

EXHIBIT 1

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July 9, 2020

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Chain Bridge Bank, N.A.
David M. Evinger
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Invoice number: 109853
Billed through: June 30, 2020
Our Matter No. 0374-2001

In reference to: Blue Flame

<u>Date</u>	<u>Attorney</u>		<u>Time</u>		<u>Rate</u>	<u>Total Cost</u>
06/17/20	MMM	Conduct initial research re UCC 4A and Regulation J as applied to alleged facts.	0.30	hours	\$925.00	\$277.50
06/17/20	MMM	Confer with G. Orseck re complaint.	0.30	hours	\$925.00	\$277.50
06/18/20	GAO	Consider potential arguments on motion to dismiss.	0.80	hours	\$975.00	\$780.00
06/18/20	GAO	Review emails from client.	1.00	hours	\$975.00	\$975.00
06/18/20	GAO	Telephone call with M. Madden re next steps.	0.30	hours	\$975.00	\$292.50
06/18/20	MMM	Confer with G. Orseck, Z. Ferguson, and email team re initial research issues.	1.10	hours	\$925.00	\$1,017.50
06/18/20	MMM	Conduct legal research and email M. Browder and Z. Ferguson re same.	3.10	hours	\$925.00	\$2,867.50
06/18/20	DB	Initial review of materials, including associated emails with team re legal issues and EDVA procedure.	2.00	hours	\$925.00	\$1,850.00
06/18/20	MDB	Review complaint.	1.70	hours	\$605.00	\$1,028.50
06/18/20	ZNF	Review complaint and other background documents	2.10	hours	\$515.00	\$1,081.50
06/19/20	GAO	Prepare for and team call with clients.	3.80	hours	\$975.00	\$3,705.00
06/19/20	GAO	Internal team meeting on strategy for response to complaint.	0.70	hours	\$975.00	\$682.50
06/19/20	GAO	Review materials from P. Fitzgerald and team.	1.50	hours	\$975.00	\$1,462.50

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06/19/20	MMM	Participate in initial strategy call with client.	2.70	hours	\$925.00	\$2,497.50
06/19/20	MMM	Analyze next steps and organize and communicate open workstreams.	1.50	hours	\$925.00	\$1,387.50
06/19/20	MMM	Emails re litigation hold notice.	0.30	hours	\$925.00	\$277.50
06/19/20	DB	Call with RR team and client re introduction to facts and strategic issues.	2.70	hours	\$925.00	\$2,497.50
06/19/20	DB	Legal research re issues raised by complaint, including associated emails with RR team.	1.40	hours	\$925.00	\$1,295.00
06/19/20	DB	Call with RR team re research status and preparation for client call.	0.60	hours	\$925.00	\$555.00
06/19/20	MDB	Research preemption.	1.40	hours	\$605.00	\$847.00
06/19/20	MDB	Call with RR team to discuss case background.	0.90	hours	\$605.00	\$544.50
06/19/20	MDB	Review Regulation J.	0.90	hours	\$605.00	\$544.50
06/19/20	MDB	Call with RR team and client to discuss background and facts of case.	2.70	hours	\$605.00	\$1,633.50
06/19/20	ZNF	Draft litigation hold	1.20	hours	\$515.00	\$618.00
06/19/20	ZNF	Confer with client over email concerning indemnification under UCC 4A	0.30	hours	\$515.00	\$154.50
06/19/20	ZNF	Confer with client to discuss litigation strategy and background facts	2.70	hours	\$515.00	\$1,390.50
06/19/20	ZNF	Confer with RR attorneys concerning preliminary research findings	0.50	hours	\$515.00	\$257.50
06/19/20	ZNF	Research case law regarding Counts I & II of the complaint	4.60	hours	\$515.00	\$2,369.00
06/19/20	LGW	Prepare background documents for M. Browder.	0.50	hours	\$275.00	\$137.50
06/20/20	GAO	Emails re legal and factual defenses.	0.30	hours	\$975.00	\$292.50
06/20/20	GAO	Review research on motion to dismiss issues.	0.50	hours	\$975.00	\$487.50
06/20/20	GAO	Review draft lit hold.	0.10	hours	\$975.00	\$97.50
06/20/20	MMM	Conduct legal research re motion to dismiss.	1.50	hours	\$925.00	\$1,387.50
06/20/20	MMM	Edit litigation hold notice.	1.00	hours	\$925.00	\$925.00
06/20/20	MMM	Emails with M. Browder and Z. Ferguson re motion to dismiss.	0.30	hours	\$925.00	\$277.50

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06/20/20	MDB	Research Regulation J.	0.20	hours	\$605.00	\$121.00	
06/20/20	MDB	Draft initial research memo re state-law claims.	1.90	hours	\$605.00	\$1,149.50	
06/20/20	MDB	Discuss task list with Z. Ferguson.	0.30	hours	\$605.00	\$181.50	
06/20/20	MDB	Edit task list.	0.40	hours	\$605.00	\$242.00	
06/20/20	MDB	Research preemption.	2.20	hours	\$605.00	\$1,331.00	
06/20/20	ZNF	Organize preliminary litigation tasks	1.10	hours	\$515.00	\$566.50	
06/20/20	ZNF	Confer with RR atty to coordinate preliminary litigation tasks	0.30	hours	\$515.00	\$154.50	
06/20/20	ZNF	Research legal issues related to motion to dismiss	1.10	hours	\$515.00	\$566.50	
06/20/20	ZNF	Revise litigation hold	0.40	hours	\$515.00	\$206.00	
06/21/20	GAO	Review research on application of Section 4A provisions.	1.20	hours	\$975.00	\$1,170.00	
06/21/20	GAO	Review emails and materials from P. Fitzgerald.	0.50	hours	\$975.00	\$487.50	
06/21/20	GAO	Review materials on CBB's terms and conditions.	0.90	hours	\$975.00	\$877.50	
06/21/20	MMM	Conduct legal research re motion to dismiss and emails re same.	2.80	hours	\$925.00	\$2,590.00	
06/21/20	MMM	Analyze potential dismissal arguments on state-law causes of action.	0.70	hours	\$925.00	\$647.50	
06/21/20	DB	Legal research re potential responses to complaint.	1.50	hours	\$925.00	\$1,387.50	
06/21/20	MDB	Review documents from client.	1.70	hours	\$605.00	\$1,028.50	
06/21/20	MDB	Research conversion claim.	1.00	hours	\$605.00	\$605.00	
06/21/20	MDB	Research fraud claims.	1.50	hours	\$605.00	\$907.50	
06/21/20	MDB	Research contract claims.	1.50	hours	\$605.00	\$907.50	
06/21/20	ZNF	Research grounds for dismissing Counts I & II of the complaint	6.60	hours	\$515.00	\$3,399.00	
06/21/20	ZNF	Review EDVA local rules	0.70	hours	\$515.00	\$360.50	
06/22/20	GAO	Telephone call with P. White re agreed extension.	0.30	hours	\$975.00	\$292.50	
06/22/20	GAO	Emails with team re research on motion to dismiss.	0.30	hours	\$975.00	\$292.50	

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06/22/20	GAO	Review materials from clients.	0.50	hours	\$975.00	\$487.50
06/22/20	CCC	Assist with pro hac applications for G. Orseck, M. Madden and M. Browder.	0.50	hours	\$275.00	\$137.50
06/22/20	MMM	Prepare for status call with D. Burke, M. Browder, and Z. Ferguson.	0.20	hours	\$925.00	\$185.00
06/22/20	MMM	Emails re MTD extension.	0.30	hours	\$925.00	\$277.50
06/22/20	MMM	Confer with G. Orseck re legal strategy.	0.20	hours	\$925.00	\$185.00
06/22/20	MMM	Emails with P. Fitzgerald re timeline and causes of action.	0.20	hours	\$925.00	\$185.00
06/22/20	MMM	Participate in status call with D. Burke, M. Browder, and Z. Ferguson.	0.80	hours	\$925.00	\$740.00
06/22/20	MMM	Edit key-document request to client.	0.30	hours	\$925.00	\$277.50
06/22/20	MMM	Confer with D. Burke re legal strategy.	0.20	hours	\$925.00	\$185.00
06/22/20	DB	Confer with M. Madden re strategic issues.	0.20	hours	\$925.00	\$185.00
06/22/20	DB	Call with M. Madden, M. Browder, and Z. Fergeson re status of legal research.	0.80	hours	\$925.00	\$740.00
06/22/20	DB	Call with L. Rubenstein re options for obtaining information re House investigation of Blue Flame.	0.40	hours	\$925.00	\$370.00
06/22/20	DB	Work on draft scheduling motion, including coordinating ancillary documents such as pro hac motions and corporate disclosure statement.	1.80	hours	\$925.00	\$1,665.00
06/22/20	LR	Discuss congressional investigation process and possible scenarios for obtaining material from House investigation with D. Burke.	0.40	hours	\$765.00	\$306.00
06/22/20	MDB	Edit draft outline.	0.30	hours	\$605.00	\$181.50
06/22/20	MDB	Call with RR team to discuss claims.	0.80	hours	\$605.00	\$484.00
06/22/20	MDB	Revise motion to dismiss outline.	3.60	hours	\$605.00	\$2,178.00
06/22/20	ZNF	Review complaint	1.40	hours	\$515.00	\$721.00
06/22/20	ZNF	Draft consolidated motion to dismiss outline	2.10	hours	\$515.00	\$1,081.50
06/22/20	ZNF	Confer with RR attys to discuss litigation strategy	0.80	hours	\$515.00	\$412.00
06/22/20	ZNF	Research grounds to dismiss Counts I & II of the complaint	6.30	hours	\$515.00	\$3,244.50

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06/22/20	LGW	Research pro hac requirements for Z. Ferguson; draft applications for G. Orseck, M. Browder and M. Madden; various revisions to same.	2.00	hours	\$275.00	\$550.00
06/23/20	GAO	Emails re collection of documents from client.	0.20	hours	\$975.00	\$195.00
06/23/20	GAO	Consider potential arguments for motion to dismiss.	1.30	hours	\$975.00	\$1,267.50
06/23/20	DIW	Set up collaboration and file share space for clients, confer with Z. Ferguson re discovery needs and timing.	0.50	hours	\$275.00	\$137.50
06/23/20	CCC	Assist with case materials for D. Burke.	0.20	hours	\$275.00	\$55.00
06/23/20	MMM	Confer with D. Burke re motion to dismiss and open items.	0.30	hours	\$925.00	\$277.50
06/23/20	MMM	Emails re motion to dismiss.	0.30	hours	\$925.00	\$277.50
06/23/20	DB	Work on joint scheduling motion, including associated filings.	1.20	hours	\$925.00	\$1,110.00
06/23/20	DB	Review MTD outline, including associated legal research.	3.40	hours	\$925.00	\$3,145.00
06/23/20	ZNF	Coordinate document-collection from client	0.60	hours	\$515.00	\$309.00
06/23/20	ZNF	Confer with RR atty to discuss arguments against Counts I & II	0.60	hours	\$515.00	\$309.00
06/23/20	ZNF	Confer with litigation support to discuss document-gathering protocols	0.30	hours	\$515.00	\$154.50
06/23/20	ZNF	Research grounds for dismissing/general arguments against Counts I & II	6.40	hours	\$515.00	\$3,296.00
06/23/20	LGW	Prepare background materials for D. Burke; finalize pro hac applications; obtain signatures.	2.00	hours	\$275.00	\$550.00
06/24/20	GAO	Review emails from P. Fitzgerald on various points.	0.50	hours	\$975.00	\$487.50
06/24/20	DB	Review and edit MTD outline, including associated legal research and emails with team.	5.50	hours	\$925.00	\$5,087.50
06/24/20	MDB	Revise motion to dismiss outline.	3.40	hours	\$605.00	\$2,057.00
06/24/20	ZNF	Revise motion to dismiss outline	0.60	hours	\$515.00	\$309.00
06/24/20	ZNF	Analyze documents from client for relevance to motion to dismiss arguments	0.70	hours	\$515.00	\$360.50

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06/24/20	ZNF	Research grounds for dismissing/otherwise prevailing on Counts I & II of complaint	8.10	hours	\$515.00	\$4,171.50
06/24/20	LGW	Review, save and organize materials received from client with comments from M. Browder and Z. Ferguson.	1.80	hours	\$275.00	\$495.00
06/25/20	GAO	Review materials from P. Fitzgerald.	0.30	hours	\$975.00	\$292.50
06/25/20	GAO	Review research on BFM claims.	1.20	hours	\$975.00	\$1,170.00
06/25/20	MMM	Emails re legal predicate for conversion claim.	0.40	hours	\$925.00	\$370.00
06/25/20	MMM	Confer with B. Sharon re document productions and legal issues.	0.30	hours	\$925.00	\$277.50
06/25/20	MMM	Edit outline of potential motion-to-dismiss arguments.	2.50	hours	\$925.00	\$2,312.50
06/25/20	DB	Additional work on MTD outline, including revisions to same, legal research, and emails wiuth team.	6.50	hours	\$925.00	\$6,012.50
06/25/20	MDB	Research conversion claim.	2.00	hours	\$605.00	\$1,210.00
06/25/20	MDB	Research tortious interference claim.	0.40	hours	\$605.00	\$242.00
06/25/20	MDB	Revise outline.	0.80	hours	\$605.00	\$484.00
06/25/20	ZNF	Revise motion to dismiss outline	2.60	hours	\$515.00	\$1,339.00
06/25/20	ZNF	Research grounds for dismissing/otherwise prevailing on Counts I & II	4.10	hours	\$515.00	\$2,111.50
06/25/20	LGW	Continue to review, save and organize materials received from client.	0.20	hours	\$275.00	\$55.00
06/26/20	GAO	Telephone call with M. Madden and D. Burke regarding assessment of theories of defense and plans for next steps.	2.10	hours	\$975.00	\$2,047.50
06/26/20	GAO	Review and comment on memo regarding potential motion to dismiss arguments.	0.80	hours	\$975.00	\$780.00
06/26/20	MMM	Conduct legal research in support of potential motion-to-dismiss arguments.	1.70	hours	\$925.00	\$1,572.50
06/26/20	MMM	Emails with D. Burke re indemnification and other theories of third-party liability.	0.30	hours	\$925.00	\$277.50
06/26/20	MMM	Confer with G. Orseck & D. Burke re motion to dismiss and strategy.	2.10	hours	\$925.00	\$1,942.50
06/26/20	MMM	Confer with D. Burke, M. Browder & Z. Ferguson re motion to dismiss.	0.30	hours	\$925.00	\$277.50

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06/26/20	MMM	Analyze client suggestion re implied-covenant claim and emails re same.	0.40	hours	\$925.00	\$370.00
06/26/20	DB	Teams call with M. Madden, M. Browder, and Z. Fergesuon re drafting responsibilities for MTD and additional legal research topics.	0.30	hours	\$925.00	\$277.50
06/26/20	DB	Review and incorporate comments from team on MTD outline before circulating to G. Orseck.	0.70	hours	\$925.00	\$647.50
06/26/20	DB	Work on updating outline to address UCC issues in light of comments from G. Orseck.	1.20	hours	\$925.00	\$1,110.00
06/26/20	DB	Teams call with G. Orseck and M. Madden re MTD outline, legal strategy, and next steps.	2.00	hours	\$925.00	\$1,850.00
06/26/20	MDB	Review documents from client.	0.10	hours	\$605.00	\$60.50
06/26/20	MDB	Call with D. Burke, M. Madden, and Z. Ferguson to discuss next steps.	0.80	hours	\$605.00	\$484.00
06/26/20	ZNF	Research arguments for dismissing Counts I & II	1.10	hours	\$515.00	\$566.50
06/26/20	ZNF	Confer with Robbins Russell attorneys to discuss motion to dismiss research and drafting agenda	0.30	hours	\$515.00	\$154.50
06/26/20	ZNF	Review motion to dismiss template and examples	0.50	hours	\$515.00	\$257.50
06/26/20	ZNF	Revise motion to dismiss outline	0.90	hours	\$515.00	\$463.50
06/26/20	LCE	Email with team on possible discovery assignments.	0.20	hours	\$605.00	\$121.00
06/26/20	LCE	Begin reading complaint.	0.20	hours	\$605.00	\$121.00
06/26/20	LGW	Review, save and organize new materials received from client with comments from M. Browder.	0.80	hours	\$275.00	\$220.00
06/27/20	MMM	Emails with L. Esbrook and Z. Ferguson re California hearing testimony.	0.20	hours	\$925.00	\$185.00
06/27/20	MMM	Emails with D. Burke and M. Browder re UCC 4A preemption of common-law claims.	0.40	hours	\$925.00	\$370.00
06/27/20	MMM	Confer with L. Esbrook re discovery.	0.50	hours	\$925.00	\$462.50

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06/27/20	DB	Emails with M. Madden and M. Browder re preemption issues.	0.50	hours	\$925.00	\$462.50
06/27/20	DB	Edit outline of Article 4A legal issues.	2.20	hours	\$925.00	\$2,035.00
06/27/20	MDB	Research preemption.	4.00	hours	\$605.00	\$2,420.00
06/27/20	ZNF	Research grounds for admitting transcript of California legislative hearing on motion to dismiss	1.30	hours	\$515.00	\$669.50
06/27/20	LCE	Close read complaint.	1.00	hours	\$605.00	\$605.00
06/27/20	LCE	Call with M. Madden to discuss case and discovery tasks.	0.50	hours	\$605.00	\$302.50
06/27/20	LCE	Communicate with team and legislative history video.	0.30	hours	\$605.00	\$181.50
06/28/20	GAO	Review analysis from M. Madden.	0.30	hours	\$975.00	\$292.50
06/28/20	GAO	Review memo on legal issues.	0.30	hours	\$975.00	\$292.50
06/28/20	GAO	Telephone call with P. Fitzgerald on legal issues.	0.70	hours	\$975.00	\$682.50
06/28/20	GAO	Telephone call with D. Burke and M. Madden re legal analysis.	1.20	hours	\$975.00	\$1,170.00
06/28/20	MMM	Confer with G. Orseck and D. Burke re Count 1.	1.00	hours	\$925.00	\$925.00
06/28/20	MMM	Conduct legal research concerning Regulation J, UCC 4A, Offering Circular 6, and case bearing on Count 1.	3.40	hours	\$925.00	\$3,145.00
06/28/20	DB	Call with G. Orseck and M. Madden re updates from client and next steps.	1.00	hours	\$925.00	\$925.00
06/28/20	DB	Further analysis re indemnification issues as follow up to discussion with G. Orseck.	1.50	hours	\$925.00	\$1,387.50
06/28/20	MDB	Research preemption.	1.30	hours	\$605.00	\$786.50
06/28/20	ZNF	Research common law basis for indemnification by CA and/or JPM	2.60	hours	\$515.00	\$1,339.00
06/28/20	ZNF	Research grounds for admitting California hearing transcript on a motion to dismiss	2.20	hours	\$515.00	\$1,133.00
06/28/20	LCE	Research and respond to team on thoughts for legislative hearing transcript designation on motion to dismiss.	1.00	hours	\$605.00	\$605.00
06/29/20	GAO	Telephone call with potential expert.	0.50	hours	\$975.00	\$487.50

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06/29/20	MMM	Review key documents, including 3/27/20 emails, wire-transfer notices, and account materials.	1.40	hours	\$925.00	\$1,295.00
06/29/20	MMM	Call potential consulting expert D. Coker.	0.60	hours	\$925.00	\$555.00
06/29/20	MMM	Outline J. Brough interview.	1.20	hours	\$925.00	\$1,110.00
06/29/20	MMM	Emails with J. Brough re interview.	0.20	hours	\$925.00	\$185.00
06/29/20	DB	Additional analysis and research re MTD arguments and merits defenses, including associated emails with M. Madden.	3.20	hours	\$925.00	\$2,960.00
06/29/20	DB	Prepare draft memo to file in response to memo from P. Fitzgerald re indemnification, including associated research.	2.60	hours	\$925.00	\$2,405.00
06/29/20	ZNF	Draft argument for motion to dismiss Count II	4.20	hours	\$515.00	\$2,163.00
06/29/20	ZNF	Research grounds for dismissing Counts I & II	3.60	hours	\$515.00	\$1,854.00
06/29/20	LCE	Listen to CA legislative hearing on accountability and transcribe relevant portions.	1.50	hours	\$605.00	\$907.50
06/29/20	LCE	Close read background documents to case and forwarded emails.	1.30	hours	\$605.00	\$786.50
06/29/20	LCE	Prepare draft Request for Production of Documents.	2.50	hours	\$605.00	\$1,512.50
06/29/20	LCE	Begin preparation of draft Request for Interrogatories.	0.80	hours	\$605.00	\$484.00
06/29/20	LCE	Search for example protective orders.	0.40	hours	\$605.00	\$242.00
06/29/20	LCE	Compile list of relevant people and entities for case.	0.80	hours	\$605.00	\$484.00
06/29/20	LCE	Review draft outline for Brough interview and respond with thoughts to M. Madden.	0.30	hours	\$605.00	\$181.50
06/30/20	GAO	Review research on UCC issues.	0.50	hours	\$975.00	\$487.50
06/30/20	GAO	Telephone calls and emails with multiple potential banking experts.	1.00	hours	\$975.00	\$975.00
06/30/20	MMM	Edit draft requests for production.	1.60	hours	\$925.00	\$1,480.00
06/30/20	MMM	Interview J. Brough.	1.40	hours	\$925.00	\$1,295.00
06/30/20	MMM	Confer with D. Burke re motion to dismiss.	0.90	hours	\$925.00	\$832.50

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06/30/20	MMM	Email G. Orseck re J. Brough interview and potential experts.	0.20	hours	\$925.00	\$185.00
06/30/20	MMM	Prepare for interview with J. Brough.	0.20	hours	\$925.00	\$185.00
06/30/20	MMM	Emails re internal communication and fact-gathering.	0.30	hours	\$925.00	\$277.50
06/30/20	MMM	Email L. Esbrook re developing potential counterclaims against plaintiff.	0.40	hours	\$925.00	\$370.00
06/30/20	MMM	Emails re litigation hold and document collection.	0.20	hours	\$925.00	\$185.00
06/30/20	DB	Interview with J. Brough re case background, including associated preparation and follow up.	2.50	hours	\$925.00	\$2,312.50
06/30/20	DB	Legal research and analysis re MTD arguments and indemnification issues.	2.50	hours	\$925.00	\$2,312.50
06/30/20	DB	Call with M. Madden re legal arguments and litigation planning.	0.80	hours	\$925.00	\$740.00
06/30/20	KRM	Prepare background materials for M. Browder.	1.20	hours	\$275.00	\$330.00
06/30/20	MDB	Review local rules.	0.30	hours	\$605.00	\$181.50
06/30/20	MDB	Research preemption issues.	1.40	hours	\$605.00	\$847.00
06/30/20	ZNF	Draft argument to dismiss Count II	3.90	hours	\$515.00	\$2,008.50
06/30/20	ZNF	Confer with client and counsel via email	0.40	hours	\$515.00	\$206.00
06/30/20	ZNF	Research common law grounds for indemnification by CA and/or JPM	1.10	hours	\$515.00	\$566.50
06/30/20	ZNF	Research grounds for dismissing Counts I & II	2.10	hours	\$515.00	\$1,081.50
06/30/20	LCE	Research possible counterclaims.	2.00	hours	\$605.00	\$1,210.00
06/30/20	LCE	Research and draft interrogatories and protective order.	3.50	hours	\$605.00	\$2,117.50
06/30/20	LCE	Interview with J. Brough.	1.30	hours	\$605.00	\$786.50
06/30/20	LCE	Clean up notes and create follow up tasks from interview with J. Brough.	0.40	hours	\$605.00	\$242.00
06/30/20	LGW	Revise discovery materials with comments from Z. Ferguson and M. Browder; revise background documents with comments from M. Madden.	0.50	hours	\$275.00	\$137.50
TOTAL					\$183,892.00	

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DISBURSEMENTS

In-house copying charges	\$110.85
Courier/Overnight delivery	\$67.09
Filing Fees	\$225.00
TOTAL	\$402.94

TIMEKEEPER SUMMARY

		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
CCC	Chase Carpino, Christine A	0.70	\$275.00	\$192.50
DB	Burke, Donald	49.00	\$925.00	\$45,325.00
DIW	Sarti, Dana I. Wesley	0.50	\$275.00	\$137.50
GAO	Orseck, Gary A.	23.60	\$975.00	\$23,010.00
KRM	Miller, Kate R	1.20	\$275.00	\$330.00
LCE	Esbrook, Leslie	18.00	\$605.00	\$10,890.00
LGW	Webb, Lyndsay G	7.80	\$275.00	\$2,145.00
LR	Rubenstein, Laurie	0.40	\$765.00	\$306.00
MDB	Browder, Megan D.	37.50	\$605.00	\$22,687.50
MMM	Madden, Matthew M.	40.50	\$925.00	\$37,462.50
ZNF	Ferguson, Zachary N	80.40	\$515.00	\$41,406.00
TOTAL		259.60		\$183,892.00

Total Fees	\$183,892.00
Total Disbursements	<u>\$402.94</u>
Total this Bill	\$184,294.94

TOTAL DUE FOR CURRENT AND OUTSTANDING INVOICES

\$184,294.94

Wire or ACH payments may be sent to:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing # 056004445

Acct # [REDACTED] for Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street, N.W., 4th Floor
Washington, DC 20006
(202) 775-4500 (t) (202) 775-4510 (f)
www.robbsrussell.com
EIN [REDACTED]

July 9, 2020

devinger@chainbridgebank.com
Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Ave.,
McLean, VA 22101

Invoice number: 109854
Billed through: June 30, 2020
Our Matter No. 0374-2002

In reference to: Blue Flame-Defamation

<u>Date</u>	<u>Attorney</u>		<u>Time</u>		<u>Rate</u>	<u>Total Cost</u>
06/20/20	MDB	Draft initial research memo re defamation.	0.40	hours	\$605.00	\$242.00
06/23/20	MDB	Revise defamation count to motion to dismiss outline.	0.30	hours	\$605.00	\$181.50
06/25/20	MDB	Research motion to dismiss outline (defamation).	1.60	hours	\$605.00	\$968.00
TOTAL						<u>\$1,391.50</u>

TIMEKEEPER SUMMARY

		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
MDB	Browder, Megan D.	2.30	\$605.00	\$1,391.50
TOTAL		2.30		\$1,391.50
Total Fees				\$1,391.50
Total this Bill				\$1,391.50

TOTAL DUE FOR CURRENT AND OUTSTANDING INVOICES \$1,391.50

Wire or ACH payments may be sent to:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing # 056004445
Acct # [REDACTED] for Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street, N.W., 4th Floor
Washington, DC 20006
(202) 775-4500 (t) (202) 775-4510 (f)
www.robbsrussell.com
EIN [REDACTED]

August 12, 2020

devinger@chainbridgebank.com
Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice number: 109969
Billed through: July 31, 2020
Our Matter No. 0374-2001

In reference to: Blue Flame

<u>Date</u>	<u>Attorney</u>		<u>Time</u>		<u>Rate</u>	<u>Total Cost</u>
07/01/20	GAO	Review emails and materials from P. Fitzgerald re UCC issues.	0.50	hours	\$1075.00	\$537.50
07/01/20	GAO	Emails and call with potential banking experts.	0.60	hours	\$1075.00	\$645.00
07/01/20	MMM	Email P. Fitzgerald re internal communications.	0.20	hours	\$925.00	\$185.00
07/01/20	MMM	Email G. Orseck re JPMorgan.	0.10	hours	\$925.00	\$92.50
07/01/20	MMM	Edit requests for production and email L. Esbrook re same.	1.90	hours	\$925.00	\$1,757.50
07/01/20	MMM	Emails with P. Fitzgerald re legal research.	0.40	hours	\$925.00	\$370.00
07/01/20	MMM	Emails re status of open items and update of task list.	1.00	hours	\$925.00	\$925.00
07/01/20	DB	Emails with J. Brough re additional document requests.	0.50	hours	\$925.00	\$462.50
07/01/20	DB	Research re potential claims against Cal and UCC issues.	2.00	hours	\$925.00	\$1,850.00
07/01/20	DB	Emails with team re potential counterclaims.	0.70	hours	\$925.00	\$647.50
07/01/20	DB	Review and comment on draft document requests.	1.20	hours	\$925.00	\$1,110.00
07/01/20	DB	Respond to client inquiry re congressional investigation.	0.30	hours	\$925.00	\$277.50
07/01/20	DB	Review and edit task list for team.	0.50	hours	\$925.00	\$462.50

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07/01/20	DB	Review background documents and account materials in connection with MTD arguments.	1.50	hours	\$925.00	\$1,387.50
07/01/20	KRM	Prepare background materials for D. Burke.	0.90	hours	\$275.00	\$247.50
07/01/20	MDB	Research preemption.	5.60	hours	\$605.00	\$3,388.00
07/01/20	ZNF	Research tort claims against California and related questions of sovereign/11A immunity	2.90	hours	\$515.00	\$1,493.50
07/01/20	ZNF	Draft statement of facts and argument to dismiss Count II	6.10	hours	\$515.00	\$3,141.50
07/01/20	LCE	Update document requests with third party communications for M. Madden.	0.20	hours	\$605.00	\$121.00
07/01/20	LCE	Respond to multiple rounds of D. Burke and M. Madden edits on requests for production and save corrected version on internal system.	2.30	hours	\$605.00	\$1,391.50
07/01/20	LCE	Fix technical issues with shared workspace and saved-over versions of requests for production.	0.30	hours	\$605.00	\$181.50
07/01/20	LCE	Update Blue Flame task list with additional research tasks.	0.20	hours	\$605.00	\$121.00
07/01/20	LCE	Research on possible counterclaims.	1.10	hours	\$605.00	\$665.50
07/01/20	LGW	Research notice examples requested by Z. Ferguson; revise discovery materials with comments from Z. Ferguson.	0.50	hours	\$275.00	\$137.50
07/02/20	GAO	Telephone call with P. Fitzgerald.	1.30	hours	\$1075.00	\$1,397.50
07/02/20	GAO	Telephone call with Promontory re potential expert witness work.	0.40	hours	\$1075.00	\$430.00
07/02/20	GAO	Meet with M. Madden and D. Burke re multiple outstanding issues including prep for meeting with clients.	1.30	hours	\$1075.00	\$1,397.50
07/02/20	GAO	Review emails from P. Fitzgerald.	0.20	hours	\$1075.00	\$215.00
07/02/20	GAO	Telephone call with T. McTaggart re potential expert work.	0.40	hours	\$1075.00	\$430.00
07/02/20	GAO	Telephone call with insurance adjuster.	0.40	hours	\$1075.00	\$430.00
07/02/20	GAO	Review and comment on potential defenses and arguments for motion to dismiss.	0.50	hours	\$1075.00	\$537.50

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07/02/20	GAO	Telephone call with Bob Ballen re potential expert witness work.	0.40	hours	\$1075.00	\$430.00
07/02/20	DIW	Capture BlueFlame Medical complete website including linked content.	1.20	hours	\$275.00	\$330.00
07/02/20	CCC	Assist with research of news alerts for Blue Flame Medical and M. Gula; assist with notice of hearing searches.	0.60	hours	\$275.00	\$165.00
07/02/20	MMM	Emails re discovery and research issues.	0.80	hours	\$925.00	\$740.00
07/02/20	MMM	Confer with G. Orseck and D. Burke re motion to dismiss strategy and research.	1.30	hours	\$925.00	\$1,202.50
07/02/20	DB	Respond to inquiry from P. Fitzgerald re UCC issues.	1.50	hours	\$925.00	\$1,387.50
07/02/20	DB	Emails with team re MTD drafting.	0.50	hours	\$925.00	\$462.50
07/02/20	DB	Research re potential claims against California and JPM, including associated emails with team.	2.00	hours	\$925.00	\$1,850.00
07/02/20	DB	Confer with G. Orseck and M. Madden re various litigation issues, including preparation for strategy call with client.	1.30	hours	\$925.00	\$1,202.50
07/02/20	MDB	Draft Motion to Dismiss.	10.20	hours	\$605.00	\$6,171.00
07/02/20	ZNF	Research sovereign immunity/11A immunity barriers to recovery against California and exceptions under CA and federal law	3.10	hours	\$515.00	\$1,596.50
07/02/20	ZNF	Research theories of recovery against JPM and CA	3.50	hours	\$515.00	\$1,802.50
07/02/20	LCE	Research possible counterclaims against Blue Flame and third parties and send research to D. Burke and M. Madden.	3.70	hours	\$605.00	\$2,238.50
07/02/20	LCE	Research how to bring California public records request.	0.80	hours	\$605.00	\$484.00
07/02/20	LCE	Conduct initial research on possible affirmative defenses and gather case law for M. Madden.	1.00	hours	\$605.00	\$605.00
07/02/20	LCE	Reach out to reporter for possible public records related to Blue Flame and correspond with team on other third-party discovery.	0.50	hours	\$605.00	\$302.50
07/02/20	LCE	Correspond with D. Burke and paralegals on pro hac vice application for EDVA.	0.20	hours	\$605.00	\$121.00

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07/02/20	LGW	Research publicly available articles, cases, and social media activity relating to Blue Flame, M. Gula, J. Thomas, and others with comments from M. Madden; prepare pro hac application materials for L. Esbrook; additional research of podcasts, screenshots, articles, and linked source documents with comments from M. Madden and L. Esbrook.	3.80	hours	\$275.00	\$1,045.00
07/03/20	GAO	Telephone calls with multiple prospective experts.	1.50	hours	\$1075.00	\$1,612.50
07/03/20	GAO	Prepare for and Zoom meeting with clients.	2.30	hours	\$1075.00	\$2,472.50
07/03/20	GAO	Emails with team re progress on legal issues.	1.20	hours	\$1075.00	\$1,290.00
07/03/20	MMM	Emails re UCC regulations and experts.	0.30	hours	\$925.00	\$277.50
07/03/20	MMM	Call with client re motion to dismiss strategy and other items.	1.80	hours	\$925.00	\$1,665.00
07/03/20	MMM	Emails following up with colleagues on open research and other items.	0.60	hours	\$925.00	\$555.00
07/03/20	DB	Emails with team re various legal issues in connection with MTD arguments.	0.80	hours	\$925.00	\$740.00
07/03/20	DB	Prepare for and attend Zoom meeting with clients re litigation strategy and related issues.	2.30	hours	\$925.00	\$2,127.50
07/03/20	DB	Emails and calls with R. Mann and G. Orseck re potential expert engagement.	1.20	hours	\$925.00	\$1,110.00
07/03/20	MDB	Draft Motion to Dismiss.	8.90	hours	\$605.00	\$5,384.50
07/03/20	ZNF	Research hwo EDVA court can exert personal jurisdiction over JPM [REDACTED]	0.40	hours	\$515.00	\$206.00
07/03/20	ZNF	Research applicability of PATRIOT Act information-sharing safe harbor	1.10	hours	\$515.00	\$566.50
07/03/20	ZNF	Draft statements of facts and motion to dismiss Count II	2.30	hours	\$515.00	\$1,184.50
07/04/20	GAO	Two calls with D. Burke re open questions on brief.	2.00	hours	\$975.00	\$1,950.00
07/04/20	GAO	Review D. Evinger materials on "Terms of Conditions."	0.30	hours	\$975.00	\$292.50
07/04/20	MMM	Review draft motion to dismiss.	0.70	hours	\$925.00	\$647.50

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07/04/20	DB	Initial read of draft MTD and associated emails with team.	1.00	hours	\$925.00	\$925.00
07/04/20	MDB	Draft Motion to Dismiss.	5.20	hours	\$605.00	\$3,146.00
07/05/20	LCE	Read correspondence on attorney signatures for EDVA.	0.10	hours	\$605.00	\$60.50
07/06/20	GAO	Prepare for and call with counsel for the insurance carrier.	1.00	hours	\$975.00	\$975.00
07/06/20	GAO	Engage with Steve Weisbrod on CBB's behalf.	0.40	hours	\$975.00	\$390.00
07/06/20	GAO	Emails and call re engaging potential expert.	0.60	hours	\$975.00	\$585.00
07/06/20	GAO	Analysis of potential fraudulent inducement defense.	0.60	hours	\$975.00	\$585.00
07/06/20	GAO	Review UCC provisions for motion to dismiss.	0.60	hours	\$975.00	\$585.00
07/06/20	MMM	Emails re public-records request to California.	0.20	hours	\$925.00	\$185.00
07/06/20	DB	Review and edit draft MTD.	1.80	hours	\$925.00	\$1,665.00
07/06/20	DB	Emails with team re potential defenses and third-party claims.	1.20	hours	\$925.00	\$1,110.00
07/06/20	DB	Call with P. Fitzgerald re potential defenses.	0.80	hours	\$925.00	\$740.00
07/06/20	ZNF	Draft findings re cause of action research	1.20	hours	\$515.00	\$618.00
07/06/20	ZNF	Research follow-up questions from meeting about causes of action against JPM and CA	3.10	hours	\$515.00	\$1,596.50
07/06/20	ZNF	Research how the EDVA court can obtain specific personal jurisdiction over JPM [REDACTED]	2.30	hours	\$515.00	\$1,184.50
07/06/20	LCE	Research on possible affirmative defense and send to M. Madden and D. Burke.	4.00	hours	\$605.00	\$2,420.00
07/06/20	LCE	Research and respond to D. Burke's follow up questions on possible counterclaims.	1.40	hours	\$605.00	\$847.00
07/06/20	LCE	Draft, review, and send public records requests to California state offices.	2.60	hours	\$605.00	\$1,573.00
07/06/20	LGW	Revise background materials with comments from M. Madden.	0.20	hours	\$275.00	\$55.00

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07/07/20	GAO	Review fraud in the inducement argument from P. Fitzgerald.	0.20	hours	\$975.00	\$195.00
07/07/20	GAO	Review emails from P. Fitzgerald re operating circular; DB matter; yellow hammer.	0.50	hours	\$975.00	\$487.50
07/07/20	GAO	Emails with potential experts.	0.30	hours	\$975.00	\$292.50
07/07/20	GAO	Telephone calls with two potential experts.	1.00	hours	\$975.00	\$975.00
07/07/20	GAO	Due diligence on proposed expert.	0.30	hours	\$975.00	\$292.50
07/07/20	GAO	Review emails and materials from J. Brough re account transactions and general ledger transactions.	0.20	hours	\$975.00	\$195.00
07/07/20	GAO	Review research on Article 4A.	1.50	hours	\$975.00	\$1,462.50
07/07/20	DB	Edit draft MTD, including associated research and emails with team re research questions.	6.50	hours	\$925.00	\$6,012.50
07/07/20	ZNF	Research causes of action to assert against JPM and CA	0.60	hours	\$515.00	\$309.00
07/07/20	ZNF	Research how the EDVA court can obtain specific personal jurisdiction over JPM [REDACTED]	5.40	hours	\$515.00	\$2,781.00
07/07/20	LGW	Continue to research notice examples requested by Z. Ferguson.	0.20	hours	\$275.00	\$55.00
07/08/20	GAO	Review memo from D. Burke re Terms and Conditions issue.	0.20	hours	\$975.00	\$195.00
07/08/20	GAO	Review emails from P. Fitzgerald and D. Evinger.	0.20	hours	\$975.00	\$195.00
07/08/20	GAO	Telephone call with D. Burke re defenses to UCC counts.	0.60	hours	\$975.00	\$585.00
07/08/20	GAO	Review materials from potential expert.	0.30	hours	\$975.00	\$292.50
07/08/20	MMM	Emails re allegations in complaint.	0.20	hours	\$925.00	\$185.00
07/08/20	MMM	Emails re open tasks.	0.30	hours	\$925.00	\$277.50
07/08/20	MMM	Edit requests for document production.	0.30	hours	\$925.00	\$277.50
07/08/20	MMM	Emails re client documents.	0.20	hours	\$925.00	\$185.00
07/08/20	MMM	Edit motion to dismiss.	2.50	hours	\$925.00	\$2,312.50
07/08/20	MMM	Review Cal. public records and emails re same.	0.30	hours	\$925.00	\$277.50

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07/08/20	DB	Additional work on MTD, including edits to draft, emails with team, calls with M. Madden re structure and potential arguments.	3.20	hours	\$925.00	\$2,960.00
07/08/20	DB	Review emails from P. Fitzgerald and associated discussion with G. Orseck.	1.20	hours	\$925.00	\$1,110.00
07/08/20	MDB	Edit Motion to Dismiss.	2.30	hours	\$605.00	\$1,391.50
07/08/20	ZNF	Draft outline of third-party complaint	0.40	hours	\$515.00	\$206.00
07/08/20	ZNF	Research how to assert 4A-211(f) indemnification claim	0.90	hours	\$515.00	\$463.50
07/08/20	ZNF	Research causes of action to assert against JPM and CA	1.60	hours	\$515.00	\$824.00
07/08/20	ZNF	Revise motion to dismiss draft (Count II and statement of facts)	4.70	hours	\$515.00	\$2,420.50
07/08/20	LCE	Research Virginia law on conversion for motion to dismiss for M. Browder.	1.90	hours	\$605.00	\$1,149.50
07/08/20	LCE	Review public records received from California State Treasurer's Office and correspond with M. Madden on additional possible requests.	0.80	hours	\$605.00	\$484.00
07/08/20	LGW	Revise client materials with comments from M. Madden.	0.20	hours	\$275.00	\$55.00
07/09/20	GAO	Telephone call with potential banking expert.	0.30	hours	\$975.00	\$292.50
07/09/20	GAO	Research on effect of [REDACTED] on civil litigation schedule.	0.30	hours	\$975.00	\$292.50
07/09/20	GAO	Review email memos on UCC issues.	0.30	hours	\$975.00	\$292.50
07/09/20	MMM	Edit motion to dismiss.	6.00	hours	\$925.00	\$5,550.00
07/09/20	MMM	Emails with client re M. Gula communication re account access in light of litigation against Bank.	0.30	hours	\$925.00	\$277.50
07/09/20	MMM	Review [REDACTED] and emails re same and strategy with [REDACTED].	0.60	hours	\$925.00	\$555.00
07/09/20	DB	Edit draft MTD.	5.00	hours	\$925.00	\$4,625.00
07/09/20	MDB	Edit Motion to Dismiss.	2.70	hours	\$605.00	\$1,633.50
07/09/20	ZNF	Research causes of action to assert against JPM and CA	1.10	hours	\$515.00	\$566.50

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07/09/20	ZNF	Research whether EDVA court has specific personal jurisdiction over JPM [REDACTED] [REDACTED]	5.10 hours	\$515.00	\$2,626.50
07/09/20	ZNF	Draft third-party complaint outline	1.50 hours	\$515.00	\$772.50
07/09/20	LCE	Follow up with California State Treasurer's Office on missing public records.	0.50 hours	\$605.00	\$302.50
07/09/20	LCE	Edit and proofread requests for production and requests for interrogatories for D. Burke and M. Madden.	1.70 hours	\$605.00	\$1,028.50
07/09/20	LCE	Draft public records act request for California State Controller's Office, fax, save to team folder.	0.60 hours	\$605.00	\$363.00
07/09/20	LGW	Prepare public records request for L. Esbrook.	0.20 hours	\$275.00	\$55.00
07/10/20	GAO	Work on motion to dismiss.	2.60 hours	\$975.00	\$2,535.00
07/10/20	GAO	Telephone call with Steve Weisbrod to outline the case for him.	0.50 hours	\$975.00	\$487.50
07/10/20	GAO	Review and consider email from Joe Sommer.	0.30 hours	\$975.00	\$292.50
07/10/20	MMM	Edit motion to dismiss.	1.90 hours	\$925.00	\$1,757.50
07/10/20	MMM	Confer with D. Burke re motion to dismiss.	0.40 hours	\$925.00	\$370.00
07/10/20	MMM	Emails re follow-up on California public-records requests.	0.30 hours	\$925.00	\$277.50
07/10/20	MMM	Emails re open items (interviews, research, motion status).	0.40 hours	\$925.00	\$370.00
07/10/20	DB	Work on draft MTD, including edits to draft and emails with team.	5.80 hours	\$925.00	\$5,365.00
07/10/20	MDB	Edit Motion to Dismiss.	2.70 hours	\$605.00	\$1,633.50
07/10/20	ZNF	Research case law on who qualifies as a "sender" under 4A-211(f)	1.90 hours	\$515.00	\$978.50
07/10/20	ZNF	Draft outline of third-party complaint	1.10 hours	\$515.00	\$566.50
07/10/20	ZNF	Research causes of action to assert against JPM and CA	3.10 hours	\$515.00	\$1,596.50
07/10/20	LCE	Proof and send email update on public records requests to client.	0.30 hours	\$605.00	\$181.50
07/10/20	LCE	Read correspondence with client.	0.20 hours	\$605.00	\$121.00
07/10/20	LCE	Read through public records request materials and draft summary for client.	0.50 hours	\$605.00	\$302.50

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07/10/20	LGW	Prepare third-party discovery folder with comments from L. Esbrook and M. Browder.	0.20	hours	\$275.00	\$55.00
07/11/20	DB	Review revised draft of MTD from G. Orseck and work on addressing comments.	1.20	hours	\$925.00	\$1,110.00
07/12/20	MMM	Review P. Fitzgerald memo on Count I.	0.40	hours	\$925.00	\$370.00
07/12/20	DB	Work on revisions to draft MTD.	2.00	hours	\$925.00	\$1,850.00
07/12/20	ZNF	Research who carries the burden of proving effective cancellation under UCC 4A-211	2.40	hours	\$515.00	\$1,236.00
07/13/20	GAO	Edit motion to dismiss.	2.80	hours	\$975.00	\$2,730.00
07/13/20	MMM	Confer with G. Orseck re motion to dismiss.	0.20	hours	\$925.00	\$185.00
07/13/20	DB	Research and emails re [REDACTED].	1.00	hours	\$925.00	\$925.00
07/13/20	DB	Review and respond to emails from client re potential MTD arguments, including associated emails with team.	2.00	hours	\$925.00	\$1,850.00
07/13/20	DB	Edit draft MTD.	4.80	hours	\$925.00	\$4,440.00
07/13/20	ZNF	Draft third-party complaint outline	3.00	hours	\$515.00	\$1,545.00
07/13/20	ZNF	Research [REDACTED]	0.40	hours	\$515.00	\$206.00
07/13/20	ZNF	Research causes of action for third-party complaint	0.70	hours	\$515.00	\$360.50
07/13/20	ZNF	Confer with RR attorney (Donald Burke) to discuss third-party complaint	0.80	hours	\$515.00	\$412.00
07/14/20	GAO	Attend Board meeting.	1.00	hours	\$975.00	\$975.00
07/14/20	GAO	Edits to new draft of brief and send to client with cover email.	1.60	hours	\$975.00	\$1,560.00
07/14/20	GAO	Two calls with D. Burke re open questions on brief.	2.00	hours	\$975.00	\$1,950.00
07/14/20	MMM	Edit motion to dismiss.	0.80	hours	\$925.00	\$740.00
07/14/20	DB	Revise MTD in response to comments from G. Orseck.	3.50	hours	\$925.00	\$3,237.50
07/14/20	DB	Confer with G. Orseck and M. Madden re open issues on MTD.	2.00	hours	\$925.00	\$1,850.00
07/14/20	ZNF	Draft outline of third-party complaint	1.30	hours	\$515.00	\$669.50

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07/14/20	ZNF	Research causes of action for third-party complaint	0.70	hours	\$515.00	\$360.50
07/14/20	ZNF	Research [REDACTED] [REDACTED] [REDACTED] [REDACTED]	2.80	hours	\$515.00	\$1,442.00
07/15/20	GAO	Telephone call with P. Fitzgerald re our motion to dismiss.	1.10	hours	\$975.00	\$1,072.50
07/15/20	GAO	Follow-up call with M. Madden and D. Burke.	0.70	hours	\$975.00	\$682.50
07/15/20	GAO	Work on revised draft of motion to dismiss.	0.70	hours	\$975.00	\$682.50
07/15/20	GAO	Prepare emails to P. Fitzgerald re questions posed about our arguments.	0.60	hours	\$975.00	\$585.00
07/15/20	MMM	Confer with G. Orseck and D. Burke re motion to dismiss.	1.00	hours	\$925.00	\$925.00
07/15/20	MMM	Review edits to draft motion to dismiss and emails re same.	0.80	hours	\$925.00	\$740.00
07/15/20	DB	Revise draft MTD to include argument for dismissal on Count I, and prepare draft cover note explaining drafting choices.	3.90	hours	\$925.00	\$3,607.50
07/15/20	DB	Confer with G. Orseck and M. Madden re client comments on MTD.	0.70	hours	\$925.00	\$647.50
07/15/20	ZNF	Draft third-party complaint outline	0.60	hours	\$515.00	\$309.00
07/15/20	ZNF	Research procedural requirements for asserting a third-party claim under FRCP 13, 14	4.20	hours	\$515.00	\$2,163.00
07/16/20	GAO	Emails with P. Fitzgerald on issues in our motion to dismiss.	0.50	hours	\$975.00	\$487.50
07/16/20	GAO	Review Mayer Brown letter.	0.30	hours	\$975.00	\$292.50
07/16/20	GAO	Further work on our draft motion to dismiss.	1.70	hours	\$975.00	\$1,657.50
07/16/20	GAO	Review request from Betsy Sharon re Gula account closing.	0.10	hours	\$975.00	\$97.50
07/16/20	MMM	Review proposed communication with M. Gula and email G. Orseck and client re same.	0.30	hours	\$925.00	\$277.50
07/16/20	DB	Further work on MTD, including revisions to draft, emails with team, reviewing Blue Flame response to congressional inquiry, and coordinating cite check.	4.50	hours	\$925.00	\$4,162.50

