	1	\$960.00	\$384.00	0.4	Communicate with J. Goldstein re court ruling on opposition to motion for leave to file amended complaint.
3/3/2022	35238762	Seibald, M. Jonathan	74426	1	\$1,115.00	\$446.00	0.4	Communicate with Darbie counsel regarding waiver of service and motion to dismiss; communicate with B. Richman regarding motion to dismiss and potential resolution.
3/4/2022	35243698	Seibald, M. Jonathan	74426	1	\$1,115.00	\$111.50	0.1	Communicate with B. Richman regarding resolution strategy.
3/4/2022	35244983	Richman, Brian A.	74426	1	\$960.00	\$384.00	0.4	Communicate with counsel for plaintiff re settlement.
3/5/2022	35250610	Walker, Helgi C.	74426	1	\$1,535.00	\$767.50	0.5	Correspondence re settlement, next steps.
3/7/2022	35255149	Richman, Brian A.	74426	1	\$960.00	\$96.00	0.1	Review second amended complaint; correspond with J. Goldstein and J. Seibald re same.
3/7/2022	35260315	Seibald, M. Jonathan	74426	1	\$1,115.00	\$223.00	0.2	Communicate with B. Richman, Darbie counsel, and client regarding motion to amended complaint and motion to dismiss.
3/8/2022	35257975	Richman, Brian A.	74426	1	\$960.00	\$384.00	0.4	Communicate with client and opposing counsel re service and briefing schedule.
3/8/2022	35267545	Walker, Helgi C.	74426	1	\$1,535.00	\$460.50	0.3	Correspondence re extension of time with GDC team and opposing counsel.
3/8/2022	35271401	Seibald, M. Jonathan	74426	1	\$1,115.00	\$334.50	0.3	Communicate with Gibson team regarding motion to dismiss extension and case strategy.
3/8/2022	35290207	Goldsmith, Barry R.	74426	1	\$1,595.00	\$319.00	0.2	Review draft email to opposing counsel re second amended to complaint.
3/9/2022	35268015	Richman, Brian A.	74426	1	\$960.00	\$576.00	0.6	Draft motion for extension of time; execute waiver of service form.
3/9/2022	35291879	Seibald, M. Jonathan	74426	1	\$1,115.00	\$334.50	0.3	Revise extension motion; communicate with Gibson team and Darbie counsel regarding extension motion.
3/10/2022	35278514	DeLeo, Robyn L.	74426	1	\$520.00	\$52.00	0.1	Upload docket entries to shared drive.
3/10/2022	35279046	Richman, Brian A.	74426	1	\$960.00	\$192.00	0.2	Revise motion for extension; correspond with A. Resnick re same.
3/10/2022	35291912	Seibald, M. Jonathan	74426	1	\$1,115.00	\$111.50	0.1	Analyze Social Life settlement letter; communicate with B. Richman regarding settlement letter.
3/11/2022	35285596	Richman, Brian A.	74426	1	\$960.00	\$384.00	0.4	Correspond with opposing counsel re settlement offer.
3/11/2022	35289207	DeLeo, Robyn L.	74426	1	\$520.00	\$52.00	0.1	Upload docket entries to shared drive.

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3/11/2022	35299179	Seibald, M. Jonathan	74426	1	\$1,115.00	\$223.00	0.2	Communicate with B. Richman regarding settlement strategy and response.
3/11/2022	35300948	Walker, Helgi C.	74426	1	\$1,535.00	\$767.50	0.5	Correspondence re settlement offer and response.
3/14/2022	35300417	Richman, Brian A.	74426	1	\$960.00	\$96.00	0.1	Correspond with client and opposing counsel re settlement.
3/14/2022	35302606	DeLeo, Robyn L.	74426	1	\$520.00	\$52.00	0.1	Upload docket filing to shared drive.
3/14/2022	35308223	Seibald, M. Jonathan	74426	1	\$1,115.00	\$334.50	0.3	Analyze Darbie waiver of service and magistrate scheduling order; communicate with Gibson team regarding settlement negotiations and motion to dismiss.
3/14/2022	35318571	Walker, Helgi C.	74426	1	\$1,535.00	\$767.50	0.5	Correspondence re settlement response and review same; review notice re waiver of service.