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07/16/20	KRM	Cite check motion to dismiss.	2.00	hours	\$275.00	\$550.00
07/16/20	ZNF	Review documents from California public records request	0.60	hours	\$515.00	\$309.00
07/16/20	ZNF	Review draft motion to dismiss	1.10	hours	\$515.00	\$566.50
07/16/20	ZNF	Draft notice of hearing	0.60	hours	\$515.00	\$309.00
07/16/20	ZNF	Research personal jurisdiction issues in third-party complaint	1.10	hours	\$515.00	\$566.50
07/16/20	ZNF	Research impleader under Rules 13 and 14 for third-party complaint	2.20	hours	\$515.00	\$1,133.00
07/16/20	ZNF	Draft third-party complaint outline	0.80	hours	\$515.00	\$412.00
07/16/20	LCE	Review motion to dismiss and send edits to D. Burke.	1.10	hours	\$605.00	\$665.50
07/16/20	LCE	Review and download Wall Street Journal article on Blue Flame and send to team for possible record request.	0.40	hours	\$605.00	\$242.00
07/16/20	LCE	Summarize public record request receipts from California agencies and send to team.	0.90	hours	\$605.00	\$544.50
07/16/20	LCE	Review client-sent material on House investigation into Blue Flame and update interrogatories and requests for production with new information.	1.30	hours	\$605.00	\$786.50
07/17/20	GAO	Telephone call with J. Sommer.	0.70	hours	\$975.00	\$682.50
07/17/20	GAO	Edit new draft of motion to dismiss.	1.00	hours	\$975.00	\$975.00
07/17/20	GAO	Prepare email to client.	0.20	hours	\$975.00	\$195.00
07/17/20	GAO	Telephone calls with D. Burke.	0.40	hours	\$975.00	\$390.00
07/17/20	DB	Work on issues re third-party claims, including call with Z. Ferguson and associated follow up research.	1.20	hours	\$925.00	\$1,110.00
07/17/20	DB	Work on MTD, including revisions in response to client comments, additional research, and discussions with G. Orseck and K. Miller re draft.	3.30	hours	\$925.00	\$3,052.50
07/17/20	DB	Call with G. Orseck and potential expert re indemnification issues.	0.70	hours	\$925.00	\$647.50
07/17/20	KRM	Continue to cite check motion to dismiss.	4.50	hours	\$275.00	\$1,237.50
07/17/20	NTT	Prepare hard copy California public records request materials for D. Burke.	1.00	hours	\$275.00	\$275.00

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07/17/20	ZNF	Confer with RR attorney (Donald Burke) to discuss third-party complaint	0.90	hours	\$515.00	\$463.50
07/17/20	ZNF	Draft outline of third-party complaint	5.10	hours	\$515.00	\$2,626.50
07/17/20	LCE	Work with L. Webb to compile public record materials in binder-ready form for D. Burke.	1.20	hours	\$605.00	\$726.00
07/17/20	LCE	Update RFPs based on relevant information in news articles.	0.70	hours	\$605.00	\$423.50
07/17/20	LGW	Prepare electronic public records materials for review by L. Esbrook.	2.20	hours	\$275.00	\$605.00
07/18/20	GAO	Further work on motion to dismiss, and related emails with client and team.	2.50	hours	\$975.00	\$2,437.50
07/18/20	MMM	Email G. Orseck re motion to dismiss argument on Count I.	0.30	hours	\$925.00	\$277.50
07/18/20	DB	Work on draft MTD, including calls and emails with team, and revisions to draft in response to client comments and cite check changes.	3.80	hours	\$925.00	\$3,515.00
07/19/20	GAO	Multiple emails with clients and team re motion to dismiss.	2.20	hours	\$975.00	\$2,145.00
07/19/20	MMM	Emails re motion to dismiss.	0.30	hours	\$925.00	\$277.50
07/19/20	DB	Work on MTD, including review of near-final draft, additional revisions in response to cite check, and emails with client re exhibits.	3.00	hours	\$925.00	\$2,775.00
07/19/20	KRM	Cite check new version of motion to dismiss.	1.00	hours	\$275.00	\$275.00
07/20/20	GAO	Final review of motion to dismiss for filing.	0.50	hours	\$975.00	\$487.50
07/20/20	MMM	Edit motion to dismiss.	1.80	hours	\$925.00	\$1,665.00
07/20/20	DB	Work on MTD, including final review and revisions to brief, finalizing ancillary documents.	4.00	hours	\$925.00	\$3,700.00
07/20/20	KRM	Prepare exhibits to motion to dismiss.	0.40	hours	\$275.00	\$110.00
07/20/20	ZNF	Review motion to dismiss	0.80	hours	\$515.00	\$412.00
07/20/20	LGW	Revise client materials with comments from M. Madden.	0.20	hours	\$275.00	\$55.00
07/21/20	GAO	Review of order and related email with CBB re argument date.	0.10	hours	\$975.00	\$97.50

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07/21/20	GAO	Prepare email/memo to D. Burke and M. Madden re next steps to prepare defense.	0.30	hours	\$975.00	\$292.50
07/21/20	GAO	Emails with J. Cullen re motion to dismiss.	0.10	hours	\$975.00	\$97.50
07/21/20	MMM	Conduct legal research concerning motion to dismiss.	0.40	hours	\$925.00	\$370.00
07/21/20	DB	Analysis re third-party claim issues.	0.80	hours	\$925.00	\$740.00
07/21/20	ZNF	Revise litigation documents (opposition and motion to strike)	0.70	hours	\$515.00	\$360.50
07/21/20	ZNF	Research derivative liability standard under Rule 14 impleader	3.30	hours	\$515.00	\$1,699.50
07/21/20	ZNF	Draft Rule 26 initial disclosures	2.30	hours	\$515.00	\$1,184.50
07/21/20	LCE	Update list of relevant individuals and work with paralegal to set up Twitter alerts.	0.50	hours	\$605.00	\$302.50
07/21/20	LGW	Prepare Court courtesy copies; revise pro hac application for L. Esbrook; conferences with L. Esbrook and M. Madden regarding Twitter alerts to monitor Blue Flame mentions on social media; revise client materials.	1.90	hours	\$275.00	\$522.50
07/22/20	GAO	Prepare for and call with M. Madden and D. Burke re next steps in the litigation.	1.00	hours	\$975.00	\$975.00
07/22/20	MMM	Research affirmative defenses and counterclaims.	0.80	hours	\$925.00	\$740.00
07/22/20	MMM	Call with G. Orseck and D. Burke re strategy on next steps.	0.80	hours	\$925.00	\$740.00
07/22/20	MMM	Edit document requests and interrogatories and circulate draft document requests to client.	1.50	hours	\$925.00	\$1,387.50
07/22/20	DB	Work on issues re third-party claims.	1.00	hours	\$925.00	\$925.00
07/22/20	DB	Call with G. Orseck and M. Madde re next steps.	1.00	hours	\$925.00	\$925.00
07/22/20	ZNF	Review Chain Bridge Bank's insurance policies to determine disclosure requirement under Rule 26	0.70	hours	\$515.00	\$360.50
07/22/20	ZNF	Draft Rule 26 initial disclosures	5.30	hours	\$515.00	\$2,729.50
07/22/20	LGW	Prepare legal and factual background materials for Z. Ferguson; review Twitter alerts with comments from L. Esbrook.	1.70	hours	\$275.00	\$467.50

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07/24/20	MMM	Edit shareholder-letter insert on litigation.	0.90	hours	\$925.00	\$832.50
07/24/20	MMM	Confer with G. Orseck re counterclaims and defenses.	0.10	hours	\$925.00	\$92.50
07/24/20	DB	Research and analysis re third-party claims, including emails with Z. Ferguson.	2.50	hours	\$925.00	\$2,312.50
07/24/20	ZNF	Research case law regarding mistake of law in Va. restitution claims	0.80	hours	\$515.00	\$412.00
07/24/20	LCE	Email correspondence with team on check in meeting.	0.10	hours	\$605.00	\$60.50
07/26/20	MMM	Review revised shareholder letter insert re litigation.	0.20	hours	\$925.00	\$185.00
07/27/20	MMM	Update task list, including defenses and counterclaims.	0.40	hours	\$925.00	\$370.00
07/27/20	MMM	Confer with team re defenses, counterclaims, third-party complaint, and discovery.	0.50	hours	\$925.00	\$462.50
07/27/20	MMM	Draft email to M. Browder providing guidance on drafting answer.	0.40	hours	\$925.00	\$370.00
07/27/20	DB	Work on issues re third-party claims.	1.20	hours	\$925.00	\$1,110.00
07/27/20	DB	Video meeting with team re next steps and assignments.	0.50	hours	\$925.00	\$462.50
07/27/20	MDB	Call with RR team to discuss upcoming deadlines.	0.40	hours	\$605.00	\$242.00
07/27/20	MDB	Draft Answer.	0.60	hours	\$605.00	\$363.00
07/27/20	ZNF	Confer with Robbins Russell attorneys to discuss litigation strategy	0.50	hours	\$515.00	\$257.50
07/27/20	LCE	Input client edits into draft Request for Production and Interrogatories.	0.90	hours	\$605.00	\$544.50
07/27/20	LCE	Update list of relevant individuals for discovery purposes.	0.30	hours	\$605.00	\$181.50
07/28/20	GAO	Telephone call with D. Burke re status of research streams.	0.20	hours	\$975.00	\$195.00
07/28/20	GAO	Review letter from insurance carrier.	0.10	hours	\$975.00	\$97.50
07/28/20	DB	Research re third-party claim issues.	1.00	hours	\$925.00	\$925.00
07/28/20	MDB	Draft answer	1.30	hours	\$605.00	\$786.50
07/29/20	MDB	Draft answer	1.40	hours	\$605.00	\$847.00

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07/29/20	ZNF	Research whether defendants can split third party claims among separate actions	3.10	hours	\$515.00	\$1,596.50
07/30/20	DB	Emails with Z. Ferguson re third-party procedure.	1.00	hours	\$925.00	\$925.00
07/30/20	DB	Prepare for interview of D. Evinger.	1.00	hours	\$925.00	\$925.00
07/30/20	MDB	Draft answer	1.40	hours	\$605.00	\$847.00
07/30/20	ZNF	Research whether third-party claims can be split among main and separate actions; whether nonmutual defensive claim preclusion can be asserted by any third-party defendant in a separate action; whether unripe indemnification claims can be asserted in a separate suit; research procedural and substantive questions regarding unjust enrichment claims under California law	5.50	hours	\$515.00	\$2,832.50
07/30/20	LCE	Correspond with team on public records request receipt and upload records to DMS.	0.40	hours	\$605.00	\$242.00
07/31/20	DB	Work on third-party claim issues, including research re restitution and emails with Z. Ferguson.	1.50	hours	\$925.00	\$1,387.50
07/31/20	DB	Prepare for, conduct, and follow up on interview of D. Evinger.	2.80	hours	\$925.00	\$2,590.00
07/31/20	ZNF	Research exceptions to Va. rule that voluntary payments made under a mistake of law cannot be recovered.	0.80	hours	\$515.00	\$412.00
07/31/20	ZNF	Revise David Evinger interview notes	0.80	hours	\$515.00	\$412.00
07/31/20	ZNF	Research whether a court applying California choice-of-law rules would apply Virginia law to an unjust enrichment claim	1.80	hours	\$515.00	\$927.00
07/31/20	ZNF	Review interview outline and prepare for interview	0.80	hours	\$515.00	\$412.00
07/31/20	ZNF	Interview David Evinger	2.00	hours	\$515.00	\$1,030.00
07/31/20	LCE	Correspond with team on public records request receipt and upload to DMS.	0.60	hours	\$605.00	\$363.00
TOTAL						<u>\$281,873.50</u>

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Invoice # 109969

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DISBURSEMENTS

In-house copying charges	\$160.95
Color printing charges	\$28.00
Computer Research Charges	\$4,132.23
Courier/Overnight delivery	\$142.40
TOTAL	\$4,463.58

TIMEKEEPER SUMMARY

		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
CCC	Chase Carpino, Christine A	0.60	\$275.00	\$165.00
DB	Burke, Donald	98.70	\$925.00	\$91,297.50
DIW	Sarti, Dana I. Wesley	1.20	\$275.00	\$330.00
GAO	Orseck, Gary A.	37.50	\$975.00	\$36,562.50
GAO	Orseck, Gary A.	11.00	\$1075.00	\$11,825.00
KRM	Miller, Kate R	8.80	\$275.00	\$2,420.00
LCE	Esbrook, Leslie	33.30	\$605.00	\$20,146.50
LGW	Webb, Lyndsay G	11.30	\$275.00	\$3,107.50
MDB	Browder, Megan D.	42.70	\$605.00	\$25,833.50
MMM	Madden, Matthew M.	34.90	\$925.00	\$32,282.50
NTT	Turner, Nadia T	1.00	\$275.00	\$275.00
ZNF	Ferguson, Zachary N	111.90	\$515.00	\$57,628.50
	TOTAL	392.90		\$281,873.50

Total Fees	\$281,873.50
Less Courtesy Discount	(\$10,000.00)
Total Fees	\$271,873.50
Total Disbursements	<u>\$4,463.58</u>
Total this Bill	\$276,337.08

Previous Balance	\$184,294.94
07/27/20 Payment - thank you. Check No. 15110	(\$184,294.94)
TOTAL DUE FOR CURRENT AND OUTSTANDING INVOICES	\$276,337.08

Wire or ACH payments may be sent to:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222

Routing # 056004445

Acct # [REDACTED] for Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street, N.W., 4th Floor
Washington, DC 20006
(202) 775-4500 (t) (202) 775-4510 (f)
www.robbsrussell.com
EIN [REDACTED]

August 12, 2020

devinger@chainbridgebank.com
Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice number: 109970
Billed through: July 31, 2020
Our Matter No. 0374-2002

In reference to: Blue Flame-Defamation

<u>Date</u>	<u>Attorney</u>		<u>Time</u>		<u>Rate</u>	<u>Total Cost</u>
07/06/20	MDB	Draft Motion to Dismiss.	7.50	hours	\$605.00	\$4,537.50
07/07/20	MDB	Edit Motion to Dismiss.	0.60	hours	\$605.00	\$363.00
07/08/20	MDB	Edit Motion to Dismiss.	0.90	hours	\$605.00	\$544.50
07/09/20	MDB	Edit Motion to Dismiss.	4.00	hours	\$605.00	\$2,420.00
TOTAL						\$7,865.00

TIMEKEEPER SUMMARY

	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
MDB Browder, Megan D.	13.00	\$605.00	\$7,865.00
TOTAL	13.00		\$7,865.00
Total Fees			\$7,865.00
Total this Bill			\$7,865.00

Previous Balance		\$1,391.50
07/27/20	Payment - thank you. Check No. 15110	(\$1,391.50)
TOTAL DUE FOR CURRENT AND OUTSTANDING INVOICES		\$7,865.00

Wire or ACH payments may be sent to:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing # 056004445
Acct # [REDACTED] for Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

September 8, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200068
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: August 31, 2020.

RE: Blue Flame

Total Professional Services	\$ 168,838.50
Total Expenses	<u>\$ 5,289.74</u>
TOTAL THIS INVOICE	\$ 174,128.24

ROBBINS|RUSSELL

September 8, 2020
Invoice #: 200068

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/03/20	DB	Follow up to D. Evinger interview.	.40	925.00	370.00
8/03/20	DB	Research re third-party claim issues, including emails with team.	1.50	925.00	1,387.50
8/03/20	LCE	Update draft RFP and draft memo to M. Madden explaining changes.	1.70	605.00	1,028.50
8/03/20	MMM	Edit document requests in response to comments.	.50	925.00	462.50
8/03/20	ZNF	Revise Evinger interview notes	.50	515.00	257.50
8/04/20	MMM	Edit Answer.	.80	925.00	740.00
8/04/20	ZNF	Research mistake of law-voluntary payment doctrine under Virginia law and exceptions.	7.90	515.00	4,068.50
8/05/20	DB	Analysis re third-party claim issues.	1.50	925.00	1,387.50
8/05/20	MMM	Review Anchor Bank decision and emails re same.	.70	925.00	647.50
8/05/20	MMM	Edit Answer.	1.30	925.00	1,202.50
8/05/20	ZNF	Draft outline on mistake of law-voluntary payment doctrine under Virginia law	3.10	515.00	1,596.50
8/05/20	ZNF	Research mistake of law-voluntary payment doctrine under Virginia law	3.50	515.00	1,802.50
8/06/20	DB	Review research from Z. Ferguson re mistake of law issues and voluntary payment doctrine, including associated emails.	2.00	925.00	1,850.00
8/06/20	ZNF	Draft outline on mistake of law-voluntary payment doctrine under Virginia law	4.10	515.00	2,111.50
8/06/20	ZNF	Research mistake of law-voluntary payment doctrine under Virginia law	2.00	515.00	1,030.00
8/07/20	DB	Work on issues re soft post to Blue Flame account including calls, emails, and analysis.	2.50	925.00	2,312.50
8/07/20	GAO	Prep for and telephone call with S. Weisbrod re insurance issues and letter to insurer.	1.20	975.00	1,170.00
8/07/20	GAO	Review P. Fitzgerald legal analysis memo.	.30	975.00	292.50
8/07/20	LCE	Update RFPs with M. Madden comments.	.50	605.00	302.50
8/07/20	MMM	Edit document requests and emails re same.	.50	925.00	462.50
8/09/20	MMM	Review P. Fitzgerald memo on Section 404 arguments and email re same.	.50	925.00	462.50
8/10/20	DB	Video meeting with client and co-counsel.	1.00	925.00	925.00
8/10/20	DB	Additional follow up re soft post to Blue Flame account.	1.00	925.00	925.00

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September 8, 2020
Invoice #: 200068

Date	Tkpr	Description	Hours	Rate	Amount
8/10/20	GAO	Review of insurance issue and related call with S. Weisbrod.	.60	975.00	585.00
8/10/20	MMM	Email P. Fitzgerald & team re potential reply points in support of Section 404 dismissal.	.20	925.00	185.00
8/11/20	DB	Research re restitution issues, including emails with Z. Ferguson.	1.50	925.00	1,387.50
8/11/20	GAO	Telephone call with clients and S. Weisbrod re insurance issues.	.50	975.00	487.50
8/11/20	GAO	Follow-up call with S. Weisbrod.	.30	975.00	292.50
8/12/20	ZNF	Research exception to the voluntary payment doctrine under Va. law	.80	515.00	412.00
8/14/20	DB	Review memos from client and associated analysis re MTD issues.	1.50	925.00	1,387.50
8/15/20	LCE	Correspond with M. Madden on Citigroup mistaken bank transfer case.	.10	605.00	60.50
8/16/20	DB	Emails with P. Fitzgerald re Revlon litigation.	.30	925.00	277.50
8/16/20	LCE	Correspond with M. Madden on Citigroup mistaken bank transfer case.	.10	605.00	60.50
8/17/20	DB	Research re Regions Bank case, including drafting outline memo and associated emails with P. Fitzgerald.	3.50	925.00	3,237.50
8/17/20	DB	Review opposition brief and begin analysis re reply.	1.50	925.00	1,387.50
8/17/20	GAO	Read and consider Blue Flame brief in opposition to MTD.	2.50	975.00	2,437.50
8/17/20	LCE	Research news on Citigroup mistaken wire for M. Madden.	.60	605.00	363.00
8/17/20	MDB	Review Opposition to Motion to Dismiss.	.30	605.00	181.50
8/17/20	MMM	Review brief in opposition to motion to dismiss.	1.50	925.00	1,387.50
8/17/20	MMM	Email P. Fitzgerald re relevant developments in Citibank mistaken-wire case that bear on arguments against Blue Flame's claims and defenses thereto.	.30	925.00	277.50
8/17/20	ZNF	Review opposition to motion to dismiss	1.20	515.00	618.00
8/18/20	DB	Work on reply brief on MTD, including call with Go. Orseck and M. Madden, research and analysis, outlining brief, and emails with team.	7.00	925.00	6,475.00
8/18/20	DB	Review and comment on draft email to clients re opposition brief.	.80	925.00	740.00
8/18/20	GAO	Prepare for and meeting with D. Burke and M. Madden to discuss reply brief.	1.90	975.00	1,852.50
8/18/20	KRM	Telephone conference with N.D. Ga. Clerk's Office regarding obtaining 2002 filing.	.20	275.00	55.00
8/18/20	LCE	Research case law for tortious interference claim and conversion claim for Z. Ferguson and M. Browder and draft memos on same.	3.80	605.00	2,299.00

ROBBINS|RUSSELL

September 8, 2020
Invoice #: 200068

Date	Tkpr	Description	Hours	Rate	Amount
8/18/20	LCE	Review opposition to motion to dismiss with focus on conversion and tortious interference.	.30	605.00	181.50
8/18/20	LGW	Research cases cited in opposition memorandum for M. Browder.	1.00	275.00	275.00
8/18/20	MDB	Review Opposition to Motion to Dismiss.	1.00	605.00	605.00
8/18/20	MMM	Outline reply brief.	.50	925.00	462.50
8/18/20	MMM	Confer with G. Orseck and D. Burke re responses to arguments in opposition to motion to dismiss, research tasks, and drafting strategy.	1.90	925.00	1,757.50
8/18/20	MMM	Emails re arguments in opposition brief and research and strategy for responding to them.	1.10	925.00	1,017.50
8/18/20	MMM	Draft and research fraud section of reply brief.	3.00	925.00	2,775.00
8/18/20	ZNF	Confer with partner to discuss motion to dismiss reply	.50	515.00	257.50
8/18/20	ZNF	Research and draft motion to dismiss reply	5.40	515.00	2,781.00
8/19/20	DB	Draft MTD reply, including associated research and emails with team.	7.20	925.00	6,660.00
8/19/20	GAO	Review and edit section of reply brief on fraud claims.	1.00	975.00	975.00
8/19/20	GAO	Emails with D. Burke and client on legal arguments.	.40	975.00	390.00
8/19/20	LCE	Research attorney client privilege issues related to bank regulators for M. Madden.	3.90	605.00	2,359.50
8/19/20	LCE	Research Virginia law on waiving express contractual provisions for M. Browder in motion to dismiss.	1.50	605.00	907.50
8/19/20	MDB	Draft Reply ISO Motion to Dismiss.	7.20	605.00	4,356.00
8/19/20	MMM	Draft and research fraud section of reply brief.	4.50	925.00	4,162.50
8/19/20	MMM	Draft response to P. Fitzgerald's inquiry re new reliance-based arguments in support of dismissing fraud claim.	.50	925.00	462.50
8/19/20	MMM	Edit conversion general-deposit-account section.	2.50	925.00	2,312.50
8/19/20	ZNF	Draft and revise motion to dismiss reply	8.50	515.00	4,377.50
8/20/20	DB	Emails with P. Fitzgerald re conversion issues.	.50	925.00	462.50
8/20/20	GAO	Edit reply brief on motion to dismiss.	1.80	975.00	1,755.00
8/20/20	GAO	Review emails from P. Fitzgerald.	.30	975.00	292.50
8/20/20	GAO	Telephone call with D. Burke re various legal issues.	.20	975.00	195.00
8/20/20	LCE	Review D.C. case law research on waiving express contractual provisions for motion to dismiss and read through draft portions of motion to dismiss.	.50	605.00	302.50
8/20/20	MDB	Draft Reply ISO Motion to Dismiss.	1.30	605.00	786.50
8/20/20	MDB	Edit Reply ISO Motion to Dismiss.	3.40	605.00	2,057.00
8/20/20	MMM	Review draft of tortious interference section of reply brief.	.80	925.00	740.00
8/20/20	MMM	Review draft reply section on UCC counts.	1.20	925.00	1,110.00

ROBBINS|RUSSELL

September 8, 2020
Invoice #: 200068

Date	Tkpr	Description	Hours	Rate	Amount
8/20/20	MMM	Emails with M. Browder re edits to general-deposit-account part of conversion reply.	.80	925.00	740.00
8/20/20	MMM	Edit funds-availability part of conversion reply.	2.30	925.00	2,127.50
8/20/20	ZNF	Revise tortious interference section of motion to dismiss reply	.80	515.00	412.00
8/20/20	ZNF	Research Article 4A cases suggesting that a request for return of funds is a cancellation request	1.50	515.00	772.50
8/21/20	DB	Continue editing combined draft of MTD reply.	2.20	925.00	2,035.00
8/21/20	DB	Review and revise draft MTD reply following edits from G. Orseck, including associated call with G. Orseck.	1.70	925.00	1,572.50
8/21/20	DB	Coordinate cite check of MTD reply.	.20	925.00	185.00
8/21/20	GAO	Draft and edit reply brief on motion to dismiss.	6.30	975.00	6,142.50
8/21/20	KRM	Cite check reply brief in support of motion to dismiss.	1.00	275.00	275.00
8/21/20	MMM	Draft reply introduction.	2.20	925.00	2,035.00
8/21/20	MMM	Edit entire draft reply brief.	1.60	925.00	1,480.00
8/22/20	DB	Edit draft reply on MTD, including review of comments from clients, and associated emails with P. Fitzgerald and team.	3.40	925.00	3,145.00
8/22/20	KRM	Continue to cite check reply brief in support of motion to dismiss.	4.80	275.00	1,320.00
8/22/20	LCE	Review Public Records Act received documents and send to team.	.30	605.00	181.50
8/22/20	ZNF	Research cases in which a court imposes 4A-404(a) liability for an ineffectively cancelled payment order	3.70	515.00	1,905.50
8/23/20	DB	Call with G. Orseck re revisions to draft reply on MTD.	.70	925.00	647.50
8/23/20	DB	Review and edit multiple drafts of MTD reply brief.	5.80	925.00	5,365.00
8/23/20	GAO	Work on reply brief, including multiple emails re edits and legal issues.	3.30	975.00	3,217.50
8/23/20	MMM	Emails re reply-brief edits.	.60	925.00	555.00
8/24/20	DB	Work on draft MTD reply, including revisions to brief, reviewing comments from clients and emails re same, discussion with insurance counsel, and finalizing for filing.	5.50	925.00	5,087.50
8/24/20	GAO	Final read of Reply Brief and comments from client.	1.00	975.00	975.00
8/24/20	GAO	Telephone call with S. Weisbrod re his edits to Reply brief.	.60	975.00	585.00
8/24/20	KRM	Cite check new version of reply brief.	.80	275.00	220.00
8/24/20	MMM	Edit reply brief.	1.90	925.00	1,757.50
8/24/20	MMM	Emails re edits to reply brief.	.80	925.00	740.00
8/25/20	DB	Prepare for MTD hearing, including identifying prep materials, and various email exchanges with P. Fitzgerald and team re potential arguments.	2.50	925.00	2,312.50

ROBBINS|RUSSELL

September 8, 2020
Invoice #: 200068

Date	Tkpr	Description	Hours	Rate	Amount
8/25/20	GAO	Emails with P. Fitzgerald re potential arguments on MTD and related research.	1.40	975.00	1,365.00
8/25/20	KRM	Prepare courtesy copy of reply brief for Court.	.30	275.00	82.50
8/25/20	LCE	Send research on follow-up in Citigroup wire transfer to team.	.40	605.00	242.00
8/25/20	MMM	Emails re surplusage point and other issues for oral argument.	.40	925.00	370.00
8/26/20	DB	Further preparation for MTD hearing, including emails with P. Fitzgerald and team re potential arguments, and analysis re third-party claim issues.	2.00	925.00	1,850.00
8/26/20	GAO	Review and respond to emails from P. Fitzgerald.	.50	975.00	487.50
8/26/20	GAO	Prepare for argument.	1.50	975.00	1,462.50
8/27/20	DB	Emails with P. Fitzgerald and team re potential arguments and mechanics of wire transfers, including associated analysis and research.	2.00	925.00	1,850.00
8/27/20	GAO	Oral argument prep and consider P. Fitzgerald emails.	.70	975.00	682.50
8/27/20	MMM	Draft email re funds availability post-wire transfer.	.40	925.00	370.00
8/28/20	DB	Call with J. Brough re funds availability issues.	.60	925.00	555.00
8/28/20	DB	Emails with P. Fitzgerald re funds availability issues and thoughts on oral argument, including associated research re Regulation CC.	2.50	925.00	2,312.50
8/28/20	GAO	Emails with client and B. Burke re legal issues.	.40	975.00	390.00
8/28/20	GAO	Review materials for oral argument.	.50	975.00	487.50
8/29/20	DB	Emails with P. Fitzgerald re UCC commentary, Regulation CC, and related issues.	1.50	925.00	1,387.50
8/30/20	DB	Emails with P. Fitzgerald re UCC Section 211 and White & Summer materials.	.20	925.00	185.00
8/30/20	GAO	Prepare for argument.	2.50	975.00	2,437.50
8/30/20	MMM	Email G. Orseck re oral-argument opening and strategy.	.20	925.00	185.00
8/31/20	DB	Follow-up emails re J.J. White amicus brief in Regions Bank case.	.50	925.00	462.50
8/31/20	DB	Emails with G. Orseck and M. Madden re argument preparation on conversion and contract claims.	1.00	925.00	925.00
8/31/20	GAO	Prepare for oral argument.	3.80	975.00	3,705.00
8/31/20	LCE	Update RFPs for M. Madden and correspond on drafting counterclaims.	.30	605.00	181.50
8/31/20	MMM	Draft email to G. Orseck and D. Burke re legal arguments in support of dismissing conversion claim.	.40	925.00	370.00
8/31/20	MMM	Emails with client re protective order and discovery requests.	.20	925.00	185.00
8/31/20	MMM	Review outline of affirmative defenses and provide comments and research follow-up requests re same.	2.30	925.00	2,127.50

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September 8, 2020
Invoice #: 200068

Date	Tkpr	Description	Hours	Rate	Amount
8/31/20	MMM	Draft email re post-MTD process and next steps.	.40	925.00	370.00
TOTAL PROFESSIONAL SERVICES					\$ 168,838.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Megan D Browder	MDB	13.20	605.00	7,986.00
Donald Burke	DB	66.00	925.00	61,050.00
Leslie Esbrook	LCE	14.00	605.00	8,470.00
Zachary N Ferguson	ZNF	43.50	515.00	22,402.50
Matthew M Madden	MMM	36.80	925.00	34,040.00
Kate R Miller	KRM	7.10	275.00	1,952.50
Gary A. Orseck	GAO	33.50	975.00	32,662.50
Lyndsay G Webb	LGW	1.00	275.00	275.00
Total		215.10		\$ 168,838.50

EXPENSES

Description	Amount
Computer Research Charges	5,126.77
Long Distance Telephone	47.86
Courier/Overnight delivery	115.11
TOTAL EXPENSES	\$ 5,289.74
TOTAL THIS INVOICE	\$ 174,128.24

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

September 8, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200068
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 174,128.24

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200068, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

September 15, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200010
Client #: 0374
Matter #: 2002

INVOICE SUMMARY

For Professional Services Rendered for the period ending: August 31, 2020.

RE: Blue Flame-Defamation

Total Professional Services	\$ 12,580.00
Total Expenses	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 12,580.00

ROBBINS|RUSSELL

September 15, 2020
Invoice #: 200010

RE: Blue Flame-Defamation

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
8/19/20	MMM	Draft defamation section of reply brief.	1.50	925.00	1,387.50
8/20/20	DB	Preparation of draft MTD reply, including drafting material re UCC issues, editing section on tortious interference, and integrating various sections into combined draft.	6.50	925.00	6,012.50
8/20/20	MMM	Draft defamation section of reply brief.	3.80	925.00	3,515.00
8/20/20	MMM	Edit defamation section of reply brief.	1.80	925.00	1,665.00

TOTAL PROFESSIONAL SERVICES

\$ 12,580.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	6.50	925.00	6,012.50
Matthew M Madden	MMM	7.10	925.00	6,567.50
Total		13.60		\$ 12,580.00

TOTAL THIS INVOICE

\$ 12,580.00

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

September 15, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200010
Client #: 0374
Matter #: 2002

REMITTANCE ADVICE

RE: Blue Flame-Defamation

BALANCE DUE THIS INVOICE

\$ 12,580.00

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

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Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200010, File # 0374 - 2002

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

October 5, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200214
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: September 30, 2020.

RE: Blue Flame

Total Professional Services	\$ 213,253.00
Total Expenses	<u>\$ 2,531.47</u>
TOTAL THIS INVOICE	\$ 215,784.47

ROBBINS|RUSSELL

October 5, 2020
Invoice #: 200214

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/01/20	DB	Assist with oral argument preparation, including associated research.	3.00	925.00	2,775.00
9/01/20	GAO	Review materials from P. Fitzgerald.	.20	975.00	195.00
9/01/20	GAO	Prep for oral argument.	2.40	975.00	2,340.00
9/01/20	MMM	Draft emails to G. Orseck re preemption argument on conversion claim.	.40	925.00	370.00
9/02/20	DB	Assist with preparation for oral argument, including emails and discussions with client and team.	2.00	925.00	1,850.00
9/02/20	GAO	Telephone call with M. Madden and D. Burke re prep for argument.	.80	975.00	780.00
9/02/20	GAO	Prep for argument.	2.20	975.00	2,145.00
9/02/20	LCE	Research and draft affirmative defenses.	4.80	605.00	2,904.00
9/02/20	MMM	Emails with G. Orseck in preparation for potential oral-argument issues and questions.	.50	925.00	462.50
9/02/20	MMM	Analyze post-argument strategy and next steps.	.80	925.00	740.00
9/02/20	ZNF	Research outstanding question regarding FRCP 14 and personal jurisdiction.	4.10	515.00	2,111.50
9/03/20	DB	Assist with oral argument preparations, including discussions and emails with team, reviewing outline from G. Orseck, and research re related issues.	3.00	925.00	2,775.00
9/03/20	DB	Analysis and research re third-party claims.	1.00	925.00	925.00
9/03/20	GAO	Prep for argument, including multiple emails with D. Burke and M. Madden.	2.60	975.00	2,535.00
9/03/20	LCE	Draft affirmative defenses and send to M. Madden.	2.10	605.00	1,270.50
9/03/20	MMM	Draft emails to G. Orseck re potential dismissal arguments on Section 404 claim and other potential issues and questions at argument (1.0hrs); comment on oral-argument outline (1.2hrs); draft potential oral-argument questions and answers (2.0hrs); emails re affirmative defenses (0.3hrs).	4.50	925.00	4,162.50
9/03/20	ZNF	Research obtaining jurisdiction over JPMorgan ██████████ under FRCP 4(k)(1)(b); whether there is basis to stay execution of a judgment pending resolution of a third-party indemnification claim; the mechanics of indemnification; and whether 4A-211(f) provides indemnification for loss or liability.	7.20	515.00	3,708.00

ROBBINS|RUSSELL

October 5, 2020
Invoice #: 200214

Date	Tkpr	Description	Hours	Rate	Amount
9/04/20	DB	Assist with oral argument preparation, including emails with team and associated analysis, and considering potential argument questions.	2.00	925.00	1,850.00
9/04/20	GAO	Prep for argument.	3.60	975.00	3,510.00
9/04/20	ZNF	Confer with Robbins Russell partner to discuss basis for bulge jurisdiction and research concerning pursuing indemnification claim in separate forum.	1.00	515.00	515.00
9/04/20	ZNF	Research whether there is a basis to stay execution pending resolution of a third-party indemnification claim, the mechanics of indemnification, and whether 4A-211(f) provides indemnification against loss or liability.	3.80	515.00	1,957.00
9/06/20	DB	Call with G. Orseck re oral argument issues.	.40	925.00	370.00
9/06/20	DB	Emails with G. Orseck and M. Madden re oral argument issues.	1.20	925.00	1,110.00
9/06/20	GAO	Prep for argument.	4.60	975.00	4,485.00
9/06/20	LCE	Communicate with team on additional relevant procurement contracts from California.	.20	605.00	121.00
9/07/20	DB	Emails with clients and team re oral argument issues.	.50	925.00	462.50
9/07/20	DB	Review briefing to prepare for argument.	1.00	925.00	925.00
9/07/20	GAO	Prep for argument.	4.50	975.00	4,387.50
9/08/20	DB	Prepare for and attend telephone argument on MTD.	1.00	925.00	925.00
9/08/20	DB	Call with co-counsel and clients re MTD argument.	.50	925.00	462.50
9/08/20	DB	Emails with team and clients re next steps.	.30	925.00	277.50
9/08/20	DIW	Confer with Z. Ferguson re discovery, data collection, first steps.	.30	275.00	82.50
9/08/20	GAO	Prep for and argument on motion to dismiss.	2.00	975.00	1,950.00
9/08/20	GAO	Post-mortem call with clients.	.50	975.00	487.50
9/08/20	GAO	Emails and discussions re next steps.	.50	975.00	487.50
9/08/20	LCE	Motion to Dismiss hearing.	.50	605.00	302.50
9/08/20	LCE	Review news on Citigroup wire case and send update to M. Madden and D. Burke.	.30	605.00	181.50
9/08/20	LCE	Review public procurement contracts for PPE with State of California and summarize key themes for M. Madden.	1.60	605.00	968.00
9/08/20	LCE	Review changes to requests for production from M. Madden.	1.30	605.00	786.50
9/08/20	LGW	Research publicly available California PPE procurement contracts for L. Esbrook.	2.00	275.00	550.00
9/08/20	MDB	Attend oral argument telephonically.	.20	605.00	121.00

ROBBINS|RUSSELL

October 5, 2020
Invoice #: 200214

Date	Tkpr	Description	Hours	Rate	Amount
9/08/20	MMM	Prepare for oral argument (1.0hr); participate in oral argument (0.5hr); confer internally and with client re MTD result (0.6hr); email team re MTD (0.2hr); prepare for client board meeting (0.2hr); participate in board meeting (0.6hr); emails re next steps (0.4hr).	3.50	925.00	3,237.50
9/08/20	ZNF	Review briefs for hearing; participate in electronic hearing.	.80	515.00	412.00
9/08/20	ZNF	Research jurisdictional and procedural questions related to third-party complaint	5.20	515.00	2,678.00
9/08/20	ZNF	Confer with Robbins Russell attorneys and litigation support to determine initial document-collection methods	.50	515.00	257.50
9/09/20	DB	Emails with team re next steps and agenda for client call.	.50	925.00	462.50
9/09/20	DB	Review scheduling order, including emails with team re same.	.30	925.00	277.50
9/09/20	GAO	Review and edit our draft written discovery.	.70	975.00	682.50
9/09/20	GAO	Prepare list of next steps and agenda items for client call.	.70	975.00	682.50
9/09/20	GAO	Review research on various items from D. Burke.	.30	975.00	292.50
9/09/20	GAO	Review scheduling order.	.10	975.00	97.50
9/09/20	GAO	Review transcript on motion to dismiss.	.30	975.00	292.50
9/09/20	KRM	Telephone conference with court reporter regarding motion to dismiss hearing transcript; emails with D. Burke regarding same.	.40	275.00	110.00
9/09/20	LCE	Research whether litigation funding is discoverable in 4th Circuit and send memo on same to M. Madden.	2.10	605.00	1,270.50
9/09/20	MMM	Edit draft document requests and interrogatories (1.7hrs); review scheduling order and draft email to client re same (0.6hr).	2.30	925.00	2,127.50
9/09/20	ZNF	Research and draft third-party complaint [REDACTED]	3.40	515.00	1,751.00
9/09/20	ZNF	Arrange discovery meeting with client and litigation support	.40	515.00	206.00
9/10/20	DB	Review research on litigation-funding discovery, including associated emails with G. Orseck and M. Madden.	.50	925.00	462.50
9/10/20	DB	Review draft document subpoenas, including associated emails with comments on same.	.50	925.00	462.50
9/10/20	DB	Call with G. Orseck and M. Madden re next step after MTD decision.	.80	925.00	740.00
9/10/20	DIW	Update litigation support team re call to begin collection efforts.	.10	275.00	27.50
9/10/20	GAO	Internal call with M. Madden and D. Burke re to-do list.	.80	975.00	780.00
9/10/20	GAO	Emails and discussions re written discovery.	.60	975.00	585.00
9/10/20	GAO	Prepare agenda for call.	.30	975.00	292.50
9/10/20	LCE	Research and draft proposed third-party subpoenas for state agencies.	2.40	605.00	1,452.00

ROBBINS|RUSSELL

October 5, 2020
Invoice #: 200214

Date	Tkpr	Description	Hours	Rate	Amount
9/10/20	MMM	Confer with G. Orseck and D. Burke re next steps and client call (0.8hr); email team re third-party discovery (0.4); edit document requests and interrogatories, including emails with client team re same (2.1hrs); edit board meeting minutes (0.4hr); edit proposed document requests to JPMC (0.5).	4.20	925.00	3,885.00
9/10/20	ZNF	Draft and revise Rule 45 subpoena and schedule for JPMorgan	3.90	515.00	2,008.50
9/10/20	ZNF	Research questions related to third-party complaint [REDACTED] [REDACTED]	.60	515.00	309.00
9/11/20	CCC	Emails with Z. Ferguson and L. Esbrook regarding subpoena addresses for NY, NY and Sacramento.	.20	275.00	55.00
9/11/20	DB	Call with clients re next steps, including associated preparation.	1.00	925.00	925.00
9/11/20	DB	Review scheduling orders for other recent cases and develop proposal for discovery deadlines.	.80	925.00	740.00
9/11/20	DB	Research re third-party claims and procedure.	.50	925.00	462.50
9/11/20	DIW	Review remaining claims for issues and possible implicated data sources, draft issues to address on call, telephone conference with clients and their IT personnel map data for collection efforts, follow-up discussions, call with B. Sharon, and notes to Z. Ferguson.	2.00	275.00	550.00
9/11/20	GAO	Prepare for and call with clients on next steps.	1.00	975.00	975.00
9/11/20	GAO	Telephone call with D. Evinger on various issues.	.30	975.00	292.50
9/11/20	GAO	Review proposed scheduling order from D. Burke.	.20	975.00	195.00
9/11/20	LCE	Draft notices and third party subpoenas for CA state agencies.	1.10	605.00	665.50
9/11/20	MAM	Conference call with Client re data collection.	.80	370.00	N/C
9/11/20	MMM	Confer with client re litigation strategy (1hr); edit motion (0.2hr); confer with Z. Ferguson re document collection (0.1hr); emails with team re next steps (0.3hr); emails with Z. Ferguson and LitSupport re document-collection parameters (0.3hr).	1.90	925.00	1,757.50
9/11/20	ZNF	Confer with client to determine initial document-collection protocols.	.80	515.00	412.00
9/11/20	ZNF	Prepare for 2PM discovery meeting with client	1.50	515.00	772.50
9/11/20	ZNF	Draft summary of meeting with client for partner; research and answer preliminary document-collection strategy questions.	2.00	515.00	1,030.00
9/11/20	ZNF	Revise Rule 45 subpoena to JPMorgan	1.80	515.00	927.00
9/13/20	CF	No Charge - Confer with G. Orseck	.60	605.00	N/C
9/13/20	MMM	Update task list and emails re open items.	.50	925.00	462.50
9/14/20	CCC	Emails with Z. Ferguson and L. Esbrook regarding subpoena addresses for NY, NY and Sacramento.	.20	275.00	55.00
9/14/20	CF	No Charge - Review case documents	2.30	605.00	N/C

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Date	Tkpr	Description	Hours	Rate	Amount
9/14/20	DB	Prepare draft of joint discovery plan, including review of scheduling orders in other recent cases.	1.50	925.00	1,387.50
9/14/20	GAO	Emails with team re division of responsibility for next steps in the litigation.	.20	975.00	195.00
9/14/20	GAO	Emails with JPMC counsel.	.20	975.00	195.00
9/14/20	GAO	Review notes of early interview with J. Brough and D. Evinger.	.40	975.00	390.00
9/14/20	LCE	Research issue of third party subpoenas.	1.90	605.00	1,149.50
9/14/20	MMM	Emails with colleagues regarding open items and tasks.	.80	925.00	740.00
9/14/20	ZNF	Review litigation documents to determine proper custodians for initial discovery collection.	2.40	515.00	1,236.00
9/15/20	CF	Participate in team meeting	.80	605.00	484.00
9/15/20	DB	Revise joint discovery plan and circulate same to opposing counsel.	.30	925.00	277.50
9/15/20	DB	Team meeting.	.50	925.00	462.50
9/15/20	GAO	Team meeting.	.40	975.00	390.00
9/15/20	GAO	Prepare for call with JPMC.	.20	975.00	195.00
9/15/20	GAO	Review draft joint discovery plan from D. Burke.	.20	975.00	195.00
9/15/20	GAO	Emails re insurance issues.	.20	975.00	195.00
9/15/20	LCE	Team call to discuss responsibilities.	.30	605.00	181.50
9/15/20	LCE	Draft additional paragraphs for answer.	2.50	605.00	1,512.50
9/15/20	LGW	Attend weekly team meeting.	.70	275.00	192.50
9/15/20	MMM	Edit Answer.	.40	925.00	370.00
9/15/20	MMM	Confer with team about open tasks and next steps.	.50	925.00	462.50
9/15/20	MMM	Edit discovery plan and emails re plan and 26(f) conference with SRZ.	.40	925.00	370.00
9/15/20	ZNF	Confer with Chain Bridge litigation team to discuss case strategy	.60	515.00	309.00
9/15/20	ZNF	Confer with client and litigation support to determine initial collection methods	1.60	515.00	824.00
9/16/20	DB	Call with J. Condren (JPM) and G. Orseck, including associated follow up discussion with G. Orseck.	.80	925.00	740.00
9/16/20	DIW	Review proposed eDiscovery collection date range, rationale, per Z. Ferguson and M. Madden, exchange email with Z. Ferguson re same.	.50	275.00	137.50
9/16/20	GAO	Telephone call with J. Condren (JPMC).	.70	975.00	682.50
9/16/20	GAO	Follow-up call with D. Burke.	.10	975.00	97.50
9/16/20	GAO	Follow-up call with P. Fitzgerald.	.30	975.00	292.50
9/16/20	LCE	Edit answer.	3.80	605.00	2,299.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/16/20	MMM	Email Z. Ferguson re document-collection parameters.	.10	925.00	92.50
9/16/20	ZNF	Research issues regarding third-party complaint	1.80	515.00	927.00
9/16/20	ZNF	Review account-opening documents for Blue Flame entities; email correspondence with client regarding discovery.	1.30	515.00	669.50
9/17/20	CF	Review and respond to correspondence	.30	605.00	181.50
9/17/20	DB	Review draft initial disclosures.	.50	925.00	462.50
9/17/20	DB	Call with G. Orseck and M. Madden to discuss strategy re JPM.	.40	925.00	370.00
9/17/20	DB	Research re common-interest privilege issues.	1.20	925.00	1,110.00
9/17/20	DIW	Technical advice re data collection for eDiscovery.	.10	275.00	27.50
9/17/20	GAO	Telephone call with J. Condren re multiple issues.	.70	975.00	682.50
9/17/20	GAO	Follow-up call with M. Madden and D. Burke.	.40	975.00	390.00
9/17/20	LCE	Edit answer for M. Madden.	.50	605.00	302.50
9/17/20	MMM	Confer with G. Orseck and D. Burke re communications with JPMC re case.	.50	925.00	462.50
9/17/20	ZNF	Research and draft third-party complaint [REDACTED]	1.90	515.00	978.50
9/18/20	CF	Confer with D. Burke	.20	605.00	121.00
9/18/20	CF	Research common interest privilege	5.10	605.00	3,085.50
9/18/20	DB	Research and analysis re common-interest privilege issues, including emails and discussion with A. Strasser and C. Forstein.	1.50	925.00	1,387.50
9/18/20	DIW	Exchange email with T. Ahmad, Z. Ferguson re email collection and encryption, stage .pst file with client email collection for processing, begin same.	1.90	275.00	522.50
9/18/20	GAO	Call with J. Condren.	.50	975.00	487.50
9/18/20	GAO	Follow-up to call with Condren.	.30	975.00	292.50
9/18/20	MMM	Edit Answer.	2.50	925.00	2,312.50
9/18/20	ZNF	Research and draft third-party complaint [REDACTED]	2.50	515.00	1,287.50
9/19/20	DIW	Complete email processing, load non-duplicates to ECA for assessment by Z. Ferguson, M. Madden, email to Z. Ferguson and LitSupport re status of ECA and password protected files.	1.10	275.00	302.50
9/19/20	ZNF	Research and draft third-party complaint [REDACTED]	5.80	515.00	2,987.00
9/20/20	ZNF	Research and draft third-party complaint against [REDACTED]	6.10	515.00	3,141.50
9/21/20	CF	Research common interest privilege	.90	605.00	544.50
9/21/20	CF	Review and respond to correspondence	.40	605.00	242.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/21/20	DB	Call with G. Orseck and M. Madden to prepare for conference with opposing counsel.	.30	925.00	277.50
9/21/20	DB	Prepare for and conduct conference with opposing counsel re discovery issues.	.50	925.00	462.50
9/21/20	DB	Review research from C. Forstein re common-interest issue.	.50	925.00	462.50
9/21/20	DB	Review draft third-party complaint.	1.00	925.00	925.00
9/21/20	MMM	Confer with G. Orseck and D. Burke about discovery plan (0.4hr); prepare for and participate in Rule 26(f) conference. (0.6hr).	1.00	925.00	925.00
9/21/20	ZNF	Draft third-party complaint [REDACTED] [REDACTED]	7.30	515.00	3,759.50
9/22/20	CF	No Charge - Participate in team meeting	.80	605.00	N/C
9/22/20	DB	Call with D. Evinger re various issues.	.70	925.00	647.50
9/22/20	DB	Revise third-party complaint.	.50	925.00	462.50
9/22/20	DB	Emails with client and opposing counsel re discovery plan.	.50	925.00	462.50
9/22/20	DB	Coordinate with Z. Ferguson re draft protective order.	.30	925.00	277.50
9/22/20	DB	Team meeting.	.50	925.00	462.50
9/22/20	DB	Review draft answer.	.60	925.00	555.00
9/22/20	GAO	Team meeting.	.50	975.00	487.50
9/22/20	GAO	Telephone call with S. Weisbrod re insurance issues.	.40	975.00	390.00
9/22/20	GAO	Emails with P. Fitzgerald re next steps.	.20	975.00	195.00
9/22/20	LCE	Team call to discuss scheduling deadlines.	.50	605.00	302.50
9/22/20	MMM	Review discovery plan (0.1hr); participate in team strategy call (0.5hr); edit answer, defenses, and counterclaims (7.4hrs).	8.00	925.00	7,400.00
9/22/20	ZNF	Confer with Chain Bridge litigation team to discuss case strategy	.50	515.00	257.50
9/22/20	ZNF	Draft protective order, motion, and memorandum in support of motion	2.10	515.00	1,081.50
9/23/20	CF	Review and respond to correspondence	.40	605.00	242.00
9/23/20	DB	Comment on draft answer, including associated emails with M. Madden.	1.00	925.00	925.00
9/23/20	DB	Review draft protective order.	.50	925.00	462.50
9/23/20	LCE	Research defense of necessity for affirmative defenses.	1.20	605.00	726.00
9/23/20	MMM	Edit answer (1.9hrs); email L. Esbrook regarding open questions on affirmative defenses (0.4hr).	2.30	925.00	2,127.50
9/23/20	ZNF	Draft protective order, motion, and memorandum in support of motion	2.70	515.00	1,390.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/24/20	DB	Work on attorney's fees counterclaims, including coordinate with G. Orseck and L. Esbrook, and editing draft from L. Esbrook.	2.20	925.00	2,035.00
9/24/20	GAO	Telephone call with Analysis Group re potential testifying experts.	.60	975.00	585.00
9/24/20	GAO	Telephone call with J. Condren and follow-up emails with client and team.	.80	975.00	780.00
9/24/20	GAO	Work on potential counter-claim for attorneys fees.	.80	975.00	780.00
9/24/20	LCE	Answer follow up questions on affirmative defenses and counterclaims research.	1.50	605.00	907.50
9/24/20	LCE	Draft counterclaim and correspond with D. Burke and G. Orseck re same.	3.80	605.00	2,299.00
9/24/20	ZNF	Research legal basis for asserting counterclaim based on breach of account agreement.	.50	515.00	257.50
9/25/20	DB	Work on draft protective order, including review and revising draft, analysis re potential impact of subpoenas, and circulating draft to client and opposing counsel.	1.50	925.00	1,387.50
9/25/20	DB	Emails with M. Madden re potential counterclaims.	.40	925.00	370.00
9/25/20	DB	Initial review of discovery responses, including circulating same to clients.	.80	925.00	740.00
9/25/20	DB	Revise third-party complaint.	1.00	925.00	925.00
9/25/20	GAO	Review and edit counterclaim.	1.00	975.00	975.00
9/25/20	GAO	Review resumes for experts.	.30	975.00	292.50
9/25/20	GAO	Emails re protective order terms.	.20	975.00	195.00
9/25/20	GAO	Review BF's discovery responses.	.40	975.00	390.00
9/25/20	LCE	Analyze potential additional counterclaims and affirmative defenses for M. Madden.	.60	605.00	363.00
9/25/20	MMM	Edit answer, defenses, and counterclaims (1.7hrs); review and comment on protective order (0.3hr).	2.00	925.00	1,850.00
9/25/20	ZNF	Revise draft protective order.	.90	515.00	463.50
9/25/20	ZNF	Review draft answer to complaint.	.80	515.00	412.00
9/27/20	GAO	Review comments on Answer and Counterclaims.	.30	975.00	292.50
9/27/20	GAO	Emails with Analysis Group re experts.	.20	975.00	195.00
9/27/20	MMM	Edit answer, defenses, and counterclaims.	2.50	925.00	2,312.50
9/28/20	CF	Analyze responses and objections to CBB First RFPs	3.60	605.00	2,178.00
9/28/20	DB	Review analysis re discovery responses.	.50	925.00	462.50
9/28/20	GAO	Review P. Fitzgerald comments on answer.	.20	975.00	195.00
9/28/20	GAO	Review and address email from M. Madden re items on our to-do list.	.30	975.00	292.50