3/14/2022	35372411	Goldsmith, Barry R.	74426	1	\$1,595.00	\$478.50	0.3	Attention to settlement discussions and emails re same.
3/15/2022	35313371	DeLeo, Robyn L.	74426	1	\$520.00	\$52.00	0.1	Upload docket entry to shared drive.
4/30/2022	35674415	Richman, Brian A.	74426	1	\$960.00	\$2,976.00	3.1	Draft motion to dismiss second amended complaint.
5/1/2022	35675110	Richman, Brian A.	74426	1	\$960.00	\$1,920.00	2	Draft motion to dismiss second amended complaint.
5/4/2022	35710190	Richman, Brian A.	74426	1	\$960.00	\$3,648.00	3.8	Draft motion to dismiss second amended complaint.
5/4/2022	35720200	Seibald, M. Jonathan	74426	1	\$1,115.00	\$5,240.50	4.7	Draft motion to dismiss second amended complaint; communicate with Gibson team, client, and Darbie counsel regarding motion to dismiss.
5/4/2022	35725023	Goldsmith, Barry R.	74426	1	\$1,595.00	\$478.50	0.3	Review motion to dismiss.
5/5/2022	35729501	Seibald, M. Jonathan	74426	1	\$1,115.00	\$223.00	0.2	Analyze comments on motion to dismiss; communicate with B. Richman regarding motion to dismiss.
5/6/2022	35736244	DeLeo, Robyn L.	74426	1	\$520.00	\$1,820.00	3.5	Cite check Motion to Dismiss Second Amended Complaint and Incorporated Memorandum of Law per B. Richman.
5/6/2022	35736384	Seibald, M. Jonathan	74426	1	\$1,115.00	\$2,676.00	2.4	Draft motion to dismiss; communicate with Gibson team and Darbie counsel regarding motion to dismiss.
5/6/2022	35739632	Walker, Helgi C.	74426	1	\$1,535.00	\$767.50	0.5	Review draft motion to dismiss second amended complaint and correspondence re same.
5/7/2022	35737323	Seibald, M. Jonathan	74426	1	\$1,115.00	\$111.50	0.1	Communicate with B. Richman regarding motion to dismiss.
5/7/2022	35737722	Richman, Brian A.	74426	1	\$960.00	\$96.00	0.1	Review argument sections from J.H. Darbie.
5/8/2022	35737729	Richman, Brian A.	74426	1	\$960.00	\$2,208.00	2.3	Revise motion to dismiss based on J.H. Darbie comments.
5/8/2022	35739980	Seibald, M. Jonathan	74426	1	\$1,115.00	\$111.50	0.1	Email correspondence with B. Richman regarding motion to dismiss.
5/9/2022	35741787	Richman, Brian A.	74426	1	\$960.00	\$2,784.00	2.9	Revise motion to dismiss; prepare motion to dismiss for filing; coordinate with counsel for J.H. Darbie.
5/9/2022	35750962	Walker, Helgi C.	74426	1	\$1,535.00	\$767.50	0.5	Review revised draft motion to dismiss and correspondence re finalization of same for filing.

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5/9/2022	35755647	Seibald, M. Jonathan	74426	1	\$1,115.00	\$1,784.00	1.6	Revise motion to dismiss brief; communicate with B. Richman, A. Resnick, and Darbie counsel regarding motion to dismiss.
5/9/2022	35789415	Goldsmith, Barry R.	74426	1	\$1,595.00	\$478.50	0.3	Review and comment on motion to dismiss.
5/12/2022	35779985	Walker, Helgi C.	74426	1	\$1,535.00	\$307.00	0.2	Review notices of motions re appearances, pro hac vices for Darbie.
5/17/2022	35801050	DeLeo, Robyn L.	74426	1	\$520.00	\$52.00	0.1	Upload docket entry to shared drive.
5/17/2022	35814114	Walker, Helgi C.	74426	1	\$1,535.00	\$307.00	0.2	Correspondence re new Basile counsel; correspondence with opposing counsel.
5/23/2022	35851023	Richman, Brian A.	74426	1	\$960.00	\$192.00	0.2	Review opposition to motion to dismiss.
5/23/2022	35854674	Walker, Helgi C.	74426	1	\$1,535.00	\$1,535.00	1	Review opposition to motion to dismiss as filed and correspondence re same.