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Date	Tkpr	Description	Hours	Rate	Amount
9/28/20	LCE	Analyze responses to requests for production and information for D. Burke.	2.90	605.00	1,754.50
9/28/20	LCE	Analyze bringing claims for individuals as counterclaim plaintiffs.	1.20	605.00	726.00
9/28/20	LCE	Call with M. Cole and prepare for same.	1.30	605.00	786.50
9/28/20	LCE	Polish and circulate notes from call with M. Cole.	.30	605.00	181.50
9/28/20	LCE	Revise answer per M. Madden's instruction and proof.	1.70	605.00	1,028.50
9/28/20	LCE	Track down email to respond to final outstanding paragraph of complaint.	.60	605.00	363.00
9/28/20	MAM	Review and respond to emails from Z. Ferguson re access to the ECA and user credentials.	.80	370.00	296.00
9/28/20	MMM	Email team re open tasks (0.6hr); confer with D. Evinger (x2) re answer (0.5hr); prepare and do M. Cole interview (1.5hrs); confer with J. Brough re answer (0.2hrs).	2.80	925.00	2,590.00
9/28/20	ZNF	Revise draft initial disclosures.	.70	515.00	360.50
9/28/20	ZNF	Review Blue Flame's objections to RFPs and interrogatories	1.10	515.00	566.50
9/29/20	CF	Revise analysis of responses and objections to CBB First RFPs	1.90	605.00	1,149.50
9/29/20	DB	Follow-up on draft protective order, including review of revisions from opposing counsel and associated emails with client.	.50	925.00	462.50
9/29/20	DB	Revise draft initial disclosures, including review of client emails and discussion with Z. Ferguson re status of document collection.	1.20	925.00	1,110.00
9/29/20	DB	Final review of answer and counterclaims.	.50	925.00	462.50
9/29/20	GAO	Emails with Analysis Group re potential experts.	.30	975.00	292.50
9/29/20	GAO	Telephone call with P. Fitzgerald on multiple issues.	.30	975.00	292.50
9/29/20	GAO	Review protective order.	.20	975.00	195.00
9/29/20	GAO	Final review of answer and counterclaims.	.50	975.00	487.50
9/29/20	LCE	Redact exhibits for counterclaims.	.50	605.00	302.50
9/29/20	LCE	Draft pro hac vice motion and correspond with assistant on filing.	.20	605.00	121.00
9/29/20	LCE	Final edits and proof of answer, affirmative defenses, and counterclaims, and file.	3.10	605.00	1,875.50
9/29/20	LGW	Revise pro hac application for L. Esbrook; redact exhibits with comments from L. Esbrook.	2.30	275.00	632.50
9/29/20	MAM	Respond to email from Z. Ferguson re de-duplication of documents in the database.	.20	370.00	74.00
9/29/20	MMM	Edit and finalize answer, defenses, and counterclaims (2.4hrs); emails regarding open tasks (0.5hr); confer with team members (0.3hr).	3.20	925.00	2,960.00

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Date	Tkpr	Description	Hours	Rate	Amount
9/29/20	ZNF	Revise initial disclosures	1.10	515.00	566.50
9/29/20	ZNF	Review Blue Flame's RFPs and interrogatories; research basis on which to object and identify issues raised by RFPs and interrogatories; draft summary of RFP and interrogatory issues and potential objections.	5.50	515.00	2,832.50
9/30/20	CF	Participate in team meeting	.80	605.00	484.00
9/30/20	DB	Team meeting.	.80	925.00	740.00
9/30/20	DB	Revise draft initial disclosures in response to comments from M. Madden and related emails with team.	.70	925.00	647.50
9/30/20	GAO	Prepare for team meeting.	.60	975.00	585.00
9/30/20	GAO	Telephone call with J. Condren.	.50	975.00	487.50
9/30/20	GAO	Emails to clients re JPMC.	.20	975.00	195.00
9/30/20	GAO	Telephone call with P. Fitzgerald re next steps.	.30	975.00	292.50
9/30/20	GAO	Review and edit our initial disclosures.	.40	975.00	390.00
9/30/20	LCE	Call with team to discuss agenda for week.	.60	605.00	363.00
9/30/20	LCE	Draft and send emails to California public agencies on public records requests.	.90	605.00	544.50
9/30/20	LCE	Submit pro hac vice motion.	.20	605.00	121.00
9/30/20	LCE	Find example discovery letters for response to objections to RFPs.	.30	605.00	181.50
9/30/20	MMM	Review initial disclosures (0.3hr); draft task list and team meeting agenda (0.7hr); review summaries of BF interrogatories and document requests and email Z. Ferguson regarding same (0.4hr); participate in team meeting (0.7hr); confer with Z. Ferguson regarding search terms (0.2hr); edit email to California agencies regarding public-records requests (0.1hr); email D. Evinger regarding document production (0.3hr).	2.70	925.00	2,497.50
9/30/20	ZNF	Confer with Chain Bridge team to discuss litigation strategy	1.10	515.00	566.50
9/30/20	ZNF	Revise initial disclosures to incorporate partner input	.60	515.00	309.00
TOTAL PROFESSIONAL SERVICES				\$ 213,253.00	

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October 5, 2020
Invoice #: 200214**SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Hours	Rate	Total
Megan D Browder	MDB	.20	605.00	121.00
Donald Burke	DB	44.50	925.00	41,162.50
Christine A Chase Carpino	CCC	.40	275.00	110.00
Leslie Esbrook	LCE	46.80	605.00	28,314.00
Zachary N Ferguson	ZNF	85.90	515.00	44,238.50
Carolyn Forstein	CF	14.40	605.00	8,712.00
Matthew M Madden	MMM	48.30	925.00	44,677.50
Michael A McClain, Jr.	MAM	1.00	370.00	370.00
Kate R Miller	KRM	.40	275.00	110.00
Gary A. Orseck	GAO	43.50	975.00	42,412.50
Dana I. Wesley Sarti	DIW	6.00	275.00	1,650.00
Lyndsay G Webb	LGW	5.00	275.00	1,375.00
Total		296.40		\$ 213,253.00

EXPENSES

Description	Amount
In-house copying charges	277.20
Computer Research Charges	1,944.56
Courier/Overnight delivery	122.68
Trial and Hearing Transcripts	101.50
Long Distance Telephone	10.53
Filing Fees	75.00
TOTAL EXPENSES	\$ 2,531.47
TOTAL THIS INVOICE	\$ 215,784.47

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Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

October 5, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200214
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 215,784.47

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200214, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

November 11, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200356
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: October 31, 2020.

RE: Blue Flame

Total Professional Services	\$ 309,698.00
Less Courtesy Discount	<u>\$ -10,000.00</u>
Net Professional Services	\$ 299,698.00
Total Expenses	<u>\$ 3,283.81</u>
TOTAL THIS INVOICE	\$ 302,981.81

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November 11, 2020
Invoice #: 200356

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
10/01/20	DB	Review draft initial disclosures and circulate same to client, including associated review of insurance contracts and emails with insurance counsel.	.80	925.00	740.00
10/01/20	DB	Follow up with C. Forstein re research on common interest communications.	.20	925.00	185.00
10/01/20	GAO	Review summary of initial disclosures for clients.	.30	975.00	292.50
10/01/20	GAO	Emails with M. Chakraborty re PPE expert.	.20	975.00	195.00
10/01/20	LCE	Review proposed search terms for Z. Ferguson.	.30	605.00	181.50
10/01/20	LCE	Draft objection letter to response to requests for production.	4.00	605.00	2,420.00
10/01/20	MMM	Review and comment on search parameters (0.3hr); draft email to D. Evinger and J. Brough regarding BFM document requests (0.2hr).	.50	925.00	462.50
10/01/20	ZNF	Draft search terms to respond to BFM's RFP; confer with partner about same; outline discrete categories of documents not collected from initial document collection;	3.10	515.00	1,596.50
10/02/20	CF	Summarize common interest research.	1.20	605.00	726.00
10/02/20	DB	Review and comment on research from C. Forstein re common interest communications.	.50	925.00	462.50
10/02/20	DB	Review and address comments from client on draft initial disclosures, including associated emails with Z. Ferguson.	.80	925.00	740.00
10/02/20	DB	Supervise discovery issues, including emails with team re search terms and preparation for production of insurance policies.	.50	925.00	462.50
10/02/20	DB	Edit letter to opposing counsel re discovery objections.	1.00	925.00	925.00
10/02/20	DIW	Review email re email collection and searches to narrow for likely review, exchange email with Z. Ferguson and M. McClain re same.	.20	275.00	55.00
10/02/20	GAO	Prepare for and call with Charles Grice re potential expert testimony.	.90	975.00	877.50
10/02/20	GAO	Emails with client re experts.	.30	975.00	292.50
10/02/20	LCE	Review and analyze emails related to plaintiff's new businesses.	.20	605.00	121.00
10/02/20	LCE	Organize public records received from California.	.20	605.00	121.00
10/02/20	ZNF	Revise search terms for CBB production; confer with client to initiate second collection of documents.	.90	515.00	463.50

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November 11, 2020
Invoice #: 200356

Date	Tkpr	Description	Hours	Rate	Amount
10/04/20	LCE	Review production by California and summarize for team.	2.00	605.00	1,210.00
10/04/20	ZNF	Draft responses and objections to BFM's first set of requests for production; research bases for same.	7.70	515.00	3,965.50
10/05/20	CF	Draft objections to BFM interrogatories.	2.30	605.00	1,391.50
10/05/20	DB	Edit letter to opposing counsel re discovery objections.	.50	925.00	462.50
10/05/20	DB	Coordinate filing of stipulated protective order.	.20	925.00	185.00
10/05/20	DB	Call with Analysis Group re potential PPE experts.	.60	925.00	555.00
10/05/20	DB	Edit third-party complaint.	1.50	925.00	1,387.50
10/05/20	DIW	Decrypt, move eDocs and newly collected additional email into processing queue, confer with D. Burke, Z. Ferguson and M. McClain re same, verify methodology for search term filtering to identify review population.	3.50	275.00	962.50
10/05/20	GAO	Telephone call with Analysis Group re potential PPE expert.	.60	975.00	585.00
10/05/20	LCE	Revise letter for meet and confer on requests for production for D. Burke.	.90	605.00	544.50
10/05/20	MAM	Respond to email from Z. Ferguson re search term edits and hit count reports.	.10	370.00	37.00
10/05/20	MAM	Draft email to Z. Ferguson re clarification on search terms and time periods.	.30	370.00	111.00
10/05/20	MAM	Edit search terms and run search hit reports.	.80	370.00	296.00
10/05/20	MMM	Prepare for (0.2hr) and call (0.8hr) J. Brough and D. Evinger regarding Blue Flame document requests.	1.00	925.00	925.00
10/05/20	MMM	Emails with Z. Ferguson regarding document collection.	.20	925.00	185.00
10/05/20	MMM	Edits to letter to Blue Flame regarding document-request objections and emails regarding same.	1.50	925.00	1,387.50
10/05/20	ZNF	Draft objections and responses to Plaintiff's requests for production	2.10	515.00	1,081.50
10/05/20	ZNF	Confer with client regarding document collection; coordinate document collection efforts among litigation support team.	1.80	515.00	927.00
10/06/20	CF	Participate in team meeting.	.70	605.00	423.50
10/06/20	CF	Research local rules on discovery objections.	1.20	605.00	726.00
10/06/20	DB	Team meeting re status and open tasks.	.70	925.00	647.50
10/06/20	DB	Revisions to third-party complaint in response to comments from M. Madden and G. Orseck.	.80	925.00	740.00
10/06/20	DB	Call with G. Orseck re third-party complaint.	.40	925.00	370.00
10/06/20	DB	Review proposed production of insurance policies for initial disclosures.	.40	925.00	370.00
10/06/20	DIW	Review document request, draft production specifications, confirm same with Z. Ferguson, stage public documents in Casepoint for use with witnesses.	1.60	275.00	440.00

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10/06/20	GAO	Review and edit third-party complaint against JPMC.	.50	975.00	487.50
10/06/20	GAO	Telephone call with D. Burke re third-party complaint.	.40	975.00	390.00
10/06/20	GAO	Weekly team meeting.	.70	975.00	682.50
10/06/20	GAO	Review research on [REDACTED]	.20	975.00	195.00
10/06/20	GAO	Review letter to Schulte taking issue with their objections to our document requests.	.20	975.00	195.00
10/06/20	LCE	Weekly call to discuss upcoming work.	.80	605.00	484.00
10/06/20	LCE	Research authentication of state public records documents.	1.80	605.00	1,089.00
10/06/20	LCE	Start discovery outline.	1.00	605.00	605.00
10/06/20	LCE	Prepare documents for client from public record production and summarize for D. Burke.	.80	605.00	484.00
10/06/20	LCE	Final edits to letter to opposing counsel and send.	.50	605.00	302.50
10/06/20	MAM	Edit search terms and run search hit reports.	1.90	370.00	703.00
10/06/20	MAM	Respond to email from D. Sarti re setting up of coding panel for 1st level review.	.20	370.00	74.00
10/06/20	MAM	Respond to email from Z. Ferguson re coding template format.	.10	370.00	37.00
10/06/20	MAM	Draft email to Z. Ferguson responding to questions related to search term syntax, search term hits, and revised search term parameters.	.80	370.00	296.00
10/06/20	MMM	Draft task list and meeting agenda, then participate in weekly team meeting.	1.70	925.00	1,572.50
10/06/20	MMM	Emails regarding [REDACTED] privilege and fact/depositions outline.	.80	925.00	740.00
10/06/20	MMM	Review draft 3d party complaint.	.30	925.00	277.50
10/06/20	MMM	Review proposed search-terms hit report and make suggestions for tailoring responsive-document searches.	.30	925.00	277.50
10/06/20	MMM	Review call recordings and draft emails regarding same.	.50	925.00	462.50
10/06/20	MMM	Edit and finalize discovery letter to Blue Flame.	.20	925.00	185.00
10/06/20	ZNF	Confer with Chain Bridge litigation team to discuss litigation strategy.	.70	515.00	360.50
10/06/20	ZNF	Coordinate discovery with litigation support team	2.30	515.00	1,184.50
10/06/20	ZNF	Review and revise 3d party complaint	1.10	515.00	566.50
10/06/20	ZNF	Review documents from client to determine relevant to discovery demands	1.60	515.00	824.00
10/07/20	CCC	Prepare courtesy copy for Court; assist with transcriptions of voice recordings.	.40	275.00	110.00
10/07/20	CF	Correspond with Z. Ferguson and L. Esbrook re document review	.50	605.00	302.50
10/07/20	CF	Review and respond to correspondence re case development.	.30	605.00	181.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/07/20	DB	Finalize and serve initial disclosures, including production of insurance policies.	.50	925.00	462.50
10/07/20	DB	Circulate draft third-party complaint to clients and respond to follow-up inquiries.	.50	925.00	462.50
10/07/20	DIW	Convert proprietary file type audio recordings to universal audio format.	.20	275.00	55.00
10/07/20	DIW	Prepare production specifications for CBB001, load new data to document review workspace, exchange email with Z. Ferguson re tasks, verify production CBB001 and load for service on counsel.	2.30	275.00	632.50
10/07/20	GAO	Listen to and comment on recordings of conversations with JPMC and California.	.50	975.00	487.50
10/07/20	GAO	Emails with team re discovery.	.30	975.00	292.50
10/07/20	LCE	Draft and send email to client summarizing California public records production.	.40	605.00	242.00
10/07/20	LCE	Direct litigation support team on uploading discovery to CasePoint.	.30	605.00	181.50
10/07/20	LCE	Prepare deposition outline.	.50	605.00	302.50
10/07/20	LGW	Transcribe recordings of phone conversations received from J. Brough.	4.00	275.00	1,100.00
10/07/20	MAM	Review search term hits and draft a search term hit report reflecting Search Term Hits #1 for Z. Ferguson.	3.80	370.00	1,406.00
10/07/20	MAM	Respond to emails from Z. Ferguson re search terms and associated hits.	.20	370.00	74.00
10/07/20	MMM	Emails with L. Esbrook and Z. Ferguson re California production and Bank document collection and review.	.60	925.00	555.00
10/07/20	ZNF	Coordinate collection and review of documents from client; coordinate transcription of recordings; coordinate production of insurance documents to be served in connection with initial disclosures.	4.80	515.00	2,472.00
10/08/20	DB	Review initial disclosure and circulate same to clients.	.30	925.00	277.50
10/08/20	DB	Coordinate service of third-party complaint.	.50	925.00	462.50
10/08/20	DB	Call with Analysis Group re potential PPE expert.	.40	925.00	370.00
10/08/20	DIW	Process additional client email collection for possible review, exchange email with N. Ferguson re same.	1.20	275.00	330.00
10/08/20	GAO	Telephone call with Analysis Group re potential PPE expert.	.50	975.00	487.50
10/08/20	LCE	Draft discovery outline.	3.50	605.00	2,117.50
10/08/20	LCE	Review Z. Ferguson findings on consent for recorded discovery.	.10	605.00	60.50
10/08/20	LGW	Revise transcriptions of recordings of phone conversations with comments from Z. Ferguson.	1.00	275.00	275.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/08/20	MAM	Respond to email from Z. Ferguson re updated search term and associated hits.	.10	370.00	37.00
10/08/20	MMM	Edit objections to interrogatories and email Z. Ferguson regarding same.	.80	925.00	740.00
10/08/20	ZNF	Research legality of phone recordings under federal and state law; research questions related to jurisdiction over JPM for third-party complaint;	6.20	515.00	3,193.00
10/09/20	DB	Meet and confer call with opposing counsel re document requests, including associated follow-up discussion with M. Madden.	.90	925.00	832.50
10/09/20	DB	Review comments from client on third-party complaint.	.50	925.00	462.50
10/09/20	DB	Call with A. Schoenfeld (Wilmer) re anticipated filing of third-party complaint.	.40	925.00	370.00
10/09/20	DIW	Unitize, endorse, code email data, and load CA public documents for review, instructions to Casepoint team re implementation of data overlay.	5.00	275.00	1,375.00
10/09/20	GAO	Review new document requests from Blue Flame.	.20	975.00	195.00
10/09/20	GAO	Download on meet and confer with Schulte.	.20	975.00	195.00
10/09/20	LCE	Prepare for meet and confer on discovery obligations and call on same with opposing counsel.	2.00	605.00	1,210.00
10/09/20	LCE	Read news article on Blue Flame from L. Webb.	.20	605.00	121.00
10/09/20	LCE	Correspond with Z. Ferguson and litigation support team on discovery review process.	.50	605.00	302.50
10/09/20	LGW	Revise background materials with comments from L. Esbrook.	.50	275.00	137.50
10/09/20	MAM	Analyze potentially relevant documents and provide search term hit counts to Z. Ferguson.	2.50	370.00	925.00
10/09/20	MMM	Edit objections to Blue Flame's requests for production.	1.90	925.00	1,757.50
10/09/20	MMM	Prepare for meet and confer on discovery objections by reviewing objections, correspondence, and outlining key issues for call (1.5hrs); participate in meet and confer (0.6hr); confer with D. Burke regarding results of meet and confer and next steps (0.3hrs); email team regarding same (0.3hr).	2.70	925.00	2,497.50
10/09/20	ZNF	Revise responses and objections to BFM's interrogatories; revise responses and objections to BFM's requests for production; revise third-party complaint; draft search terms for CBB production in response to BFM's requests for production.	8.90	515.00	4,583.50
10/10/20	DB	Revise draft third-party complaint and circulate same to clients.	.50	925.00	462.50
10/10/20	MMM	Edit objections to interrogatories.	1.20	925.00	1,110.00
10/11/20	MMM	Edit objections to interrogatories.	.50	925.00	462.50
10/11/20	MMM	Edit objections to document requests.	1.50	925.00	1,387.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/11/20	ZNF	Revise CBB's responses and objections to BFM's interrogatories.	.90	515.00	463.50
10/12/20	CF	Review and respond to correspondence.	.50	605.00	302.50
10/12/20	CF	Confer with M. Madden re interrogatory responses.	.30	605.00	181.50
10/12/20	CF	Review objections to CBB interrogatories.	.40	605.00	242.00
10/12/20	DB	Revise third-party complaint.	.80	925.00	740.00
10/12/20	DB	Call with G. Orseck re revisions to third-party complaint.	.50	925.00	462.50
10/12/20	DB	Circulate revised draft of third-party complaint to clients, including email summarizing revisions and flagging exhibits for review.	.60	925.00	555.00
10/12/20	DIW	Verify and folder CA public records in Review data store, load audio files and transcripts of same to discovery database.	.10	275.00	27.50
10/12/20	DIW	Verify and folder processed CA public records in Review data store, promote, search and batch email for review, email to T. Ahmad re collection of eDocs.	2.50	275.00	687.50
10/12/20	GAO	Telephone call with potential PPE expert.	.80	975.00	780.00
10/12/20	GAO	Prepare letter to potential PPE expert.	.50	975.00	487.50
10/12/20	GAO	Telephone call with D. Burke re revisions to third-party complaint.	.50	975.00	487.50
10/12/20	GAO	Review and revise our objections to BF's interrogatories.	.40	975.00	390.00
10/12/20	MAM	Confer with D. Sarti and Z. Ferguson re document review next steps.	.20	370.00	74.00
10/12/20	MAM	Finalize document set for review.	.10	370.00	37.00
10/12/20	MMM	Edit objections to requests for production.	2.00	925.00	1,850.00
10/12/20	MMM	Confer with Z. Ferguson re document review.	.20	925.00	185.00
10/12/20	MMM	Confer with C. Forstein re interrogatory responses.	.20	925.00	185.00
10/12/20	MMM	Emails with Z. Ferguson regarding JPM document requests.	.20	925.00	185.00
10/12/20	MMM	Emails with D. Burke regarding client interviews.	.20	925.00	185.00
10/12/20	MMM	Email Z. Ferguson re structure of review of plaintiff's document production.	.20	925.00	185.00
10/12/20	MMM	Edit document requests to JPM.	.40	925.00	370.00
10/12/20	ZNF	Revise and review request for production responses; coordinate review of outgoing discovery production; draft request for production for JPMorgan.	4.50	515.00	2,317.50
10/13/20	CF	Participate in team meeting.	.70	605.00	423.50
10/13/20	CF	Review and respond to correspondence.	.60	605.00	363.00
10/13/20	CF	Review CBB interrogatory responses.	.50	605.00	302.50
10/13/20	DB	Finalize third-party complaint for filing.	.40	925.00	370.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/13/20	DIW	Add discovery review attorney user and batch documents for review; instructions and data to tech team re audio files and transcripts of same for review database	2.20	275.00	605.00
10/13/20	GAO	Weekly team meeting.	.80	975.00	780.00
10/13/20	GAO	Review and comment on list of potential deponents.	.20	975.00	195.00
10/13/20	GAO	Review and comment on our RFPs and Interrogatories.	.60	975.00	585.00
10/13/20	IEC	Confer with M. McClain re: background and protocol for document review.	.50	370.00	185.00
10/13/20	IEC	Review complaint for case with focus on document requests.	.50	370.00	185.00
10/13/20	IEC	Review and analyze documents for privilege and responsiveness.	6.50	370.00	2,405.00
10/13/20	LCE	Weekly call with team.	1.00	605.00	605.00
10/13/20	LCE	Review discovery material for deposition outline.	.30	605.00	181.50
10/13/20	LCE	Call and follow up emails on public record authentication.	.20	605.00	121.00
10/13/20	LCE	Discuss discovery review strategy with C. Forstein and Z. Ferguson.	.30	605.00	181.50
10/13/20	MAM	Draft email to attorney reviewers re case background, review protocol, and instructions for review.	.90	370.00	333.00
10/13/20	MAM	Draft email to attorney reviewers re privileged individuals and the treatment of privileged documents.	.30	370.00	111.00
10/13/20	MAM	Confer with I. Cohen re case background and review protocol.	.40	370.00	148.00
10/13/20	MAM	Analyze custodial documents for relevance and privilege.	3.00	370.00	1,110.00
10/13/20	MMM	Edit doc requests to JPM.	.20	925.00	185.00
10/13/20	MMM	Draft potential interrogatories to JPM.	.30	925.00	277.50
10/13/20	MMM	Prepare for (0.2hr) and participate in (0.8hr) weekly team strategy meeting.	1.00	925.00	925.00
10/13/20	MMM	Analyze potential deponents and schedule and draft email to team regarding same.	.50	925.00	462.50
10/13/20	MMM	Review Blue Flame interrogatory responses.	.40	925.00	370.00
10/13/20	MMM	Emails with client and D. Burke about witness interviews.	.30	925.00	277.50
10/13/20	ZNF	Revise third-party complaint; confer with Robbins Russell attorneys to discuss litigation strategy; draft interrogatories; coordinate incoming and outgoing discovery productions.	5.90	515.00	3,038.50
10/14/20	DIW	High level analysis of incoming BFM production, send to CP with instructions to load for attorney review, analyze loaded data for anomalies and errors to raise with attorney team and producing party.	1.40	275.00	385.00
10/14/20	GAO	Review BF response to our interrogatories.	.30	975.00	292.50
10/14/20	GAO	Review article on mask procurement from P. Fitzgerald.	.20	975.00	195.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/14/20	GAO	Review BF text messages.	.30	975.00	292.50
10/14/20	IEC	Review and analyze documents for privilege and responsiveness.	7.90	370.00	2,923.00
10/14/20	LCE	Divide up interviews and correspond with team on same.	.30	605.00	181.50
10/14/20	LCE	Finish shell for deposition outline and send to team.	.90	605.00	544.50
10/14/20	LCE	Draft interview outlines for M. Castagnello and M. Richardson.	2.60	605.00	1,573.00
10/14/20	LCE	Correspond with team on plaintiff's strategy and requests for production.	.50	605.00	302.50
10/14/20	MAM	Draft privilege and relevance terms and set up associated highlighting for review.	.90	370.00	333.00
10/14/20	MAM	Respond to emails from Z. Ferguson re status of review and progress reports.	.20	370.00	74.00
10/14/20	MAM	Draft email to Discovery Attorneys re status of the review and questions.	.30	370.00	111.00
10/14/20	MMM	Emails regarding setting up and preparing for interviews.	.40	925.00	370.00
10/14/20	MMM	Email Z. Ferguson regarding documents received from Blue Flame and protocol for review and reporting of key findings.	.30	925.00	277.50
10/14/20	MMM	Emails with associates regarding open discovery items.	.30	925.00	277.50
10/14/20	ZNF	Formulate review protocol for Blue Flame production; review Blue Flame production; coordinate discovery.	2.20	515.00	1,133.00
10/15/20	DB	Interview with M. Richardson.	1.00	925.00	925.00
10/15/20	DB	Review interview outline and prepare for interview with M. Richardson.	1.00	925.00	925.00
10/15/20	DB	Emails with Z. Ferguson re document review issues.	.50	925.00	462.50
10/15/20	DB	Review and comment on Ribeiro and Mojica interview outlines, including review of document collection for relevant emails.	1.50	925.00	1,387.50
10/15/20	DIW	Technical assistance with discovery, including process and load new client eDocs.	1.00	275.00	275.00
10/15/20	GAO	Emails with Analysis Group re potential experts.	.20	975.00	195.00
10/15/20	IEC	Review and analyze documents for privilege and responsiveness.	9.00	370.00	3,330.00
10/15/20	LCE	Interview with Mike Richardson.	1.00	605.00	605.00
10/15/20	LCE	Revise interview outline and prepare for Mike Richardson interview.	1.40	605.00	847.00
10/15/20	LCE	Clean up notes for M. Richardson interview.	.70	605.00	423.50
10/15/20	LCE	Revise interview outline for M. Castagnello.	.40	605.00	242.00
10/15/20	MAM	Review document review progress and send status update to case team.	.20	370.00	74.00

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10/15/20	MAM	Analyze custodial documents for relevance and privilege.	5.30	370.00	1,961.00
10/15/20	MAM	Edit search terms hits and compile search term hit report for Z. Ferguson.	.40	370.00	148.00
10/15/20	MAM	Respond to emails from Z. Ferguson re review project staffing and project timelines.	.40	370.00	148.00
10/15/20	MAM	Draft email to D. Sarti and Z. Ferguson re BFM incoming collection issues.	.20	370.00	74.00
10/15/20	MMM	Emails with team regarding interviews and document review.	.40	925.00	370.00
10/15/20	ZNF	Draft interview outlines for Thais Ribeiro and Claudia Mojica-Guadron; coordinate initial review of CBB documents; coordinate processing of BFM production.	6.80	515.00	3,502.00
10/16/20	CF	Draft responses to interrogatories.	1.20	605.00	726.00
10/16/20	DB	Prepare for witness interviews.	.50	925.00	462.50
10/16/20	DB	Interviews with T. Rebeiro and C. Mojica.	2.00	925.00	1,850.00
10/16/20	DB	Emails with A. Schoenfeld (Wilmer) re service issues.	.30	925.00	277.50
10/16/20	DIW	Confer with A. Ribadia of tech team re conversion of client email to Eastern rather than GMT, review email threading and similarity options for BFM production and implement same.	3.40	275.00	935.00
10/16/20	IEC	Review and analyze documents for privilege and responsiveness.	8.00	370.00	2,960.00
10/16/20	MAM	Confer with D. Sarti re BFM production documents and isolating unique documents in the collection.	.60	370.00	222.00
10/16/20	MAM	Review document review progress and send status update to case team.	.10	370.00	37.00
10/16/20	MAM	Respond to email from Z. Ferguson re duplicates.	.10	370.00	37.00
10/16/20	MAM	Update privilege and relevance terms and modify associated highlighting.	.90	370.00	333.00
10/16/20	MAM	Edit search terms and send search term hit report to Z. Ferguson.	.90	370.00	333.00
10/16/20	ZNF	Interview Claudia Mojica-Guadron and Thais Ribeiro; revise interview notes; confer with client to discuss IT policies concerning call recordings; draft email to CBB litigation team concerning call recordings.	4.70	515.00	2,420.50
10/17/20	ZNF	Consolidate and revise interview notes for interviews with Claudia Mojica and Thais Ribeiro.	2.30	515.00	1,184.50
10/18/20	CF	Draft responses to interrogatories.	2.60	605.00	1,573.00
10/18/20	CF	Prepare outline for H. Schoeppe interview.	1.80	605.00	1,089.00
10/18/20	DB	Review outline for Castagnello interview, including associated emails with L. Esbrook.	.60	925.00	555.00
10/18/20	LCE	Prepare for interview with M. Castagnello.	1.10	605.00	665.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/18/20	MAM	Analyze custodial documents for relevance and privilege.	3.00	370.00	1,110.00
10/19/20	CCC	Serve Summons and Third-Party Complaint on registered agent.	.30	275.00	82.50
10/19/20	CF	Revise interview notes.	1.40	605.00	847.00
10/19/20	DB	Interviews with M. Castagnello and H. Schoeppe, including associated preparation and follow up.	2.60	925.00	2,405.00
10/19/20	DB	Emails with team re Bank call recordings.	.60	925.00	555.00
10/19/20	DIW	Confer with M. McClain, Z. Ferguson re threaded review of BFM incoming production, set up new coding template and tags for same; prepare cross reference for network file share records.	3.60	275.00	990.00
10/19/20	GAO	Emails with D. Burke re call records at the Bank.	.20	975.00	195.00
10/19/20	LCE	Prepare for M. Castagnello interview.	.70	605.00	423.50
10/19/20	LCE	M. Castagnello interview.	1.20	605.00	726.00
10/19/20	LCE	Clean up notes from M. Castagnello interview.	.70	605.00	423.50
10/19/20	MAM	Confer with R. Kearny re case overview and coding protocol.	.30	370.00	111.00
10/19/20	MAM	Analyze custodial documents for relevance and privilege.	4.30	370.00	1,591.00
10/19/20	RHK	Telephone call with M. McClain to discuss review of documents.	.20	370.00	74.00
10/19/20	RHK	Review background materials to prepare for document review.	1.80	370.00	666.00
10/19/20	RHK	Analyze documents for relevance and privilege.	6.00	370.00	2,220.00
10/19/20	ZNF	Confer with litigation support to discuss email threading and other ways to reduce document review set; coordinate collection of eDocs from client.	2.80	515.00	1,442.00
10/20/20	CCC	Follow-up with process server regarding final affidavit of service on JPMorgan.	.10	275.00	27.50
10/20/20	CF	Revise draft interrogatory responses.	1.20	605.00	726.00
10/20/20	CF	Participate in team meeting.	.80	605.00	484.00
10/20/20	DB	Emails with opposing counsel re hearing on motion to dismiss counterclaims.	.20	925.00	185.00
10/20/20	DB	Team meeting re open tasks and strategy issues.	.70	925.00	647.50
10/20/20	DIW	Confer with Z. Ferguson re QC of client documents and threaded email review of BFM documents, set up QC phase, continue drafting cross reference for ad hoc collection of materials in iManage in formal eDiscovery collection.	2.30	275.00	632.50
10/20/20	GAO	Prepare for and team meeting.	.70	975.00	682.50
10/20/20	LCE	Weekly team call to discuss discovery obligations and third party complaint.	.80	605.00	484.00
10/20/20	LCE	Correspond with C. Forstein and Z. Ferguson on discovery review search terms.	.20	605.00	121.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/20/20	LCE	Research how to serve deposition subpoenas on state government agency for M. Madden.	.70	605.00	423.50
10/20/20	MAM	Review document review progress and send status update to case team.	.20	370.00	74.00
10/20/20	MAM	Confer with Z. Ferguson and D. Sarti re project status and QC phase.	.70	370.00	259.00
10/20/20	MAM	Draft response to review attorney questions.	.20	370.00	74.00
10/20/20	MAM	Respond to email re QC review of documents.	.20	370.00	74.00
10/20/20	MMM	Edit task list and draft team meeting agenda.	.50	925.00	462.50
10/20/20	MMM	Participate in weekly team strategy meeting.	.70	925.00	647.50
10/20/20	MMM	Edit interrogatory responses.	.50	925.00	462.50
10/20/20	MMM	Analyze document-review search terms and email Z. Ferguson regarding same; attention to other open discovery and document-review issues.	.60	925.00	555.00
10/20/20	RHK	Analyze documents for relevance and privilege.	9.00	370.00	3,330.00
10/20/20	ZNF	Confer with Chain Bridge litigation team to discuss case developments; coordinate with lit support to set up QC for CBB production documents; draft document-review protocol for BFM production.	4.30	515.00	2,214.50
10/21/20	DB	Review and analysis of motion to dismiss counterclaims, including associated emails with team and clients, and related initial research.	1.00	925.00	925.00
10/21/20	DIW	Complete background documents-eDiscovery cross reference chart, confer with Z. Ferguson re records not found in Casepoint, verify BFM002 production and send to tech team with instructions.	2.70	275.00	742.50
10/21/20	LCE	Correspond with litigation support on questions related to document review.	.50	605.00	302.50
10/21/20	LCE	Research how to serve deposition subpoenas on state government agency for M. Madden.	.20	605.00	121.00
10/21/20	LCE	Research on adhesion contracts and validity of contract provisions under public policy for D. Burke.	2.50	605.00	1,512.50
10/21/20	MAM	Review document review progress and send status update to case team.	.10	370.00	37.00
10/21/20	MAM	Draft email to Discovery Attorneys re questions and project status.	.20	370.00	74.00
10/21/20	MAM	Respond to emails from Z. Ferguson re BFM documents, productions, and project status.	.20	370.00	74.00
10/21/20	MAM	Edit search terms and send search term hit report to Z. Ferguson.	.40	370.00	148.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/21/20	MAM	Review completed documents and set up associated QC phase.	.70	370.00	259.00
10/21/20	MMM	Read MTD counterclaims.	.30	925.00	277.50
10/21/20	RHK	Analyze documents for relevance and privilege.	5.70	370.00	2,109.00
10/21/20	ZNF	Review BFM's motion to dismiss out counterclaims; coordinate discovery with litigation support to reduce number of documents for review ensure that iManage documents are collected directly from custodians.	2.60	515.00	1,339.00
10/22/20	DB	Review comments from D. Evinger on motion to dismiss counterclaims.	.30	925.00	277.50
10/22/20	DB	Analysis and research re opposition to motion to dismiss counterclaims, including emails with L. Esbrook.	.50	925.00	462.50
10/22/20	DB	Call with G. Orseck re opposition to motion to dismiss counterclaims, including associated preparation.	.30	925.00	277.50
10/22/20	DB	Call with A. Schoenfeld (Wilmer) re service of third-party complaint and scheduling issues.	.30	925.00	277.50
10/22/20	DB	Analysis of incoming productions on Casepoint platform, including associated emails with D. Sarti re Blue Flame's document custodians and technical issues with productions.	1.20	925.00	1,110.00
10/22/20	DIW	Folder background documents as loaded to Casepoint, email to T. Ahmad re additional eDocs, process and load ad hoc files from client to Casepoint Review, review BFM production for missing metadata and exchange email with D. Burke and others re same.	3.70	275.00	1,017.50
10/22/20	GAO	Review Blue Flame motion to dismiss.	.40	975.00	390.00
10/22/20	GAO	Confer with D. Burke re our response to motion to dismiss.	.30	975.00	292.50
10/22/20	LCE	Research on Virginia law on unconscionability for D. Burke.	1.50	605.00	907.50
10/22/20	LCE	Begin quality control review of responsive documents.	.30	605.00	181.50
10/22/20	LCE	Review outstanding discovery obligations for Blue Flame and summarize for M. Madden.	1.20	605.00	726.00
10/22/20	MAM	Respond to email from Z. Ferguson re user access.	.20	370.00	74.00
10/22/20	MAM	Respond to emails re bulk coding of email threads.	.20	370.00	74.00
10/22/20	MAM	Revise search terms and run hit reports.	1.60	370.00	592.00
10/22/20	MMM	Emails regarding document review strategy.	.50	925.00	462.50
10/22/20	MMM	Confer with D. Burke regarding document-review strategy.	.20	925.00	185.00
10/22/20	ZNF	Coordinate review of documents for production; review BFM production to find ways to cut review set for discovery attorneys; refine search terms and instructions for BFM document review.	10.30	515.00	5,304.50
10/23/20	CF	Review correspondence re document review.	.40	605.00	242.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/23/20	DB	Supervise discovery issues, including emails with Z. Ferguson and M. Madden re review of incoming documents, call with team re preparing outgoing production, and review of incoming productions on Caspoint platform.	2.00	925.00	1,850.00
10/23/20	DB	Emails with G. Orseck and M. Madden re status of service and discovery from JPM.	.30	925.00	277.50
10/23/20	DB	Review and edit draft letter re Blue Flame's objections to document requests, including associated discussion with L. Esbrook.	1.00	925.00	925.00
10/23/20	DIW	Technical assistance with discovery, including pre-production tasks for CBB002, exchange email with L. Esbrook and Z. Ferguson re redaction and confidentiality coding, conference call with D. Burke, M. Madden, L. Esbrook, Z. Ferguson, M. McClain re redactions and production workflow.	2.40	275.00	660.00
10/23/20	GAO	Telephone call with M. Chakraborty re Grice and Faulkner.	.50	975.00	487.50
10/23/20	GAO	Emails with D. Burke re dealings with JP Morgan.	.20	975.00	195.00
10/23/20	GAO	Draft Faulkner outline.	.50	975.00	487.50
10/23/20	LCE	Quality control responsive documents for production.	3.00	605.00	1,815.00
10/23/20	LCE	Calls with D. Burke to discuss discovery review.	.50	605.00	302.50
10/23/20	LCE	Additional quality control of responsive documents for production.	3.10	605.00	1,875.50
10/23/20	LCE	Draft response email to opposing counsel on outstanding requests for production for D. Burke.	1.20	605.00	726.00
10/23/20	LCE	Call with team to discuss discovery review.	.40	605.00	242.00
10/23/20	LCE	Read through email to D. Burke on unconscionability and send.	.20	605.00	121.00
10/23/20	MAM	Conference call with case team re production.	.30	370.00	111.00
10/23/20	MAM	Revise search terms and run search term hits on various search strings.	2.80	370.00	1,036.00
10/23/20	MAM	Finalize QC set and prepare batches.	.60	370.00	222.00
10/23/20	MMM	Internal call regarding CBB document review and pre-production tasks.	.50	925.00	462.50
10/23/20	MMM	Confer with D. Sarti about using TAR to efficiently identify key BFM documents, and draft email to D. Burke regarding same.	.20	925.00	185.00
10/23/20	MMM	Emails regarding record on BFM agreed delivery date/schedule on California transaction.	.20	925.00	185.00
10/23/20	ZNF	Coordinate with litigation support to minimize discovery review collection; quality check second production to Blue Flame; confer with Robbins Russell attorneys to coordinate production tasks.	5.60	515.00	2,884.00
10/24/20	CF	Revise interrogatory responses.	.80	605.00	484.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/24/20	DB	Review documents identified for upcoming production.	.30	925.00	277.50
10/24/20	DB	Research and analysis re opposition to Blue Flame's MTD.	1.50	925.00	1,387.50
10/24/20	LCE	Respond to emails concerning discovery review.	.10	605.00	60.50
10/24/20	MAM	Respond to email from Z. Ferguson re QC review.	.30	370.00	111.00
10/24/20	MAM	Respond to emails from case team re production set for review.	.10	370.00	37.00
10/24/20	MAM	Review completed batches and set up pre-production folder for review by attorneys.	.50	370.00	185.00
10/24/20	MMM	Edit interrogatory responses.	1.30	925.00	1,202.50
10/25/20	DB	Review incoming productions and email with opposing counsel re pace of production and technical issues.	1.50	925.00	1,387.50
10/25/20	DB	Review draft interrogatory responses, including associated emails with team.	.60	925.00	555.00
10/25/20	DB	Emails with Z. Ferguson re instructions and tagging outline for review of incoming Blue Flame productions.	.80	925.00	740.00
10/25/20	GAO	Draft email to clients re Mark Faulkner.	.30	975.00	292.50
10/25/20	LCE	Review draft responses to interrogatories and emails on discovery outline.	.20	605.00	121.00
10/25/20	MAM	Respond to email from Z. Ferguson re user access and removing of documents with false hits in batches.	.10	370.00	37.00
10/25/20	MMM	Edit interrogatory responses and draft email re same.	.60	925.00	555.00
10/25/20	MMM	Review documents proposed for production to quality control on privilege and responsiveness.	2.60	925.00	2,405.00
10/25/20	MMM	Edit fact outline.	2.10	925.00	1,942.50
10/25/20	ZNF	Review interrogatory responses; revise review instructions for discovery attorneys; review second production set for Blue Flame.	1.30	515.00	669.50
10/26/20	CF	Revise interrogatory responses.	.60	605.00	363.00
10/26/20	DB	Work on draft opposition to Blue Flame MTD, including research, drafting, and emails with team.	3.20	925.00	2,960.00
10/26/20	DB	Emails with Z. Ferguson re various discovery issues.	.50	925.00	462.50
10/26/20	DB	Review email exchange with client re questions from insurance carrier.	.30	925.00	277.50
10/26/20	GAO	Review C. Grice outline.	.50	975.00	487.50
10/26/20	GAO	Review research on MTD our counterclaim.	.40	975.00	390.00
10/26/20	GAO	Review draft letter to insurers and related emails with P. Fitzgerald.	.30	975.00	292.50
10/26/20	LCE	Research law in Virginia for D. Burke for response to motion to dismiss counterclaims.	1.70	605.00	1,028.50

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Date	Tkpr	Description	Hours	Rate	Amount
10/26/20	LCE	Review Blue Flame production and quality control non responsive documents.	.80	605.00	484.00
10/26/20	MAM	Draft instruction email to reviewers for review of BFM incoming productions.	.60	370.00	222.00
10/26/20	MAM	Respond to email with Z. Ferguson re QC of incoming production review.	.10	370.00	37.00
10/26/20	MAM	Respond to emails with Z. Ferguson re production steps and batch set up.	.40	370.00	148.00
10/26/20	MAM	Revise coding panel for BFM review.	.90	370.00	333.00
10/26/20	MAM	Revise corpus of BFM documents to review.	1.70	370.00	629.00
10/26/20	MAM	Review documents to be included in production and set up associated folder for final QC.	1.30	370.00	481.00
10/26/20	MMM	Emails re document review and production, and re interrogatory responses.	.40	925.00	370.00
10/26/20	RHK	Analyze documents for relevance and privilege.	4.00	370.00	1,480.00
10/26/20	ZNF	Coordinate review of BFM documents; review BFM production documents; review outgoing discovery production.	4.30	515.00	2,214.50
10/27/20	CF	Participate in call with M. Madden, D. Evinger, and J. Brough re interrogatory responses.	.40	605.00	242.00
10/27/20	CF	Participate in team call.	.60	605.00	363.00
10/27/20	CF	Revise interrogatory responses.	.80	605.00	484.00
10/27/20	DB	Weekly team meeting re open tasks and strategy.	.50	925.00	462.50
10/27/20	DB	Emails with B. Sharon re collection of call recordings.	.20	925.00	185.00
10/27/20	DB	Emails with A. Schoenfeld (Wilmer) re scheduling and discovery issues.	.70	925.00	647.50
10/27/20	DB	Draft motion to dismiss counterclaims.	3.50	925.00	3,237.50
10/27/20	GAO	Prepare for and weekly team meeting.	.60	975.00	585.00
10/27/20	GAO	Review our responses to Blue Flame interrogatories.	.20	975.00	195.00
10/27/20	GAO	Review draft stipulation from Wilmer on scheduling.	.10	975.00	97.50
10/27/20	IEC	Review and analyze incoming production documents for responsiveness.	9.50	370.00	3,515.00
10/27/20	LCE	Team meeting to discuss upcoming work allocation.	.60	605.00	363.00
10/27/20	LCE	Review Blue Flame production.	2.30	605.00	1,391.50
10/27/20	LGW	Research article requested by M. Madden.	.20	275.00	55.00
10/27/20	MAM	Finalize documents and prepare production Volume CBB002 for submission to vendor for processing.	2.50	370.00	925.00
10/27/20	MAM	Update user credentials to allow access BFM documents.	.10	370.00	37.00
10/27/20	MAM	Draft email response to reviewers re questions.	.40	370.00	148.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/27/20	MAM	Run search terms across non-date restricted BFM incoming documents and batch out for review.	1.30	370.00	481.00
10/27/20	MAM	Respond to emails with Z. Ferguson re potential privilege documents.	.30	370.00	111.00
10/27/20	MMM	Update litigation task list and team-meeting agenda.	.50	925.00	462.50
10/27/20	MMM	Emails regarding open discovery items.	.30	925.00	277.50
10/27/20	MMM	Participate in weekly team strategy meeting.	.50	925.00	462.50
10/27/20	MMM	Confer with D. Burke regarding experts.	.20	925.00	185.00
10/27/20	MMM	Review initial outline of Grice report on BFM liability and edit expert engagement letter re same.	.50	925.00	462.50
10/27/20	RHK	Analyze incoming production for significance to identified issues.	9.00	370.00	3,330.00
10/27/20	SAR	Verify CBB002 production media for accuracy and content.	.40	275.00	110.00
10/27/20	ZNF	Confer with Robbins Russell attorneys to discuss case developments; coordinate review of outgoing production; review discovery documents.	2.10	515.00	1,081.50
10/28/20	CF	Review and finalize interrogatory responses.	1.10	605.00	665.50
10/28/20	CF	Review and respond to correspondence re doc review.	.50	605.00	302.50
10/28/20	DB	Supervise document production, including emails with team and review of final production files.	.60	925.00	555.00
10/28/20	DB	Work on draft opposition to motion to dismiss counterclaims.	3.20	925.00	2,960.00
10/28/20	GAO	Review court orders and address next steps with D. Burke.	.20	975.00	195.00
10/28/20	IEC	Review and analyze incoming production documents for responsiveness.	9.50	370.00	3,515.00
10/28/20	LCE	Review Blue Flame production.	.80	605.00	484.00
10/28/20	LCE	Draft deposition outline.	2.50	605.00	1,512.50
10/28/20	MAM	Review and modify coding template.	.20	370.00	74.00
10/28/20	MAM	Draft email to Discovery Attorneys re new hot document tagging guidance.	.10	370.00	37.00
10/28/20	MAM	Review production Volume CBB002 from vendor and verify contents.	2.10	370.00	777.00
10/28/20	MAM	Draft email to Z. Ferguson re production status and information for cover letter.	.40	370.00	148.00
10/28/20	MAM	Respond to emails from L. Esbrook re BFM date restricted and non-date restricted batches.	.20	370.00	74.00
10/28/20	MAM	Prepare hightail link for service of production Volume CBB002.	.50	370.00	185.00
10/28/20	MAM	Respond to email from Z. Ferguson re native files in production.	.20	370.00	74.00

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Date	Tkpr	Description	Hours	Rate	Amount
10/28/20	MMM	Edit interrogatory responses.	.90	925.00	832.50
10/28/20	RHK	Analyze incoming production for significance to identified issues.	9.00	370.00	3,330.00
10/28/20	ZNF	Review second document production to Blue Flame; review produced Blue Flame documents; coordinate review of Blue Flame document production.	5.50	515.00	2,832.50
10/29/20	CF	Review BFM document production.	2.40	605.00	1,452.00
10/29/20	DB	Emails with team and client re extensions to case deadlines.	.20	925.00	185.00
10/29/20	DB	Revise draft opposition to motion to dismiss and circulate same to clients.	1.00	925.00	925.00
10/29/20	GAO	Review and edit opposition to Blue Flame's motion to dismiss our counterclaim.	1.60	975.00	1,560.00
10/29/20	IEC	Review and analyze incoming production documents for responsiveness.	7.60	370.00	2,812.00
10/29/20	LCE	Draft deposition outline.	7.70	605.00	4,658.50
10/29/20	LCE	Quality control review non responsive documents.	1.80	605.00	1,089.00
10/29/20	LCE	Add deadlines to calendar.	.20	605.00	121.00
10/29/20	LCE	Correspond with team on production review and tagging.	.60	605.00	363.00
10/29/20	MAM	Draft email response to Z. Ferguson re issues with dates in incoming projection metadata.	.30	370.00	111.00
10/29/20	MAM	Respond to questions from Z. Ferguson re bulk tagging documents.	.10	370.00	37.00
10/29/20	MAM	Draft email to attorneys re folder location of documents to review.	.20	370.00	74.00
10/29/20	MAM	Review documents related to other party PPE deals and update coding.	.60	370.00	222.00
10/29/20	MAM	Review documents containing false hits and remove similar documents from review phase.	1.20	370.00	444.00
10/29/20	MAM	Respond to email from Z. Ferguson re next steps to prepare for next production.	.10	370.00	37.00
10/29/20	MAM	Respond to questions from Discovery Attorneys.	.10	370.00	37.00
10/29/20	MMM	Review opposition to motion to dismiss counterclaims.	.50	925.00	462.50
10/29/20	MMM	Confer with J. Brough and D. Evinger regarding interrogatory responses.	.30	925.00	277.50
10/29/20	RHK	Analyze incoming production for significance to identified issues.	10.00	370.00	3,700.00
10/29/20	ZNF	Review documents produced by BFM; coordinate second production of documents with litigation support.	3.50	515.00	1,802.50
10/30/20	CCC	Cite check opposition for D. Burke.	4.20	275.00	1,155.00
10/30/20	DB	Call with A. Schoenfeld (Wilmer) re various scheduling issues.	.40	925.00	370.00

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Invoice #: 200356

Date	Tkpr	Description	Hours	Rate	Amount
10/30/20	DB	Review and revise opposition to motion to dismiss counterclaims, including coordinating cite check and incorporating comments.	1.30	925.00	1,202.50
10/30/20	DB	Emails with client and team re JPM issues.	.20	925.00	185.00
10/30/20	GAO	Emails with D. Burke re our next steps vis a vis JPM.	.20	975.00	195.00
10/30/20	IEC	Review and analyze incoming production documents for responsiveness.	7.20	370.00	2,664.00
10/30/20	LCE	Review Blue Flame production documents.	1.00	605.00	605.00
10/30/20	LCE	Draft deposition outline.	6.80	605.00	4,114.00
10/30/20	MAM	Review potentially interesting documents for relevance and hot issues.	.20	370.00	74.00
10/30/20	MAM	Respond to email from L. Esbrook and Z. Ferguson re daily status updates of hot and interesting documents.	.20	370.00	74.00
10/30/20	MAM	Review hot and interesting documents and provide folders of each for attorney review.	1.10	370.00	407.00
10/30/20	MAM	Respond to questions from L. Esbrook re documents in hot and interesting folders.	.20	370.00	74.00
10/30/20	MMM	Review updated fact outline.	.60	925.00	555.00
10/30/20	RHK	Analyze incoming production for significance to identified issues.	8.00	370.00	2,960.00
10/30/20	ZNF	Review litigation documents produced by BFM; identify documents for second CBB production.	4.10	515.00	2,111.50
10/31/20	MAM	Review document review progress and send status update to case team for hot and interesting documents.	.20	370.00	74.00
TOTAL PROFESSIONAL SERVICES					\$ 309,698.00
Less Courtesy Discount					<u>\$ -10,000.00</u>
NET PROFESSIONAL SERVICES					\$ 299,698.00

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November 11, 2020
Invoice #: 200356**SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	54.60	925.00	50,505.00
Christine A Chase Carpino	CCC	5.00	275.00	1,375.00
Ian E Cohen	IEC	66.20	370.00	24,494.00
Leslie Esbrook	LCE	76.70	605.00	46,403.50
Zachary N Ferguson	ZNF	114.90	515.00	59,173.50
Carolyn Forstein	CF	25.80	605.00	15,609.00
Robert H Kearney	RHK	62.70	370.00	23,199.00
Matthew M Madden	MMM	39.20	925.00	36,260.00
Michael A McClain, Jr.	MAM	61.20	370.00	22,644.00
Gary A. Orseck	GAO	18.00	975.00	17,550.00
Sherry A Rather	SAR	.40	275.00	110.00
Dana I. Wesley Sarti	DIW	39.30	275.00	10,807.50
Lyndsay G Webb	LGW	5.70	275.00	1,567.50
Total		569.70		\$ 309,698.00

EXPENSES

Description	Amount
Litigation Support from Vendor	125.97
Computer Research Charges	2,930.75
Miscellaneous/Other	16.95
Process Server & Subpoena Fees	163.50
Courier/Overnight delivery	46.64
TOTAL EXPENSES	\$ 3,283.81
TOTAL THIS INVOICE	\$ 302,981.81

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Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

November 11, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200356
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE	\$ 302,981.81
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For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200356, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

December 4, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200501
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: November 30, 2020.

RE: Blue Flame

Total Professional Services	\$ 310,022.50
Less Courtesy Discount	<u>\$ -10,000.00</u>
Net Professional Services	\$ 300,022.50
Total Expenses	<u>\$ 6,691.59</u>
TOTAL THIS INVOICE	\$ 306,714.09

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December 4, 2020
Invoice #: 200501

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
11/01/20	DB	Review and edit opposition to motion to dismiss counterclaims.	1.00	925.00	925.00
11/01/20	LCE	Review Blue Flame produced documents for relevance.	.30	605.00	181.50
11/01/20	ZNF	Email L. Esbrook concerning BFM document review and discovery outline.	.70	515.00	360.50
11/02/20	CF	Correspond with Z. Ferguson and L. Esbrook re document review.	.50	605.00	302.50
11/02/20	DB	Coordinate with Z. Ferguson re review of incoming production materials.	.50	925.00	462.50
11/02/20	DB	Finalize and serve RFPs to JPM.	.40	925.00	370.00
11/02/20	DB	Emails with B. Sharon re document collection issues.	.30	925.00	277.50
11/02/20	DB	Additional revisions to opposition to MTD counterclaims, including emails with clients re same.	1.20	925.00	1,110.00
11/02/20	GAO	Review opposition to motion to dismiss counterclaim.	.40	975.00	390.00
11/02/20	IEC	Review and analyze incoming production documents for responsiveness.	6.10	370.00	2,257.00
11/02/20	LCE	Review Blue Flame produced documents for relevance.	1.60	605.00	968.00
11/02/20	LCE	Propose additional search terms for Blue /flame production review.	.60	605.00	363.00
11/02/20	LCE	Update discovery outline with newly-tagged relevant documents.	2.00	605.00	1,210.00
11/02/20	LCE	Draft Grice cancellation expert outline.	.60	605.00	363.00
11/02/20	MAM	Review search hit reports and batch out relevant BlueFlame documents.	.90	370.00	333.00
11/02/20	MAM	Review daily hot and interesting documents and sent to attorneys for review.	.10	370.00	37.00
11/02/20	MAM	Revise search terms and provide hit counts to Z. Ferguson.	1.20	370.00	444.00
11/02/20	MAM	Respond to questions from Z. Ferguson re search term hit counts.	.10	370.00	37.00
11/02/20	MAM	Review and respond to emails from L. Esbrook re review status and next steps.	.20	370.00	74.00
11/02/20	RHK	Analyze incoming production for significance to identified issues.	6.20	370.00	2,294.00

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11/02/20	ZNF	Email L. Esbrook concerning search terms for clean-up search of BFM's first two document productions; enter search terms into Casepoint to determine hit count and refine terms further; coordinate review of BFM's third document production with M. McClain; review documents from BFM's second document production.	6.20	515.00	3,193.00
11/03/20	CF	Participate in team meeting.	.50	605.00	302.50
11/03/20	DB	Revise and finalize opposition brief to MTD counterclaims.	2.00	925.00	1,850.00
11/03/20	DB	Prepare for and attend team strategy meeting.	.80	925.00	740.00
11/03/20	DB	Emails with B. Sharon re document collection issues.	.20	925.00	185.00
11/03/20	GAO	Prepare for and weekly team meeting.	.70	975.00	682.50
11/03/20	GAO	Final read of our opposition motion to dismiss counterclaims.	.30	975.00	292.50
11/03/20	GAO	Review and edit Grice engagement letter.	.20	975.00	195.00
11/03/20	GAO	Review and comment on L. Esbrook discovery outline.	.50	975.00	487.50
11/03/20	IEC	Review and analyze incoming production documents for responsiveness.	6.50	370.00	2,405.00
11/03/20	LCE	Weekly team call to strategize and allocate work responsibilities.	.80	605.00	484.00
11/03/20	LCE	Correspond with team on production review terms.	.40	605.00	242.00
11/03/20	LCE	Correspond with team on discovery outline comments.	.30	605.00	181.50
11/03/20	LCE	Review Blue Flame produced documents for relevance.	2.20	605.00	1,331.00
11/03/20	MAM	Review incoming production and verify folder structure.	.30	370.00	111.00
11/03/20	MAM	Draft updated instruction email to attorney reviewers.	.10	370.00	37.00
11/03/20	MAM	Review documents for production and set up preproduction folders.	.30	370.00	111.00
11/03/20	MAM	Draft updates to coding template.	.30	370.00	111.00
11/03/20	MAM	Draft email to Z. Ferguson re anticipated production set and related issues.	.20	370.00	74.00
11/03/20	MAM	Respond to emails from Z. Ferguson re additional documents to review from BFM productions.	.20	370.00	74.00
11/03/20	MAM	Draft email response to reviewer questions.	.20	370.00	74.00
11/03/20	MMM	Prepare for and participate in weekly team strategy meeting.	.80	925.00	740.00
11/03/20	MMM	Confer with L. Esbrook regarding Grice liability report.	.20	925.00	185.00
11/03/20	MMM	Email to client regarding Grice liability engagement.	.20	925.00	185.00
11/03/20	MMM	Draft engagement letter for Grice indemnification engagement.	.80	925.00	740.00
11/03/20	MMM	Review updated discovery outline.	.90	925.00	832.50
11/03/20	MMM	Call with D. Evinger regarding Grice liability engagement.	.30	925.00	277.50

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11/03/20	SAR	Communicate with case team re Blue Flame production availability in hosted workspace.	.20	275.00	55.00
11/03/20	ZNF	Coordinate review of third BFM production; review BFM production for litigation relevance; email L. Esbrook and M. McClain regarding document-tagging issues; draft and email new instructions for discovery attorneys regarding clean-up review of second BFM production;	5.90	515.00	3,038.50
11/04/20	CCC	Prepare courtesy copy for E.D. Virginia.	.30	275.00	82.50
11/04/20	CF	Review CBB production.	3.70	605.00	2,238.50
11/04/20	DB	Emails with Z. Ferguson re review of incoming productions.	.30	925.00	277.50
11/04/20	DB	Review documents for potential production and emails with Z. Ferguson re same.	.50	925.00	462.50
11/04/20	IEC	Review and analyze incoming production documents for responsiveness.	9.50	370.00	3,515.00
11/04/20	LCE	Review Blue Flame produced documents for relevance.	1.10	605.00	665.50
11/04/20	LCE	Read through Grice draft expert report on cancellation and send to M. Madden.	.40	605.00	242.00
11/04/20	LCE	Review for quality control Chain Bridge proposed production.	2.20	605.00	1,331.00
11/04/20	LCE	Correspond with team on quality control searches and tagging.	.60	605.00	363.00
11/04/20	MAM	Confer with Z. Ferguson re CBB003 production.	.40	370.00	148.00
11/04/20	MAM	Review documents set slated for production and send imaging request.	.20	370.00	74.00
11/04/20	MAM	Review project status and set up additional 1st level and QC batches.	.80	370.00	296.00
11/04/20	MAM	Draft email re instructions for review of BFM documents.	.20	370.00	74.00
11/04/20	MAM	Draft email response to reviewer questions.	.30	370.00	111.00
11/04/20	MAM	Draft email to Z. Ferguson re availability of third BFM production.	.10	370.00	37.00
11/04/20	MAM	Email Z. Ferguson re privilege and non-privileged document counts.	.20	370.00	74.00
11/04/20	MAM	Reply to email from Z. Ferguson re number of remaining documents not produced current stored eDOCS.	.30	370.00	111.00
11/04/20	MAM	Review finalized production documents and separate into preproduction QC Batches.	.40	370.00	148.00
11/04/20	MAM	Respond to emails re BFM custodian overlays.	.20	370.00	74.00
11/04/20	MAM	Respond to email from Z. Ferguson re redacting for account information.	.10	370.00	37.00
11/04/20	MAM	Respond to question re breaking families for responsiveness.	.20	370.00	74.00
11/04/20	MAM	Draft email to Z. Ferguson re cleaning up privilege coding.	.20	370.00	74.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/04/20	MMM	Emails responding to document-production questions.	.30	925.00	277.50
11/04/20	RHK	Analyze incoming production for significance to identified issues.	10.00	370.00	3,700.00
11/04/20	SAR	Communicate with Z. Ferguson re plaintiffs third document production custodian and confidentiality metadata overlay information.	.40	275.00	110.00
11/04/20	ZNF	Coordinate clean-up review of BFM's second document production; coordinate review of BFM's third document production; review documents from BFM's second and third productions for litigation relevance; email M. McClain regarding questions related to CBB's third document production; coordinate quality check review of CBB's third production; email D. Burke about third BFM document production;	8.60	515.00	4,429.00
11/05/20	CF	Review CBB production.	3.10	605.00	1,875.50
11/05/20	CF	Correspond with Z. Ferguson, L. Esbrook, M. Madden, and D. Burke re production.	2.30	605.00	1,391.50
11/05/20	DB	Emails with team re production of documents.	.50	925.00	462.50
11/05/20	DIW	Project status review, confirm saved custodian searches.	.30	275.00	82.50
11/05/20	DIW	Email with M. McCain, load and process new client documents for review.	.60	275.00	165.00
11/05/20	GAO	Emails re coordination with Wilmer on experts.	.20	975.00	195.00
11/05/20	GAO	Review discovery outline.	.30	975.00	292.50
11/05/20	IEC	Review and analyze incoming production documents for responsiveness.	7.00	370.00	2,590.00
11/05/20	LCE	Edit Grice due diligence report.	4.70	605.00	2,843.50
11/05/20	LCE	Compile list of documents to include in Grice due diligence report.	2.40	605.00	1,452.00
11/05/20	LCE	Correspond with litigation support and team about tagging issues in discovery.	.80	605.00	484.00
11/05/20	MAM	Confer with D. Sarti re productions.	.20	370.00	74.00
11/05/20	MAM	Confer with Z. Ferguson re VOL 03 of the production.	.40	370.00	148.00
11/05/20	MAM	Review documents for redactions.	1.60	370.00	592.00
11/05/20	MAM	Review potential documents for production and set up preproduction review batches.	4.90	370.00	1,813.00
11/05/20	MMM	Emails and discussions regarding expert engagement and document production questions; review elevated documents prior to production.	1.90	925.00	1,757.50
11/05/20	RHK	Analyze incoming production for significance to identified issues.	4.60	370.00	1,702.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/05/20	ZNF	Review documents for CBB's third production; apply redactions to sensitive documents; confer with M. McClain, L. Esbrook, and C. Forstein regarding proper document coding; compare custodian overlay data with custodian data in BFM's productions to determine how many documents retain "unspecified custodian" designation; email S. Rather regarding same; confer with Robbins Russell team regarding outstanding discrete RFP requests;	9.20	515.00	4,738.00
11/06/20	CF	Review BFM production.	2.70	605.00	1,633.50
11/06/20	DB	Review and edit draft joint defense agreement, and correspond with Wilmer re same.	1.00	925.00	925.00
11/06/20	DB	Review documents for potential production and related emails with team.	.70	925.00	647.50
11/06/20	DB	Emails and calls with B. Sharon re production of phone call recordings.	.60	925.00	555.00
11/06/20	DB	Emails with clients re draft joint defense agreement.	.80	925.00	740.00
11/06/20	GAO	Emails with D. Burke re our dealings with Wilmer and M. Faulkner.	.60	975.00	585.00
11/06/20	GAO	Review joint defense agreement with Wilmer.	.20	975.00	195.00
11/06/20	GAO	Review our discovery outline to prep for depositions.	.40	975.00	390.00
11/06/20	LCE	Review hot, interesting, and issue tag docs to update discovery outline.	6.00	605.00	3,630.00
11/06/20	LCE	Correspond with litigation support and team on issue tagging Blue Flame production.	.40	605.00	242.00
11/06/20	LCE	Final edits to Grice due diligence list of documents and send to M. Madden along with draft due diligence report.	.80	605.00	484.00
11/06/20	MAM	Review preproduction documents and prepare for production.	2.60	370.00	962.00
11/06/20	MAM	Confer with Z. Ferguson re production.	.10	370.00	37.00
11/06/20	MAM	Review hot and interesting documents and sent to attorneys for review.	.30	370.00	111.00
11/06/20	MAM	Submit replacement document to vendor and request upload.	.80	370.00	296.00
11/06/20	MMM	Analyze and communicate regarding document production questions; review documents prior to production.	2.30	925.00	2,127.50
11/06/20	ZNF	Finalize third production set of CBB documents to submit to Casepoint; email D. Burke and M. Madden concerning remaining documents to be collected from CBB; generate search terms for and coordinate review of BFM's third document production.	6.70	515.00	3,450.50
11/07/20	DB	Emails with M. Madden and Z. Ferguson re upcoming production.	.80	925.00	740.00
11/07/20	MAM	Review and correct miscoded documents in production set.	.80	370.00	296.00

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11/07/20	MAM	Review documents and prepare for review by Z. Ferguson.	.40	370.00	148.00
11/07/20	MAM	Respond to emails with Z. Ferguson re production status, confidentiality coding, and other production related issues.	.40	370.00	148.00
11/07/20	MMM	Emails with D. Burke and Z. Ferguson regarding document production; review documents slated for potential production.	.90	925.00	832.50
11/07/20	ZNF	Review final document set for CBB's third document production.	1.50	515.00	772.50
11/08/20	DB	Emails with clients re joint defense agreement.	.30	925.00	277.50
11/08/20	LCE	Correspond with team on document collection strategy and search terms.	.30	605.00	181.50
11/08/20	MAM	Review final production documents and prepare for submission to vendor.	2.10	370.00	777.00
11/09/20	CF	Review documents and update discovery outline.	4.70	605.00	2,843.50
11/09/20	CF	Review and respond to correspondence.	.50	605.00	302.50
11/09/20	DB	Review and circulate Blue Flame's reply in support of MTD counterclaims.	.60	925.00	555.00
11/09/20	DB	Call with Wilmer and G. Orseck re expert issues.	.40	925.00	370.00
11/09/20	DB	Circulate additional edits to joint defense agreement to Wilmer.	.40	925.00	370.00
11/09/20	DIW	Verify production CBB003, draft production summary specifications and make accessible for service.	.50	275.00	137.50
11/09/20	GAO	Telephone call with Wilmer Cutler re diligence expert.	.40	975.00	390.00
11/09/20	GAO	Emails with D. Burke and others re next steps on expert witnesses.	.40	975.00	390.00
11/09/20	GAO	Listen to audio recording of call from Tim Coffey and follow-up.	.20	975.00	195.00
11/09/20	LCE	Review issue tagged documents to update discovery outline.	3.50	605.00	2,117.50
11/09/20	LCE	Draft Grice due diligence report and document collection list.	3.00	605.00	1,815.00
11/09/20	LCE	Draft Grice cancellation report.	2.60	605.00	1,573.00
11/09/20	LCE	Review document collection for due diligence expert report and correspond with paralegal on same.	1.00	605.00	605.00
11/09/20	LCE	Send M. Madden draft due diligence expert report and document collection list for Analysis Group.	.30	605.00	181.50
11/09/20	LGW	Research and prepare documents for expert with comments from L. Esbrook.	4.00	275.00	1,100.00
11/09/20	MAM	Review final production and made corrections.	.90	370.00	333.00
11/09/20	MAM	Review hot and interesting documents and send to attorneys for review.	.20	370.00	74.00
11/09/20	MAM	Prepare production for service.	.40	370.00	148.00

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11/09/20	MAM	Revise search terms and set up associated batches.	1.10	370.00	407.00
11/09/20	MAM	Respond to emails from Z. Ferguson re production issues.	.20	370.00	74.00
11/09/20	MAM	Verify production volume CBB003.	.50	370.00	185.00
11/09/20	MMM	Edit draft Grice liability outline.	1.00	925.00	925.00
11/09/20	MMM	Review updated fact outline and email team re same.	.60	925.00	555.00
11/09/20	ZNF	Review documents for CBB's third production; finalize and serve CBB's third production; review BFM documents for litigation relevance.	7.80	515.00	4,017.00
11/10/20	CF	Participate in team meeting.	.70	605.00	423.50
11/10/20	CF	Update cast of characters.	2.20	605.00	1,331.00
11/10/20	CF	Review and respond to correspondence.	.60	605.00	363.00
11/10/20	DB	Identify prep materials for argument on motion to dismiss.	.50	925.00	462.50
11/10/20	DB	Prepare for and attend team meeting.	.70	925.00	647.50
11/10/20	DB	Emails with Wilmer re choice-of-law on joint defense agreement.	.40	925.00	370.00
11/10/20	DB	Coordinate with D. Sarti re review of call recordings.	.40	925.00	370.00
11/10/20	DIW	Exchange email with M. McClain re revision to CBB003, send replacement production image to Casepoint, confer with D. Burke re telephone recordings from client and processing steps for same, queue audio files for machine transcription.	1.60	275.00	440.00
11/10/20	GAO	Review and comment on Blue Flame's reply in support of motion to dismiss our counterclaim.	1.30	975.00	1,267.50
11/10/20	GAO	Team meeting.	.70	975.00	682.50
11/10/20	LCE	Review Blue Flame third production for relevant documents.	2.90	605.00	1,754.50
11/10/20	LCE	Edit Grice cancellation expert report draft outline for M. Madden.	.50	605.00	302.50
11/10/20	LCE	Weekly team call to strategize and allocate work responsibilities.	.80	605.00	484.00
11/10/20	LCE	Correspond with team on production search terms.	.30	605.00	181.50
11/10/20	LCE	Update discovery outline.	1.30	605.00	786.50
11/10/20	LCE	Correspond with associates on proposed third party subpoena.	.30	605.00	181.50
11/10/20	LGW	Revise expert materials with comments from L. Esbrook; prepare oral argument materials for D. Burke.	3.00	275.00	825.00
11/10/20	MAM	Draft email to D. Sarti re changes in production and submission of new images to Casepoint to upload.	.20	370.00	74.00
11/10/20	MMM	Review materials and docs for C. Grice and send email AG re same.	.50	925.00	462.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/10/20	MMM	Prepare agenda and task list (0.4hr); participate in team meeting (0.6hrs); and review call-recording information (0.2hr).	1.20	925.00	1,110.00
11/10/20	MMM	Review and revise discovery outline and edit list of deposition targets.	1.10	925.00	1,017.50
11/10/20	ZNF	Confer with Robbins Russell attorneys to discuss status of case; review documents produced by Blue Flame Medical for litigation relevance; draft and revise subpoena to third-party;	8.10	515.00	4,171.50
11/11/20	DB	Review Blue Flame reply in support of MTD counterclaims, and related analysis re arguments for hearing.	1.20	925.00	1,110.00
11/11/20	DB	Review execution version of joint defense agreement.	.20	925.00	185.00
11/11/20	DB	Emails with team re discovery issues, including Velox subpoena and review of call recordings.	.50	925.00	462.50
11/11/20	DIW	Up-convert client call recordings to allow machine transcription, update collection logs with Eastern end times, draft instructions for tech team handling of priority date range files, continue audio processing for non-priority date range.	5.90	275.00	1,622.50
11/11/20	GAO	Emails with JPM counsel re confidentiality agreement and joint sponsorship of expert.	.30	975.00	292.50
11/11/20	GAO	Emails with Analysis Group re Faulkner.	.20	975.00	195.00
11/11/20	GAO	Review draft subpoena to Velox.	.10	975.00	97.50
11/11/20	LCE	Correspond with paralegals to add Bates numbers to discovery outline and review same.	.40	605.00	242.00
11/11/20	LCE	Update expert report outlines and document lists for experts.	1.10	605.00	665.50
11/11/20	LGW	Continue to prepare oral argument materials for D. Burke; continue to revise expert materials with comments from L. Esbrook.	4.30	275.00	1,182.50
11/11/20	MAM	Review corrected production images and modify coding accordingly.	.10	370.00	37.00
11/11/20	MAM	Review documents related to Bank of America and send to attorneys for review.	.50	370.00	185.00
11/11/20	MMM	Emails regarding call -recording review, Velox subpoena, document production, and other open discovery items.	.40	925.00	370.00
11/11/20	ZNF	Revise subpoena to Velox Medical; review documents produced by BFM for litigation relevance; perform targeted searches through BFM production to answer factual questions about case; update discovery outline.	6.60	515.00	3,399.00
11/12/20	DB	Coordinate with Z. Ferguson re review of additional documents from client.	.30	925.00	277.50
11/12/20	DB	Review Wilmer's edits to protective order and respond to Wilmer re same.	.30	925.00	277.50

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Date	Tkpr	Description	Hours	Rate	Amount
11/12/20	LCE	Review newly tagged interesting Blue Flame production documents and add to discovery outline.	1.50	605.00	907.50
11/12/20	LGW	Revise discovery outline with comments from L. Esbrook.	1.00	275.00	275.00
11/12/20	MAM	Respond to email from L. Esbrook re hot and interesting documents.	.10	370.00	37.00
11/12/20	MAM	Review hot and interesting documents and send to attorneys.	.30	370.00	111.00
11/12/20	MMM	Emails regarding open discovery items, including service and notice of subpoena.	.30	925.00	277.50
11/12/20	ZNF	Finalize and serve subpoena; review produced documents for responsiveness to BFM's requests for production; draft email correspondence.	3.10	515.00	1,596.50
11/13/20	CF	Update discovery outline to incorporate issue tag review.	2.00	605.00	1,210.00
11/13/20	DB	Respond to inquiry from Wilmer re additional edits to protective order.	.30	925.00	277.50
11/13/20	DIW	Technical assistance with discovery, including incoming BFM production, handling of documents previously produced to government, continued processing of telephone audio recordings.	3.30	275.00	907.50
11/13/20	GAO	Emails with JPM counsel and Donald re coordinating strategy.	.20	975.00	195.00
11/13/20	LCE	Update expert report outline and document list for expert due diligence report.	2.40	605.00	1,452.00
11/13/20	LCE	Review Bank anti-fraud policies for relevance to expert report.	.30	605.00	181.50
11/13/20	LCE	Update discovery outline with new Blue Flame production documents.	1.60	605.00	968.00
11/13/20	LCE	Call with Advisory Group on draft expert outline.	.90	605.00	544.50
11/13/20	MMM	Emails regarding open discovery items.	.60	925.00	555.00
11/13/20	MMM	Call with Analysis Group regarding C. Grice liability report.	.70	925.00	647.50
11/13/20	RHK	Analyze audio recordings for relevance and privilege.	7.00	370.00	2,590.00
11/13/20	ZNF	Coordinate fourth CBB document production; review CBB's responsive audio recordings; update discovery outline.	4.10	515.00	2,111.50
11/14/20	DB	Prepare for argument on motion to dismiss counterclaims.	1.50	925.00	1,387.50
11/15/20	DB	Review materials and prepare for argument on motion to dismiss counterclaims.	2.00	925.00	1,850.00
11/15/20	DIW	Technical assistance with discovery, including complete processing of telephone audio recordings, instructions and data to tech team re same.	1.50	275.00	412.50
11/16/20	DB	Review and revise outline for argument on motion to dismiss counterclaims.	2.20	925.00	2,035.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/16/20	DIW	Technical assistance with discovery, including discussion with A. Ribadia re duplicate analysis [REDACTED], per Z. Ferguson.	.80	275.00	220.00
11/16/20	GAO	Review outline from D. Burke for oral argument and provide input.	.50	975.00	487.50
11/16/20	LCE	Blue Flame fourth production document review.	2.30	605.00	1,391.50
11/16/20	MAM	Review hot and interesting documents and send to attorneys for review.	.20	370.00	74.00
11/16/20	MAM	Review incoming BFM documents with search term hits and batch for review.	.10	370.00	37.00
11/16/20	MAM	Draft email to discovery attorneys re additional batches.	.10	370.00	37.00
11/16/20	MAM	Draft email to attorneys re batched documents from BFM production volume 4, hit count reports, and additional issues folders.	.30	370.00	111.00
11/16/20	MAM	Respond to email from Z. Ferguson re options for isolating out documents related to those coded as hot or interesting.	.20	370.00	74.00
11/16/20	MAM	Analyze search term hits in relevant and not relevant documents to determine outliers and draft email to J. Ettinger re the same.	.80	370.00	296.00
11/16/20	ZNF	Coordinate fourth CBB document production; review BFM production for litigation relevance; review JPMC answer; review briefing for counterclaims motion to dismiss argument.	4.20	515.00	2,163.00
11/17/20	CF	Review CBB documents for privilege.	1.90	605.00	1,149.50
11/17/20	CF	Listed to counterclaims oral argument.	.40	605.00	242.00
11/17/20	DB	Prepare for and deliver argument on motion to dismiss counterclaims.	1.50	925.00	1,387.50
11/17/20	DIW	Review duplicate report for client-produced records, email with tech team re same.	1.20	275.00	330.00
11/17/20	GAO	Prepare with D. Burke and attend argument on motion to dismiss counterclaim.	1.20	975.00	1,170.00
11/17/20	GAO	Emails with Wilmer team re Mark Faulkner.	.30	975.00	292.50
11/17/20	GAO	Meet with D. Burke and M. Madden re strategy for engaging Wilmer/JPMC.	.60	975.00	585.00
11/17/20	GAO	Review draft interrogatories to JPM.	.20	975.00	195.00
11/17/20	GAO	Review NYT article on N95 supply chain.	.30	975.00	292.50
11/17/20	LCE	Listen to oral argument on motion to dismiss counterclaims.	.30	605.00	181.50
11/17/20	LCE	Review proposed production for privilege.	1.50	605.00	907.50
11/17/20	LCE	Revise draft expert report for Analysis Group and send.	1.40	605.00	847.00
11/17/20	LGW	Revise background documents with comments from L. Esbrook.	.20	275.00	55.00

ROBBINS|RUSSELL

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Date	Tkpr	Description	Hours	Rate	Amount
11/17/20	MAM	Respond to email from Z. Ferguson re documents for fourth CBB production.	.20	370.00	74.00
11/17/20	MAM	Respond to email from Z. Ferguson re document metadata.	.20	370.00	74.00
11/17/20	MMM	Attend oral argument on counterclaims by telephone.	.50	925.00	462.50
11/17/20	MMM	Review NYT feature on PPE market and emails re same.	.40	925.00	370.00
11/17/20	ZNF	Attend phone hearing on motion to dismiss counterclaims; review documents and recordings for fourth CBB production; review documents produced by BFM for litigation relevance; coordinate production of CBB documents.	7.20	515.00	3,708.00
11/18/20	CCC	Assist with research of potential discovery materials for L. Esbrook; conferences with L. Webb regarding same.	.50	275.00	137.50
11/18/20	CF	Participate in team meeting.	.50	605.00	302.50
11/18/20	CF	Confer with L. Esbrook and Z. Ferguson.	.20	605.00	121.00
11/18/20	CF	Participate in call with Analysis Group and Mark Faulkner.	.70	605.00	423.50
11/18/20	CF	Correspond with D. Burke re Faulkner.	2.50	605.00	1,512.50
11/18/20	CF	Review BFM docs	5.20	605.00	3,146.00
11/18/20	DB	Call with Mark Faulkner and Wilmer team.	.60	925.00	555.00
11/18/20	DB	Call with Wilmer team re joint-defense strategy.	1.60	925.00	1,480.00
11/18/20	DB	Follow-up email with Analysis Group re N95 mask issues.	.80	925.00	740.00
11/18/20	DIW	Create package of all CBB and BFM productions to date for service on JPMorgan.	1.60	275.00	440.00
11/18/20	GAO	Weekly team meeting.	.50	975.00	487.50
11/18/20	GAO	Prepare for and call with Wilmer Hale re overall strategy.	1.60	975.00	1,560.00
11/18/20	GAO	Telephone call with Mark Faulkner.	.60	975.00	585.00
11/18/20	GAO	Follow-up work with D. Burke re N95 v. KN95 mask issue.	.30	975.00	292.50
11/18/20	GAO	Multiple emails and calls re 60 Minutes inquiries.	.80	975.00	780.00
11/18/20	LCE	Team meeting to strategize and allocate work for the week.	.50	605.00	302.50
11/18/20	LCE	Review Blue Flame's fourth document production.	2.00	605.00	1,210.00
11/18/20	LCE	Update discovery outline.	.30	605.00	181.50
11/18/20	LCE	Review Chain Bridge proposed production for privilege issues.	.80	605.00	484.00
11/18/20	LCE	Organize discovery outline to create binders for deposition preparation.	1.50	605.00	907.50
11/18/20	LGW	Research database for potential discovery materials; research hearing transcript requested by D. Burke.	3.50	275.00	962.50
11/18/20	MAM	Review hot and interesting documents and sent to attorneys for review.	.30	370.00	111.00
11/18/20	MAM	Respond to question from Z. Ferguson re BFM documents reviewed.	.50	370.00	185.00

ROBBINS|RUSSELL

December 4, 2020
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Date	Tkpr	Description	Hours	Rate	Amount
11/18/20	MMM	Draft task list and meeting agenda (0.5hr); participate in team meeting (0.5hr).	1.00	925.00	925.00
11/18/20	MMM	Outline agenda for call with Wilmer.	.30	925.00	277.50
11/18/20	MMM	Emails re deposition prep, open discovery items, 60 Minutes, JPMC's objections to RFPs.	1.10	925.00	1,017.50
11/18/20	MMM	Participate in call with Wilmer regarding defense strategy on BFM claim against CBB.	1.60	925.00	1,480.00
11/18/20	ZNF	Confer with CBB litigation team; draft deposition notice and subpoena for Mike Gulag; review CBB production to JPM; review produced documents from BFM for litigation relevance; quality check documents for fourth CBB production.	6.80	515.00	3,502.00
11/19/20	CCC	Prepare discovery materials for G. Orseck, M. Madden and D. Burke; revise discovery outline with comments from L. Esbrook.	7.90	275.00	2,172.50
11/19/20	CF	Update discovery outline to incorporate issue tag review.	3.40	605.00	2,057.00
11/19/20	CF	Propose redacted version of outline for JPM.	.60	605.00	363.00
11/19/20	CF	Review and respond to correspondence.	.70	605.00	423.50
11/19/20	CF	Review JPM responses to RFPs.	.60	605.00	363.00
11/19/20	DB	Additional follow-up emails re 60 Minutes inquiry.	.50	925.00	462.50
11/19/20	DIW	Technical assistance with discovery, including analysis of data and coding sharing options for Z. Ferguson, review of additional telephone recordings and associated collection data.	1.00	275.00	275.00
11/19/20	GAO	Telephone call with M. Madden re deposition strategy.	.30	975.00	292.50
11/19/20	GAO	Begin to prepare for Gula and Thomas depositions.	.40	975.00	390.00
11/19/20	LCE	Respond to questions on Blue Flame re preparation of binders.	.20	605.00	121.00
11/19/20	LCE	Respond to Z. Ferguson questions on Blue Flame production.	.30	605.00	181.50
11/19/20	LCE	Read news articles on Maryland settlement and forward to team.	.20	605.00	121.00
11/19/20	LCE	Add interesting documents to discovery outline.	4.00	605.00	2,420.00
11/19/20	LCE	Review proposed discovery outline to share with JPMorgan and comment on same.	.30	605.00	181.50
11/19/20	LGW	Continue to research database for potential discovery materials; various emails and conferences with L. Esbrook and C. ChaseCarpino regarding same.	13.70	275.00	3,767.50
11/19/20	MAM	Review hot and interesting documents and sent to attorneys for review.	.30	370.00	111.00
11/19/20	MAM	Review potential privilege, further review, and tech documents and sent to attorneys for review.	1.10	370.00	407.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/19/20	MMM	Confer with G. Orseck regarding Gula and Thomas depositions.	.20	925.00	185.00
11/19/20	MMM	Emails regarding Maryland settlement, deposition prep, documents to be included in next production.	.40	925.00	370.00
11/19/20	MMM	Confer with G. Orseck and D. Burke regarding agenda for coordination call with Wilmer.	1.10	925.00	1,017.50
11/19/20	ZNF	Review documents in CBB fourth production for privilege and redaction; prepare fourth production; draft subpoena to John Thomas; correspond with counsel via email; investigate methods to produce BFM documents to JPM on an ongoing basis.	8.20	515.00	4,223.00
11/20/20	CCC	Continue to prepare discovery materials for G. Orseck, M. Madden and D. Burke; continue to revise outline with comments from L. Esbrook.	9.80	275.00	2,695.00
11/20/20	CF	Review and respond to correspondence.	.80	605.00	484.00
11/20/20	DB	Emails with team re deposition planning and related issues.	.50	925.00	462.50
11/20/20	DB	Emails with G. Orseck and M. Madden re JPM indemnification claim.	.30	925.00	277.50
11/20/20	DIW	Technical assistance with discovery, including handling of new client data for review and production, confer with Z. Ferguson and M. McClain about tech issues and viewers, next production.	.60	275.00	165.00
11/20/20	GAO	Prepare for depositions.	.60	975.00	585.00
11/20/20	KRM	Assist with discovery materials for G. Orseck, M. Madden, and D. Burke.	1.80	275.00	495.00
11/20/20	LCE	Update and oversee preparation of binders with discovery outline.	4.50	605.00	2,722.50
11/20/20	LCE	Update discovery outline to share with JP Morgan under joint defense agreement.	.80	605.00	484.00
11/20/20	LGW	Research database for new potential discovery materials; research and prepare list of duplicates across volumes; various emails and conferences with L. Esbrook and C. ChaseCarpino regarding same.	5.00	275.00	1,375.00
11/20/20	MAM	Confer with D. Sarti re production to JPM and uploading documents.	.30	370.00	111.00
11/20/20	MAM	Draft reply to Z. Ferguson re setting up preproduction QC batches treatment of documents produced in government in preproduction QC.	.40	370.00	148.00
11/20/20	MAM	Review recently added documents and sent to Z. Ferguson for review.	.10	370.00	37.00
11/20/20	MMM	Emails regarding deposition notices (0.3hr); edit deposition notices prior to service (0.3hr).	.60	925.00	555.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/20/20	ZNF	Review documents for fourth production to BFM; draft deposition notices; research court and federal rules regarding remote depositions; confer with JPM counsel to resolve document-production issue.	6.60	515.00	3,399.00
11/21/20	LCE	Email with Z. Ferguson on quality control document review.	.10	605.00	60.50
11/21/20	MAM	Review documents for inclusion in CBB004 production volume and batch for preproduction QC review.	4.10	370.00	1,517.00
11/21/20	MAM	Respond to emails from Z. Ferguson re documents to be included in production volume CBB004, inconsistent coding issues to be cleaned up, confirming coding choices, coding protocols, and questions related to the treatment of documents to be withheld.	.70	370.00	259.00
11/21/20	ZNF	Coordinate 4th Chain Bridge document production; review documents for production.	2.70	515.00	1,390.50
11/22/20	LCE	Quality control review for Chain Bridge production.	2.90	605.00	1,754.50
11/22/20	ZNF	Review documents for 4th CBB production; apply redactions to withhold sensitive unresponsive information.	3.70	515.00	1,905.50
11/23/20	CF	Confer with M. Madden, D. Burke, and L. Esbrook re JPM documents.	.30	605.00	181.50
11/23/20	CF	Revise draft outline for JPM.	.50	605.00	302.50
11/23/20	CF	Participate in call with Analysis Group.	.50	605.00	302.50
11/23/20	CF	Review BFM documents.	1.10	605.00	665.50
11/23/20	CF	Review and respond to correspondence.	.40	605.00	242.00
11/23/20	DB	Call with Analysis Group re Mark Faulkner issues.	.50	925.00	462.50
11/23/20	DIW	Confer with Z. Ferguson, prepare field list for production of selected BFM records to JPMorgan; verify BFM005 production and draft instructions for CP tech team re same.	2.70	275.00	742.50
11/23/20	GAO	Telephone call with M. Chakraborty re Mark Faulkner report.	.50	975.00	487.50
11/23/20	GAO	Deposition prep.	.60	975.00	585.00
11/23/20	LCE	Update discovery outline for joint defense and call with team on same.	.30	605.00	181.50
11/23/20	LCE	Update Grice expert cancellation outline.	.70	605.00	423.50
11/23/20	LCE	Review Blue Flame-produced text message for complete chains in response to query by G. Orseck and correspond with C. Forstein and Z. Ferguson on same.	1.30	605.00	786.50
11/23/20	MAM	Respond to emails from Z. Ferguson re CBB production volume 4.	.40	370.00	148.00
11/23/20	MAM	Review excels in need of redaction and isolate from the potential production documents.	.90	370.00	333.00
11/23/20	MAM	Review and edit proposed set of production documents and folder for attorney review.	1.80	370.00	666.00

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Date	Tkpr	Description	Hours	Rate	Amount
11/23/20	MAM	Edit tagging for documents being sent to JPM.	.30	370.00	111.00
11/23/20	MAM	Confirm redactions on proposed production documents.	.50	370.00	185.00
11/23/20	MMM	Call regarding joint-defense version of discovery outline; emails regarding Blue Flame document production; emails regarding deposition notices and subpoenas; draft email to Analysis Group regarding Grice report.	1.20	925.00	1,110.00
11/23/20	ZNF	Coordinate CBB production 4; coordinate production of BFM documents to JPM; draft deposition notices and subpoenas.	8.20	515.00	4,223.00
11/24/20	CCC	Emails with L. Esbrook regarding electronic versions of discovery materials.	.20	275.00	55.00
11/24/20	CF	Participate in team meeting.	.60	605.00	363.00
11/24/20	CF	Review BFM documents.	2.40	605.00	1,452.00
11/24/20	DB	Prepare for and participate in weekly team meeting.	.70	925.00	647.50
11/24/20	DB	Emails with Wilmer team re joint-defense materials.	.30	925.00	277.50
11/24/20	DB	Initial review of proposed production documents, including emails with Z. Ferguson re initial comments.	.50	925.00	462.50
11/24/20	DIW	Technical assistance with discovery, including partial re-production of BFM records to JPMorgan with RREOUS key documents coding.	1.30	275.00	357.50
11/24/20	GAO	Team meeting.	.70	975.00	682.50
11/24/20	GAO	Prepare for depositions.	.80	975.00	780.00
11/24/20	GAO	Emails re deposition scheduling.	.20	975.00	195.00
11/24/20	IEC	Review and analyze new incoming productions for relevant documents	6.00	370.00	2,220.00
11/24/20	LCE	Correspond with paralegals and review their work to find missing text message fragments from Blue Flame production and review text productions.	.70	605.00	423.50
11/24/20	LCE	Weekly team strategy call.	.80	605.00	484.00
11/24/20	LCE	Review Blue Flame production.	2.30	605.00	1,391.50
11/24/20	LCE	Review e-binder of discovery outline documents to look for relevant missing documents.	1.40	605.00	847.00
11/24/20	LCE	Correspond with M. Madden and Z. Ferguson on service for California subpoenas.	.20	605.00	121.00
11/24/20	LGW	Research and organize text message screenshots between J. Thomas and B. Yee with comments from L. Esbrook.	3.00	275.00	825.00
11/24/20	MAM	Review BFM documents containing the transcript of text messages for relevance and send to attorneys for review.	.50	370.00	185.00
11/24/20	MAM	Revise search terms, run terms across BMF production 5, and batch for review.	1.20	370.00	444.00

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December 4, 2020
Invoice #: 200501