5/23/2022	35858830	Seibald, M. Jonathan	74426	1	\$1,115.00	\$669.00	0.6	Analyze Social Life opposition brief.
5/24/2022	35867338	Richman, Brian A.	74426	1	\$960.00	\$1,440.00	1.5	Review response to motion to dismiss; research for reply brief.
5/24/2022	35872312	Seibald, M. Jonathan	74426	1	\$1,115.00	\$892.00	0.8	Analyze motion to dismiss opposition brief; communicate with B. Richman regarding opposition brief.
5/27/2022	35899002	Seibald, M. Jonathan	74426	1	\$1,115.00	\$111.50	0.1	Communicate with B. Richman regarding reply brief.
5/28/2022	35911570	Richman, Brian A.	74426	1	\$960.00	\$2,112.00	2.2	Draft reply brief in support of motion to dismiss; communicate with A. Resnick re same.
5/29/2022	35911581	Richman, Brian A.	74426	1	\$960.00	\$1,728.00	1.8	Draft reply brief in support of motion to dismiss; communicate with J. Goldstein re same.
5/30/2022	35904145	Seibald, M. Jonathan	74426	1	\$1,115.00	\$2,341.50	2.1	Revise motion to dismiss reply brief; communicate with B. Richman regarding motion to dismiss reply brief.
5/30/2022	35911589	Richman, Brian A.	74426	1	\$960.00	\$7,776.00	8.1	Draft reply brief in support of motion to dismiss; revise brief; correspond with GDC team re same.
5/31/2022	35906863	DeLeo, Robyn L.	74426	1	\$520.00	\$1,300.00	2.5	Cite check Defendants' Reply in Support of Motion to Dismiss Second Amended Complaint per B. Richman.
5/31/2022	35911629	Richman, Brian A.	74426	1	\$960.00	\$2,016.00	2.1	Revise reply brief; correspond with counsel for J.H. Darbie; communicate with J. Goldstein re revisions and strategy; coordinate cite check; finalize brief for filing.
5/31/2022	35916387	Seibald, M. Jonathan	74426	1	\$1,115.00	\$2,899.00	2.6	Revise reply brief; communicate with B. Goldsmith, H. Walker, and B. Richman regarding reply brief.
5/31/2022	35920003	Walker, Helgi C.	74426	1	\$1,535.00	\$767.50	0.5	Review draft reply and correspondence re same, edits to same.
5/31/2022	35924192	Goldsmith, Barry R.	74426	1	\$1,595.00	\$478.50	0.3	Review reply motion to dismiss and multiple emails re same.
7/13/2022	36269198	Seibald, M. Jonathan	74426	1	\$1,115.00	\$334.50	0.3	Communicate with client regarding LGH decision and notice of supplemental authority.
7/14/2022	36273838	Richman, Brian A.	74426	1	\$960.00	\$480.00	0.5	Attention to notice of supplemental authority.

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7/14/2022	36278164	Walker, Helgi C.	74426	1	\$1,535.00	\$307.00	0.2	Review and revise notice of supplemental authority and correspondence re same.
7/14/2022	36278410	Seibald, M. Jonathan	74426	1	\$1,115.00	\$1,561.00	1.4	Draft notice of supplemental authority; communicate with client, Gibson team, and Darbie counsel regarding notice of supplemental authority.
7/14/2022	36295953	Goldsmith, Barry R.	74426	1	\$1,595.00	\$319.00	0.2	Review notice of supplemental authority.
7/15/2022	36283217	Richman, Brian A.	74426	1	\$960.00	\$1,440.00	1.5	Communicate with client re notice of supplemental authority; revise same.
7/15/2022	36286203	DeLeo, Robyn L.	74426	1	\$520.00	\$52.00	0.1	Upload docket entry to shared drive.
7/15/2022	36287408	Seibald, M. Jonathan	74426	1	\$1,115.00	\$1,226.50	1.1	Revise notice of supplemental authority; communicate with Gibson team, client, A. Resnick,, and Darbie counsel regarding notice of supplemental authority.
7/15/2022	36290137	Walker, Helgi C.	74426	1	\$1,535.00	\$460.50	0.3	Correspondence re notice of supplemental authority and review same as filed.
9/15/2022	36755897	Seibald, M. Jonathan	74426	1	\$1,115.00	\$223.00	0.2	Analyze supplemental authority for potential filing with court; communicate with B. Richman regarding potential filing of notice of supplemental authority.