Date	Tkpr	Description	Hours	Rate	Amount
11/24/20	MAM	Update production documents to exclude families members of privileged documents.	.30	370.00	111.00
11/24/20	MMM	Draft task list and team meeting agenda.	.40	925.00	370.00
11/24/20	MMM	Confer with D. Burke regarding production (0.1hr); emails regarding deposition schedule, prep for Gula and Thomas depositions and other open items (0.4hr).	.50	925.00	462.50
11/24/20	MMM	Participate in weekly team strategy meeting.	.60	925.00	555.00
11/24/20	RHK	Analyze incoming production for significance to identified issues.	6.00	370.00	2,220.00
11/24/20	ZNF	Confer with litigation team to discuss status; review documents in BFM's fifth production for litigation relevance; coordinate review of BFM's fifth production.	4.90	515.00	2,523.50
11/25/20	CF	Correspond with Z. Ferguson and L. Esbrook.	.40	605.00	242.00
11/25/20	CF	Review BFM documents.	.90	605.00	544.50
11/25/20	DB	Review proposed production documents and emails with Z. Ferguson re comments on same.	1.50	925.00	1,387.50
11/25/20	IEC	Review and analyze new incoming productions for relevant documents	1.50	370.00	555.00
11/25/20	LCE	Communicate with discovery team on remaining documents to review and search.	.50	605.00	302.50
11/25/20	LCE	Review Blue Flame production batches.	1.80	605.00	1,089.00
11/25/20	MAM	Respond to email from Z. Ferguson re using advanced analytics to isolate out similar hot and interesting documents.	.20	370.00	74.00
11/25/20	MAM	Review documents slated for production and respond to question from Z. Ferguson re the same.	.90	370.00	333.00
11/25/20	MAM	Review documents identified by Z. Ferguson, remove non responsive documents, and finalize preproduction folder.	.50	370.00	185.00
11/25/20	MAM	Review hot and interesting documents and send to attorneys for review.	.20	370.00	74.00
11/25/20	MMM	Confer with D. Burke regarding documents slated for production (0.2hr); emails regarding production and other open discovery items (0.2hr).	.40	925.00	370.00
11/25/20	RHK	Analyze incoming production for significance to identified issues.	3.60	370.00	1,332.00
11/25/20	ZNF	Review documents produced by BFM for litigation relevance; generate terms for additional searches of BFM documents; use Casepoint analytics to find additional relevant documents in BFM production; finalize fourth production of BFM documents.	5.20	515.00	2,678.00
11/28/20	LCE	Update discovery outline.	1.30	605.00	786.50
11/28/20	LCE	Draft outline of opposition to motion to dismiss counterclaims.	4.30	605.00	2,601.50

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December 4, 2020
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Date	Tkpr	Description	Hours	Rate	Amount
11/29/20	MMM	Emails regarding meet and confer with Blue Flame regarding depositions.	.30	925.00	277.50
11/30/20	CF	Participate in team call.	.20	605.00	121.00
11/30/20	CF	Correspond with M. Madden.	.20	605.00	121.00
11/30/20	CF	Correspond with Z. Ferguson re privilege log.	.50	605.00	302.50
11/30/20	CF	Update discovery outline to incorporate audio files.	6.90	605.00	4,174.50
11/30/20	CF	Update discovery outline to incorporate issue tag review.	2.70	605.00	1,633.50
11/30/20	DB	Emails with G. Orseck and L. Esbrook re deposition prep and M. Faulkner issues.	.50	925.00	462.50
11/30/20	DB	Meet and confer call with opposing counsel re deposition and discovery schedule, including associated follow-up discussion with team.	.90	925.00	832.50
11/30/20	DB	Prepare for update call with clients re discovery status.	.50	925.00	462.50
11/30/20	DIW	Run similarity jobs to identify additional records like those already coded Hot and Interesting, set up auto-folder actions for KeyDocs tags.	1.20	275.00	330.00
11/30/20	GAO	Outline Gula and Thomas depositions.	4.00	975.00	3,900.00
11/30/20	GAO	Call with Schulte re deposition schedule.	.30	975.00	292.50
11/30/20	GAO	Prepare for presentation to clients.	.30	975.00	292.50
11/30/20	GAO	Review proposal for new discovery schedule.	.20	975.00	195.00
11/30/20	LCE	Call with opposing counsel on deposition scheduling.	.50	605.00	302.50
11/30/20	LCE	Update team on status of discovery strategy and outstanding tasks.	.20	605.00	121.00
11/30/20	LCE	Correspond with litigation support on outstanding questions on review of Blue Flame production.	.20	605.00	121.00
11/30/20	LCE	Follow up call with team on deposition schedules.	.40	605.00	242.00
11/30/20	LCE	Review discovery for texts and emails related to possible deposition topics for G. Orseck.	.50	605.00	302.50
11/30/20	LCE	Correspond with team on deposition strategy for Gula and Thomas depositions.	.40	605.00	242.00
11/30/20	LCE	Correspond with team on clean up searches.	.20	605.00	121.00
11/30/20	MAM	Review and verify coding in production volume CBB004 and submit to vendor for processing.	3.60	370.00	1,332.00
11/30/20	MAM	Respond to questions from L. Esbrook re document families.	.10	370.00	37.00

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December 4, 2020
Invoice #: 200501

Date	Tkpr	Description	Hours	Rate	Amount
11/30/20	MMM	Outline client-status update call (0.8hr); email team re document review progress and findings (0.2hr); meet and confer with other parties' counsel regarding deposition schedule (0.4hr); confer with D. Burke regarding document production (0.1hr); participate in internal call regarding deposition schedule and strategy (0.5hr); draft email to Blue Flame's counsel regarding deposition-schedule proposal (0.5hr).	2.50	925.00	2,312.50
11/30/20	ZNF	Email with lit support about CBB's fourth document production; research requirements for categorical privilege log in E.D. Va.; review BFM produced documents to generate search terms for clean-up review; confer with opposing counsel to schedule depositions; confer with Robbins Russell litigation team re deposition schedule.	5.60	515.00	2,884.00
TOTAL PROFESSIONAL SERVICES					\$ 310,022.50
Less Courtesy Discount					<u>\$ -10,000.00</u>
NET PROFESSIONAL SERVICES					\$ 300,022.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	35.00	925.00	32,375.00
Christine A Chase Carpino	CCC	18.70	275.00	5,142.50
Ian E Cohen	IEC	36.60	370.00	13,542.00
Leslie Esbrook	LCE	95.10	605.00	57,535.50
Zachary N Ferguson	ZNF	131.80	515.00	67,877.00
Carolyn Forstein	CF	58.60	605.00	35,453.00
Robert H Kearney	RHK	37.40	370.00	13,838.00
Matthew M Madden	MMM	28.10	925.00	25,992.50
Michael A McClain, Jr.	MAM	48.10	370.00	17,797.00
Kate R Miller	KRM	1.80	275.00	495.00
Gary A. Orseck	GAO	23.40	975.00	22,815.00
Sherry A Rather	SAR	.60	275.00	165.00
Dana I. Wesley Sarti	DIW	24.10	275.00	6,627.50
Lyndsay G Webb	LGW	37.70	275.00	10,367.50
Total		577.00		\$ 310,022.50

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December 4, 2020
Invoice #: 200501**EXPENSES**

Description	Amount
Computer Research Charges	975.98
Litigation Support from Vendor	4,813.71
Trial and Hearing Transcripts	94.25
Process Server & Subpoena Fees	325.00
Courier/Overnight delivery	482.65
TOTAL EXPENSES	\$ 6,691.59
TOTAL THIS INVOICE	\$ 306,714.09

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Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

December 4, 2020

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200501
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 306,714.09

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200501, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

January 19, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200630
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: December 31, 2020.

RE: Blue Flame

Total Professional Services	\$ 209,138.50
Total Expenses	<u>\$ 15,273.68</u>
TOTAL THIS INVOICE	\$ 224,412.18

ROBBINS|RUSSELL

January 19, 2021
Invoice #: 200630

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/01/20	CF	Participate in team meeting.	.50	605.00	302.50
12/01/20	DB	Participate in weekly team strategy meeting.	.30	925.00	277.50
12/01/20	DB	Call with clients re discovery issues and strategy.	1.00	925.00	925.00
12/01/20	DB	Coordinate response to P. Fitzgerald re Chicago mask donation.	.20	925.00	185.00
12/01/20	DB	Emails with team re discovery scheduling issues.	.30	925.00	277.50
12/01/20	DB	Emails with Analysis Group re Faulkner issues.	.20	925.00	185.00
12/01/20	DB	Review draft consent motion re discovery deadlines.	.20	925.00	185.00
12/01/20	DIW	Review proposed production CBB004, note corrections and follow up with M. McClain.	.90	275.00	247.50
12/01/20	GAO	Weekly team meeting.	.50	975.00	487.50
12/01/20	GAO	Meeting with clients re litigation update.	1.00	975.00	975.00
12/01/20	GAO	Emails and negotiations with opposing counsel over deposition scheduling.	.30	975.00	292.50
12/01/20	GAO	Address follow-up items from client status call.	.40	975.00	390.00
12/01/20	GAO	Call with A. Schoenfeld re JPMC's position in discovery.	.30	975.00	292.50
12/01/20	GAO	Call with Donald and Matt re discovery schedule.	.20	975.00	195.00
12/01/20	IEC	Analyze and review documents in newly loaded batches	6.00	370.00	2,220.00
12/01/20	LCE	Call with Analysis Group on draft expert report and preparation for same.	.60	605.00	363.00
12/01/20	LCE	Review new issue tags and update discovery outline on same.	1.50	605.00	907.50
12/01/20	LCE	Weekly team strategy meeting.	.50	605.00	302.50
12/01/20	LGW	Prepare Chicago mask donation timeline materials with comments from C. Forstein.	.50	275.00	137.50
12/01/20	MAM	Finalize additional search terms and set up additional BFM review batches based on search terms.	2.40	370.00	888.00
12/01/20	MAM	Review privileged documents and confirm what needs to be logged.	.30	370.00	111.00
12/01/20	MAM	Review metadata for production documents included in CBB004, verify native production documents for audio files, submit documents with additional instructions for processing.	2.60	370.00	962.00
12/01/20	MAM	Draft instruction email to Discovery Attorneys re review of additional BFM batches.	.20	370.00	74.00
12/01/20	MAM	Respond to question re privilege issues in BFM documents.	.10	370.00	37.00

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12/01/20	MAM	Draft email to Z. Ferguson re metadata issues in redacted documents.	.20	370.00	74.00
12/01/20	MMM	Draft meeting agenda and related emails.	.30	925.00	277.50
12/01/20	MMM	Participate in weekly team strategy meeting.	.30	925.00	277.50
12/01/20	MMM	Participate in call with P. Fitzgerald, J. Brough, and D. Evinger.	1.00	925.00	925.00
12/01/20	MMM	Emails regarding BFM counterproposal on deposition.	.60	925.00	555.00
12/01/20	MMM	Review Analysis Group memorandum regarding regulatory landscape in preparation for discussion of Grice report.	.80	925.00	740.00
12/01/20	MMM	Prepare for and participate in call with Analysis Group regarding Grice liability report.	.90	925.00	832.50
12/01/20	MMM	Review BFM's draft consent motion on schedule and emails re same.	.30	925.00	277.50
12/01/20	RHK	Analyze incoming production for significance to identified issues.	6.10	370.00	2,257.00
12/01/20	ZNF	Confer with Robbins Russell litigation team to discuss case developments; draft email to Velox Medical; revise California official subpoenas; review CBB production 4 for processing errors; coordinate cleanup review of all BFM productions; review documents produced by BFM.	5.10	515.00	2,626.50
12/02/20	CF	Participate in call with M. Faulkner.	.50	605.00	302.50
12/02/20	CF	Correspond with D. Burke and L. Webb re collection of documents for expert.	.50	605.00	302.50
12/02/20	CF	Correspond with Z. Ferguson and L. Esbrook re discovery.	.30	605.00	181.50
12/02/20	DB	Emails with M. Madden and Z. Ferguson re subpoenas.	.20	925.00	185.00
12/02/20	DB	Call with M. Faulkner and Analysis Group re N95 issues.	.50	925.00	462.50
12/02/20	DIW	Verify production CBB004 data file and corresponding images, develop KeyDocs quality control review workflow, conference with Z. Ferguson and team re computer-assisted control review for key documents.	1.30	275.00	357.50
12/02/20	GAO	Telephone call with Alan Schoenfeld re settlement strategy.	.60	975.00	585.00
12/02/20	GAO	Telephone call with M. Faulkner re masks report.	.50	975.00	487.50
12/02/20	GAO	Prepare email summary to clients re status with JPMC.	.20	975.00	195.00
12/02/20	GAO	Prepare for Thomas and Gula depositions.	3.30	975.00	3,217.50
12/02/20	IEC	Analyze and review documents in newly loaded batches	2.00	370.00	740.00
12/02/20	LCE	Compile new materials to send to expert.	1.20	605.00	726.00
12/02/20	LCE	Send list of outstanding tasks to associates to take over in coming week.	.30	605.00	181.50
12/02/20	LCE	Respond to G. Orseck question on discovery outline materials.	1.00	605.00	605.00

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12/02/20	LGW	Prepare materials for expert review with comments from L. Esbrook.	1.20	275.00	330.00
12/02/20	MAM	Verify and prepare production volume CBB004 for service.	1.60	370.00	592.00
12/02/20	MAM	Draft email to Z. Ferguson re information related to production volume CBB004 to be included in cover letter.	.20	370.00	74.00
12/02/20	MMM	Emails regarding non-party deposition subpoenas.	.30	925.00	277.50
12/02/20	MMM	Review BFM production documents to analyze text messages among principals and other key documents.	1.40	925.00	1,295.00
12/02/20	MMM	Email G. Orseck and D. Burke re financial information concerning BFM.	.30	925.00	277.50
12/02/20	RHK	Analyze incoming production for significance to identified issues.	3.50	370.00	1,295.00
12/02/20	ZNF	Confer with litigation support staff and Casepoint representative to discuss use of Casepoint analytic tools in reviewing BFM's produced documents.	.60	515.00	309.00
12/02/20	ZNF	Review BFM's produced documents to answer specific questions regarding discovery timeline.	1.30	515.00	669.50
12/02/20	ZNF	Perform quality check for Chain Bridge's fourth document production.	.60	515.00	309.00
12/02/20	ZNF	Review federal rules for service of party and nonparty subpoenas.	.40	515.00	206.00
12/02/20	ZNF	Email M. Madden and D. Burke regarding subpoena rules.	.30	515.00	154.50
12/02/20	ZNF	Arrange for service of nonparty subpoenas with paralegal.	.30	515.00	154.50
12/02/20	ZNF	Revise California officials' subpoenas and draft cover letter.	1.30	515.00	669.50
12/02/20	ZNF	Draft and send emails serving Chain Bridge Bank's fourth document production.	.30	515.00	154.50
12/02/20	ZNF	Review documents produced by Blue Flame for relevance to claims and defenses.	2.20	515.00	1,133.00
12/03/20	CCC	Service of subpoenas for Z. Ferguson; emails with Capitol Process Services; emails with Z. Ferguson regarding status of service.	.50	275.00	137.50
12/03/20	CF	Draft discovery letter for M. Madden.	2.10	605.00	1,270.50
12/03/20	CF	Correspond with M. Madden re document production.	.40	605.00	242.00
12/03/20	DB	Email clients re Chicago donation transaction.	.30	925.00	277.50
12/03/20	DB	Emails with M. Madden and Z. Ferguson re third-party subpoenas.	.30	925.00	277.50
12/03/20	GAO	Review order from Judge Brinkema.	.10	975.00	97.50
12/03/20	GAO	Emails with Schulte re Thomas and Gula depositions.	.10	975.00	97.50
12/03/20	GAO	Review materials for deposition prep.	2.50	975.00	2,437.50

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12/03/20	LGW	Prepare additional documents for expert review with comments from C. Forstein.	.50	275.00	137.50
12/03/20	MAM	Review additional coded BFM documents and folder for review by attorneys.	.30	370.00	111.00
12/03/20	MMM	Email clients and experts regarding deadline changes.	.30	925.00	277.50
12/03/20	MMM	Emails regarding misc open discovery items, including depositions, discovery documents, subpoenas for California depositions.	1.10	925.00	1,017.50
12/03/20	ZNF	Finalize and arrange for service of deposition subpoenas for California officials.	1.70	515.00	875.50
12/03/20	ZNF	Review document identified by Casepoint analytics for relevance to claims and defenses.	1.40	515.00	721.00
12/03/20	ZNF	Email litigation support re protocol to identify all privileged documents for privilege log.	.40	515.00	206.00
12/03/20	ZNF	Research attorney-client privilege and work product questions in relation to privilege log.	1.10	515.00	566.50
12/03/20	ZNF	Draft privilege log.	2.10	515.00	1,081.50
12/03/20	ZNF	Research notice rules re nonparty deposition subpoenas	.50	515.00	257.50
12/04/20	CF	Review discovery materials for missing items.	3.40	605.00	2,057.00
12/04/20	CF	Coordinate collection of documents for expert.	.70	605.00	423.50
12/04/20	CF	Review and respond to correspondence.	.50	605.00	302.50
12/04/20	DB	Emails re follow-up to Velox subpoena.	.30	925.00	277.50
12/04/20	GAO	Call with Wilmer regarding JPMC's dealings with California.	.50	975.00	487.50
12/04/20	GAO	Follow-up emails with P. Fitzgerald and team.	.20	975.00	195.00
12/04/20	GAO	Review binders of documents for deposition prep.	1.40	975.00	1,365.00
12/04/20	LGW	Continue to prepare additional documents for expert review.	.20	275.00	55.00
12/04/20	MAM	Review privileged documents and respond to questions from Z. Ferguson re the same.	2.40	370.00	888.00
12/04/20	MAM	Confer with D. Sarti re content of the review folder.	.20	370.00	74.00
12/04/20	MMM	Emails re scheduling of Thomas and Gula depositions.	.30	925.00	277.50
12/04/20	MMM	Edit letter to BFM regarding document production.	.40	925.00	370.00
12/04/20	ZNF	Email litigation support re possible folders for privileged documents	.70	515.00	360.50
12/04/20	ZNF	Serve fourth document production and draft associated emails.	.30	515.00	154.50
12/04/20	ZNF	Draft privilege log.	3.40	515.00	1,751.00
12/04/20	ZNF	Search CBB production folders for privileged documents to include in privilege log.	.70	515.00	360.50
12/05/20	DB	Emails with P. Fitzgerald re discovery documents.	.40	925.00	370.00

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12/05/20	MMM	Emails re Coffey call recording and other open items.	.20	925.00	185.00
12/05/20	ZNF	Conduct macro-analysis of BFM productions to identify any problems or anomalies to note in discovery letter to opposing counsel.	1.30	515.00	669.50
12/05/20	ZNF	Search and send documents requested by client, and email D. Burke about same.	1.00	515.00	515.00
12/06/20	CF	Correspond with M. Madden, Z. Ferguson, and M. McClain re discovery review.	.40	605.00	242.00
12/07/20	CF	Correspond with M. Madden and Z. Ferguson re discovery.	.80	605.00	484.00
12/07/20	CF	Review document clean-up searches.	2.40	605.00	1,452.00
12/07/20	CF	Update discovery outline.	1.80	605.00	1,089.00
12/07/20	DB	Follow-up emails with P. Fitzgerald re discovery documents.	.30	925.00	277.50
12/07/20	GAO	Call with P. White re settlement.	.50	975.00	487.50
12/07/20	GAO	Emails and calls with clients and co-counsel with update.	.50	975.00	487.50
12/07/20	GAO	Review documents for discovery.	1.50	975.00	1,462.50
12/07/20	MMM	Emails re depositions, call recordings, letter to BFM regarding discovery items,	.80	925.00	740.00
12/07/20	MMM	Review withheld and redacted documents and edit privilege log re same.	1.50	925.00	1,387.50
12/07/20	ZNF	Review BFM productions to determine responsiveness to RFPs;	2.60	515.00	1,339.00
12/07/20	ZNF	Confer with C. Forstein to determine categories of documents to request from BFM	.30	515.00	154.50
12/08/20	CF	Participate in team meeting.	.60	605.00	363.00
12/08/20	CF	Revise discovery letter for M. Madden.	3.30	605.00	1,996.50
12/08/20	CF	Coordinate collection of documents for expert.	.30	605.00	181.50
12/08/20	CF	Update discovery outline.	.40	605.00	242.00
12/08/20	DB	Review discovery documents for sharing with Faulkner.	.80	925.00	740.00
12/08/20	DB	Attend team strategy meeting.	.60	925.00	555.00
12/08/20	GAO	Team meeting.	.60	975.00	585.00
12/08/20	GAO	Emails with Analysis Group and Wilmer re M. Faulkner.	.20	975.00	195.00
12/08/20	GAO	Call with A. Schoenfeld re our dealings with California.	.40	975.00	390.00
12/08/20	GAO	Review binders for deposition prep.	2.20	975.00	2,145.00
12/08/20	LGW	Revise documents for expert review with comments from C. Forstein.	.20	275.00	55.00
12/08/20	MMM	Prepare agenda for weekly team meeting.	.20	925.00	185.00
12/08/20	MMM	Participate in weekly team meeting.	.60	925.00	555.00

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Date	Tkpr	Description	Hours	Rate	Amount
12/08/20	MMM	Emails regarding JPMC/CA agreements, Bearman deposition, and other open issues.	.40	925.00	370.00
12/08/20	ZNF	Confer with Robbins Russell attorneys to discuss case developments.	.60	515.00	309.00
12/08/20	ZNF	Review and revise discovery letter to SRZ.	.80	515.00	412.00
12/08/20	ZNF	Review discovery outline	2.30	515.00	1,184.50
12/08/20	ZNF	Review BFM document productions to ensure pertinent documents have been tagged and reviewed.	1.70	515.00	875.50
12/09/20	CF	Correspond with G. Orseck, D. Burke, and Z. Ferguson re discovery materials.	1.20	605.00	726.00
12/09/20	DB	Review documents and prepare materials to share with Analysis Group re Faulkner report.	1.00	925.00	925.00
12/09/20	DB	Emails with team re discovery documents.	.50	925.00	462.50
12/09/20	DB	Emails with M. Madden and Z. Ferguson re privilege log.	.20	925.00	185.00
12/09/20	DB	Call with Analysis Group, Faulkner, and Wilmer re expert report issues.	.80	925.00	740.00
12/09/20	DB	Prepare for, conduct, and follow-up on meet-and-confer call with Velox counsel re subpoena.	1.70	925.00	1,572.50
12/09/20	GAO	Prepare for and meet with J. Brough and D. Evinger to prepare for call with insurance carriers.	1.00	975.00	975.00
12/09/20	GAO	Call with M. Faulkner, Analysis Group, and Wilmer re expert report.	.80	975.00	780.00
12/09/20	GAO	Review binders in prep for depositions.	2.00	975.00	1,950.00
12/09/20	LCE	Catch up on discovery outline tasks.	.30	605.00	181.50
12/09/20	MMM	Emails regarding MD/BFM settlement, Bearman deposition, withheld email on draft privilege log, and other open items.	.50	925.00	462.50
12/09/20	ZNF	Confer with Velox Medical's counsel regarding compliance with subpoena.	.90	515.00	463.50
12/09/20	ZNF	Revise privilege log to incorporate partner feedback.	3.20	515.00	1,648.00
12/09/20	ZNF	Research attorney-client privilege and work product questions related to documents in privilege log.	1.40	515.00	721.00
12/09/20	ZNF	Revise notes re meeting with Velox Medical counsel	.20	515.00	103.00
12/09/20	ZNF	Email C. Forstein regarding documents in discovery outline	.20	515.00	103.00
12/09/20	ZNF	Review BFM and California documents productions to answer questions about documents in discovery timeline and to determine how to narrow Velox subpoena requests.	1.10	515.00	566.50
12/10/20	CF	Correspond with paralegals re discovery binders.	.30	605.00	181.50
12/10/20	CF	Revise discovery letter for M. Madden.	1.20	605.00	726.00
12/10/20	DB	Emails re request for 60 Minutes materials, including brief research re scope of reporter's privilege.	1.20	925.00	1,110.00

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12/10/20	DB	Review letter from California AG re Yee deposition.	.50	925.00	462.50
12/10/20	DB	Prepare for and call with A. Prizgintas re status of JPM document production.	.50	925.00	462.50
12/10/20	GAO	Prep for and call with insurance carrier.	1.50	975.00	1,462.50
12/10/20	GAO	Follow-up call with S. Weisbrod.	.20	975.00	195.00
12/10/20	GAO	Review subpoena objection re Betty Yee and confer with D. Burke.	.20	975.00	195.00
12/10/20	GAO	Review correspondence from 60 Minutes and follow-up.	.20	975.00	195.00
12/10/20	LCE	Correspond with team on California subpoena contacts.	.30	605.00	181.50
12/10/20	LCE	Correspond with C. Forstein and Z. Ferguson on outstanding discovery outline obligations.	.50	605.00	302.50
12/10/20	LCE	Review draft expert report and correspond with M. Madden on same.	.90	605.00	544.50
12/10/20	MMM	Edit letter to BFM regarding document-production issues.	.70	925.00	647.50
12/10/20	MMM	Emails with D. Burke and Z. Ferguson re Bearman and California depositions.	.30	925.00	277.50
12/10/20	MMM	Review California letter re Yee deposition and emails re same.	.40	925.00	370.00
12/10/20	ZNF	Email M. Madden, D. Burke, L. Esbrook, and litigation support regarding depositions and related matters.	.60	515.00	309.00
12/10/20	ZNF	Review filings in Citibank NA v. Brigade Capital Management for relevance to Count I and II UCC claims.	.80	515.00	412.00
12/11/20	DB	Review draft letter to opposing counsel re discovery issues.	.20	925.00	185.00
12/11/20	DB	Emails with client re status of discovery issues, including 60 Minutes interview and Yee subpoena.	.80	925.00	740.00
12/11/20	DB	Call with C. Porter (Cal. AG's Office) re Yee subpoena.	.30	925.00	277.50
12/11/20	DB	Call with Wilmer re Yee deposition issues.	.40	925.00	370.00
12/11/20	DIW	Uppcode audio files to enable machine rough transcription.	.20	275.00	55.00
12/11/20	LGW	Research additional discovery timeline materials.	3.00	275.00	825.00
12/11/20	LGW	Transcribe audio files; emails with L. Esbrook regarding same.	4.50	275.00	1,237.50
12/11/20	MMM	Call with Wilmer regarding California discovery.	.40	925.00	370.00
12/11/20	MMM	Edit, finalize, and send letter to BFM re document discovery issues.	.30	925.00	277.50
12/11/20	ZNF	Confer with California deputy AG regarding Betty Yee deposition subpoena.	.10	515.00	51.50
12/11/20	ZNF	Email L. Esbrook and C. Forstein regarding items for discovery binder update.	.90	515.00	463.50
12/13/20	DB	Emails with P. Fitzgerald re depositions of California officials.	.20	925.00	185.00

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12/14/20	CCC	Revise discovery materials with comments from L. Esbrook; emails with L. Esbrook and L. Webb regarding same.	4.80	275.00	1,320.00
12/14/20	CF	Correspond with G. Orseck re discovery materials.	1.40	605.00	847.00
12/14/20	DB	Analysis of letter from Velox counsel re letter on subpoena issues.	.50	925.00	462.50
12/14/20	DB	Emails with G. Orseck and M. Madden re Yee deposition and California's letter.	.50	925.00	462.50
12/14/20	GAO	Prep for depos.	3.80	975.00	3,705.00
12/14/20	GAO	Confer with M. Madden and D. Burke re discovery strategy.	.30	975.00	292.50
12/14/20	LCE	Correspond with paralegals and G. Orseck on discovery binders.	.40	605.00	242.00
12/14/20	LCE	Emails with team on transcription of audio calls.	.30	605.00	181.50
12/14/20	LCE	Email with G. Orseck and C. Forstein regarding discovery outline timeline.	.10	605.00	60.50
12/14/20	LGW	Continue to transcribe audio files; emails with L. Esbrook regarding same.	15.50	275.00	4,262.50
12/14/20	MMM	Emails with G. Orseck and D. Burke regarding Yee deposition and other deposition-related issues.	.60	925.00	555.00
12/15/20	CCC	Continue to revise discovery materials with comments from L. Esbrook; prepare new discovery materials for G. Orseck, M. Madden, D. Burke.	3.90	275.00	1,072.50
12/15/20	CF	Review discovery materials for deposition prep.	5.80	605.00	3,509.00
12/15/20	DB	Emails with P. Fitzgerald re California depositions and Thomas-Yee text messages, including preparing documents for circulating to clients.	1.00	925.00	925.00
12/15/20	GAO	Review documents for depos.	.60	975.00	585.00
12/15/20	GAO	Review draft Grice report.	.80	975.00	780.00
12/15/20	GAO	Convey my comments to M. Madden on draft Grice report.	.60	975.00	585.00
12/15/20	LCE	Email with G. Orseck and C. Forstein regarding depositions strategy for Blue Flame supply chain	1.00	605.00	605.00
12/15/20	LCE	Confirm Bates-stamp discovery outline edits proposed by paralegals.	.30	605.00	181.50
12/15/20	LCE	Email with paralegals regarding document storage	.20	605.00	121.00
12/15/20	LCE	Calls with G. Orseck and M. Madden regarding edits to expert report.	.90	605.00	544.50
12/15/20	MMM	Call with G. Orseck and L. Esbrook to discuss draft Grice report on liability.	.90	925.00	832.50
12/15/20	MMM	Confer with L. Esbrook on comments regarding Grice liability report and next steps.	.20	925.00	185.00
12/15/20	MMM	Draft email to H. Huang re deposition request.	.30	925.00	277.50

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12/16/20	CCC	Revise electronic discovery materials.	.60	275.00	165.00
12/16/20	CF	Review and respond to correspondence.	.40	605.00	242.00
12/16/20	DB	Review Velox letter and associates emails with M. Madden and Z. Ferguson.	1.40	925.00	1,295.00
12/16/20	DB	Work on response to letter from California AG's office, including drafting letter, legal research re apex doctrine, and emails with team and client.	2.20	925.00	2,035.00
12/16/20	DB	Emails with A. Schoenfeld (Wilmer) re research on damages issues.	1.20	925.00	1,110.00
12/16/20	GAO	Review documents for deposition prep.	.70	975.00	682.50
12/16/20	GAO	Multiple emails with Matt and Donald re discovery strategy.	.50	975.00	487.50
12/16/20	MMM	Email H. Huang re deposition subpoena, and emails with colleagues regarding same.	.30	925.00	277.50
12/16/20	MMM	Draft email to BFM and JPMC counsel regarding pending depositions.	.20	925.00	185.00
12/16/20	MMM	Review and comment on D. Burke's proposed response to Velox Medical's letter objecting to document subpoena.	.30	925.00	277.50
12/16/20	MMM	Draft email to D. Evinger regarding proposed production of text messages to government.	.20	925.00	185.00
12/16/20	MMM	Emails regarding other open discovery items (California depositions, discovery outline, defensive deposition prep, etc.)	.40	925.00	370.00
12/16/20	MMM	Edit letter to Velox Medical, and emails re same.	.30	925.00	277.50
12/16/20	ZNF	Draft and revise deposition subpoena for Henry Huang.	.30	515.00	154.50
12/16/20	ZNF	Review Velox Medical's counsel's response to subpoena and email D. Burke and M. Madden re same.	.70	515.00	360.50
12/17/20	CF	Correspond with G. Orseck re BFM banking relationships.	.80	605.00	484.00
12/17/20	CF	Review and respond to correspondence.	.50	605.00	302.50
12/17/20	DB	Prepare for, conduct, and follow-up on meet-and-confer call with Velox counsel re response to document subpoena, including associated emails with M. Madden and Z. Ferguson.	1.40	925.00	1,295.00
12/17/20	DB	Finalize letter to California AG's office re Yee subpoena.	.50	925.00	462.50
12/17/20	DB	Prepare for and conduct call with California AG's office re Yee subpoena.	.20	925.00	185.00
12/17/20	GAO	Review document binders in prep for depositions.	1.60	975.00	1,560.00
12/17/20	GAO	Review correspondence on discovery from JPMC and Blue Flame.	.20	975.00	195.00
12/17/20	LCE	Begin editing expert report.	1.70	605.00	1,028.50
12/17/20	MMM	Edit and comment on Grice liability report, and emails with L Esbrook re same.	4.50	925.00	4,162.50
12/17/20	MMM	Review JPMC objections to BFM document requests.	.20	925.00	185.00

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Date	Tkpr	Description	Hours	Rate	Amount
12/17/20	MMM	Emails regarding Velox Medical document subpoena.	.20	925.00	185.00
12/17/20	ZNF	Review documents produced by BFM to generate search terms for Velox subpoena production.	1.30	515.00	669.50
12/17/20	ZNF	Email D. Burke and M. Madden regarding Velox subpoena production search terms.	.30	515.00	154.50
12/18/20	CF	Review and respond to correspondence re discovery.	.50	605.00	302.50
12/18/20	DB	Review vetting results from Analysis Group re Faulkner public statements, including associated emails with Wilmer.	.50	925.00	462.50
12/18/20	DB	Follow-up re Velox subpoena, including drafting letter re objections and revising search terms.	2.00	925.00	1,850.00
12/18/20	DB	Call with Wilmer re discovery issues.	.40	925.00	370.00
12/18/20	GAO	Emails with Analysis Group re M. Faulkner report.	.20	975.00	195.00
12/18/20	GAO	Review documents for depositions.	.40	975.00	390.00
12/18/20	LCE	Work with paralegals to update Bates numbers in discovery outline.	.30	605.00	181.50
12/18/20	LCE	Send email to Analysis Group with comments on expert report and additional materials.	.30	605.00	181.50
12/18/20	LCE	Comment on draft expert report.	5.50	605.00	3,327.50
12/18/20	LCE	Prepare document list to send to Analysis Group for draft expert report.	1.20	605.00	726.00
12/18/20	LGW	Revise discovery outline with comments from L. Esbrook.	1.80	275.00	495.00
12/18/20	LGW	Prepare additional materials for expert review with comments from L. Esbrook.	1.80	275.00	495.00
12/18/20	MAM	Respond to question from Z. Ferguson re searching for Bates Nos.	.20	370.00	74.00
12/18/20	MAM	Review load files for CBB0004 and confirm missing text.	1.30	370.00	481.00
12/18/20	MAM	Review production images for CBB004 and respond to questions from Z. Ferguson re the same.	.50	370.00	185.00
12/18/20	MAM	Confer with S. Rather re image issues and potential solutions.	.50	370.00	185.00
12/18/20	MMM	Call with Wilmer regarding discovery.	.40	925.00	370.00
12/18/20	MMM	Confer with C. Forstein regarding BFM letter regarding discovery.	.20	925.00	185.00
12/18/20	MMM	Emails with D. Burke, C. Forstein, and Z. Ferguson re response to BFM discovery letter.	.20	925.00	185.00
12/18/20	MMM	Review L. Esbrook's comments on draft Grice report prior to sending.	.50	925.00	462.50
12/18/20	ZNF	Review JPM's objections and responses to CBB's first requests for production	.30	515.00	154.50
12/18/20	ZNF	Review December 17 letter from opposing counsel regarding discovery an research response.	2.70	515.00	1,390.50

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January 19, 2021
Invoice #: 200630

Date	Tkpr	Description	Hours	Rate	Amount
12/18/20	ZNF	Email M. Madden, D. Burke, C. Forstein, and L. Esbrook regarding response to December 17 discovery letter from opposing counsel.	.40	515.00	206.00
12/21/20	CF	Correspond with Z. Ferguson and L. Esbrook.	.40	605.00	242.00
12/21/20	DB	Emails with M. Madden and Z. Ferguson re responses to opposing counsel's letter re discovery issues.	.50	925.00	462.50
12/21/20	DIW	Review imaging issue with M. McClain, prepare tech team instructions for replacement images and overlay production.	.40	275.00	110.00
12/21/20	LCE	Email team regarding production of bank call logs.	.30	605.00	181.50
12/21/20	MAM	Confer with D. Sarti re CBB production images.	.20	370.00	74.00
12/21/20	MAM	Draft email to Z. Ferguson re replacement images for Production Vol. CBB004.	.30	370.00	111.00
12/21/20	MAM	Review metadata on audio files and respond to questions from Z. Ferguson re the same.	.30	370.00	111.00
12/21/20	MMM	Emails regarding Grice liability report, BFM discovery letter, California depositions, production of call log, and other open items.	1.10	925.00	1,017.50
12/21/20	MMM	Edit letter to BFM responding to questions posed about CBB's document production.	.50	925.00	462.50
12/21/20	ZNF	Email M. Madden, D. Burke, C. Forstein, and L. Esbrook regarding discovery items related to December 17 letter from opposing counsel.	.70	515.00	360.50
12/21/20	ZNF	Draft response to opposing counsel's December 17 discovery letter.	3.40	515.00	1,751.00
12/21/20	ZNF	Draft spreadsheet of all calls between CBB and JPM, California, and Blue Flame	1.30	515.00	669.50
12/22/20	CF	Participate in team call.	.90	605.00	544.50
12/22/20	CF	Confer with B. Arnold re deposition logistics.	.40	605.00	242.00
12/22/20	CF	Correspond with C. Chase Carpino and G. Orseck re depositions.	.50	605.00	302.50
12/22/20	CF	Correspond with Z. Ferguson and L. Esbrook.	.20	605.00	121.00
12/22/20	DB	Attend a portion of weekly team meeting.	.50	925.00	462.50
12/22/20	DB	Emails with Z. Ferguson re legal research on summary judgment issues.	.50	925.00	462.50
12/22/20	DB	Emails with M. Madden and Z. Ferguson re discovery issues.	.40	925.00	370.00
12/22/20	DB	Confer with B. Arnold re Chinese deposition rules.	.40	925.00	370.00
12/22/20	DB	Emails with California AG's office re scheduling depositions.	.20	925.00	185.00
12/22/20	GAO	Weekly team meeting.	.80	975.00	780.00
12/22/20	GAO	Review email from H. Huang's counsel.	.10	975.00	97.50
12/22/20	LCE	Email with team on additional documents for expert report.	.10	605.00	60.50

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January 19, 2021
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Date	Tkpr	Description	Hours	Rate	Amount
12/22/20	LCE	Weekly team strategy call.	1.00	605.00	605.00
12/22/20	LCE	Begin drafting defense deposition outline.	1.50	605.00	907.50
12/22/20	MAM	Draft email to Z. Ferguson re status of updated images for CBB004.	.20	370.00	74.00
12/22/20	MMM	Prepare team meeting agenda and updated task list.	.50	925.00	462.50
12/22/20	MMM	Participate in weekly team meeting and strategy session.	.90	925.00	832.50
12/22/20	MMM	Edit discovery letter to BFM.	.30	925.00	277.50
12/22/20	MMM	Emails with L. Esbrook regarding substance of Brough and Evinger deposition-prep outline.	.40	925.00	370.00
12/22/20	ZNF	Email M. Madden, D. Burke, C. Forstein, and L. Esbrook regarding response to December 17 discovery letter.	.90	515.00	463.50
12/22/20	ZNF	Draft email to client regarding supplemental discovery requests.	.20	515.00	103.00
12/22/20	ZNF	Revise call log spreadsheet.	.90	515.00	463.50
12/22/20	ZNF	Coordinate review of JPM production and delivery of supplemental production images with litigation support.	.60	515.00	309.00
12/22/20	ZNF	Confer with G. Orseck, M. Madden, D. Burke, C. Forstein, and L. Esbrook to discuss case developments and litigation strategy.	.80	515.00	412.00
12/22/20	ZNF	Research argument regarding damages element of UCC Article 4A claim.	.20	515.00	103.00
12/23/20	CCC	Follow-up on affidavits of service; Gula and Thomas deposition matters with Alderson; emails with C. Forstein regarding same.	.50	275.00	137.50
12/23/20	CF	Review and respond to correspondence.	.40	605.00	242.00
12/23/20	DB	Emails with team and clients re open discovery items.	.50	925.00	462.50
12/23/20	DB	Review letter to opposing counsel re discovery issues.	.20	925.00	185.00
12/23/20	DIW	Verify incoming JPMorgan production data, forward to tech team with instructions and metrics re same to attorney team, other technical assistance with discovery.	.80	275.00	220.00
12/23/20	GAO	Debrief on status of Grice report.	.20	975.00	195.00
12/23/20	LCE	Call with Analysis Group on expert report	.80	605.00	484.00
12/23/20	LCE	Update discovery outline	.30	605.00	181.50
12/23/20	LCE	Draft deposition defense outline.	4.30	605.00	2,601.50
12/23/20	LGW	Revise discovery materials with comments from L. Esbrook.	.30	275.00	82.50
12/23/20	MMM	Call with Analysis Group re Grice liability report.	.70	925.00	647.50
12/23/20	MMM	Confer with L. Esbrook re deposition-prep outline.	.20	925.00	185.00
12/23/20	MMM	Emails with D. Burke and Z. Ferguson re document production.	.50	925.00	462.50

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January 19, 2021
Invoice #: 200630

Date	Tkpr	Description	Hours	Rate	Amount
12/23/20	MMM	Edit discovery letter to BFM.	.20	925.00	185.00
12/23/20	MMM	Emails with J. Brough and internally re call logs and response to BFM question about related document production.	.30	925.00	277.50
12/23/20	ZNF	Revise call log spreadsheets for CBB landline and cell phone calls	.90	515.00	463.50
12/23/20	ZNF	Email M. Madden, D. Burke, and C. Forstein regarding response to December 17 letter from opposing counsel.	.60	515.00	309.00
12/23/20	ZNF	Revise and send letter in response to December 17 letter from opposing counsel	.50	515.00	257.50
12/24/20	CCC	Follow-up on affidavits of service; emails with Z. Ferguson regarding same.	.10	275.00	27.50
12/24/20	CF	Review JPM documents.	2.20	605.00	1,331.00
12/24/20	DB	Email clients re deposition notices.	.30	925.00	277.50
12/24/20	DB	Review draft deposition protocol from Wilmer and email Wilmer re same.	.40	925.00	370.00
12/24/20	DIW	Process new data from client, verify image overlay production for volume CBB004, batch incoming production docs for review.	1.60	275.00	440.00
12/24/20	GAO	Review BF deposition notices and follow-up emails.	.30	975.00	292.50
12/24/20	ZNF	Review replacement document images for CBB Production 4.	.70	515.00	360.50
12/24/20	ZNF	Review produced documents from JPM.	.30	515.00	154.50
12/24/20	ZNF	Research damages as an element of a claim under UCC 4A-404.	.90	515.00	463.50
12/25/20	ZNF	Review document produced by JPMorgan for relevance to claims and defenses in litigation.	.80	515.00	412.00
12/26/20	MMM	Analyze deposition strategy and assignments.	.60	925.00	555.00
12/28/20	DB	Review proposed deposition schedule and emails with M. Madden re same.	.40	925.00	370.00
12/28/20	DIW	Confer with Schulte help desk re credentials issue for access to Plaintiff's production, verify data, send to tech team with instructions.	1.30	275.00	357.50
12/28/20	LCE	Correspond on draft expert report.	.20	605.00	121.00
12/28/20	LCE	Finish first draft of defense deposition outline for M. Madden.	3.20	605.00	1,936.00
12/28/20	MMM	Analyze deposition strategy and confer with D. Burke and draft emails to G. Orseck and D. Burke re same.	1.50	925.00	1,387.50
12/28/20	MMM	Emails with J. Brough re deposition schedule and witness availability.	.20	925.00	185.00
12/28/20	ZNF	Email L. Esbrook and C. Forstein concerning discovery questions.	.10	515.00	51.50

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January 19, 2021
Invoice #: 200630

Date	Tkpr	Description	Hours	Rate	Amount
12/29/20	DB	Edits documents and coordinate with L. Esbrook re subpoenas to Suuchi.	.80	925.00	740.00
12/29/20	DB	Initial review of JPM production.	.60	925.00	555.00
12/29/20	DB	Weekly team meeting re strategy and open discovery issues.	.50	925.00	462.50
12/29/20	LCE	Weekly team strategy meeting.	.50	605.00	302.50
12/29/20	LCE	Draft and revise third party subpoenas and schedules.	1.50	605.00	907.50
12/29/20	MMM	Participate in weekly team meeting.	.50	925.00	462.50
12/29/20	MMM	Edit Brough/Evinger deposition prep outline.	.80	925.00	740.00
12/29/20	MMM	Emails with team re S. Ramesh subpoenas, document production, and other open discovery issues.	.70	925.00	647.50
12/29/20	MMM	Revise and update deposition strategy and schedule.	.30	925.00	277.50
12/29/20	ZNF	Confer with M. Madden, D. Burke, L. Esbrook, and C. Forstein to discuss case developments and litigation strategy.	.50	515.00	257.50
12/29/20	ZNF	Email L. Esbrook regarding third-party subpoena.	.20	515.00	103.00
12/29/20	ZNF	Email M. Madden and D. Burke regarding remaining documents for final Chain Bridge Bank document production.	.50	515.00	257.50
12/29/20	ZNF	Revise call logs for fifth production.	.30	515.00	154.50
12/30/20	CCC	Assist with privilege log redaction documents in discovery materials.	.30	275.00	82.50
12/30/20	CCC	Service of subpoena matters in New Jersey and Delaware; emails with Capitol Process Services and L. Esbrook regarding questions and issues.	.70	275.00	192.50
12/30/20	DB	Work on issues re privilege log, including review of draft and calls with M. Madden and Z. Ferguson.	.80	925.00	740.00
12/30/20	DB	Follow up re Velox subpoena, including call with D. Cloherty and associated emails.	.70	925.00	647.50
12/30/20	DIW	Process additional client files for Review.	.20	275.00	55.00
12/30/20	LCE	Work with paralegals to add redacted documents to discovery binders.	1.30	605.00	786.50
12/30/20	LCE	Revise and send deposition and subpoenas and notices for third parties.	1.70	605.00	1,028.50
12/30/20	LCE	Correspond with D. Burke and M. Madden on service of third party subpoenas.	.40	605.00	242.00
12/30/20	LCE	Draft memo to third party for service of subpoena by email.	.30	605.00	181.50
12/30/20	LCE	Revise defense deposition outline for M. Madden.	3.30	605.00	1,996.50
12/30/20	LGW	Research privilege log materials in discovery outline; prepare redacted replacements for G. Orseck with comments from L. Esbrook.	5.00	275.00	1,375.00
12/30/20	MMM	Edit privilege log and emails re same.	1.50	925.00	1,387.50

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January 19, 2021
Invoice #: 200630

Date	Tkpr	Description	Hours	Rate	Amount
12/30/20	MMM	Confer with D. Burke and Z. Ferguson on open questions re privilege log.	.20	925.00	185.00
12/30/20	MMM	Draft email to Blue Flame regarding deposition schedule.	.30	925.00	277.50
12/30/20	MMM	Emails re multiple open items, including S. Ramesh subpoenas, California depositions, and deposition schedule.	.50	925.00	462.50
12/30/20	MMM	Prepare for call with JPMC counsel re discovery and depositions.	.20	925.00	185.00
12/30/20	ZNF	Revise privilege log to incorporate partner feedback.	2.10	515.00	1,081.50
12/30/20	ZNF	Email M. Madden and D. Burke re edits to Defendants' privilege log.	.60	515.00	309.00
12/31/20	DB	Follow up re subpoena to Suuchi, including call with Ms. Ramesh and associated emails.	.80	925.00	740.00
12/31/20	DB	Call with A. Schoenfeld (Wilmer) re discovery issues.	.20	925.00	185.00
12/31/20	DIW	Prepare production CBB005, submit instructions re same to tech team.	.80	275.00	220.00
12/31/20	LCE	Read emails on deposition subpoenas.	.20	605.00	121.00
12/31/20	MMM	Call with A. Schoenfeld (Wilmer) re discovery and depositions.	.20	925.00	185.00
12/31/20	MMM	Emails re open discovery items and issues.	.30	925.00	277.50

TOTAL PROFESSIONAL SERVICES

\$ 209,138.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	34.70	925.00	32,097.50
Christine A Chase Carpino	CCC	11.40	275.00	3,135.00
Ian E Cohen	IEC	8.00	370.00	2,960.00
Leslie Esbrook	LCE	40.20	605.00	24,321.00
Zachary N Ferguson	ZNF	68.70	515.00	35,380.50
Carolyn Forstein	CF	36.00	605.00	21,780.00
Robert H Kearney	RHK	9.60	370.00	3,552.00
Matthew M Madden	MMM	37.90	925.00	35,057.50
Michael A McClain, Jr.	MAM	14.00	370.00	5,180.00
Gary A. Orseck	GAO	35.00	975.00	34,125.00
Dana I. Wesley Sarti	DIW	7.50	275.00	2,062.50
Lyndsay G Webb	LGW	34.50	275.00	9,487.50
Total		337.50		\$ 209,138.50

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January 19, 2021
Invoice #: 200630**EXPENSES**

Description	Amount
Outside Copying & Printing	1,839.45
Process Server & Subpoena Fees	500.00
Long Distance Telephone	60.17
Computer Research Charges	231.08
Courier/Overnight delivery	127.41
Litigation Support from Vendor	12,230.57
In-house copying charges	285.00
TOTAL EXPENSES	\$ 15,273.68
TOTAL THIS INVOICE	\$ 224,412.18

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Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

January 19, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200630
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 224,412.18

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200630, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

February 11, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200912
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: January 31, 2021.

RE: Blue Flame

Total Professional Services	\$ 633,185.50
Less Courtesy Discount	<u>\$ -20,000.00</u>
Net Professional Services	\$ 613,185.50
Total Expenses	<u>\$ 19,163.01</u>
TOTAL THIS INVOICE	\$ 632,348.51

ROBBINS|RUSSELL

February 11, 2021
Invoice #: 200912

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/01/21	GAO	Emails with team re deposition planning and logistics.	.20	975.00	195.00
1/01/21	MMM	Edit deposition schedule to accommodate JPMC conflicts, email G. Orseck and D. Burke re same, and email Blue Flame regarding Thomas and Gula depositions.	.90	925.00	832.50
1/04/21	CCC	Emails with C. Forstein regarding upcoming depositions and Alderson demo; emails with L. Murphy regarding same.	.20	290.00	58.00
1/04/21	CF	Correspond with G. Orseck, C. Chase Carpino, and Alderson to coordinate depositions.	.60	660.00	396.00
1/04/21	DB	Review revisions to remote deposition protocol.	.40	925.00	370.00
1/04/21	DIW	Verify CBB005 from tech team, prepare for service, verify incoming BFM and DOJ-CA productions from counsel for Blue Flame, submit instructions re same to tech team.	2.30	290.00	667.00
1/04/21	GAO	Prepare for depositions.	2.50	975.00	2,437.50
1/04/21	LCE	Update key player list based on JP Morgan discovery production.	2.00	660.00	1,320.00
1/04/21	LCE	Add new relevant documents from third-party productions to discovery outline.	1.70	660.00	1,122.00
1/04/21	LCE	Coordinate printing and sending of new relevant docs to partners with paralegals.	.60	660.00	396.00
1/04/21	LGW	Continue to prepare privilege log redacted replacements for G. Orseck with comments from L. Esbrook.	.20	290.00	58.00
1/04/21	MAM	Review hot and interesting documents in the JPM productions and sent to attorneys for review.	.10	370.00	37.00
1/04/21	MAM	Update search terms for incoming productions, run search term hit reports, and batch out new documents.	1.30	370.00	481.00
1/04/21	MMM	Emails with team re open document-review tasks, third-party productions, deposition notices,	.70	925.00	647.50
1/04/21	MMM	Review documents prior to production.	.30	925.00	277.50
1/04/21	MMM	Emails with client and opposing counsel re deposition schedule.	.30	925.00	277.50
1/04/21	ZNF	Review Blue Flame Medical's privilege log for questionable entries and anomalies.	1.40	565.00	791.00
1/04/21	ZNF	Review Blue Flame Medical's fifth document production.	.50	565.00	282.50
1/04/21	ZNF	Coordinate production Chain Bridge Bank's fifth document production.	1.20	565.00	678.00

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February 11, 2021
Invoice #: 200912

Date	Tkpr	Description	Hours	Rate	Amount
1/04/21	ZNF	Coordinate review of Blue Flame Medical's 6th document production.	.50	565.00	282.50
1/04/21	ZNF	Review document from Blue Flame's 6th document production.	1.10	565.00	621.50
1/04/21	ZNF	Email D. Sarti and M. McClain concerning metadata issues with respect to Blue Flame Medical's document productions.	.50	565.00	282.50
1/05/21	CCC	Assist with research of additional discovery materials for L. Esbrook.	.60	290.00	174.00
1/05/21	CF	Correspond with D. Burke and G. Orseck re protective order.	.40	660.00	264.00
1/05/21	CF	Send discovery documents to L. Loss.	.40	660.00	264.00
1/05/21	CF	Research responses to questions from G. Orseck.	.50	660.00	330.00
1/05/21	CF	Review J. Thomas outline.	.70	660.00	462.00
1/05/21	DB	Review revised version of discovery outline.	1.20	925.00	1,110.00
1/05/21	DB	Confer with M. Madden re Suuchi subpoena.	.30	925.00	277.50
1/05/21	DB	Coordinate review of document from Velox Medical.	.40	925.00	370.00
1/05/21	DB	Call with D. Cloherty re Velox Medical subpoena.	.20	925.00	185.00
1/05/21	DIW	Verify new data loaded, folder for review, confer with Z. Ferguson, L. Esbrook re unitization of BFM-produced copies of California agency documents, verify Velox Med data and draft instructions for tech team re same.	1.30	290.00	377.00
1/05/21	GAO	Prepare for Thomas and Gula depositions.	3.30	975.00	3,217.50
1/05/21	LCE	Velox production document review.	1.80	660.00	1,188.00
1/05/21	LCE	Review documents produced from California subpoena for relevant information.	5.90	660.00	3,894.00
1/05/21	LCE	Review new Blue Flame productions for relevant documents.	1.50	660.00	990.00
1/05/21	LCE	Correspond with team on review of Thomas deposition outline.	.10	660.00	66.00
1/05/21	LGW	Continue to prepare privilege log redacted replacements for G. Orseck with comments from L. Esbrook.	2.50	290.00	725.00
1/05/21	MAM	Respond to questions from Z. Ferguson re batching out BFM007.	.30	370.00	111.00
1/05/21	MAM	Review hot and interesting documents from BFM006 and folder for associate review.	.10	370.00	37.00
1/05/21	MAM	Revise search terms, run hit reports, and batch out BFM007 for review.	.60	370.00	222.00
1/05/21	MMM	Numerous emails re depositions with client, opposing counsel, and internally, including working on modifications made to schedule and assignments and discussions of approach to California depositions.	1.70	925.00	1,572.50
1/05/21	MMM	Confer with D. Burke re Suuchi subpoenas and strategy.	.30	925.00	277.50

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February 11, 2021
Invoice #: 200912

Date	Tkpr	Description	Hours	Rate	Amount
1/05/21	MMM	Call with D. Evinger re depositions.	.30	925.00	277.50
1/05/21	MMM	Draft team meeting agenda.	.30	925.00	277.50
1/05/21	ZNF	Email C. Forstein, L. Esbrook, D. Sarti and M. McClain regarding document production and review.	.60	565.00	339.00
1/05/21	ZNF	Compare BFM productions 6 and 7 with requests from December 11 letter to determine Plaintiff's compliance with discovery requests.	1.10	565.00	621.50
1/05/21	ZNF	Analyze and process production from Velox Medical and prepare for service of same on opposing counsel.	1.10	565.00	621.50
1/05/21	ZNF	Review BFM productions 6 and 7 for relevance to claims and defenses.	4.10	565.00	2,316.50
1/05/21	ZNF	Review BFM's privilege log.	.60	565.00	339.00
1/06/21	CF	Participate in team meeting.	.80	660.00	528.00
1/06/21	CF	Correspond with G. Orseck re deposition preparation.	2.30	660.00	1,518.00
1/06/21	CF	Research local rules.	.70	660.00	462.00
1/06/21	CF	Review BFM production.	1.70	660.00	1,122.00
1/06/21	DB	Emails with Cal. AG's office re Yee subpoena.	.20	925.00	185.00
1/06/21	DB	Attend weekly team meeting.	.80	925.00	740.00
1/06/21	DB	Review discovery materials in preparation for depositions.	3.20	925.00	2,960.00
1/06/21	DIW	Verify VLX data loaded, folder for review.	.40	290.00	116.00
1/06/21	GAO	Weekly team meeting.	.80	975.00	780.00
1/06/21	GAO	Prepare outline for Thomas deposition and circulate to clients and AG.	3.00	975.00	2,925.00
1/06/21	LCE	Review Thomas deposition outline.	4.30	660.00	2,838.00
1/06/21	LCE	Review proposed search terms for Velox materials.	.20	660.00	132.00
1/06/21	LCE	Send memo on relevant documents from California subpoena production to team.	1.10	660.00	726.00
1/06/21	LCE	Gather and send to team relevant documents for deposition preparation.	2.90	660.00	1,914.00
1/06/21	LCE	Draft notice to reschedule final pre trial conference.	.60	660.00	396.00
1/06/21	LCE	Correspond with team on additional documents to add to Thomas deposition outline.	.40	660.00	264.00
1/06/21	MAM	Batch out remaining documents from BFM007 per instructions from Z. Ferguson.	.10	370.00	37.00
1/06/21	MMM	Participate in weekly team meeting.	.80	925.00	740.00
1/06/21	MMM	Emails following up on open items discussed at team meeting.	.20	925.00	185.00
1/06/21	MMM	Edit and review Thomas deposition outline and proposed exhibits, identifying additional potential exhibits and lines of questioning.	4.10	925.00	3,792.50

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1/06/21	ZNF	Review agenda and prepare for BFM v. CBB status meeting	.40	565.00	226.00
1/06/21	ZNF	Confer with CBB litigation team to discuss case developments and litigation strategy	.90	565.00	508.50
1/06/21	ZNF	Coordinate review and production of documents from Velox Medical.	1.70	565.00	960.50
1/06/21	ZNF	Review documents from BFM's seventh production for litigation relevance.	1.90	565.00	1,073.50
1/07/21	CCC	Deposition matters in preparation for Thomas and Gula depositions; emails with Alderson and C. Forstein regarding same; set-up new depositions for L. Esbrook.	.30	290.00	87.00
1/07/21	CF	Review M. Gula deposition outline.	1.30	660.00	858.00
1/07/21	CF	Review deposition protocol.	.40	660.00	264.00
1/07/21	CF	Correspond re M. Gula deposition.	.90	660.00	594.00
1/07/21	CF	Review and respond to correspondence re deposition scheduling.	.40	660.00	264.00
1/07/21	DB	Emails with M. Madden re preparing for call re Yee subpoena.	.50	925.00	462.50
1/07/21	DB	Call with D. Cloherty re follow up on Velox Medical subpoena.	.20	925.00	185.00
1/07/21	DIW	Analyze more VLX data, instructions for loading, other technical assistance with discovery	.90	290.00	261.00
1/07/21	GAO	Prepare for Gula deposition.	4.60	975.00	4,485.00
1/07/21	IEC	Review and analyze new incoming production batches for relevant information.	5.30	370.00	1,961.00
1/07/21	LCE	Review M. Madden comments to Thomas deposition outline.	.40	660.00	264.00
1/07/21	LCE	Draft defense deposition outline for M. Cole.	1.40	660.00	924.00
1/07/21	LCE	Add proposed comments to draft Gula deposition outline.	2.90	660.00	1,914.00
1/07/21	LCE	Respond to questions on document binders in preparation for Thomas and Gula depositions.	3.30	660.00	2,178.00
1/07/21	LCE	Edit notice to reschedule final pre trial conference.	.70	660.00	462.00
1/07/21	LCE	Edit notice to reschedule final pre trial conference.	1.00	660.00	660.00
1/07/21	LCE	Review Velox production.	.40	660.00	264.00
1/07/21	LCE	Add comments to Thomas deposition outline.	1.60	660.00	1,056.00
1/07/21	LGW	Revise discovery timeline with comments from L. Esbrook.	.20	290.00	58.00
1/07/21	MAM	Draft instruction email to reviewers re review of Velox documents.	.80	370.00	296.00
1/07/21	MAM	Review Velox productions, set up and run search terms, and batch out documents for general review.	1.30	370.00	481.00
1/07/21	MMM	Conduct follow-up analysis of issues pertinent to Thomas deposition.	.70	925.00	647.50
1/07/21	MMM	Email C. Grice re indemnification engagement.	.30	925.00	277.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/07/21	MMM	Prepare for and outline call with California AG on Yee subpoena and emails re same.	.70	925.00	647.50
1/07/21	MMM	Emails regarding deposition schedule and other open items.	.80	925.00	740.00
1/07/21	MMM	Review Gula deposition outline and provide comments and answers to open substantive questions.	1.90	925.00	1,757.50
1/07/21	RHK	Analyze incoming production for significance to identified issues.	5.50	370.00	2,035.00
1/07/21	ZNF	Review document produced by Velox Medical for relevance to claims and defenses in litigation.	3.60	565.00	2,034.00
1/07/21	ZNF	Coordinate review and service of third production from Velox Medical.	.50	565.00	282.50
1/07/21	ZNF	Analyze BFM's privilege log and related documents for questionable redactions and withholds.	1.70	565.00	960.50
1/07/21	ZNF	Review BFM's 6th and 7th productions for relevance to claims and defenses in litigation.	.90	565.00	508.50
1/07/21	ZNF	Email C. Forstein, L. Esbrook, D. Sarti, and M. McClain regarding deposition prep and discovery matters.	1.60	565.00	904.00
1/08/21	CCC	Deposition matters; emails with C. Forstein regarding attendees; set-up additional depositions for L. Esbrook.	.80	290.00	232.00
1/08/21	CCC	Assist with additional discovery materials for D. Burke and M. Madden.	.40	290.00	116.00
1/08/21	CCC	File motion with E.D. Virginia; prepare court copy.	.30	290.00	87.00
1/08/21	CF	Review and respond to correspondence re deposition scheduling.	.70	660.00	462.00
1/08/21	CF	Confer with M. Madden, G. Orseck, and L. Esbrook.	.50	660.00	330.00
1/08/21	CF	Review discovery documents.	3.40	660.00	2,244.00
1/08/21	DB	Follow up re Yee subpoena, including emails with team and call with M. Madden.	.50	925.00	462.50
1/08/21	DB	Review documents produced by Velox Medical in connection with evaluating response to subpoena and next steps.	1.20	925.00	1,110.00
1/08/21	DIW	Verify VLX and BFM008 data loaded, other technical assistance with discovery.	1.50	290.00	435.00
1/08/21	GAO	Prepare for depositions.	5.50	975.00	5,362.50
1/08/21	GAO	Call with team on deposition strategy.	.50	975.00	487.50
1/08/21	IEC	Review and analyze new incoming production batches for relevant information.	4.70	370.00	1,739.00
1/08/21	LCE	Call with G. Orseck, M. Madden, and C. Forstein on questions for Thomas deposition.	.80	660.00	528.00
1/08/21	LCE	Prepare documents for upcoming depositions and answer G. Orseck questions on same.	5.60	660.00	3,696.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/08/21	LCE	Correspond with paralegals on hard copy print outs of relevant documents for depositions.	.50	660.00	330.00
1/08/21	LCE	Correspond with paralegals to file motion to reschedule final pre trial conference.	.80	660.00	528.00
1/08/21	LCE	Review new Blueflame production for relevant deposition material.	3.60	660.00	2,376.00
1/08/21	LCE	Send team email with additional documents relevant for depositions from latest production.	.70	660.00	462.00
1/08/21	LGW	Prepare deposition materials for G. Orseck with comments from L. Esbrook and C. Forstein.	3.50	290.00	1,015.00
1/08/21	LGW	Prepare additional discovery materials for M. Madden and D. Burke.	3.50	290.00	1,015.00
1/08/21	MAM	Review BFM008, run search terms, run hit reports, and batch out relevant documents.	1.20	370.00	444.00
1/08/21	MMM	Confer with G. Orseck, L. Esbrook, and C. Forstein re Thomas and Gula depositions.	.80	925.00	740.00
1/08/21	MMM	Emails regarding Thomas and Gula depositions.	.30	925.00	277.50
1/08/21	MMM	Call with California AG office re Yee deposition subpoena.	.60	925.00	555.00
1/08/21	MMM	Confer with D. Burke and email team re call with California AG re Yee subpoena..	.60	925.00	555.00
1/08/21	RHK	Analyze incoming production for significance to identified issues.	8.50	370.00	3,145.00
1/08/21	ZNF	Review documents produced by Velox Medical, Inc. for relevance to claims and defenses.	3.10	565.00	1,751.50
1/08/21	ZNF	Email. L. Esbrook and C. Forstein regarding discovery matters.	.40	565.00	226.00
1/08/21	ZNF	Coordinate review of and review BFM's 8th production of documents.	1.70	565.00	960.50
1/09/21	CF	Correspond with G. Orseck re discovery outlines.	1.20	660.00	792.00
1/09/21	CF	Review Velox production.	2.00	660.00	1,320.00
1/09/21	CF	Review Velox production.	2.10	660.00	1,386.00
1/09/21	CF	Review BFM production.	4.30	660.00	2,838.00
1/09/21	GAO	Review comments from Analysis Group and clients re deposition outlines.	1.50	975.00	1,462.50
1/09/21	GAO	Review newly produced documents for use at depositions.	1.30	975.00	1,267.50
1/09/21	GAO	Revise deposition outlines.	1.20	975.00	1,170.00
1/09/21	LCE	Review Blue Flame and Velox productions for relevant deposition material.	7.10	660.00	4,686.00
1/09/21	LCE	Summarize production findings for team and answer questions on same.	2.00	660.00	1,320.00

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1/09/21	MMM	Emails regarding Thomas and Gula depositions.	.30	925.00	277.50
1/09/21	ZNF	Review documents produced by Velox Medical and Blue Flame Medical for relevance to claims and defenses.	6.40	565.00	3,616.00
1/09/21	ZNF	Email L. Esbrook and C. Forstein regarding discovery documents for John Thomas's deposition.	.90	565.00	508.50
1/10/21	CF	Prepare outlines and exhibits for depositions of J. Thomas and M. Gula.	7.80	660.00	5,148.00
1/10/21	DB	Review draft Faulkner outline.	1.00	925.00	925.00
1/10/21	DB	Further review of draft Faulkner outline.	.50	925.00	462.50
1/10/21	GAO	Prepare for depositions.	6.50	975.00	6,337.50
1/10/21	LCE	Help team with deposition prep questions.	1.50	660.00	990.00
1/10/21	ZNF	Review unedited 60 Minutes review with John Thomas for significant unaired statements.	2.70	565.00	1,525.50
1/10/21	ZNF	Review produced documents to update Thomas deposition outline.	1.10	565.00	621.50
1/10/21	ZNF	Email L. Esbrook and C. Forstein regarding Thomas deposition outline.	.40	565.00	226.00
1/11/21	CCC	Deposition matters; emails with C. Forstein regarding same.	.70	290.00	203.00
1/11/21	CF	Set up and participate in deposition of J. Thomas.	8.90	660.00	5,874.00
1/11/21	CF	Review and respond to correspondence.	.40	660.00	264.00
1/11/21	CF	Revise M. Gula deposition outline.	2.40	660.00	1,584.00
1/11/21	DB	Review draft Faulkner outline.	1.00	925.00	925.00
1/11/21	GAO	Prepare for and depose John Thomas.	10.50	975.00	10,237.50
1/11/21	GAO	Prep for Gula.	2.00	975.00	1,950.00
1/11/21	LCE	Review Analysis Group revisions to expert report and correspond with M. Madden on same.	.60	660.00	396.00
1/11/21	LCE	Update main discovery outline with new documents for deposition preparation.	4.10	660.00	2,706.00
1/11/21	LCE	Answer questions on document collection for Thomas deposition.	2.30	660.00	1,518.00
1/11/21	LCE	Discuss strategy for Gula deposition in light of Thomas deposition with associates.	.60	660.00	396.00
1/11/21	MMM	Prepare for and participate in J. Thomas deposition.	10.00	925.00	9,250.00
1/11/21	MMM	Draft email to clients summarizing Thomas deposition.	.60	925.00	555.00
1/11/21	ZNF	Review documents produced by Blue Flame Medical to answer questions raised in Thomas deposition.	4.40	565.00	2,486.00
1/11/21	ZNF	Review transcript of Thomas deposition.	.80	565.00	452.00
1/12/21	CCC	Deposition matters.	.50	290.00	145.00
1/12/21	CF	Set up and participate in deposition of M. Gula.	7.20	660.00	4,752.00

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1/12/21	CF	Review and respond to correspondence.	.30	660.00	198.00
1/12/21	DB	Call with Cal. AG's office re Yee subpoena.	.20	925.00	185.00
1/12/21	DB	Prepare for and call with S. Ramesh re subpoena issues.	.50	925.00	462.50
1/12/21	DIW	Confer with D. Burke re 3rd party production options for best data and compliance with limited resources.	.10	290.00	29.00
1/12/21	GAO	Prepare for and take Gula deposition.	9.50	975.00	9,262.50
1/12/21	LCE	Answer questions for deposition preparation.	.40	660.00	264.00
1/12/21	LCE	Propose document collection questions after read through of Thomas deposition transcript.	2.30	660.00	1,518.00
1/12/21	LCE	Correspond with team on additional documents necessary for Gula deposition.	.90	660.00	594.00
1/12/21	LCE	Read through Gula deposition testimony transcript and prepare list of follow up document requests and questions for subsequent depositions.	1.10	660.00	726.00
1/12/21	LCE	Read through correspondence on depositions.	.20	660.00	132.00
1/12/21	MMM	Prepare for and participate in Gula deposition.	8.60	925.00	7,955.00
1/12/21	MMM	Confer with G. Orseck regarding Gula deposition and California depositions.	.20	925.00	185.00
1/12/21	MMM	Confer with D. Burke regarding Suuchi discovery and other depositions.	.30	925.00	277.50
1/12/21	MMM	Call with California AG's office re depositions.	.40	925.00	370.00
1/12/21	MMM	Draft summary of Gula deposition for clients and reply to questions re same.	.50	925.00	462.50
1/12/21	ZNF	Review comments from client regarding deposition outline and recommend additional questions.	1.40	565.00	791.00
1/12/21	ZNF	Review produced documents to determine topics for SCO 30(b)(6) deposition.	1.10	565.00	621.50
1/12/21	ZNF	Draft Schedule A of SCO 30(b)(6) deposition subpoena.	1.30	565.00	734.50
1/12/21	ZNF	Review produced documents in response questions raised during Gula deposition.	1.20	565.00	678.00
1/12/21	ZNF	Review transcript from John Thomas deposition.	2.90	565.00	1,638.50
1/13/21	CCC	Final Thomas transcript matters; emails with Z. Ferguson regarding upcoming depositions; emails with M. Madden regarding upcoming deposition set-up.	.40	290.00	116.00
1/13/21	CCC	Assist with research of additional discovery materials.	.30	290.00	87.00
1/13/21	CF	Participate in team meeting.	.70	660.00	462.00
1/13/21	CF	Prepare deposition materials for H. Schoeppe.	4.30	660.00	2,838.00
1/13/21	CF	Correspond with L. Esbrook and Z. Ferguson.	.30	660.00	198.00
1/13/21	DB	Attend weekly team meeting.	.70	925.00	647.50

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1/13/21	GAO	Emails with clients re Gula and Thomas depos.	.80	975.00	780.00
1/13/21	GAO	Edit and circulate comments on draft of Faulkner report.	1.30	975.00	1,267.50
1/13/21	GAO	Team meeting.	.70	975.00	682.50
1/13/21	LCE	Weekly team strategy meeting.	.80	660.00	528.00
1/13/21	LCE	Edit response letter to opposing counsel on discovery issues.	1.70	660.00	1,122.00
1/13/21	LCE	Update main discovery outline and binders.	2.80	660.00	1,848.00
1/13/21	LCE	Work with paralegals to organize and update call transcripts.	.80	660.00	528.00
1/13/21	LCE	Respond to team emails on miscellaneous discovery questions.	.70	660.00	462.00
1/13/21	LCE	Correspond with M. Madden on issues for expert report.	.50	660.00	330.00
1/13/21	LCE	Review deposition transcripts to prepare for Ethan Bearman deposition.	.50	660.00	330.00
1/13/21	LCE	Review sequence of events with suppliers for D. Burke.	1.00	660.00	660.00
1/13/21	LGW	Revise discovery materials with comments from L. Esbrook.	2.80	290.00	812.00
1/13/21	MMM	Prepare team meeting agenda and update deposition plan and strategy.	.50	925.00	462.50
1/13/21	MMM	Participate in weekly team meeting.	.80	925.00	740.00
1/13/21	MMM	Call with P. Fitzgerald.	.30	925.00	277.50
1/13/21	MMM	Emails with D. Evinger and internally regarding deposition results and other issues.	.60	925.00	555.00
1/13/21	ZNF	Draft and confirm content of letter to opposing counsel regarding document production deficiencies suggested by Gula's and Thomas's depositions.	3.70	565.00	2,090.50
1/13/21	ZNF	Confer with G. Orseck, M. Madden, D. Burke, C. Forstein, and L. Esbrook to discuss case updates and litigation strategy.	.90	565.00	508.50
1/13/21	ZNF	Email C. Forstein and L. Esbrook regarding discovery and deposition issues.	1.10	565.00	621.50
1/14/21	CCC	Assist with research and revisions to discovery materials.	.60	290.00	174.00
1/14/21	CCC	Prepare Schoeppe potential deposition materials for D. Burke, C. Forstein and witness.	2.60	290.00	754.00
1/14/21	CCC	Final Thomas exhibits and video matters.	.60	290.00	174.00
1/14/21	CF	Prepare deposition materials for H. Schoeppe.	5.40	660.00	3,564.00
1/14/21	CF	Prepare H. Schoeppe notes for production.	.50	660.00	330.00
1/14/21	DB	Prepare for Schoeppe deposition, including emails with C. Forstein and reviewing relevant documents.	2.00	925.00	1,850.00
1/14/21	DB	Coordinate production of notes from H. Schoeppe.	1.00	925.00	925.00
1/14/21	DIW	Process handwritten notes of H. Schoeppe, D. Evinger for review, redaction and production, email with tech team to plan for production deadline.	1.20	290.00	348.00

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1/14/21	GAO	Review and respond to comments from P. Fitzgerald re Gula and Thomas depositions.	.30	975.00	292.50
1/14/21	LCE	Work with paralegals to update main discovery outline with new tabs.	2.20	660.00	1,452.00
1/14/21	LCE	Review draft expert report on due diligence and compile documents for expert.	4.50	660.00	2,970.00
1/14/21	LCE	Correspond with Z. Ferguson on edits to discovery letter.	.40	660.00	264.00
1/14/21	LCE	Prepare M. Cole deposition outline.	1.50	660.00	990.00
1/14/21	LGW	Research and revise discovery materials with comments from L. Esbrook.	8.50	290.00	2,465.00
1/14/21	MMM	Outline M. Wong deposition.	5.40	925.00	4,995.00
1/14/21	MMM	Emails regarding depositions.	.20	925.00	185.00
1/14/21	MMM	Edit proposed letter to SRZ regarding missing discovery.	1.10	925.00	1,017.50
1/14/21	MMM	Confer with P. Fitzgerald on depositions and other case matters.	.40	925.00	370.00
1/14/21	ZNF	Draft and revise letter to BFM counsel regarding deficiencies in document production.	2.10	565.00	1,186.50
1/14/21	ZNF	Review BFM document production to identify deficiencies to include in letter to opposing counsel.	1.90	565.00	1,073.50
1/14/21	ZNF	Draft 30(b)(6) subpoena and schedule for the California State Controller's Office.	1.40	565.00	791.00
1/14/21	ZNF	Revise Defendants' privilege log.	1.90	565.00	1,073.50
1/14/21	ZNF	Coordinate deposition of Michael Wong.	.20	565.00	113.00
1/15/21	CCC	Final Gula transcript, exhibit and video matters.	.80	290.00	232.00
1/15/21	CCC	Prepare additional discovery materials for G. Orseck, D. Burke, M. Madden with comments from L. Esbrook.	4.90	290.00	1,421.00
1/15/21	CCC	Continue to prepare Schoeppe potential deposition materials for D. Burke, C. Forstein and witness.	1.60	290.00	464.00
1/15/21	CCC	Wong deposition matters with Z. Ferguson.	.20	290.00	58.00
1/15/21	CF	Confer with H. Schoeppe.	.20	660.00	132.00
1/15/21	CF	Coordinate deposition logistics.	1.80	660.00	1,188.00
1/15/21	CF	Prepare deposition materials for H. Schoeppe.	2.00	660.00	1,320.00
1/15/21	DB	Coordinate production of notes from J. Brough.	1.00	925.00	925.00
1/15/21	DB	Confer with M. Madden re deposition topics for Controller's Office.	.30	925.00	277.50
1/15/21	DIW	Confer with attorney team re production CBB006.	.20	290.00	58.00
1/15/21	GAO	Call with S. Weisbrod re insurance claim.	.50	975.00	487.50
1/15/21	LCE	No Charge - Prepare attendance list email for upcoming depositions.	.60	660.00	N/C

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1/15/21	LCE	Correspond with team on upcoming deposition needs.	.50	660.00	330.00
1/15/21	LCE	Work with paralegals to courier updated binders to partners and proofread new outline.	3.10	660.00	2,046.00
1/15/21	LCE	Review deposition protocol and calendar upcoming depositions.	.60	660.00	396.00
1/15/21	LCE	Update Brough/Evinger deposition outline with new tabs.	2.50	660.00	1,650.00
1/15/21	LGW	Prepare deposition transcript materials for C. Forstein.	.50	290.00	145.00
1/15/21	MMM	Emails with California and internally re depositions, HW notes production, and other discovery items.	.80	925.00	740.00
1/15/21	MMM	Edit amended privilege log and emails re same.	.30	925.00	277.50
1/15/21	MMM	Confer with D. Burke re 30(b)(6) topics for SCO.	.30	925.00	277.50
1/15/21	MMM	Outline M. Wong deposition.	.90	925.00	832.50
1/15/21	MMM	Emails regarding open discovery items and issues.	.90	925.00	832.50
1/15/21	ZNF	Review transcript of Michael Gula deposition.	1.50	565.00	847.50
1/15/21	ZNF	Revise and serve amended privilege log.	.60	565.00	339.00
1/15/21	ZNF	Email D. Burke and M. Madden regarding coordination of Wong deposition.	.30	565.00	169.50
1/15/21	ZNF	Email C. Chase Carpino regarding coordination of Wong deposition.	.40	565.00	226.00
1/15/21	ZNF	Email C. Forstein and L. Esbrook regarding deposition protocol and protective order.	.40	565.00	226.00
1/16/21	DIW	Process handwritten notes of J. Brough for redaction and production, email to attorney team.	.30	290.00	87.00
1/16/21	LCE	Review draft letter to opposing counsel on discovery issues.	.30	660.00	198.00
1/16/21	MMM	Outline Wong deposition.	4.10	925.00	3,792.50
1/16/21	MMM	Edit and circulate draft missing-documents letter to SRZ.	.30	925.00	277.50
1/16/21	MMM	Edit Grice liability report and email L. Esbrook re same.	1.10	925.00	1,017.50
1/17/21	GAO	Read and comment on Matt's Wong deposition outline.	.50	975.00	487.50
1/17/21	GAO	Read through and comment on deposition prep outline for Brough and Evinger.	.70	975.00	682.50
1/17/21	GAO	Read and edit letter to Schulte on missing discovery items.	.20	975.00	195.00
1/17/21	LCE	Propose edits to M. Wong deposition outline.	1.50	660.00	990.00
1/17/21	LCE	Email with G. Orseck and M. Madden concerning expert report.	.20	660.00	132.00
1/17/21	MMM	Edit Wong deposition outline.	.20	925.00	185.00
1/17/21	MMM	Edit letter to Blue Flame re missing discovery.	.20	925.00	185.00
1/17/21	MMM	Prepare for Bearman deposition.	3.70	925.00	3,422.50

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1/17/21	ZNF	Review produced documents to confirm issues in discovery letter.	.90	565.00	508.50
1/17/21	ZNF	Review outline for deposition of Michael Wong.	1.10	565.00	621.50
1/17/21	ZNF	Review document produced by California relating to issuance of payment warrant to Blue Flame.	1.50	565.00	847.50
1/17/21	ZNF	Revise Schedule A to California State Controller's Office subpoena to include issue relating to SCO's approval of Blue Flame's payment warrant.	.50	565.00	282.50
1/18/21	DB	Joint defense call with Wilmer re various discovery issues and Faulkner draft.	.50	925.00	462.50
1/18/21	DB	Review and consolidate comments on draft Faulkner report.	2.50	925.00	2,312.50
1/18/21	DB	Review and revise deposition topics for Cal. Controller's Office.	1.20	925.00	1,110.00
1/18/21	DB	Coordinate production of handwritten notes from J. Brough and D. Evinger.	.60	925.00	555.00
1/18/21	DB	Follow up call with G. Orseck and M. Madden after call with Wilmer.	.30	925.00	277.50
1/18/21	GAO	Call with Wilmer re next steps in litigation.	.70	975.00	682.50
1/18/21	GAO	Follow-up call with D. Burke and M. Madden.	.30	975.00	292.50
1/18/21	LCE	Correspond with C. Forstein and Z. Ferguson on outstanding tasks for depositions.	.40	660.00	264.00
1/18/21	LCE	Prepare and send revised draft expert report and materials on due diligence report to Analysis Group.	1.20	660.00	792.00
1/18/21	LCE	Prepare for G. Orseck edits to Brough and Evinger deposition outline.	.90	660.00	594.00
1/18/21	MMM	Draft Bearman deposition outline.	4.70	925.00	4,347.50
1/18/21	MMM	Edit Wong deposition outline.	1.70	925.00	1,572.50
1/18/21	MMM	Participate in call with JPMC counsel re discovery and depositions.	.80	925.00	740.00
1/18/21	MMM	Confer with G. Orseck and D. Burke regarding JPMC call and follow-up steps.	.40	925.00	370.00
1/18/21	MMM	Emails with C. Grice re indemnification report.	.20	925.00	185.00
1/18/21	MMM	Emails with L. Esbrook re Grice liability report comments.	.20	925.00	185.00
1/18/21	ZNF	Collect and number exhibits for Wong deposition	1.20	565.00	678.00
1/18/21	ZNF	Review and revise Wong deposition outline	3.40	565.00	1,921.00
1/18/21	ZNF	Review documents produced by Blue Flame Medical for deposition prep.	1.40	565.00	791.00
1/18/21	ZNF	Revise Schedule A for 30(b)(6) deposition subpoena to California State Controller's Office.	1.20	565.00	678.00
1/19/21	CCC	Assist with research of Brough & Evinger deposition materials.	.80	290.00	232.00

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1/19/21	CF	Participate in team meeting.	.70	660.00	462.00
1/19/21	CF	Review and respond to correspondence.	.50	660.00	330.00
1/19/21	DB	Additional edits to deposition topics for Cal. Controller's Office.	.30	925.00	277.50
1/19/21	DB	Review and comment on draft engagement letter for M. Faulkner.	.40	925.00	370.00
1/19/21	DB	Attend weekly team meeting.	.70	925.00	647.50
1/19/21	DIW	Confer with attorney team re production CBB006, draft instructions, submit to tech team, verify data, prepare for service on opposing counsel.	1.00	290.00	290.00
1/19/21	GAO	Weekly team meeting.	.70	975.00	682.50
1/19/21	GAO	Confer with M. Madden re Wong deposition.	.50	975.00	487.50
1/19/21	GAO	Emails re prep for David and Jon.	.30	975.00	292.50
1/19/21	LCE	Prepare outline for Brough and Evinger deposition preparation and prepare binders.	6.60	660.00	4,356.00
1/19/21	LCE	Weekly team strategy meeting.	.70	660.00	462.00
1/19/21	LCE	Prepare outline for Cole deposition preparation and binders for same.	4.50	660.00	2,970.00
1/19/21	LGW	Draft list of tabs/documents added to discovery outline with comments from L. Esbrook; emails with L. Esbrook regarding same.	2.70	290.00	783.00
1/19/21	LGW	Research Brough and Evinger documents for deposition preparation with comments from L. Esbrook.	5.10	290.00	1,479.00
1/19/21	MAM	Revise coding panel per instructions from Z. Ferguson.	.10	370.00	37.00
1/19/21	MMM	Review draft 30(b)(6) topics for California SCO deposition.	.20	925.00	185.00
1/19/21	MMM	Participate in weekly team meeting to discuss litigation strategy.	.70	925.00	647.50
1/19/21	MMM	Draft Bearman deposition outline.	1.50	925.00	1,387.50
1/19/21	MMM	Review correspondence from California AG re protective order and emails re same.	.50	925.00	462.50
1/19/21	MMM	Depose M. Wong (California DGS).	7.80	925.00	7,215.00
1/19/21	MMM	Emails regarding Wong deposition.	.20	925.00	185.00
1/19/21	ZNF	Attend Zoom deposition of Michael Wong.	7.30	565.00	4,124.50
1/19/21	ZNF	Review Wong outline and exhibits.	1.20	565.00	678.00
1/19/21	ZNF	Coordinate deposition prep of Claudia Mojica.	.30	565.00	169.50
1/20/21	CCC	Prepare Brough & Evinger potential deposition materials for G. Orseck, M. Madden, L. Esbrook and witnesses; emails with L. Esbrook regarding same; assist with research of Cole potential deposition materials; deposition matters.	4.70	290.00	1,363.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/20/21	CCC	Emails with Z. Ferguson regarding Mojica deposition materials.	.20	290.00	58.00
1/20/21	CF	Draft H. Schoeppe deposition outline.	5.80	660.00	3,828.00
1/20/21	CF	Correspond with team re deposition prep.	.90	660.00	594.00
1/20/21	CF	Summarize contracts and cancellation for expert report.	1.70	660.00	1,122.00
1/20/21	DB	Prepare for Schoeppe deposition, including reviewing and commenting on prep outline, discussion with D. Evinger re capital ratio issues, and related emails with team and client.	3.00	925.00	2,775.00
1/20/21	DB	Review and comment on Bearman deposition outline.	.80	925.00	740.00
1/20/21	DB	Emails re logistics for Mojica deposition.	.40	925.00	370.00
1/20/21	DIW	Review incoming production details, contact opposing counsel's vendor for access issue resolution, verify BFM production and send to tech team with instructions, other technical assistance with discovery.	2.10	290.00	609.00
1/20/21	GAO	Call with M. Madden and L. Esbrook re Brough/Evinger prep.	.50	975.00	487.50
1/20/21	GAO	Review summary of Wong deposition.	.30	975.00	292.50
1/20/21	GAO	Review Maria Cole prep outline.	.50	975.00	487.50
1/20/21	GAO	Review Schoeppe outline.	.30	975.00	292.50
1/20/21	GAO	Review Bearman deposition outline.	.40	975.00	390.00
1/20/21	GAO	Review Evinger document and D. Burke summary re ICS issue.	.40	975.00	390.00
1/20/21	GAO	Review Q&As with Tamra Ferguson for insurers.	.20	975.00	195.00
1/20/21	LCE	Call with Charles Grice on cancellation expert report.	.50	660.00	330.00
1/20/21	LCE	Call on Brough Evinger production with G. Orseck and M. Madden.	.50	660.00	330.00
1/20/21	LCE	Schedule deposition preparation sessions with clients.	.50	660.00	330.00
1/20/21	LCE	Respond to M. Madden comments for Bearman deposition outline revision.	2.30	660.00	1,518.00
1/20/21	LCE	Review Blue Flame ninth production in advance of Bearman deposition.	3.00	660.00	1,980.00
1/20/21	LCE	Draft list of additional topics for expert report to cover.	.50	660.00	330.00
1/20/21	LCE	Assemble exhibits for Bearman deposition.	3.50	660.00	2,310.00
1/20/21	LCE	Respond to G. Orseck questions for Brough and Evinger deposition preparation.	2.50	660.00	1,650.00
1/20/21	LCE	Revise Cole deposition practice outline and binders.	1.80	660.00	1,188.00
1/20/21	LGW	Continue to research Brough and Evinger documents for deposition preparation with comments from L. Esbrook.	3.70	290.00	1,073.00
1/20/21	LGW	Research Cole documents for deposition preparation with comments from L. Esbrook.	3.80	290.00	1,102.00

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1/20/21	MMM	Prepare for (0.3) and participate in (0.3) call with C. Grice re indemnification report.	.60	925.00	555.00
1/20/21	MMM	Confer with L. Esbrook re Grice indemnification report.	.20	925.00	185.00
1/20/21	MMM	Prepare for Bearman deposition.	5.50	925.00	5,087.50
1/20/21	MMM	Confer with G. Orseck and L. Esbrook re Brough and Evinger work product.	.50	925.00	462.50
1/20/21	MMM	Emails following up on open discovery issues.	.30	925.00	277.50
1/20/21	ZNF	Email C. Forstein and L. Esbrook concerning discovery issues related to depositions.	.70	565.00	395.50
1/20/21	ZNF	Review documents produced by Plaintiff and Defendants to create binder for Claudia Mojica.	1.50	565.00	847.50
1/20/21	ZNF	Prepare and serve Chain Bridge Bank's sixth document production.	.60	565.00	339.00
1/20/21	ZNF	Prepare for call with Claudia Mojica.	.40	565.00	226.00
1/20/21	ZNF	Meet with Claudia Mojica to discuss deposition logistics.	.30	565.00	169.50
1/20/21	ZNF	Review discovery and deposition outlines to omit privileged documents clawed back by Blue Flame Medical.	.70	565.00	395.50
1/21/21	CCC	Finalize Brough & Evinger potential deposition materials for witnesses.	.50	290.00	145.00
1/21/21	CCC	Research Mojica potential deposition materials; prepare Mojica materials for Z. Ferguson and D. Burke; emails with Z. Ferguson regarding questions.	4.60	290.00	1,334.00
1/21/21	CCC	Prepare master chart of deposition exhibits requested of G. Orseck.	2.80	290.00	812.00
1/21/21	CF	Participate in deposition prep for H. Schoeppe.	6.60	660.00	4,356.00
1/21/21	CF	Correspond with D. Burke and Analysis Group.	.40	660.00	264.00
1/21/21	DB	Attend deposition prep meeting with H. Schoeppe and C. Forstein.	6.50	925.00	6,012.50
1/21/21	DIW	Review deposition prep documents, prepare set with requested naming convention for C. Chase Carpino, other technical assistance with discovery.	.70	290.00	203.00
1/21/21	GAO	Join portion of Schoeppe deposition prep.	.40	975.00	390.00
1/21/21	GAO	Download on Bearman deposition.	.30	975.00	292.50
1/21/21	GAO	Prepare for Brough and Evinger depositions.	2.40	975.00	2,340.00
1/21/21	GAO	Call with J. Missner re litigation funder and follow-up with Z. Ferguson on Rule 45 subpoena.	.60	975.00	585.00
1/21/21	GAO	Call with A. Schoenfeld on multiple items.	.60	975.00	585.00
1/21/21	GAO	Prepare update for team on outstanding issues.	.40	975.00	390.00
1/21/21	LCE	Prepare for and second chair deposition of Ethan Bearman.	9.80	660.00	6,468.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/21	LCE	Prepare for M. Cole deposition.	.80	660.00	528.00
1/21/21	LCE	Summarize Bearman deposition for team.	.50	660.00	330.00
1/21/21	MMM	Prepare for Bearman deposition.	.80	925.00	740.00
1/21/21	MMM	Take Bearman deposition.	9.00	925.00	8,325.00
1/21/21	ZNF	Draft Rule 45 subpoena to TRGP Capital Management.	1.50	565.00	847.50
1/21/21	ZNF	Draft defense outline for deposition of Claudia Mojica-Guadron.	5.70	565.00	3,220.50
1/21/21	ZNF	Email C. Forstein and L. Esbrook regarding questions about discovery production.	.40	565.00	226.00
1/21/21	ZNF	Finalize binder for Mojica deposition prep and coordinate printing and deliver of binders.	2.00	565.00	1,130.00
1/22/21	CCC	Final Wong transcript and exhibit matters; revise master exhibit list with new exhibits.	.90	290.00	261.00
1/22/21	CCC	Service of subpoena matters for Z. Ferguson.	.30	290.00	87.00
1/22/21	CCC	Prepare Cole potential deposition materials for L. Esbrook, M. Madden.	1.50	290.00	435.00
1/22/21	CF	Defend deposition of H. Schoeppe.	7.40	660.00	4,884.00
1/22/21	CF	Draft summary of deposition.	.50	660.00	330.00
1/22/21	CF	Review and respond to correspondence.	.40	660.00	264.00
1/22/21	DB	Attend and monitor Schoeppe deposition, including associated emails with team re same.	7.00	925.00	6,475.00
1/22/21	DB	Initial review of outline for Mojica deposition prep.	.50	925.00	462.50
1/22/21	GAO	Call and emails with M. Madden and L. Esbrook re production of Brough and Evinger notes.	.70	975.00	682.50
1/22/21	GAO	Review and edit Rule 45 subpoena to litigation funder.	.30	975.00	292.50
1/22/21	GAO	Begin to prepare SJ outline.	.40	975.00	390.00
1/22/21	GAO	Review and edit 30(b)(6) notice to Cal Treasurer's Office.	.20	975.00	195.00
1/22/21	GAO	Multiple emails re H. Schoeppe deposition.	.40	975.00	390.00
1/22/21	LCE	Final updates to Cole binder for deposition and coordinate with paralegals to send binders to clients.	3.00	660.00	1,980.00
1/22/21	LCE	Review deposition transcripts for testimony relevant to Analysis Group.	1.50	660.00	990.00
1/22/21	LCE	Call with G. Orseck and M. Madden on privilege notes.	.50	660.00	330.00
1/22/21	LCE	Update exhibit tracker from Bearman deposition.	.30	660.00	198.00
1/22/21	LCE	Review additional materials for Cole deposition prep session.	.80	660.00	528.00
1/22/21	LGW	Research additional Cole documents for deposition preparation with comments from L. Esbrook.	1.00	290.00	290.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/21	MMM	Multiple emails regarding open items including Cole deposition prep, answering D. Evinger question on Bearman deposition, TRGP subpoena, the SCO 30(b)(6) deposition, and Gonzales deposition.	1.20	925.00	1,110.00
1/22/21	MMM	Email G. Orseck and D. Burke regarding litigation-funding discovery.	.30	925.00	277.50
1/22/21	MMM	Email G. Orseck regarding status of Grice liability report.	.30	925.00	277.50
1/22/21	MMM	Confer with California AG re Gonzales deposition.	.30	925.00	277.50
1/22/21	MMM	Emails regarding Coffey deposition.	.20	925.00	185.00
1/22/21	ZNF	Coordinate deposition of Claudia Mojica.	1.10	565.00	621.50
1/22/21	ZNF	Revise and serve subpoena to California State Controller's Office.	.90	565.00	508.50
1/22/21	ZNF	Revise and coordinate service of subpoena on TRGP Capital Management LLC.	2.10	565.00	1,186.50
1/22/21	ZNF	Draft defense deposition outline for Claudia Mojica deposition.	1.40	565.00	791.00
1/23/21	GAO	Multiple emails with clients and team re deposition prep and defense theories.	.70	975.00	682.50
1/23/21	GAO	Call with L. Esbrook and M. Madden re document production issues.	.60	975.00	585.00
1/23/21	GAO	Prepare email to clients regarding two strategic issues for discussion.	.40	975.00	390.00
1/23/21	GAO	Call with J. Brough re document production issue and deposition prep.	.30	975.00	292.50
1/23/21	LCE	Call with G. Orseck, M. Madden, and client on producing notes and update outline accordingly.	1.10	660.00	726.00
1/23/21	LCE	Draft emails to client on strategic issues and summary of recent deposition testimony.	1.30	660.00	858.00
1/23/21	MMM	Call with J Brough.	1.00	925.00	925.00
1/23/21	MMM	Emails with client regarding defenses to myriad claims and allegations.	.70	925.00	647.50
1/23/21	ZNF	Review and analyze transcript of Heather Schoeppe deposition.	3.10	565.00	1,751.50
1/24/21	CF	Review and respond to correspondence re depositions and discovery.	.70	660.00	462.00
1/24/21	DB	Review outline for Mojica deposition prep, including associated emails with Z. Ferguson.	1.20	925.00	1,110.00
1/24/21	LCE	Respond to emails from M. Madden and G. Orseck on miscellaneous deposition prep tasks.	.30	660.00	198.00
1/24/21	LCE	Create annotated version of answer to interrogatories for G. Orseck.	1.50	660.00	990.00

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1/24/21	LCE	Draft memo to G. Orseck on timing of events relevant to case.	1.10	660.00	726.00
1/24/21	LCE	Edit M. Cole deposition preparation outline with M. Madden's comments.	1.60	660.00	1,056.00
1/24/21	LCE	Correspond with D. Burke on M. Cole outline.	.30	660.00	198.00
1/24/21	LCE	Revise timeline insert for case with additional materials.	.50	660.00	330.00
1/24/21	MMM	Prepare for Cole preparation meeting and email L. Esbrook re key points.	1.60	925.00	1,480.00
1/24/21	MMM	Review SRZ letter regarding discovery and supplemental privilege log and outline follow-up questions re same.	.20	925.00	185.00
1/24/21	MMM	Emails to team and client re open items.	.40	925.00	370.00
1/24/21	MMM	Email Wilmer re Coffey deposition.	.20	925.00	185.00
1/24/21	MMM	Prepare for and outline N. Gonzales deposition.	1.80	925.00	1,665.00
1/24/21	ZNF	Email C. Forstein and L. Esbrook regarding discovery and deposition matters.	.90	565.00	508.50
1/24/21	ZNF	Review outline and prepare for Claudia Mojica witness preparation session.	2.60	565.00	1,469.00
1/25/21	CCC	Final Wong video matters.	.50	290.00	145.00
1/25/21	CCC	Deposition matters; emails with Z. Ferguson and L. Esbrook regarding Cole and Mojica set-up.	.40	290.00	116.00
1/25/21	CCC	Prepare Mojica hightail for C. Forstein.	.20	290.00	58.00
1/25/21	CF	Participate in team meeting.	.50	660.00	330.00
1/25/21	CF	Redact documents for production and correspond with D. Wesley Sarti re same.	.80	660.00	528.00
1/25/21	CF	Draft production letter.	.70	660.00	462.00
1/25/21	CF	Research and correspond with Z. Ferguson, L. Esbrook and M. Madden re discovery.	.90	660.00	594.00
1/25/21	CF	Correspond with G. Orseck.	.80	660.00	528.00
1/25/21	CF	Correspond with Z. Ferguson and Veritext representative re depositions.	.50	660.00	330.00
1/25/21	DB	Attend team meeting re various discovery issues.	.50	925.00	462.50
1/25/21	DB	Attend deposition prep meeting for C. Mojica.	4.50	925.00	4,162.50
1/25/21	DIW	Convert call transcripts to format for loading to existing audio records in review database, instructions and files to tech team.	.40	290.00	116.00
1/25/21	GAO	Prepare for Evinger and Brough depositions.	2.50	975.00	2,437.50
1/25/21	GAO	Call with P. Fitzgerald re multiple issues.	.30	975.00	292.50
1/25/21	GAO	Deposition prep session with D. Evinger.	2.00	975.00	1,950.00
1/25/21	GAO	Team meeting.	.50	975.00	487.50