1/17/2023	37718802	Richman, Brian A.	74426	1	\$1,210.00	\$363.00	0.3	Attention to [REDACTED] and potential notice of supplemental authority.
1/18/2023	37727736	Seibald, M. Jonathan	74426	1	\$1,265.00	\$253.00	0.2	Communicate with B. Richman and client regarding notice of supplemental authority.
1/18/2023	37729702	Richman, Brian A.	74426	1	\$1,210.00	\$242.00	0.2	Correspond with client re notice of supplemental authority re SDNY decision.
1/20/2023	37734817	Richman, Brian A.	74426	1	\$1,210.00	\$605.00	0.5	Draft notice of supplemental authority.
1/20/2023	37742663	Seibald, M. Jonathan	74426	1	\$1,265.00	\$126.50	0.1	Revise notice of supplemental authority; communicate with Gibson team regarding notice of supplemental authority.
1/20/2023	37746932	Walker, Helgi C.	74426	1	\$1,785.00	\$357.00	0.2	Correspondence re draft notice of supplemental authority and review same.
1/23/2023	37749742	Richman, Brian A.	74426	1	\$1,210.00	\$242.00	0.2	Communicate with counsel for J.H. Darbie re notice of supplemental authority; finalize notice for filing.
1/23/2023	37758686	Walker, Helgi C.	74426	1	\$1,785.00	\$178.50	0.1	Review notice of supplemental authority as filed.
2/13/2023	37952701	Walker, Helgi C.	74426	1	\$1,785.00	\$892.50	0.5	Correspondence re magistrate report and review.
2/13/2023	37958850	Seibald, M. Jonathan	74426	1	\$1,265.00	\$1,012.00	0.8	Analyze Magistrate motion to dismiss decision; communicate with B. Richman and client regarding motion to dismiss decision and strategy for next steps.
2/13/2023	37959211	Richman, Brian A.	74426	1	\$1,210.00	\$605.00	0.5	Review magistrate report and recommendation.
2/14/2023	37962194	Seibald, M. Jonathan	74426	1	\$1,265.00	\$506.00	0.4	Communicate with B. Richman regarding strategy for objections to Magistrate's motion to dismiss report; analyze local rules relating to objections to Magistrate's report.



Date	ID	Timekeeper	Client	Matter	Rate	Billed Amt	Billed Hrs	Narrative
2/14/2023	37968374	Richman, Brian A.	74426	1	\$1,210.00	\$968.00	0.8	Communicate with J. Goldstein re magistrate report and recommendations and strategy re same.
2/25/2023	38045183	Richman, Brian A.	74426	1	\$1,210.00	\$4,114.00	3.4	Draft objections to magistrate report and recommendation; research re leave to amend previously abandoned claims.
2/26/2023	38046994	Richman, Brian A.	74426	1	\$1,210.00	\$3,146.00	2.6	Draft objections to magistrate report and recommendation; research re leave to amend previously abandoned claims.
2/26/2023	38049702	Seibald, M. Jonathan	74426	1	\$1,265.00	\$632.50	0.5	Revise objections to magistrate's report; communicate with B. Richman regarding objections to magistrate's report.
2/27/2023	38064978	Goldsmith, Barry R.	74426	1	\$1,815.00	\$726.00	0.4	Attention to objections to magistrate decision
2/27/2023	38068144	Walker, Helgi C.	74426	1	\$1,785.00	\$892.50	0.5	Correspondence re response to magistrate judge report and recommendations and review same, GDC team edits to same
2/27/2023	38073006	Richman, Brian A.	74426	1	\$1,210.00	\$2,299.00	1.9	Communicate with client re objections to magistrate report; revise draft objections.
2/27/2023	38073542	Seibald, M. Jonathan	74426	1	\$1,265.00	\$1,518.00	1.2	Revise objections to magistrate's report; analyze Social Life's objections to magistrate's report; communicate with B. Richman regarding objections.