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1/25/21	GAO	Multiple email chains with P. Fitzgerald and clients on outstanding issues.	1.30	975.00	1,267.50
1/25/21	LCE	Deposition preparation for D. Evinger.	2.00	660.00	1,320.00
1/25/21	LCE	Correspond with paralegals on outstanding tasks for deposition prep.	1.00	660.00	660.00
1/25/21	LCE	Correspond with client on technical issues related to deposition review materials.	.40	660.00	264.00
1/25/21	LCE	Update draft expert report on wire cancellation for M. Madden.	2.10	660.00	1,386.00
1/25/21	LCE	Minor edits to client deposition outline.	.80	660.00	528.00
1/25/21	LCE	Weekly team strategy meeting.	.50	660.00	330.00
1/25/21	LCE	Call with client in advance of deposition and internal team call following.	1.90	660.00	1,254.00
1/25/21	LCE	Prepare for Evinger and Brough depositions.	.50	660.00	330.00
1/25/21	LCE	Draft summary memo on ICS accounts for G. Orseck.	.60	660.00	396.00
1/25/21	LCE	Correspond with expert on new draft report.	.50	660.00	330.00
1/25/21	LCE	Research and revise response letter on production issues.	.40	660.00	264.00
1/25/21	LGW	Revise phone call transcripts with comments from L. Esbrook.	3.10	290.00	899.00
1/25/21	LGW	Revise JPM deposition outline insert with comments from L. Esbrook.	.80	290.00	232.00
1/25/21	LGW	Research transcripts with comments from L. Esbrook.	1.00	290.00	290.00
1/25/21	MMM	Emails regarding open items, including responses to client question, planning for team meeting, and preparation for Cole deposition.	1.10	925.00	1,017.50
1/25/21	MMM	Prepare D. Evinger for deposition.	2.00	925.00	1,850.00
1/25/21	MMM	Participate in weekly team meeting.	.50	925.00	462.50
1/25/21	MMM	Email C. Grice re indemnification report.	.20	925.00	185.00
1/25/21	MMM	Edits and emails regarding SCO 30(b)(6) deposition.	.30	925.00	277.50
1/25/21	MMM	Email G. Orseck re D. Evinger deposition.	.20	925.00	185.00
1/25/21	MMM	Email G. Orseck and D. Burke regarding H. Schoeppe deposition.	.20	925.00	185.00
1/25/21	MMM	Prepare M. Cole for deposition.	1.00	925.00	925.00
1/25/21	ZNF	Prepare witness Claudia Mojica-Guadron for deposition.	4.70	565.00	2,655.50
1/25/21	ZNF	Confer with Robbins Russell team to discuss case developments and litigation strategy.	.60	565.00	339.00
1/25/21	ZNF	Prepare for Claudia Mojica-Guardon witness prep session.	1.10	565.00	621.50
1/25/21	ZNF	Research response to Schulte discovery letter.	1.30	565.00	734.50
1/25/21	ZNF	Draft, revise, and serve notice of deposition for the California State Controller's Office.	.80	565.00	452.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/25/21	ZNF	Draft email noticing deposition attendance.	.20	565.00	113.00
1/25/21	ZNF	Email L. Esbrook and C. Forstein regarding discovery and deposition-related issues.	1.20	565.00	678.00
1/25/21	ZNF	Prepare for deposition of Claudia Mojica-Guadron.	.70	565.00	395.50
1/26/21	CCC	Deposition matters.	.30	290.00	87.00
1/26/21	CCC	Revise master chart of deposition exhibits.	1.20	290.00	348.00
1/26/21	CCC	Final Bearman transcript and exhibit matters.	.30	290.00	87.00
1/26/21	CF	Draft notice of deposition.	.80	660.00	528.00
1/26/21	CF	Prepare and send document production.	1.50	660.00	990.00
1/26/21	CF	Review depositions for testimony related to J. Brough and D. Evinger.	3.40	660.00	2,244.00
1/26/21	DB	Attend and monitor deposition of C. Mojica, including various update emails with team.	6.00	925.00	5,550.00
1/26/21	DIW	Review call transcripts loaded to existing audio records in review database, submit production CBB007 to tech team, verify CBB007 deliverable and prepare for service.	.80	290.00	232.00
1/26/21	GAO	Join portion of M. Cole deposition prep.	.40	975.00	390.00
1/26/21	GAO	Prepare for and prep session with J. Brough.	2.60	975.00	2,535.00
1/26/21	GAO	Internal discussions re production of Brough/Evinger notes.	.30	975.00	292.50
1/26/21	GAO	Review memos and emails from P. Fitzgerald.	.30	975.00	292.50
1/26/21	GAO	Prepare detailed outline of our SJ motion.	1.50	975.00	1,462.50
1/26/21	GAO	Download on Mojica deposition.	.20	975.00	195.00
1/26/21	GAO	Review materials from L. Esbrook re Brough/Evinger prep.	.40	975.00	390.00
1/26/21	GAO	Further Evinger and Brough depositions prep.	1.00	975.00	975.00
1/26/21	LCE	Prepare for and lead deposition prep for M. Cole.	9.20	660.00	6,072.00
1/26/21	LCE	Prepare for M. Cole deposition.	.30	660.00	198.00
1/26/21	LCE	Prepare for Evinger and Brough deposition practice sessions.	.60	660.00	396.00
1/26/21	MMM	Emails re Coffey deposition, Grice liability report, and other open items.	.20	925.00	185.00
1/26/21	MMM	Edit letter to Blue Flame re discovery matters.	.20	925.00	185.00
1/26/21	MMM	Prepare M. Cole for deposition.	5.30	925.00	4,902.50
1/26/21	MMM	Prepare J. Brough for deposition.	1.80	925.00	1,665.00
1/26/21	MMM	Draft Gonzales deposition outline.	2.20	925.00	2,035.00
1/26/21	ZNF	Review notes and documents in preparation for deposition of Claudia Mojica.	.90	565.00	508.50
1/26/21	ZNF	Participate in deposition of Claudia Mojica.	5.90	565.00	3,333.50
1/26/21	ZNF	Draft highlight summary of Claudia Mojica deposition.	.90	565.00	508.50
1/26/21	ZNF	Research and draft follow-up discovery letter to Schulte.	2.30	565.00	1,299.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/27/21	CCC	Final Bearman video matters; final Schoeppe transcript and exhibit matters.	1.00	290.00	290.00
1/27/21	CCC	Prepare Wong and Bearman deposition and exhibits hightail links for C. Forstein.	.30	290.00	87.00
1/27/21	CCC	Deposition matters.	.20	290.00	58.00
1/27/21	CF	Correspond with Analysis Group re Mark Faulkner report.	.20	660.00	132.00
1/27/21	CF	Review summary judgment outline.	.60	660.00	396.00
1/27/21	CF	Review and respond to correspondence.	.50	660.00	330.00
1/27/21	DB	Prepare for upcoming JPM depositions.	1.20	925.00	1,110.00
1/27/21	DIW	Analyze, prepare instructions for BFM010 production, data to tech team.	.50	290.00	145.00
1/27/21	GAO	Review and comment on Natalie Gonzales deposition outline and discuss with M. Madden.	.60	975.00	585.00
1/27/21	GAO	Emails and discussions on multiple factual and expert issues with team.	.70	975.00	682.50
1/27/21	LCE	M. Cole deposition and follow up.	7.00	660.00	4,620.00
1/27/21	LCE	Review N. Gonzales deposition outline for M. Madden.	.70	660.00	462.00
1/27/21	LCE	Finish and send G. Orseck tracker of Evinger Brough references in prior testimony.	.80	660.00	528.00
1/27/21	LCE	Answer D. Burke questions for JPM deposition outlines.	1.00	660.00	660.00
1/27/21	LCE	Correspond with Veritext for deposition scheduling.	.30	660.00	198.00
1/27/21	LCE	Respond to C. Forstein and Z. Ferguson questions for deposition prep.	.70	660.00	462.00
1/27/21	LCE	Review client emails on deposition strategy.	.30	660.00	198.00
1/27/21	MMM	Participate in M. Cole deposition.	5.00	925.00	4,625.00
1/27/21	MMM	Draft internal and client emails summarizing M. Cole deposition.	.50	925.00	462.50
1/27/21	MMM	Confer with G., Orseck re Gonzales deposition.	.20	925.00	185.00
1/27/21	MMM	Call and emails with California AG's office re Gonzales deposition.	.20	925.00	185.00
1/27/21	MMM	Draft Gonzales deposition outline.	1.30	925.00	1,202.50
1/27/21	MMM	Call with D. Evinger regarding depositions and BFM allegations..	.50	925.00	462.50
1/27/21	MMM	Edit discovery letter to Blue Flame.	.60	925.00	555.00
1/27/21	ZNF	Revise Gonzales deposition outline.	3.30	565.00	1,864.50
1/27/21	ZNF	Review produced documents to confirm details of discovery letter.	.80	565.00	452.00
1/27/21	ZNF	Review transcript of deposition of Ethan Bearman.	2.30	565.00	1,299.50
1/27/21	ZNF	Prepare exhibits for deposition of Natalie Gonzales.	1.00	565.00	565.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/27/21	ZNF	Coordinate Gonzales deposition with vendor.	.70	565.00	395.50
1/28/21	CCC	Deposition matters.	.10	290.00	29.00
1/28/21	CF	Attend M. Gonzales deposition.	2.20	660.00	1,452.00
1/28/21	CF	Review and respond to correspondence.	.80	660.00	528.00
1/28/21	DB	Prepare for upcoming JPM depositions.	2.50	925.00	2,312.50
1/28/21	DB	Prepare for and conduct meet and confer re JPM 30(b)(6) deposition.	1.20	925.00	1,110.00
1/28/21	DB	Follow up with M. Castagnello re interactions with M. Gula, including emails with B. Sharon, calls, and gathering relevant documents.	.90	925.00	832.50
1/28/21	GAO	Prep session with D. Evinger.	7.50	975.00	7,312.50
1/28/21	GAO	Discuss newly produced document with Matt and L. Esbrook and decide on best course.	.40	975.00	390.00
1/28/21	LCE	Client deposition preparation.	9.20	660.00	6,072.00
1/28/21	LCE	Prepare for upcoming deposition.	.30	660.00	198.00
1/28/21	MMM	Prepare for Gonzales deposition.	1.60	925.00	1,480.00
1/28/21	MMM	Take Gonzales deposition.	3.80	925.00	3,515.00
1/28/21	MMM	Prepare D. Evinger for deposition.	3.50	925.00	3,237.50
1/28/21	MMM	Emails summarizing Gonzales prep internally and for client.	.40	925.00	370.00
1/28/21	MMM	Confer with G. Orseck and L. Esbrook re Evinger deposition.	.30	925.00	277.50
1/28/21	MMM	Emails regarding Grice liability report and Gonzales deposition.	.40	925.00	370.00
1/28/21	ZNF	Finalize exhibits and prepare for deposition of Natalie Gonzales.	1.40	565.00	791.00
1/28/21	ZNF	Research document production questions related to discovery letter to BFM.	1.60	565.00	904.00
1/28/21	ZNF	Participate in deposition of Natalie Gonzales.	3.60	565.00	2,034.00
1/28/21	ZNF	Email C. Forstein and L. Esbrook regarding production-related questions.	.20	565.00	113.00
1/28/21	ZNF	Draft email to client regarding collection protocol for Spark messages.	.40	565.00	226.00
1/28/21	ZNF	Draft summary of Natalie Gonzales deposition for internal use.	.60	565.00	339.00
1/28/21	ZNF	Revise letter to BFM regarding discovery issues.	.40	565.00	226.00
1/28/21	ZNF	Review transcript of Bearman deposition.	.40	565.00	226.00
1/29/21	CCC	Deposition matters.	.20	290.00	58.00
1/29/21	CCC	Final Mojica-Guardon transcript and exhibit matters.	.50	290.00	145.00
1/29/21	CF	Participate in call with D. Burke and SRZ re discovery.	.60	660.00	396.00
1/29/21	CF	Attend D. Evinger deposition.	.80	660.00	528.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/29/21	CF	Confer with L. Esbrook and Z. Ferguson.	.70	660.00	462.00
1/29/21	DB	Review revised draft of Faulkner report.	1.00	925.00	925.00
1/29/21	DB	Prepare for, conduct, and follow up on meet-and-confer with opposing counsel re TRGP subpoena.	1.00	925.00	925.00
1/29/21	DB	Review draft letter to Schulte re document production issues.	.30	925.00	277.50
1/29/21	GAO	Prepare for and defend David Evinger deposition.	9.50	975.00	9,262.50
1/29/21	GAO	Follow-up call with client.	.30	975.00	292.50
1/29/21	GAO	Prepare summary for clients.	.50	975.00	487.50
1/29/21	LCE	Participate in Evinger deposition session.	9.30	660.00	6,138.00
1/29/21	LCE	Send attendance lists.	.10	660.00	66.00
1/29/21	LCE	Review emails from clients on strategy.	.20	660.00	132.00
1/29/21	MMM	Read real-time transcript of selected portions of D. Evinger deposition	2.30	925.00	2,127.50
1/29/21	MMM	Emails re final edits to discovery letter to Blue Flame.	.20	925.00	185.00
1/29/21	ZNF	Research case law and local rules regarding whether communications with client during deposition breaks are privileged.	.50	565.00	282.50
1/29/21	ZNF	Revise, finalize, and serve letter regarding BFM's document productions.	.30	565.00	169.50
1/29/21	ZNF	Participate in remote deposition of David Evinger.	7.20	565.00	4,068.00
1/30/21	DB	Respond to inquiry from P. Fitzgerald re depositions.	.50	925.00	462.50
1/30/21	DB	Respond to inquiry from P. Fitzgerald re Section 4A-404 issues.	.50	925.00	462.50
1/30/21	GAO	Multiple emails with clients re discovery.	.50	975.00	487.50
1/30/21	LCE	Read and respond to emails on upcoming depositions.	.20	660.00	132.00
1/31/21	CF	Review draft expert report.	.90	660.00	594.00
1/31/21	CF	Draft audit letter.	1.00	660.00	660.00
1/31/21	DB	Further review revised draft of Faulkner report, including reviewing comments from G. Orseck.	.60	925.00	555.00
1/31/21	GAO	Read and edit draft Faulkner report.	2.50	975.00	2,437.50
1/31/21	LCE	Read and respond to emails on upcoming depositions.	.30	660.00	198.00
1/31/21	LCE	Edit due diligence expert report.	3.90	660.00	2,574.00
1/31/21	MMM	Draft email responding to multiple client questions regarding document discovery and depositions.	.60	925.00	555.00
TOTAL PROFESSIONAL SERVICES					\$ 633,185.50
Less Courtesy Discount					<u>\$ -20,000.00</u>

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February 11, 2021
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NET PROFESSIONAL SERVICES

\$ 613,185.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	63.90	925.00	59,107.50
Christine A Chase Carpino	CCC	37.30	290.00	10,817.00
Ian E Cohen	IEC	10.00	370.00	3,700.00
Leslie Esbrook	LCE	205.40	660.00	135,564.00
Zachary N Ferguson	ZNF	156.10	565.00	88,196.50
Carolyn Forstein	CF	111.30	660.00	73,458.00
Robert H Kearney	RHK	14.00	370.00	5,180.00
Matthew M Madden	MMM	140.20	925.00	129,685.00
Michael A McClain, Jr.	MAM	5.90	370.00	2,183.00
Gary A. Orseck	GAO	107.50	975.00	104,812.50
Dana I. Wesley Sarti	DIW	13.70	290.00	3,973.00
Lyndsay G Webb	LGW	42.90	290.00	12,441.00
Total		908.20		\$ 629,117.50

EXPENSES

Description	Amount
Process Server & Subpoena Fees	920.75
Deposition Transcript Cost	16,164.98
Long Distance Telephone	87.13
Computer Research Charges	214.24
Courier/Overnight delivery	952.56
In-house copying charges	823.35
TOTAL EXPENSES	\$ 19,163.01
TOTAL THIS INVOICE	\$ 632,348.51

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

February 11, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 200912
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 632,348.51

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 200912, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

March 9, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201068
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: February 28, 2021.

RE: Blue Flame

Total Professional Services	\$ 392,033.50
Total Expenses	<u>\$ 61,777.46</u>
TOTAL THIS INVOICE	\$ 453,810.96

ROBBINS|RUSSELL

March 9, 2021
Invoice #: 201068

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/01/21	CCC	Final Cole transcript and exhibit matters.	.40	290.00	116.00
2/01/21	CCC	Revise master chart of deposition exhibits.	.90	290.00	261.00
2/01/21	CF	Review and respond to correspondence.	.90	660.00	594.00
2/01/21	DB	Review and comment on draft Faulkner expert report.	2.00	925.00	1,850.00
2/01/21	DB	Prepare for upcoming JPM depositions.	3.00	925.00	2,775.00
2/01/21	GAO	Prepare for and meet with J. Brough for deposition prep.	8.20	975.00	7,995.00
2/01/21	GAO	Call with P. Fitzgerald.	.50	975.00	487.50
2/01/21	GAO	Read and comment on Grice draft report.	1.00	975.00	975.00
2/01/21	LCE	Review latest version of expert due diligence report.	.80	660.00	528.00
2/01/21	LCE	Internal preparation for J. Brough deposition and follow up.	8.10	660.00	5,346.00
2/01/21	LCE	Prepare documents to send to Analysis Group for due diligence report.	.70	660.00	462.00
2/01/21	LCE	Correspond with D. Evinger on logistics for depositions.	.20	660.00	132.00
2/01/21	LCE	Correspond with team on miscellaneous document requests.	.20	660.00	132.00
2/01/21	LCE	Review and suggest comments on expert cancellation report.	1.50	660.00	990.00
2/01/21	LCE	Revise and suggest comments related to red flags on due diligence expert report.	1.50	660.00	990.00
2/01/21	MMM	Draft responses to questions posed by P. Fitzgerald re Bearman deposition.	.50	925.00	462.50
2/01/21	MMM	Edit Grice liability report.	3.90	925.00	3,607.50
2/01/21	MMM	Confer with G. Orseck re Brough notes and research record re same.	.40	925.00	370.00
2/01/21	ZNF	Review transcript from deposition of Ethan Bearman.	1.50	565.00	847.50
2/01/21	ZNF	Review transcript from deposition of Michael Gula.	3.30	565.00	1,864.50
2/01/21	ZNF	Research basis for arguing that a party cannot prevail on a UCC Article 4A claim at summary judgment without proving damages.	.70	565.00	395.50
2/02/21	CCC	Final Evinger transcript and exhibit matters; final Gonzales transcript matters.	.60	290.00	174.00
2/02/21	CCC	Revise master chart of deposition exhibits.	.30	290.00	87.00
2/02/21	CF	Review draft summary judgment motion and research questions.	1.70	660.00	1,122.00
2/02/21	CF	Review revised M. Faulkner report.	1.40	660.00	924.00

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March 9, 2021
Invoice #: 201068

Date	Tkpr	Description	Hours	Rate	Amount
2/02/21	CF	Review and respond to correspondence.	.80	660.00	528.00
2/02/21	DB	Prepare for upcoming JPM depositions.	3.50	925.00	3,237.50
2/02/21	DB	Further revisions to draft Faulkner expert report.	.80	925.00	740.00
2/02/21	DIW	Analyze JPMC002 production, instructions to vendor and information re same to D. Burke.	.40	290.00	116.00
2/02/21	GAO	Prepare for and defend J. Brough deposition.	9.80	975.00	9,555.00
2/02/21	GAO	Prepare summary for clients.	.50	975.00	487.50
2/02/21	GAO	Multiple emails with team re outstanding discovery items.	.40	975.00	390.00
2/02/21	LCE	Update document collection list for due diligence expert report.	.30	660.00	198.00
2/02/21	LCE	Second chair deposition of John Brough.	9.30	660.00	6,138.00
2/02/21	LCE	Gather additional documents referred to in Brough deposition.	.30	660.00	198.00
2/02/21	MMM	Edit Grice liability report.	1.00	925.00	925.00
2/02/21	MMM	Edit Grice cancellation report.	2.50	925.00	2,312.50
2/02/21	MMM	Review JPMC document production.	.30	925.00	277.50
2/02/21	MMM	Call with Analysis Group re Grice liability report.	.60	925.00	555.00
2/02/21	ZNF	Research whether claim under 4A-404(a) requires proof of damages and whether that proof must be submitted on summary judgment.	3.20	565.00	1,808.00
2/02/21	ZNF	Email L. Esbrook regarding document-production questions raised in Brough deposition.	.50	565.00	282.50
2/02/21	ZNF	Attend deposition of John Brough.	6.30	565.00	N/C
2/03/21	CCC	Final Cole video matters.	.40	290.00	116.00
2/03/21	CCC	Deposition matters.	.20	290.00	58.00
2/03/21	CF	Participate in team meeting.	.70	660.00	462.00
2/03/21	CF	Participate in call with Analysis Group.	1.00	660.00	660.00
2/03/21	CF	Draft follow up question for Analysis Group.	.80	660.00	528.00
2/03/21	DB	Participate in weekly team meeting re strategy and discovery issues.	.70	925.00	647.50
2/03/21	DB	Confer with M. Madden re deposition issues.	.20	925.00	185.00
2/03/21	DB	Call with Analysis Group and co-counsel re draft Faulkner report.	1.10	925.00	1,017.50
2/03/21	DB	Prepare for JPM depositions.	2.00	925.00	1,850.00
2/03/21	GAO	Call with AG and co-counsel on Faulkner draft report.	1.10	975.00	1,072.50
2/03/21	GAO	Emails to M. Madden and D. Burke re follow-up to Brough deposition.	.20	975.00	195.00
2/03/21	GAO	Weekly team meeting.	.50	975.00	487.50
2/03/21	GAO	Confer with M. Madden and D. Burke re SCO deposition.	.50	975.00	487.50

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March 9, 2021
Invoice #: 201068

Date	Tkpr	Description	Hours	Rate	Amount
2/03/21	GAO	Emails with A. Schoenfeld re our response to BFM's damages expert.	.30	975.00	292.50
2/03/21	GAO	Review documents from L. Esbrook.	.40	975.00	390.00
2/03/21	LCE	Weekly strategy meeting.	.80	660.00	528.00
2/03/21	LCE	Gather materials for expert on due diligence report and email Analysis Group on same.	2.50	660.00	1,650.00
2/03/21	MMM	Draft agenda for weekly team meeting.	.30	925.00	277.50
2/03/21	MMM	Participate in weekly team meeting.	.60	925.00	555.00
2/03/21	MMM	Confer with D. Burke re deposition strategy.	.20	925.00	185.00
2/03/21	ZNF	Confer with RR Chain Bridge team to discuss litigation developments and strategy.	.70	565.00	395.50
2/03/21	ZNF	Research whether court can dismiss claim on summary judgment for lack of damages when damages are an element of the claim.	1.10	565.00	621.50
2/03/21	ZNF	Review documents produced by CBB and BFM to answer questions re production of documents to experts.	.60	565.00	339.00
2/03/21	ZNF	Research whether claim under 4A-404(a) requires proof of damages and whether that proof must be submitted on summary judgment.	.70	565.00	395.50
2/04/21	CCC	Research Korpall potential deposition materials for D. Burke.	1.20	290.00	348.00
2/04/21	CCC	Final Gonzales exhibit and video matters; final Mojica video matters.	.70	290.00	203.00
2/04/21	CF	Respond to inquiry from Analysis Group.	1.10	660.00	726.00
2/04/21	DB	Call with G. Orseck and M. Madden re discovery issues.	.50	925.00	462.50
2/04/21	DB	Call with L. Esbrook re general ledger documents.	.80	925.00	740.00
2/04/21	DB	Follow up re subpoena to TRGP.	.50	925.00	462.50
2/04/21	DB	Respond to inquiry from P. Fitzgerald re summary judgment on absence of damages, including associated research.	1.20	925.00	1,110.00
2/04/21	DB	Prepare for JPM depositions, including reviewing newly produced documents.	1.00	925.00	925.00
2/04/21	DIW	Prepare set of deposition prep documents with requested naming conventions.	.40	290.00	116.00
2/04/21	GAO	Meeting with D. Burke and M. Madden re multiple strategy issues.	.50	975.00	487.50
2/04/21	GAO	Review expert reports.	1.00	975.00	975.00
2/04/21	LCE	Call with D. Burke on regulatory requirements.	.80	660.00	528.00
2/04/21	LCE	Gather documents and analyze regulatory requirements portion of expert draft due diligence report.	2.20	660.00	1,452.00
2/04/21	LCE	Respond to client emails on miscellaneous fact questions.	.30	660.00	198.00

ROBBINS|RUSSELL

March 9, 2021
Invoice #: 201068

Date	Tkpr	Description	Hours	Rate	Amount
2/04/21	LCE	Work with paralegal to prepare additional files for Analysis Group on draft expert due diligence report.	.40	660.00	264.00
2/04/21	LCE	Draft email to Analysis Group on questions related to expert due diligence report.	.50	660.00	330.00
2/04/21	LCE	Suggest revisions to draft expert cancellation report.	2.90	660.00	1,914.00
2/04/21	LCE	Correspond with M. Madden on follow up to draft expert cancellation report.	.10	660.00	66.00
2/04/21	LCE	Correspond with client on materials related to regulatory requirements.	.40	660.00	264.00
2/04/21	LGW	Prepare Grice expert materials for L. Esbrook.	1.20	290.00	348.00
2/04/21	MMM	Comment on Grice cancellation report.	2.20	925.00	2,035.00
2/04/21	MMM	Confer with G. Orseck and D. Burke re open discovery items and client questions.	.50	925.00	462.50
2/04/21	ZNF	Review JPMC production for litigation relevance.	.80	565.00	452.00
2/05/21	CCC	Prepare Korpai potential deposition materials for D. Burke and Z. Ferguson; emails with D. Burke regarding same.	2.70	290.00	783.00
2/05/21	CCC	Final Brough exhibit and transcript matters.	.40	290.00	116.00
2/05/21	CF	Research CA lobbying and procurement law.	1.90	660.00	1,254.00
2/05/21	CF	Respond to inquiry from Analysis Group.	.80	660.00	528.00
2/05/21	DB	Prepare for JPM depositions, including review of newly produced documents.	4.00	925.00	3,700.00
2/05/21	DB	Review revised draft of Faulkner expert report.	.80	925.00	740.00
2/05/21	DIW	Analyze new JPMC production, make accessible to attorney team.	.80	290.00	232.00
2/05/21	GAO	Multiple emails and calls re discovery and expert reports.	.70	975.00	682.50
2/05/21	LCE	Prepare comments and email to Analysis Group on final section of due diligence expert report.	3.50	660.00	2,310.00
2/05/21	LCE	Correspond with expert on draft cancellation report.	.30	660.00	198.00
2/05/21	LCE	Comment on expert cancellation report.	.40	660.00	264.00
2/05/21	LGW	Revise Grice expert materials with comments from L. Esbrook.	1.00	290.00	290.00
2/05/21	MMM	Emails with L. Esbrook re Grice diligence report.	.60	925.00	555.00
2/05/21	MMM	Draft email to clients re draft Grice reports.	.40	925.00	370.00
2/05/21	ZNF	Research case law regarding state analogs of UCC Article 4A for helpful precedent.	3.00	565.00	1,695.00
2/05/21	ZNF	Coordinate CBB participation in depositions of Rakesh Korpai, Andrew Sturmfels, and Tim Coffey.	.80	565.00	452.00
2/05/21	ZNF	Email C. Forstein and L. Esbrook regarding expert witness and deposition issues.	.20	565.00	113.00
2/06/21	CF	Review correspondence.	.60	660.00	396.00

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2/06/21	DB	Revise draft Faulkner report, including associated discussion with G. Orseck.	2.00	925.00	1,850.00
2/06/21	DB	Prepare for R. Korpall deposition.	1.50	925.00	1,387.50
2/06/21	LCE	Correspond with team on emails from client and read related materials.	.80	660.00	528.00
2/07/21	CF	Review correspondence.	.40	660.00	264.00
2/07/21	DB	Prepare for R. Korpall deposition.	2.50	925.00	2,312.50
2/07/21	DB	Revise and comment on draft Faulkner report.	3.20	925.00	2,960.00
2/07/21	GAO	Call with P. Fitzgerald on multiple issues.	.70	975.00	682.50
2/07/21	GAO	Call with D. Burke re Faulkner report.	.70	975.00	682.50
2/07/21	GAO	Review and edit Faulkner report.	1.20	975.00	1,170.00
2/08/21	CCC	Deposition matters.	.20	290.00	58.00
2/08/21	CCC	Final updated Gonzales exhibits matters.	.20	290.00	58.00
2/08/21	CF	Review and respond to correspondence.	.80	660.00	528.00
2/08/21	CF	Research CA lobbying law.	3.20	660.00	2,112.00
2/08/21	CF	Review M. Faulkner report.	1.80	660.00	1,188.00
2/08/21	DB	Revise draft of Faulkner report and circulate same to Analysis Group. .	1.00	925.00	925.00
2/08/21	DB	Prepare for R. Korpall and T. Coffey depositions.	6.50	925.00	6,012.50
2/08/21	GAO	Work on Faulkner report.	1.60	975.00	1,560.00
2/08/21	GAO	Review C. Forstein research re Matt Littman issues.	.20	975.00	195.00
2/08/21	GAO	Review and edits to Grice I draft.	1.30	975.00	1,267.50
2/08/21	GAO	Review and comment on Korpall deposition outline.	.60	975.00	585.00
2/08/21	LCE	Revise expert report on due diligence.	6.00	660.00	3,960.00
2/08/21	LCE	Revise expert report on cancellation.	1.70	660.00	1,122.00
2/08/21	LCE	Respond to M. Madden comments on expert report due diligence draft.	.80	660.00	528.00
2/08/21	LCE	Correspond with Analysis Group on draft expert report on due diligence.	.60	660.00	396.00
2/08/21	LGW	Revise call start times chart for expert review with comments from L. Esbrook.	.80	290.00	232.00
2/08/21	MMM	Confer with G. Orseck re Grice diligence report.	.20	925.00	185.00
2/08/21	MMM	Email L. Esbrook re Grice diligence report.	.20	925.00	185.00
2/08/21	MMM	Email C. Porter re SCO 30(b)(6) deposition.	.10	925.00	92.50
2/08/21	MMM	Edit Grice diligence report.	4.50	925.00	4,162.50
2/08/21	MMM	Emails re Grice diligence report.	.30	925.00	277.50
2/08/21	ZNF	Review produced documents and audio to prepare for deposition of Rakesh Korpall.	2.70	565.00	1,525.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/08/21	ZNF	Call with D. Burke to discuss exhibits for Korpall deposition.	.20	565.00	113.00
2/08/21	ZNF	Prepare possible exhibits for Korpall deposition and exchange emails with D. Burke regarding same.	1.80	565.00	1,017.00
2/08/21	ZNF	Research Reg. J and Bank Secrecy Act in the context of last-in-time rule.	.60	565.00	339.00
2/08/21	ZNF	Update deposition master exhibit tracker.	.30	565.00	169.50
2/09/21	CF	Cite check M. Faulkner report.	4.40	660.00	2,904.00
2/09/21	CF	Summarize CA lobbying research for P. Fitzgerald.	.90	660.00	594.00
2/09/21	DB	Prepare for, take, and follow-up to R. Korpall deposition.	10.50	925.00	9,712.50
2/09/21	GAO	Prepare for and Chain Bridge board meeting.	.80	975.00	780.00
2/09/21	GAO	Download on Korpall deposition.	.30	975.00	292.50
2/09/21	GAO	Read and edit Faulkner report.	1.00	975.00	975.00
2/09/21	GAO	Review and edit email to P. Fitzgerald re Matt Littman issues.	.10	975.00	97.50
2/09/21	GAO	Read and edit Grice's main report.	2.50	975.00	2,437.50
2/09/21	GAO	Draft new insert for Grice II based upon Korpall testimony.	.30	975.00	292.50
2/09/21	LCE	Respond to emails about expert report materials.	.30	660.00	198.00
2/09/21	LCE	Cite check due diligence expert report.	7.50	660.00	4,950.00
2/09/21	LCE	Cite check cancellation expert report.	2.00	660.00	1,320.00
2/09/21	LCE	Further edits to due diligence expert report.	1.80	660.00	1,188.00
2/09/21	LCE	Send expert additional source materials.	.20	660.00	132.00
2/09/21	LGW	Revise Grice expert materials with comments from L. Esbrook.	3.00	290.00	870.00
2/09/21	MMM	Review Korpall real time deposition transcript and emails with G. Orseck and D. Burke re same.	2.30	925.00	2,127.50
2/09/21	MMM	Edit Grice diligence report.	.60	925.00	555.00
2/09/21	MMM	Call with Analysis Group re Grice diligence report.	.50	925.00	462.50
2/09/21	MMM	Edits to Grice indemnity report.	.90	925.00	832.50
2/09/21	MMM	Sturmfels deposition prep.	1.20	925.00	1,110.00
2/09/21	MMM	Emails with L. Esbrook re Grice diligence report.	.40	925.00	370.00
2/09/21	MMM	Emails re directing Grice to JPMC testimony bearing on wire cancellation.	.30	925.00	277.50
2/09/21	MMM	Emails re Sturmfels depositions prep.	.40	925.00	370.00
2/09/21	ZNF	Review outline in preparation for Korpall deposition.	.50	565.00	282.50
2/09/21	ZNF	Participate in deposition of Rakesh Korpall.	8.60	565.00	4,859.00
2/09/21	ZNF	Draft headline summary of Korpall deposition for Robbins Russell team.	.40	565.00	226.00
2/09/21	ZNF	Draft longer summary of Korpall deposition for Robbins Russell team.	1.10	565.00	621.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/09/21	ZNF	Update master exhibit tracker.	.50	565.00	282.50
2/09/21	ZNF	Gather exhibits for deposition of Andrew Sturmfels.	.40	565.00	226.00
2/10/21	CCC	Deposition matters.	.20	290.00	58.00
2/10/21	CF	Cite check M. Faulkner report.	10.30	660.00	6,798.00
2/10/21	DB	Call with A. Schoenfeld and G. Orseck re expert issues.	.70	925.00	647.50
2/10/21	DB	Follow-up call with G. Orseck and M. Madden re expert issues.	.50	925.00	462.50
2/10/21	DB	Prepare for T. Coffey deposition.	3.50	925.00	3,237.50
2/10/21	DB	Review and comment on revised Faulkner report, including associated emails with Analysis Group, co-counsel, and clients.	2.50	925.00	2,312.50
2/10/21	GAO	Call with A. Schoenfeld re our expert reports.	.70	975.00	682.50
2/10/21	GAO	Prepare for and call with Matt and Donald on expert reports and depositions.	.80	975.00	780.00
2/10/21	GAO	Review and edit new draft of Grice due diligence report.	.90	975.00	877.50
2/10/21	GAO	Review and address Wilmer comments on Faulkner report.	.20	975.00	195.00
2/10/21	GAO	Review and comment on D. Burke's outline for Coffey deposition.	.50	975.00	487.50
2/10/21	JL	Cite check Faulkner expert report.	6.50	290.00	1,885.00
2/10/21	LCE	Respond to emails on expert report deadlines and questions from M. Madden.	.40	660.00	264.00
2/10/21	LCE	Incorporate suggested client and others edits to cancellation expert report.	2.10	660.00	1,386.00
2/10/21	LCE	Cite check and incorporate suggested edits to due diligence expert report.	5.90	660.00	3,894.00
2/10/21	LGW	Revise expert cancellation report with comments from L. Esbrook.	2.00	290.00	580.00
2/10/21	MMM	Edit Grice indemnification report.	.70	925.00	647.50
2/10/21	MMM	Confer with G. Orseck and D. Burke re expert reports.	.60	925.00	555.00
2/10/21	MMM	Participate in Sturmfels depositions.	4.80	925.00	4,440.00
2/10/21	MMM	Confer with G. Orseck and D. Burke re Korpall testimony.	.30	925.00	277.50
2/10/21	MMM	Draft email to P. Fitzgerald re Grice diligence report.	.40	925.00	370.00
2/10/21	MMM	Edit Grice diligence report.	1.10	925.00	1,017.50
2/10/21	MMM	Comment on Coffey deposition outline.	.40	925.00	370.00
2/10/21	ZNF	Participate in deposition of Andrew Sturmfels.	4.70	565.00	2,655.50
2/10/21	ZNF	Review Blue Flame production letter and analyze sufficiency of response.	.70	565.00	395.50
2/10/21	ZNF	Gather and finalize exhibits for deposition of Andrew Sturmfels.	.90	565.00	508.50
2/10/21	ZNF	Analyze draft Grice expert opinion.	1.20	565.00	678.00
2/11/21	CCC	Final Korpall transcript and exhibit matters.	.40	290.00	116.00

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2/11/21	CF	Implement edits to M. Faulkner report.	2.10	660.00	1,386.00
2/11/21	CF	Correspond with D. Burke re M. Faulkner report.	1.10	660.00	726.00
2/11/21	DB	Prepare, take, and follow up re T. Coffey deposition.	7.20	925.00	6,660.00
2/11/21	DB	Review and address comments on draft Faulkner report.	1.50	925.00	1,387.50
2/11/21	GAO	Read and edit three expert reports, and related emails and calls with co-counsel and Analysis Group.	3.60	975.00	3,510.00
2/11/21	GAO	Download on Coffey deposition.	.30	975.00	292.50
2/11/21	LCE	Suggest comments on latest draft of expert cancellation report for M. Madden.	.60	660.00	396.00
2/11/21	LCE	Prepare clean drafts of expert report and ensure that comments from all reviewers appear in latest draft.	1.10	660.00	726.00
2/11/21	LCE	Update draft expert cancellation report with latest round of suggested comments.	1.30	660.00	858.00
2/11/21	LCE	Review and comment on proposed appendices for due diligence expert report.	1.40	660.00	924.00
2/11/21	LCE	Review Analysis Group edits to expert due diligence report and analyze for M. Madden.	.80	660.00	528.00
2/11/21	LCE	Send additional source material for expert on due diligence report to Analysis Group.	.50	660.00	330.00
2/11/21	LCE	Read through rough deposition transcripts for material to add to expert report.	.60	660.00	396.00
2/11/21	LCE	Respond to emails from G. Orseck on draft due diligence expert report.	.20	660.00	132.00
2/11/21	LCE	Add remaining suggested edits to draft expert due diligence report and send to Analysis Group.	1.30	660.00	858.00
2/11/21	LCE	Analyze expert report of JPMC for possible conflicting views for G. Orseck.	.90	660.00	594.00
2/11/21	MMM	Review Coffey deposition transcript real time.	1.40	925.00	1,295.00
2/11/21	MMM	Draft email to P. Fitzgerald re Sturmfels deposition.	.60	925.00	555.00
2/11/21	MMM	Edit Grice indemnification report.	.70	925.00	647.50
2/11/21	MMM	Review comments on draft Grice diligence report.	1.30	925.00	1,202.50
2/11/21	MMM	Email P. Fitzgerald re Grice indemnification report.	.20	925.00	185.00
2/11/21	MMM	Email Wilmer re draft Grice diligence report.	.20	925.00	185.00
2/11/21	ZNF	Participate in deposition of Tim Coffey.	5.00	565.00	2,825.00
2/11/21	ZNF	Prepare for Coffey deposition.	.80	565.00	452.00
2/11/21	ZNF	Draft internal summary of Coffey deposition.	.30	565.00	169.50
2/11/21	ZNF	Email C. Forstein regarding BYD-California N95 transaction.	.20	565.00	113.00
2/11/21	ZNF	Email C. Forstein and L. Esbrook regarding expert report subjects.	.30	565.00	169.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/12/21	CF	Review draft M. Faulkner report.	2.20	660.00	1,452.00
2/12/21	DB	Review revisions and assist in finalizing Faulkner report, including associated emails and discussions with Analysis Group, co-counsel, and clients.	2.50	925.00	2,312.50
2/12/21	DIW	Verify production BFM011, instructions and data to tech team.	.60	290.00	174.00
2/12/21	GAO	Final review of expert reports.	1.50	975.00	1,462.50
2/12/21	GAO	Call with A. Schoenfeld re multiple strategy issues.	.60	975.00	585.00
2/12/21	GAO	Initial view of O'Malley and Baskett reports.	1.40	975.00	1,365.00
2/12/21	GAO	Emails re BFM's highly confidential designations.	.40	975.00	390.00
2/12/21	LCE	Prepare final version of expert cancellation report.	.60	660.00	396.00
2/12/21	LCE	Review proposed final appendices for expert due diligence report.	.40	660.00	264.00
2/12/21	LCE	Correspond with M. Madden on steps to prepare final versions of due diligence expert report.	.40	660.00	264.00
2/12/21	LCE	Review final edits to expert due diligence report.	1.50	660.00	990.00
2/12/21	LCE	Correspond with team on service of expert reports.	.50	660.00	330.00
2/12/21	LCE	Serve expert reports.	.20	660.00	132.00
2/12/21	MMM	Confer with G. Orseck re Pesce and Grice diligence reports.	.30	925.00	277.50
2/12/21	MMM	Email Wilmer re Pesce report.	.20	925.00	185.00
2/12/21	MMM	Edit Grice diligence report.	1.20	925.00	1,110.00
2/12/21	MMM	Emails with L. Esbrook re finalization and service of Grice reports.	.50	925.00	462.50
2/13/21	CF	Review correspondence re expert report designations.	.30	660.00	198.00
2/13/21	DB	Further review of expert reports, including emails re confidentiality issues.	1.20	925.00	1,110.00
2/13/21	LCE	Respond to G. Orseck question on confidentiality designation.	.30	660.00	198.00
2/14/21	LCE	Read through expert reports from plaintiff and third party plaintiff.	.30	660.00	198.00
2/14/21	MMM	Email P. Fitzgerald re confidentiality of expert reports and protective-order requirements.	.20	925.00	185.00
2/14/21	MMM	Email P. Fitzgerald regarding defamation claim.	.20	925.00	185.00
2/15/21	CF	Draft letter re expert report designations.	1.30	660.00	858.00
2/15/21	DB	Follow up re JPM Highly Confidential designations, including reviewing documents for proposed re-designations.	1.20	925.00	1,110.00
2/15/21	GAO	Review and edit board meeting minutes for D. Evinger.	.30	975.00	292.50
2/15/21	GAO	Begin outlines for expert depositions.	.80	975.00	780.00
2/15/21	ZNF	Analyze BFM and CBB expert reports.	2.30	565.00	1,299.50
2/16/21	CF	Participate in team meeting.	.70	660.00	462.00

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2/16/21	CF	Research CA procurement law.	3.40	660.00	2,244.00
2/16/21	CF	Correspond with G. Orseck re protective order.	.80	660.00	528.00
2/16/21	CF	Finalize and send letter designations to opposing counsel.	.80	660.00	528.00
2/16/21	DB	Participate in weekly team meeting.	.90	925.00	832.50
2/16/21	DB	Follow up re JPM Highly Confidential designations, including reviewing deposition transcripts and drafting email to Wilmer.	1.50	925.00	1,387.50
2/16/21	GAO	Weekly team meeting.	.90	975.00	877.50
2/16/21	GAO	Review and edit C. Forstein letter to Schulte.	.30	975.00	292.50
2/16/21	GAO	Manage deposition prep issues with team.	.50	975.00	487.50
2/16/21	GAO	Emails with clients.	.20	975.00	195.00
2/16/21	LCE	Review discovery letters for additional content to add.	.40	660.00	264.00
2/16/21	LCE	Close read expert reports.	1.10	660.00	726.00
2/16/21	LCE	Weekly team strategy meeting.	.90	660.00	594.00
2/16/21	MMM	Draft task list and team-meeting agenda.	.50	925.00	462.50
2/16/21	MMM	Participate in team strategy meeting.	1.00	925.00	925.00
2/16/21	MMM	Analyze Baskett report.	1.60	925.00	1,480.00
2/16/21	MMM	Emails with P. Fitzgerald re depositions.	.30	925.00	277.50
2/16/21	ZNF	Review Baskett damages report and draft internal assessment.	2.10	565.00	1,186.50
2/16/21	ZNF	Email B. Sharon regarding collection of Spark notes and draft internal CBB email.	.70	565.00	395.50
2/16/21	ZNF	Review BFM's productions for texts messages between John Thomas and various counterparties.	.40	565.00	226.00
2/16/21	ZNF	Confer with G. Orseck, M. Madden, D. Burke, L. Esbrook, and C. Forstein to discuss case updates and litigation strategy.	1.00	565.00	565.00
2/16/21	ZNF	Review draft letter to BFM regarding confidentiality designations.	.10	565.00	56.50
2/17/21	CF	Correspond with C. Chase Carpino and others re deposition bills.	.30	660.00	198.00
2/17/21	CF	Review and respond to correspondence.	.50	660.00	330.00
2/17/21	DB	Emails with team re Blue Flame's damages theory.	.60	925.00	555.00
2/17/21	GAO	Call with M. Madden re deposition planning.	.50	975.00	487.50
2/17/21	GAO	Deposition prep.	1.10	975.00	1,072.50
2/17/21	LCE	Respond to G. Orseck question on Signal chats.	.50	660.00	330.00
2/17/21	LCE	Analyze potential interrogatory and requests for admission.	4.70	660.00	3,102.00
2/17/21	LCE	Respond to discovery questions.	.30	660.00	198.00
2/17/21	LGW	Research potential Baskett deposition materials for Z. Ferguson.	5.50	290.00	1,595.00
2/17/21	MMM	Analyze potential Littman deposition topics and goals.	.90	925.00	832.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/17/21	MMM	Analyze Baskett report and schedules and emails re same.	1.20	925.00	1,110.00
2/17/21	MMM	Confer with G. Orseck re open items.	.40	925.00	370.00
2/17/21	MMM	Draft email to P. Fitzgerald re strategy on Littman deposition and SCO deposition.	1.10	925.00	1,017.50
2/17/21	MMM	Emails re Signal chats, recent SRZ document requests, and other open discovery questions.	.60	925.00	555.00
2/17/21	MMM	Email P. Fitzgerald re Thomas Ex. 6.	.10	925.00	92.50
2/17/21	ZNF	Email M. Madden and D. Burke regarding BFM production letter.	.10	565.00	56.50
2/17/21	ZNF	Review document productions to determine response to BFM production letter.	.60	565.00	339.00
2/17/21	ZNF	Analyze Baskett expert damages report and email L. Webb regarding preparation of binder for the same.	3.70	565.00	2,090.50
2/17/21	ZNF	Review produced documents to determine the basis for statement made in the Baskett expert report.	1.10	565.00	621.50
2/18/21	CCC	Final Sturmfels, Coffey transcript and exhibit matters; final Coffey, Brough, Evinger video matters.	1.90	290.00	551.00
2/18/21	CF	Draft deposition and document subpoenas for M. Littman.	2.10	660.00	1,386.00
2/18/21	CF	Review and respond to correspondence.	.40	660.00	264.00
2/18/21	DB	Further emails with team re Blue Flame's damages theory.	.40	925.00	370.00
2/18/21	GAO	Call with A. Schoenfeld on multiple outstanding expert items.	.50	975.00	487.50
2/18/21	GAO	Emails with co-counsel and clients re our plans for remaining depositions.	.40	975.00	390.00
2/18/21	LGW	Continue to research potential Baskett deposition materials for Z. Ferguson.	3.00	290.00	870.00
2/18/21	MMM	Emails re Littman subpoenas.	.30	925.00	277.50
2/18/21	MMM	Email P. Fitzgerald re testimony on JPMC's FBI contact.	.20	925.00	185.00
2/18/21	MMM	Edit email to clients re SRZ document requests.	.10	925.00	92.50
2/18/21	MMM	Confer with A. Schoenfeld (Wilmer) and G. Orseck re experts.	.50	925.00	462.50
2/18/21	MMM	Emails re experts.	.30	925.00	277.50
2/18/21	ZNF	Draft response to Blue Flame's document production letter.	.60	565.00	339.00
2/18/21	ZNF	Research response to Blue Flame discovery letter and email J. Brough and D. Evinger regarding the same.	1.50	565.00	847.50
2/18/21	ZNF	Review Faulkner report and reports from BFM's experts.	1.60	565.00	904.00
2/19/21	CF	Draft notice of subpoena for M. Littman and revise draft document subpoena.	.90	660.00	594.00
2/19/21	CF	Correspond with G. Orseck, Z. Ferguson, and L. Esbrook re BFM referral fees.	.80	660.00	528.00
2/19/21	GAO	Review deposition transcripts.	1.80	975.00	1,755.00