# Exhibit 3

Disb ID	Date	Client	Matter	Bill Num	Billed Amt	Narrative
43539115	4/24/2021	74426	1	2021063961	\$240.00	SHI,ANDREW A 04/24/21 00000-00000 WESTLAW RESEARCH AND PRINTING CHARGES
43573281	4/26/2021	74426	1	2021051360	\$2,575.05	RICHMAN,BRIAN 04/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43573541	4/27/2021	74426	1	2021051360	\$339.63	RICHMAN,BRIAN 04/27/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43629048	5/10/2021	74426	1	2021063961	\$960.00	RICHMAN,BRIAN 05/10/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43629315	5/11/2021	74426	1	2021063961	\$2,902.85	RICHMAN,BRIAN 05/11/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43630091	5/14/2021	74426	1	2021063961	\$120.00	SHI,ANDREW A 05/14/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43657768	5/17/2021	74426	1	2021063961	\$120.00	SHI,ANDREW A 05/17/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43683930	5/28/2021	74426	1	2021063961	\$731.42	SHI,ANDREW A 05/28/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43721537	6/2/2021	74426	1	2021072491	\$2,276.12	RICHMAN,BRIAN 06/02/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43721783	6/3/2021	74426	1	2021072491	\$1,639.26	RICHMAN,BRIAN 06/03/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43722089	6/4/2021	74426	1	2021072491	\$600.00	RICHMAN,BRIAN 06/04/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43722246	6/5/2021	74426	1	2021072491	\$4,057.42	RICHMAN,BRIAN 06/05/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43745425	6/9/2021	74426	1	2021072491	\$1,914.86	RICHMAN,BRIAN 06/09/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43745737	6/10/2021	74426	1	2021072491	\$720.00	RICHMAN,BRIAN 06/10/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43746027	6/11/2021	74426	1	2021072491	\$240.00	RICHMAN,BRIAN 06/11/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43746028	6/11/2021	74426	1	2021072491	\$240.00	ROEDER,SAM 06/11/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43799478	6/26/2021	74426	1	2021072491	\$1,894.50	RICHMAN,BRIAN 06/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43799661	6/27/2021	74426	1	2021072491	\$832.77	RICHMAN,BRIAN 06/27/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43828879	6/28/2021	74426	1	2021072491	\$367.62	RICHMAN,BRIAN 06/28/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43853366	7/6/2021	74426	1	2021081819	\$120.00	SHI,ANDREW A 07/06/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43949189	7/22/2021	74426	1	2021081819	\$120.00	RICHMAN,BRIAN 07/22/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
43990097	8/2/2021	74426	1	2021092127	\$1,485.70	SHI,ANDREW A 08/02/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44027329	8/13/2021	74426	1	2021092127	\$120.00	RICHMAN,BRIAN 08/13/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44027330	8/13/2021	74426	1	2021092127	\$247.62	SHI,ANDREW A 08/13/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44059658	8/16/2021	74426	1	2021092127	\$615.23	SHI,ANDREW A 08/16/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44059335	8/21/2021	74426	1	2021092127	\$284.10	SHI,ANDREW A 08/21/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44059470	8/22/2021	74426	1	2021092127	\$439.26	RICHMAN,BRIAN 08/22/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44086095	8/25/2021	74426	1	2021092127	\$600.00	RICHMAN,BRIAN 08/25/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44086340	8/26/2021	74426	1	2021092127	\$360.00	RICHMAN,BRIAN 08/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
44086341	8/26/2021	74426	1	2021092127	\$219.63	SHI,ANDREW A 08/26/21 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
45238216	4/30/2022	74426	1	2022052423	\$2,036.93	RICHMAN,BRIAN 04/30/22 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
45238340	5/1/2022	74426	1	2022060900	\$1,013.84	RICHMAN,BRIAN 05/01/22 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
45282907	5/4/2022	74426	1	2022060900	\$895.52	RICHMAN,BRIAN 05/04/22 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
45283697	5/8/2022	74426	1	2022060900	\$840.00	RICHMAN,BRIAN 05/08/22 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
45401478	5/31/2022	74426	1	2022072042	\$0.00	SCHECHTER,ROBYN 05/31/22 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
46447552	1/20/2023	74426	1	2023022724	\$240.00	RICHMAN,BRIAN 01/20/23 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
46622461	2/25/2023	74426	1	2023033198	\$996.03	RICHMAN,BRIAN 02/25/23 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES
46622900	2/26/2023	74426	1	2023033198	\$1,236.03	RICHMAN,BRIAN 02/26/23 74426-00001 WESTLAW RESEARCH AND PRINTING CHARGES