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Invoice #: 201068

Date	Tkpr	Description	Hours	Rate	Amount
2/19/21	LCE	Call with G. Orseck to discuss upcoming depositions.	.20	660.00	132.00
2/19/21	LCE	Begin California SCO 30(b)(6) witness prep outline.	.90	660.00	594.00
2/19/21	LCE	Call with M. Madden to discuss 30(b)(6) witness outline.	.30	660.00	198.00
2/19/21	LCE	Email with team on answers to questions from client.	.30	660.00	198.00
2/19/21	MMM	Emails re experts and other open items.	.40	925.00	370.00
2/19/21	MMM	Email G. Orseck re Littman and SCO depositions.	.20	925.00	185.00
2/19/21	MMM	Email J. Brough re litigation disclosure.	.20	925.00	185.00
2/19/21	MMM	Confer with L. Esbrook re SCO deposition.	.30	925.00	277.50
2/19/21	ZNF	Search produced documents to determine BFM's principals' motivation for forming BFM.	.50	565.00	282.50
2/19/21	ZNF	Analyze supplemental documents from client to determine what, if anything, to produce in response to Blue Flame's letter.	.50	565.00	282.50
2/20/21	MMM	Review and reply to emails from P. Fitzgerald re myriad discovery issues.	1.40	925.00	1,295.00
2/21/21	CF	Review correspondence.	.70	660.00	462.00
2/21/21	DB	Respond to inquiry from P. Fitzgerald re Baskett report issues.	.80	925.00	740.00
2/21/21	GAO	Multiple emails with clients re open issues.	.30	975.00	292.50
2/21/21	GAO	Emails with D. Burke re responses to Peter's inquiries.	.20	975.00	195.00
2/21/21	GAO	Call with P. Fitzgerald on multiple issues.	.80	975.00	780.00
2/21/21	GAO	Review L. Stamm CV and related emails with AG.	.30	975.00	292.50
2/21/21	LCE	Draft 30(b)(6) witness deposition.	4.70	660.00	3,102.00
2/21/21	ZNF	Review transcript of Heather Schoeppe deposition.	2.40	565.00	1,356.00
2/21/21	ZNF	Review second Grice report and O'Malley report.	.80	565.00	452.00
2/22/21	CF	Revise and send M. Littman subpoenas and notice.	1.60	660.00	1,056.00
2/22/21	DIW	Process new client document for review and production, exchange email with Z. Ferguson re review coding.	.60	290.00	174.00
2/22/21	GAO	Prepare for and call with Laura Stamm and Analysis Group re rebuttal expert report.	1.20	975.00	1,170.00
2/22/21	GAO	Call with M. Madden and Z. Ferguson re work to help prepare L. Stamm.	.40	975.00	390.00
2/22/21	GAO	Review and edit Littman document subpoena.	.20	975.00	195.00
2/22/21	LCE	Draft 30(b)(6) witness deposition.	5.40	660.00	3,564.00
2/22/21	MMM	Email L. Esbrook re SCO deposition.	.30	925.00	277.50
2/22/21	MMM	Confer (2x) with G. Orseck re Baskett report and rebuttal.	.60	925.00	555.00
2/22/21	MMM	Edit Littman subpoenas and notice.	.40	925.00	370.00
2/22/21	MMM	Analyze Baskett damage report.	.50	925.00	462.50
2/22/21	MMM	Call with Analysis Group and Wilmer re Baskett rebuttal.	.80	925.00	740.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/22/21	MMM	Confer with G. Orseck and Z. Ferguson re support for Baskett rebuttal.	.50	925.00	462.50
2/22/21	MMM	Emails with J. Williamson and P. Fitzgerald re litigation disclosure.	.50	925.00	462.50
2/22/21	ZNF	Email C. Forstein, L. Esbrook, D. Sarti, and M. Madden concerning litigation-related issues.	.60	565.00	339.00
2/22/21	ZNF	Review transcript of Maria Cole deposition.	2.70	565.00	1,525.50
2/22/21	ZNF	Review unproduced CBB documents to ensure CBB has produced all responsive nonprivileged documents in its possession.	.70	565.00	395.50
2/22/21	ZNF	Review Baskett damages report.	.30	565.00	169.50
2/22/21	ZNF	Confer with G. Orseck and M. Madden concerning Baskett damages rebuttal expert.	.50	565.00	282.50
2/22/21	ZNF	Search through produced documents to find documents supportive of Baskett rebuttal expert's argument.	3.50	565.00	1,977.50
2/23/21	CF	Participate in team meeting.	1.00	660.00	660.00
2/23/21	CF	Follow up on research items with L. Esbrook and Z. Ferguson.	.90	660.00	594.00
2/23/21	CF	Review materials for SJ research.	.40	660.00	264.00
2/23/21	GAO	Team meeting.	1.00	975.00	975.00
2/23/21	GAO	Review and edit letter to Blue Flame.	.20	975.00	195.00
2/23/21	GAO	Review Baskett materials for deposition.	.70	975.00	682.50
2/23/21	GAO	Emails re open discovery issues.	.40	975.00	390.00
2/23/21	LCE	Weekly team strategy call.	.80	660.00	528.00
2/23/21	LCE	Finish 30(b)(6) deposition outline and send to G. Orseck.	3.20	660.00	2,112.00
2/23/21	LCE	Schedule 30(b)(6) deposition with opposing counsel.	.30	660.00	198.00
2/23/21	MMM	Draft team meeting agenda and task list.	.50	925.00	462.50
2/23/21	MMM	Participate in team strategy meeting.	1.00	925.00	925.00
2/23/21	MMM	Emails with L. Esbrook re expert depositions.	.30	925.00	277.50
2/23/21	MMM	Review and comment on potential interrogatories and requests for admission.	.40	925.00	370.00
2/23/21	MMM	Draft demand to BFM for additional Basket-related documents, and emails with G. Orseck and Z. Ferguson re same.	.40	925.00	370.00
2/23/21	MMM	Draft email to California Dep. AG re SCO deposition.	.20	925.00	185.00
2/23/21	ZNF	Draft response letter to Blue Flame regarding document production.	.80	565.00	452.00
2/23/21	ZNF	Confer with G. Orseck, M. Madden, D. Burke, C. Forstein, and L. Esbrook to discuss case development and litigation strategy.	.90	565.00	508.50
2/23/21	ZNF	Search through produced documents and other discovery for evidence to support argument in the Stamm report.	4.80	565.00	2,712.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/23/21	ZNF	Draft outline organizing evidence Stamm report.	3.20	565.00	1,808.00
2/24/21	CF	Coordinate process server for M. Littman.	.50	660.00	330.00
2/24/21	CF	Review and respond to correspondence.	.70	660.00	462.00
2/24/21	DB	Review re-designated JPM documents and associated follow up, including circulating redacted versions to clients.	1.00	925.00	925.00
2/24/21	DB	Analysis re potential follow-up discovery re JPM issues.	1.00	925.00	925.00
2/24/21	GAO	Call with P. Fitzgerald re multiple issues.	.70	975.00	682.50
2/24/21	GAO	Emails with M. Madden re deposition strategy.	.20	975.00	195.00
2/24/21	GAO	Email clients re status with L. Stamm.	.20	975.00	195.00
2/24/21	GAO	Deposition prep.	.70	975.00	682.50
2/24/21	LCE	Arrange scheduling and prepare amended deposition notice for 30(b)(6).	.80	660.00	528.00
2/24/21	LCE	Revise 30(b)(6) deposition outline.	2.20	660.00	1,452.00
2/24/21	LCE	Draft email to client on recent discovery findings.	.50	660.00	330.00
2/24/21	MMM	Conduct research re Littman/Smith/Yee interactions and draft emails re same.	1.70	925.00	1,572.50
2/24/21	MMM	Edit letter to Blue Flame re discovery issues.	.30	925.00	277.50
2/24/21	MMM	Edit Stamm rebuttal evidence outline.	.90	925.00	832.50
2/24/21	MMM	Emails re open items, including with J. Williamson re FR 2900 reporting, with L. Esbrook re SCO deposition, and with A. Schoenfeld re Stamm rebuttal.	.60	925.00	555.00
2/24/21	MMM	Analyze O'Malley report.	1.30	925.00	1,202.50
2/24/21	ZNF	Revise document outline for Stamm report.	1.70	565.00	960.50
2/24/21	ZNF	Search for produced documents in response to question by L. Esbrook.	.20	565.00	113.00
2/24/21	ZNF	Gather documents in support of Stamm report argument against Baskett's damages calculation.	2.20	565.00	1,243.00
2/24/21	ZNF	Email B. Sharon, K. Gordon, and M. Madden regarding collection of instant messages.	.40	565.00	226.00
2/25/21	CF	Review and respond to correspondence.	.90	660.00	594.00
2/25/21	CF	Follow up on research items with L. Esbrook and Z. Ferguson.	1.00	660.00	660.00
2/25/21	DB	Call with G. Orseck and M. Madden re expert issues, summary judgment, and general case strategy.	1.10	925.00	1,017.50
2/25/21	GAO	Review emails and memos from P. Fitzgerald, P. Brough, and D. Evinger.	.40	975.00	390.00
2/25/21	GAO	Call with M. Madden and D. Burke on multiple outstanding topics.	1.10	975.00	1,072.50
2/25/21	GAO	Review snippy emails from Jason Mitchell re document production.	.20	975.00	195.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/25/21	LCE	Respond to emails on text threads.	.70	660.00	462.00
2/25/21	LCE	Email C. Forstein on division of summary judgment brief.	.20	660.00	132.00
2/25/21	LCE	Search for background information for O'Malley deposition.	1.70	660.00	1,122.00
2/25/21	MMM	Confer with G. Orseck and D. Burke re experts, summary judgment, and other open strategic questions.	1.10	925.00	1,017.50
2/25/21	MMM	Draft lengthy email to clients regarding strategy on O'Malley report and potential Smith discovery.	1.10	925.00	1,017.50
2/25/21	MMM	Review high-level MSJ outline.	.30	925.00	277.50
2/25/21	MMM	Emails re Baskett deposition, Littman subpoenas, Stamm outline, and other open issues.	1.30	925.00	1,202.50
2/25/21	MMM	Call and email A. Touchton re Littman subpoenas.	.30	925.00	277.50
2/25/21	MMM	Review O'Malley background information.	.20	925.00	185.00
2/25/21	ZNF	Gather and transmit documents for Stamm rebuttal expert report.	4.80	565.00	2,712.00
2/25/21	ZNF	Revise response letter to BFM regarding document production.	.40	565.00	226.00
2/25/21	ZNF	Analyze productions for missing Thomas texts and draft email to M. Madden regarding the same.	.60	565.00	339.00
2/25/21	ZNF	Analyze expert report of Teresa Pesce.	1.10	565.00	621.50
2/26/21	CCC	Deposition matters for L. Esbrook.	.20	290.00	58.00
2/26/21	CF	Follow up on research items with L. Esbrook and Z. Ferguson.	1.70	660.00	1,122.00
2/26/21	DIW	Draft instructions for production CBB008, verify deliverable, prepare for service on counsel, send .xml text messaging files to tech team with request for processing options.	.80	290.00	232.00
2/26/21	GAO	Review M. Madden email to BFM re Baskett documents.	.10	975.00	97.50
2/26/21	GAO	Download from M. Madden on Schoenfeld call.	.10	975.00	97.50
2/26/21	GAO	Deposition preparation.	.40	975.00	390.00
2/26/21	LCE	Read through emails on exhibits.	.50	660.00	330.00
2/26/21	LCE	Call with M. Madden to discuss preparation for expert depositions.	.30	660.00	198.00
2/26/21	LCE	Draft expert deposition outline.	.90	660.00	594.00
2/26/21	LCE	Prepare for 30(b)(6) deposition.	1.10	660.00	726.00
2/26/21	LCE	Read through expert deposition outlines in preparation for O'Malley deposition.	1.50	660.00	990.00
2/26/21	LCE	Respond to client emails on ideas for summary judgment.	.70	660.00	462.00
2/26/21	LGW	Research additional Baskett potential deposition materials with comments from Z. Ferguson.	.20	290.00	58.00
2/26/21	MMM	Emails re O'Malley rebuttal, BFM's planned manufacturing plant, Spark messages collection, and other open items.	1.10	925.00	1,017.50
2/26/21	MMM	Confer with A. Schoenfeld and email G. Orseck re same.	.40	925.00	370.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/26/21	MMM	Email SRZ re Baskett report and information requests.	.50	925.00	462.50
2/26/21	MMM	Confer with M. Littman's counsel re subpoenas and memorialize same.	.60	925.00	555.00
2/26/21	ZNF	Review instant messages to be produced by CBB.	.50	565.00	282.50
2/26/21	ZNF	Draft document collecting demonstrably false material statements made by BFM personnel.	2.70	565.00	1,525.50
2/26/21	ZNF	Coordinate collection and production of instant messages.	.30	565.00	169.50
2/26/21	ZNF	Coordinate production in connection with letter to SRZ.	.20	565.00	113.00
2/26/21	ZNF	Review supplemental documents produced by BFM in connection with the Baskett report.	2.30	565.00	1,299.50
2/26/21	ZNF	Revise and send letter to SRZ regarding document production.	.50	565.00	282.50
2/27/21	CF	Review correspondence.	.80	660.00	528.00
2/27/21	DB	Respond to multiple inquiries from P. Fitzgerald re JPM-related discovery issues.	2.50	925.00	2,312.50
2/27/21	LCE	Respond to client emails on deposition testimony.	.40	660.00	264.00
2/28/21	LCE	Read through and respond to client emails.	.70	660.00	462.00
2/28/21	LCE	Draft O'Malley deposition outline.	2.40	660.00	1,584.00
TOTAL PROFESSIONAL SERVICES				\$ 392,033.50	

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	79.90	925.00	73,907.50
Christine A Chase Carpino	CCC	10.90	290.00	3,161.00
Leslie Esbrook	LCE	119.60	660.00	78,936.00
Zachary N Ferguson	ZNF	104.20	565.00	58,873.00
Carolyn Forstein	CF	61.40	660.00	40,524.00
Joanna Lee	JL	6.50	290.00	1,885.00
Matthew M Madden	MMM	70.90	925.00	65,582.50
Gary A. Orseck	GAO	64.90	975.00	63,277.50
Dana I. Wesley Sarti	DIW	3.60	290.00	1,044.00
Lyndsay G Webb	LGW	16.70	290.00	4,843.00
Total		538.60		\$ 392,033.50

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March 9, 2021
Invoice #: 201068**EXPENSES**

Description	Amount
Litigation Support from Vendor	5,621.99
Deposition Transcript Cost	55,600.24
Computer Research Charges	460.87
Courier/Overnight delivery	94.36
TOTAL EXPENSES	\$ 61,777.46
TOTAL THIS INVOICE	\$ 453,810.96

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

March 9, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201068
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE**RE: Blue Flame**

BALANCE DUE THIS INVOICE**\$ 453,810.96**

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201068, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

April 14, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201190
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: March 31, 2021.

RE: Blue Flame

Total Professional Services	\$ 449,812.00
Total Expenses	<u>\$ 12,583.17</u>
TOTAL THIS INVOICE	\$ 462,395.17

ROBBINS|RUSSELL

April 14, 2021
Invoice #: 201190

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
3/01/21	CCC	Prepare Baskett deposition materials for Z. Ferguson, M. Madden and G. Orseck.	2.00	290.00	580.00
3/01/21	CCC	Research Stamm Evidence Outline materials; emails with Z. Ferguson regarding questions and status.	2.10	290.00	609.00
3/01/21	CF	Review M. Littman documents.	1.90	660.00	1,254.00
3/01/21	CF	Review and respond to correspondence.	.80	660.00	528.00
3/01/21	DB	Review, revise, and finalize draft interrogatories to JPM.	1.50	925.00	1,387.50
3/01/21	DB	Review, revise, and finalize draft interrogatories to JPM, including associated discussion with Wilmer.	1.50	925.00	1,387.50
3/01/21	DB	Confer with M. Madden re causation issues and summary judgment issues.	.70	925.00	647.50
3/01/21	DIW	Draft instructions for tech team re incoming 3rd-party production to Casepoint for review, review newly loaded xml files and email to N. Ferguson re same.	.70	290.00	203.00
3/01/21	GAO	Initial review and comment on SCO 30(b)(6) deposition outline.	.60	975.00	585.00
3/01/21	GAO	Review materials for Baskett deposition.	2.00	975.00	1,950.00
3/01/21	LCE	Edit deposition outline for 30(b)(6) witness.	2.80	660.00	1,848.00
3/01/21	LCE	Draft deposition outline for O'Malley deposition.	5.70	660.00	3,762.00
3/01/21	LCE	Edit deposition outline for Grice deposition.	.20	660.00	132.00
3/01/21	MMM	Confer with Z. Ferguson re Baskett deposition and rebuttal.	.30	925.00	277.50
3/01/21	MMM	Edit interrogatories to JPMC.	.50	925.00	462.50
3/01/21	MMM	Emails re Baskett deposition and rebuttal.	.20	925.00	185.00
3/01/21	MMM	Confer with D. Burke re causation and damages issues.	.80	925.00	740.00
3/01/21	MMM	Emails re SCO deposition, interrogatory responses, deposition notices, Littman subpoenas, Stamm engagement letter, team meeting.	1.20	925.00	1,110.00
3/01/21	ZNF	Email L. Esbrook, C. Forstein, and Lit Support regarding issues of discovery.	.70	565.00	395.50
3/01/21	ZNF	Draft list of material misstatements by BFM personnel.	.20	565.00	113.00
3/01/21	ZNF	Review Baskett report and confer with M. Madden regarding deposition prep.	.40	565.00	226.00
3/01/21	ZNF	Coordinate organization and delivery logistics of Baskett depositions binders with C. Chase Carpino.	.70	565.00	395.50
3/01/21	ZNF	Draft and serve notice of deposition for William T. Baskett.	.50	565.00	282.50

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April 14, 2021
Invoice #: 201190

Date	Tkpr	Description	Hours	Rate	Amount
3/01/21	ZNF	Analyze produced Blue Flame Medical documents to undermine Baskett report argument regarding large, unconsummated BFM PPE transactions.	4.10	565.00	2,316.50
3/01/21	ZNF	Research produced BFM documents to answer question by G. Orseck regarding the Baskett report and Baskett's deposition.	3.20	565.00	1,808.00
3/02/21	CCC	Continue to research Stamm Evidence Outline materials; revise Stamm outline; prepare Stamm Evidence Outline materials for Z. Ferguson, M. Madden, G. Orseck.	2.20	290.00	638.00
3/02/21	CCC	Prepare Baskett Reviewed Correspondence materials for Z. Ferguson, M. Madden, G. Orseck; emails with Z. Ferguson regarding questions and status.	3.00	290.00	870.00
3/02/21	CF	Confer with D. Burke re summary judgment.	.80	660.00	528.00
3/02/21	CF	Review and respond to correspondence.	1.20	660.00	792.00
3/02/21	CF	Review documents in connection with summary judgment motion.	1.40	660.00	924.00
3/02/21	DB	Review RFPs from Blue Flame.	.50	925.00	462.50
3/02/21	DB	Call with C. Forstein re summary judgment arguments.	1.00	925.00	925.00
3/02/21	DB	Call with Analysis Group re damages rebuttal report.	.50	925.00	462.50
3/02/21	DB	Analysis re BFM letter to California, including associated discussions with G. Orseck and M. Madden..	.80	925.00	740.00
3/02/21	DIW	Batch CA DOJ documents produced via Blue Flame for review by attorney team, other technical assistance with discovery.	.90	290.00	261.00
3/02/21	GAO	Call with Analysis Group re Faulkner report.	.60	975.00	585.00
3/02/21	GAO	Review belatedly produced letter to CA from BFM, and discuss implications with Matt and Donald.	.60	975.00	585.00
3/02/21	GAO	Deposition prep.	2.80	975.00	2,730.00
3/02/21	LCE	Read client emails.	.20	660.00	132.00
3/02/21	LCE	Edit deposition outline for O'Malley deposition.	2.80	660.00	1,848.00
3/02/21	LCE	Document review for incoming Blue Flame production.	2.30	660.00	1,518.00
3/02/21	LCE	Edit 30(b)(6) deposition outline.	2.40	660.00	1,584.00
3/02/21	LCE	Find Blue Flame financial documents for client.	.80	660.00	528.00
3/02/21	LCE	Begin drafting fact section of summary judgment brief.	.30	660.00	198.00
3/02/21	LGW	Research materials cited in O'Malley expert report with comments from L. Esbrook.	1.70	290.00	493.00
3/02/21	LGW	Research potential additional Baskett deposition materials for Z. Ferguson.	1.50	290.00	435.00
3/02/21	LGW	Research previous Baskett expert testimony.	.40	290.00	116.00
3/02/21	MMM	Review new BFM document requests and email client re same.	.40	925.00	370.00

ROBBINS|RUSSELL

April 14, 2021
Invoice #: 201190

Date	Tkpr	Description	Hours	Rate	Amount
3/02/21	MMM	Analyze produced BFM letter to California DGS, and email G. Orseck and D. Burke, confer with D. Burke, and email clients re same.	1.10	925.00	1,017.50
3/02/21	MMM	Edit SCO deposition outline.	2.40	925.00	2,220.00
3/02/21	MMM	Confer with D. Burke re responses to tardy BFM production of letter to CA DGS.	.30	925.00	277.50
3/02/21	MMM	Call with Analysis Group re potential damages rebuttal expert.	1.10	925.00	1,017.50
3/02/21	ZNF	Confer with M. Madden, G. Orseck, and Analysis Group team to discuss Stamm expert report.	.90	565.00	508.50
3/02/21	ZNF	Review produced Spark messages for responsiveness.	.70	565.00	395.50
3/02/21	ZNF	Coordinate production and delivery of Baskett and Stamm binders with C. Chase Carpino and L. Webb.	.50	565.00	282.50
3/02/21	ZNF	Review California subpoena documents produced by BFM for relevance to claims and defenses.	2.20	565.00	1,243.00
3/02/21	ZNF	Confer with G. Orseck to discuss Baskett deposition.	.30	565.00	169.50
3/02/21	ZNF	Revise Washington-Colorado outline insert for Baskett deposition.	1.60	565.00	904.00
3/02/21	ZNF	Review produced documents for additional information requested by Analysis Group.	.50	565.00	282.50
3/02/21	ZNF	Review documents produced by BFM for helpful cross examination material for Baskett deposition.	2.40	565.00	1,356.00
3/03/21	CCC	Deposition matters.	.20	290.00	58.00
3/03/21	CF	Research summary judgment motion.	4.30	660.00	2,838.00
3/03/21	CF	Review and respond to correspondence.	.90	660.00	594.00
3/03/21	DB	Work on response to Blue Flame RFPs, including call with client and analysis of requests.	1.00	925.00	925.00
3/03/21	GAO	Review updated L. Esbrook deposition outline for SCO and provide comments and direction.	1.00	975.00	975.00
3/03/21	GAO	Review and address client comments on deposition outline.	.30	975.00	292.50
3/03/21	GAO	Outline Baskett deposition.	3.00	975.00	2,925.00
3/03/21	GAO	Review belated document production from BFM.	.20	975.00	195.00
3/03/21	LCE	Prepare deposition outline for C. Grice.	.80	660.00	528.00
3/03/21	LCE	Draft response email to client on deposition edits.	.30	660.00	198.00
3/03/21	LCE	Update 30(b)(6) deposition outline.	6.30	660.00	4,158.00
3/03/21	LCE	Draft Grice deposition outline.	2.50	660.00	1,650.00
3/03/21	MMM	Edit SCO deposition outline and emails re same.	.80	925.00	740.00
3/03/21	MMM	Confer with L. Esbrook re SCO deposition strategy.	1.00	925.00	925.00
3/03/21	MMM	Emails re Thomas/Yee text chain as produced by SCO.	.20	925.00	185.00
3/03/21	MMM	Draft email to P. Fitzgerald re Baskett report.	.60	925.00	555.00

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3/03/21	MMM	Confer with J. Bough re BFM document requests.	.50	925.00	462.50
3/03/21	MMM	Email L. Esbrook regarding implementation of client edits to SCO deposition outline.	.40	925.00	370.00
3/03/21	ZNF	Confer with J. Brough, D. Burke, and M. Madden regarding new BFM RFPs.	.50	565.00	282.50
3/03/21	ZNF	Email D. Burke and M. Madden regarding BFM's new RFPs.	.20	565.00	113.00
3/03/21	ZNF	Email Analysis Group regarding new material for Stamm report.	.10	565.00	56.50
3/03/21	ZNF	Draft outline and review materials for JPMC motion for summary judgment.	1.10	565.00	621.50
3/03/21	ZNF	Review and analyze expert report of Teresa Pesce.	.50	565.00	282.50
3/03/21	ZNF	Review documents produced by California to BFM for relevance to litigation claims and defenses.	1.40	565.00	791.00
3/03/21	ZNF	Review latest document production by BFM and email RR team regarding the same.	1.20	565.00	678.00
3/03/21	ZNF	Review documents produced by BFM for additional cross examination material for deposition of William Baskett.	1.50	565.00	847.50
3/03/21	ZNF	Review Spark messages for responsiveness.	.80	565.00	452.00
3/04/21	CF	Review documents for M. Madden letter.	.70	660.00	462.00
3/04/21	CF	Review and respond to correspondence.	1.30	660.00	858.00
3/04/21	DIW	Load additional chat threads for review by attorney team.	1.00	290.00	290.00
3/04/21	GAO	Review new material sent by Schulte re Baskett Report.	.20	975.00	195.00
3/04/21	GAO	Review M. Madden letter to Schulte.	.20	975.00	195.00
3/04/21	GAO	Prepare for depositions.	1.90	975.00	1,852.50
3/04/21	LCE	Prepare for deposition of California 30(b)(6) witness.	3.50	660.00	2,310.00
3/04/21	LCE	Deposition of California 30(b)(6) witness.	5.80	660.00	3,828.00
3/04/21	LCE	Send summary of 30(b)(6) deposition to team and client.	.80	660.00	528.00
3/04/21	MMM	Emails regarding SCO deposition and implementation of client edits to outline for same.	.60	925.00	555.00
3/04/21	MMM	Participate in SCO deposition.	5.00	925.00	4,625.00
3/04/21	MMM	Confer with L. Esbrook re main points gained from SCO deposition.	.20	925.00	185.00
3/04/21	MMM	Draft letter to SRZ regarding late production of DGS letter to BFM and requesting further document searches for other unproduced correspondence.	1.60	925.00	1,480.00
3/04/21	ZNF	Review Grice reports in connection with drafting JPMC summary judgment outline.	.80	565.00	452.00
3/04/21	ZNF	Research and draft outline for 3d party complaint motion for summary judgment.	2.70	565.00	1,525.50
3/04/21	ZNF	Resolve document discrepancies in Baskett expert report.	.50	565.00	282.50

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3/04/21	ZNF	Review Analysis Group's preliminary analysis of Baskett report weaknesses and errors.	1.10	565.00	621.50
3/04/21	ZNF	Review draft letter to Schulte and confirm absence of Dauer letter from previous productions.	.60	565.00	339.00
3/04/21	ZNF	Review corrected Appendix B to Baskett report and update Baskett deposition binder.	.50	565.00	282.50
3/04/21	ZNF	Research case law support for 4A-211(e) argument.	.90	565.00	508.50
3/04/21	ZNF	Review John Hancock documents sent by J. Brough.	.30	565.00	169.50
3/04/21	ZNF	Coordinate review of Spark documents with K. Gordon and D. Sarti.	.20	565.00	113.00
3/05/21	DB	Review outgoing production prior to service.	.80	925.00	740.00
3/05/21	DB	Call with G. Orseck and M. Madden re discovery issues.	.70	925.00	647.50
3/05/21	DIW	Identify and submit production CBB009 to tech team, verify deliverable and prepare for service.	.80	290.00	232.00
3/05/21	GAO	Address Littman and Smith issues with D. Burke.	.20	975.00	195.00
3/05/21	GAO	Review materials from AG to prepare for Baskett deposition.	.50	975.00	487.50
3/05/21	GAO	Work on Stamm report.	1.00	975.00	975.00
3/05/21	GAO	Prepare for Baskett deposition.	2.50	975.00	2,437.50
3/05/21	LCE	Revise O'Malley deposition outline and send to M. Madden.	.20	660.00	132.00
3/05/21	LCE	Read through client emails on idea for summary judgment.	.60	660.00	396.00
3/05/21	LCE	Draft Grice deposition outline.	3.90	660.00	2,574.00
3/05/21	MMM	Email Z. Ferguson re Baskett changes to docs considered.	.30	925.00	277.50
3/05/21	MMM	Review Stamm engagement letter and send to clients.	.30	925.00	277.50
3/05/21	MMM	Confer with G. Orseck and D. Burke re SCO, Littman, Smith, D. Kim, and experts.	.70	925.00	647.50
3/05/21	ZNF	Compare revised Appendix B to the Baskett report to original.	.40	565.00	226.00
3/05/21	ZNF	Review Spark messages for sensitive information requiring redaction and coordinate production of same with D. Sarti.	2.10	565.00	1,186.50
3/05/21	ZNF	Serve production of Spark notes on Blue Flame and JPMC	.20	565.00	113.00
3/05/21	ZNF	Email M. Madden and D. Burke regarding production of Spark messages.	.60	565.00	339.00
3/05/21	ZNF	Email C. C. Carpino regarding scheduling of Baskett deposition.	.20	565.00	113.00
3/05/21	ZNF	Email G. Orseck regarding Stamm report.	.20	565.00	113.00
3/05/21	ZNF	Research and draft outline for summary judgment motion against JPMC.	3.80	565.00	2,147.00
3/06/21	GAO	Review materials from AG relating to Baskett's report, and incorporate points into draft deposition outline.	.60	975.00	585.00

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3/06/21	ZNF	Draft summary judgment outline for third-party unjust enrichment claim.	2.00	565.00	1,130.00
3/06/21	ZNF	Review produced documents to respond to questions about Baskett deposition outline from G. Orseck.	1.30	565.00	734.50
3/07/21	GAO	Prepare for Baskett deposition.	3.00	975.00	2,925.00
3/07/21	LCE	Finish deposition outline for Grice for M. Madden.	1.80	660.00	1,188.00
3/07/21	MMM	Review and comment on Baskett deposition outline.	5.50	925.00	5,087.50
3/07/21	ZNF	Draft summary judgment motion outline for unjust enrichment claim against JPMC.	1.10	565.00	621.50
3/07/21	ZNF	Review and provide feedback on Baskett deposition outline.	2.90	565.00	1,638.50
3/07/21	ZNF	Review produced documents in connection with revision of Baskett deposition outline.	1.30	565.00	734.50
3/08/21	CCC	Deposition matters.	.20	290.00	58.00
3/08/21	CF	Draft subpoenas and notice for Stephanie Smith.	1.60	660.00	1,056.00
3/08/21	CF	Participate in call re expert discovery.	.30	660.00	198.00
3/08/21	CF	Research subpoena service addresses.	2.30	660.00	1,518.00
3/08/21	CF	Research summary judgment motion.	4.10	660.00	2,706.00
3/08/21	DB	Call with client and Jack Henry re RFP response.	.70	925.00	647.50
3/08/21	GAO	Team meeting.	.80	975.00	780.00
3/08/21	GAO	Prepare for Baskett deposition.	5.50	975.00	5,362.50
3/08/21	LCE	Draft subpoena and notice of deposition for third party witness and find address for same.	1.30	660.00	858.00
3/08/21	LCE	Review updated Baskett report and call with opposing counsel on same.	.30	660.00	198.00
3/08/21	LCE	Draft fact section of summary judgment brief.	2.90	660.00	1,914.00
3/08/21	MMM	Prepare for and participate in team meeting.	1.00	925.00	925.00
3/08/21	MMM	Confer with D. Burke regarding Jack Henry platform discovery.	.20	925.00	185.00
3/08/21	MMM	Review amended Baskett report and confer with G. Orseck and with SRZ re same.	.90	925.00	832.50
3/08/21	MMM	Emails with P. Fitzgerald re discussion of litigation in letter to shareholders.	.40	925.00	370.00
3/08/21	MMM	Draft email to clients re recommendations on Kim and Smith depositions.	.40	925.00	370.00
3/08/21	MMM	Email SRZ and Wilmer re discussing deposition schedule and discovery extension.	.20	925.00	185.00
3/08/21	ZNF	Confer with Robbins Russell CBB team to discuss case developments and litigation strategy.	.60	565.00	339.00
3/08/21	ZNF	Coordinate Baskett deposition logistics.	.50	565.00	282.50
3/08/21	ZNF	Email Analysis Group regarding status of Stamm draft report.	.20	565.00	113.00

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3/08/21	ZNF	Review client memo and emails regarding BFM's supply chain and whether GHC is a state-owned entity and draft email to client regarding the same.	1.20	565.00	678.00
3/08/21	ZNF	Draft unjust enrichment claim outline for summary judgment brief.	2.30	565.00	1,299.50
3/08/21	ZNF	Review comments to Baskett deposition outline by Analysis Group.	.30	565.00	169.50
3/08/21	ZNF	Confer with D. Burke, D. Evinger, J. Brough, and Jack Henry counsel regarding feasibility of responding to BFM's second set of requests for production.	.40	565.00	226.00
3/08/21	ZNF	Confer with G. Orseck to prepare for Baskett deposition.	.60	565.00	339.00
3/08/21	ZNF	Prepare exhibits for Baskett deposition.	.30	565.00	169.50
3/08/21	ZNF	Review amended Baskett report and email RR team regarding the same.	1.60	565.00	904.00
3/08/21	ZNF	Confer with opposing counsel regarding scheduling of Baskett deposition and Stamm report.	.10	565.00	56.50
3/08/21	ZNF	Review BFM's document production to identify and confirm changes in new Baskett report.	.60	565.00	339.00
3/08/21	ZNF	Review 3.10.21 draft of Stamm report.	.70	565.00	395.50
3/09/21	CCC	Subpoena address matters for C. Forstein.	.20	290.00	58.00
3/09/21	CF	Confer with D. Burke re summary judgment.	.70	660.00	462.00
3/09/21	CF	Correspond with D. Burke re summary judgment.	.90	660.00	594.00
3/09/21	CF	Finalize and send subpoenas and notice for Stephanie Smith.	1.70	660.00	1,122.00
3/09/21	CF	Research summary judgment motion.	3.80	660.00	2,508.00
3/09/21	CF	Review and respond to correspondence.	.40	660.00	264.00
3/09/21	DB	Call and emails with C. Forstein re summary judgment arguments.	1.20	925.00	1,110.00
3/09/21	GAO	Review Baskett's revised report.	2.50	975.00	2,437.50
3/09/21	GAO	Zoom call with Analysis Group re Stamm report.	.60	975.00	585.00
3/09/21	GAO	Review and comment on draft Stamm report.	1.40	975.00	1,365.00
3/09/21	GAO	Emails with AG re Stamm report.	.20	975.00	195.00
3/09/21	LCE	Draft summary judgment brief.	8.60	660.00	5,676.00
3/09/21	LCE	Email third party on deposition scheduling and edit subpoenas for same.	.40	660.00	264.00
3/09/21	MMM	Edit Kim and Smith subpoenas and emails re same.	.50	925.00	462.50
3/09/21	MMM	Review research and draft email re ownership of GHC/HUI.	.20	925.00	185.00
3/09/21	MMM	Edit Stamm report draft.	3.20	925.00	2,960.00
3/09/21	MMM	Call with Analysis Group re Stamm report.	.50	925.00	462.50
3/09/21	MMM	Confer with G. Orseck and D. Burke re Stamm draft.	.50	925.00	462.50

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3/09/21	ZNF	Draft outline and text of summary judgment motion against JPMC.	1.90	565.00	1,073.50
3/09/21	ZNF	Review memo and correspondence related to Hakim Unique Internet Company's state-owned status and ability to deliver PPE and draft email response to client regarding the same.	1.60	565.00	904.00
3/09/21	ZNF	Confer with Analysis Group to discuss revisions to the Stamm report.	.70	565.00	395.50
3/09/21	ZNF	Confer with M. Madden and G. Orseck to discuss revisions to the Stamm report.	.70	565.00	395.50
3/09/21	ZNF	Review second version of Baskett report and cross reference previous versions of Appendix B.	.60	565.00	339.00
3/09/21	ZNF	Review BFM's document production to identify weaknesses and inaccuracies in revised Baskett report.	.90	565.00	508.50
3/09/21	ZNF	Review draft of Stamm report.	.50	565.00	282.50
3/09/21	ZNF	Respond to comments in draft Stamm report by G. Orseck and Analysis Group.	1.50	565.00	847.50
3/10/21	CF	Correspond with D. Burke re summary judgment.	.50	660.00	330.00
3/10/21	CF	Review and respond to correspondence.	.60	660.00	396.00
3/10/21	DIW	Load additional CA State Controller's Office document produced to Blue Flame for review in Casepoint.	.40	290.00	116.00
3/10/21	GAO	Comment on Stamm draft.	.60	975.00	585.00
3/10/21	GAO	Review revised Baskett Report for deposition and revise outline.	2.30	975.00	2,242.50
3/10/21	LCE	Research and draft summary judgment brief.	5.30	660.00	3,498.00
3/10/21	LCE	Read through client emails and email on deposition scheduling.	.50	660.00	330.00
3/10/21	MMM	Edits and comments to Stamm report draft.	.80	925.00	740.00
3/10/21	MMM	Emails re expert depositions.	.20	925.00	185.00
3/10/21	MMM	Conduct legal research concerning NY DCL fraudulent transfer provision in preparation for oral argument.	.80	925.00	740.00
3/10/21	ZNF	Draft motion for summary judgment against JPMC.	4.80	565.00	2,712.00
3/10/21	ZNF	Review documents produced by Blue Flame for relevance to litigation claims and defenses.	.30	565.00	169.50
3/10/21	ZNF	Review analysis by Analysis Group of errors in Baskett report.	.50	565.00	282.50
3/10/21	ZNF	Confer with G. Orseck to discuss Baskett deposition.	.20	565.00	113.00
3/11/21	CF	Coordinate with N. Turner re Stephanie Smith subpoenas.	.60	660.00	396.00
3/11/21	CF	Review and respond to correspondence.	.70	660.00	462.00
3/11/21	DB	Call with opposing counsel re expert deposition scheduling.	.50	925.00	462.50
3/11/21	GAO	Prepare for Baskett deposition.	2.70	975.00	2,632.50

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3/11/21	LCE	Draft fact section and defamation, tortious interference sections of summary judgment brief.	5.50	660.00	3,630.00
3/11/21	LCE	Call to discuss expert deposition scheduling.	.50	660.00	330.00
3/11/21	MMM	Confer with SRZ and Wilmer re deposition scheduling and discovery extension and draft email re same.	.80	925.00	740.00
3/11/21	MMM	Additional emails regarding deposition scheduling and discovery extension.	.30	925.00	277.50
3/11/21	ZNF	Draft objections and responses to BFM's second set of requests for production.	.90	565.00	508.50
3/11/21	ZNF	Review updated Baskett deposition outline.	1.30	565.00	734.50
3/11/21	ZNF	Email G. Orseck with comments to updated Baskett deposition outline.	.20	565.00	113.00
3/11/21	ZNF	Draft 3d party summary judgment motion.	3.30	565.00	1,864.50
3/12/21	CCC	Deposition matters.	.10	290.00	29.00
3/12/21	CCC	Final Chivaro transcript, exhibit and video matters; final Sturmfels video matters.	.90	290.00	261.00
3/12/21	GAO	First read of rebuttal reports.	1.20	975.00	1,170.00
3/12/21	GAO	Prepare for Baskett deposition.	2.00	975.00	1,950.00
3/12/21	LCE	Draft summary judgment brief.	4.20	660.00	2,772.00
3/12/21	LCE	Schedule D. Kim deposition.	.20	660.00	132.00
3/12/21	MMM	Emails re D. Kim deposition.	.30	925.00	277.50
3/12/21	MMM	Conduct initial review of Baxter rebuttal report on indemnification.	.60	925.00	555.00
3/12/21	ZNF	Draft motion for summary judgment against JPMC.	2.90	565.00	1,638.50
3/12/21	ZNF	Prepare exhibits for deposition of William Baskett.	2.20	565.00	1,243.00
3/12/21	ZNF	Coordinate meeting between Jack Henry's in-house counsel and D. Burke regarding response to Plaintiff's second requests for production.	.30	565.00	169.50
3/12/21	ZNF	Review and analyze expert report of Thomas C. Baxter.	.70	565.00	395.50
3/13/21	DB	Review rebuttal expert reports.	1.50	925.00	1,387.50
3/13/21	MMM	Review O'Malley rebuttal to Grice report and draft email re same.	1.70	925.00	1,572.50
3/13/21	MMM	Emails about open items, including objections to BFM document requests.	.20	925.00	185.00
3/13/21	ZNF	Review revised draft of Stamm report.	.70	565.00	395.50
3/13/21	ZNF	Review and analyze Baxter report.	1.30	565.00	734.50
3/13/21	ZNF	Draft third-party summary judgment motion.	6.90	565.00	3,898.50
3/14/21	GAO	Prepare for Baskett deposition.	1.00	975.00	975.00
3/14/21	GAO	Review and circulate comments on Prisament expert report.	1.00	975.00	975.00

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3/14/21	GAO	Emails with P. Fitzgerald re causation arguments.	.20	975.00	195.00
3/14/21	GAO	Review and circulate comments on new draft of Stamm report.	1.00	975.00	975.00
3/14/21	GAO	Initial review and comment on O'Malley report.	.60	975.00	585.00
3/14/21	LCE	Finish draft of summary judgment brief section.	1.80	660.00	1,188.00
3/14/21	LCE	Read through expert rebuttal reports.	.90	660.00	594.00
3/14/21	MMM	Emails re rebuttal reports.	.20	925.00	185.00
3/14/21	MMM	Email P. Fitzgerald re discovery schedule and extension.	.20	925.00	185.00
3/14/21	MMM	Draft email regarding expert depositions.	.40	925.00	370.00
3/14/21	ZNF	Gather deposition documents and send document to client.	.20	565.00	113.00
3/14/21	ZNF	Draft and revise summary judgment motion against JPMC.	10.30	565.00	5,819.50
3/14/21	ZNF	Review exhibits for deposition of William Baskett.	.40	565.00	226.00
3/15/21	CCC	Deposition matters.	.20	290.00	58.00
3/15/21	CF	CBB: Review expert reports.	4.70	660.00	3,102.00
3/15/21	CF	Research H. Huang and GHC.	.90	660.00	594.00
3/15/21	DB	Call with Jack Henry team re response to RFPs, including associated preparation.	1.20	925.00	1,110.00
3/15/21	DB	Review and comment on draft Stamm report.	1.80	925.00	1,665.00
3/15/21	DB	Review draft sections of summary judgment briefs.	1.20	925.00	1,110.00
3/15/21	GAO	Prepare for and take Baskett deposition.	8.50	975.00	8,287.50
3/15/21	GAO	Discuss follow-up tasks with Z. Ferguson.	.20	975.00	195.00
3/15/21	LCE	Proof and send draft summary judgment section to D. Burke.	.20	660.00	132.00
3/15/21	MMM	Review selected portions of Baskett deposition in realtime.	.80	925.00	740.00
3/15/21	MMM	Review letter from counsel to M. Littman and email re same.	.30	925.00	277.50
3/15/21	ZNF	Revise first draft of third-party summary judgment motion.	1.50	565.00	847.50
3/15/21	ZNF	Participate in deposition of William Baskett.	6.40	565.00	3,616.00
3/15/21	ZNF	Draft summary of Baskett deposition.	.30	565.00	169.50
3/15/21	ZNF	Gather documents for Analysis Group to use in drafting Stamm report.	.20	565.00	113.00
3/15/21	ZNF	Prepare and review Baskett deposition exhibits.	.40	565.00	226.00
3/16/21	CCC	Deposition matters; emails with L. Esbrook regarding erratas and confidentiality designations.	.30	290.00	87.00
3/16/21	DB	Review, edit, and finalize draft responses to Blue Flame RFPs.	2.00	925.00	1,850.00
3/16/21	DB	Call with M. Madden and Wilmer team re discovery issues.	.60	925.00	555.00
3/16/21	DIW	Verify BFM012 production, data and instructions to tech team, analyze and send new CA public records to tech team for handling.	.70	290.00	203.00

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3/16/21	GAO	Analyze legal issue related by P. Fitzgerald re breach by California.	.60	975.00	585.00
3/16/21	GAO	Address SRZ's trial balloon re deposing H. Huang.	.40	975.00	390.00
3/16/21	LCE	Weekly team strategy meeting.	.80	660.00	528.00
3/16/21	LCE	Follow up email to M. Madden about tortious interference arguments.	.20	660.00	132.00
3/16/21	LCE	Brainstorm additional facts to include in summary judgment fact section.	.30	660.00	198.00
3/16/21	LCE	Calls with M. Madden and California counsel on scheduling Dan Kim deposition.	.30	660.00	198.00
3/16/21	LCE	Draft amended notice of deposition for D. Kim deposition.	.20	660.00	132.00
3/16/21	LCE	Email opposing counsel and internal tech staff on D. Kim deposition scheduling.	.30	660.00	198.00
3/16/21	LCE	Review Cole transcript for errata and confidentiality designations.	1.00	660.00	660.00
3/16/21	MMM	Prepare for and participate in team meeting.	1.20	925.00	1,110.00
3/16/21	MMM	Edit responses to RFPs.	.20	925.00	185.00
3/16/21	MMM	Email M. Chakraborty re expert schedule.	.10	925.00	92.50
3/16/21	MMM	Emails regarding misc open items, including Baxter rebuttal report, summary judgment, Stamm exhibits; Grice deposition, and errata sheets.	1.30	925.00	1,202.50
3/16/21	MMM	Emails with P. Fitzgerald re damages-rebuttal strategy.	.80	925.00	740.00
3/16/21	MMM	Confer with L. Esbrook re Kim deposition.	.30	925.00	277.50
3/16/21	MMM	Analyze deposition schedule and process multiparty conflicts.	.40	925.00	370.00
3/16/21	MMM	Analyze JPMC responses to interrogatories.	.30	925.00	277.50
3/16/21	MMM	Emails regarding production of MD correspondence and public records.	.20	925.00	185.00
3/16/21	MMM	Call with C. Porter re D. Kim deposition.	.20	925.00	185.00
3/16/21	MMM	Numerous emails regarding SRZ suggestion that H. Huang may be available to testify.	.80	925.00	740.00
3/16/21	MMM	Draft email to Wilmer re deposition-coverage strategy.	.20	925.00	185.00
3/16/21	ZNF	Review draft of Stamm report and correspond with Analysis Group regarding the same.	1.10	565.00	621.50
3/16/21	ZNF	Review Blue Flame's most recent production of documents from Maryland public-information request for relevance to Stamm report and litigation claims and defenses.	2.60	565.00	1,469.00
3/16/21	ZNF	Review latest Blue Flame production of documents from California public-records request for relevance to Stamm report and litigation claims and defenses.	.80	565.00	452.00

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3/16/21	ZNF	Finalize and serve objections and responses to Blue Flame's second set of requests for production.	.50	565.00	282.50
3/16/21	ZNF	Review draft objections and responses to Blue Flame's second set of requests for production.	.40	565.00	226.00
3/16/21	ZNF	Confer with G. Orseck, M. Madden, D. Burke, C. Forstein, and L. Esbrook to discuss case developments and litigation strategy.	1.00	565.00	565.00
3/17/21	CF	Draft H. Huang document subpoena.	1.80	660.00	1,188.00
3/17/21	CF	Correspond re Stephanie Smith subpoena.	.30	660.00	198.00
3/17/21	CF	Review Dan Kim documents.	2.90	660.00	1,914.00
3/17/21	CF	Review and respond to client correspondence.	.50	660.00	330.00
3/17/21	DB	Emails with team re Smith deposition issues.	.20	925.00	185.00
3/17/21	DB	Confer with M. Madden re deposition issues.	.30	925.00	277.50
3/17/21	DIW	Analyze potential Bates overlaps in Blue Flame's production of CA DGS records.	.30	290.00	87.00
3/17/21	GAO	Call with M. Madden and D. Burke re multiple open issues.	.30	975.00	292.50
3/17/21	GAO	Call with L. Stamm and AG re Stamm report.	1.00	975.00	975.00
3/17/21	GAO	Multiple emails re H. Huang deposition.	.40	975.00	390.00
3/17/21	LCE	Review Cole deposition for errata and confidentiality designations.	2.30	660.00	1,518.00
3/17/21	MMM	Emails regarding numerous items, including Littman letter, Huang deposition, other fact discovery open items.	.70	925.00	647.50
3/17/21	MMM	O'Malley deposition prep and emails re same.	2.40	925.00	2,220.00
3/17/21	MMM	Email and confer with G. Orseck and D. Burke re Huang subpoena strategy.	.50	925.00	462.50
3/17/21	MMM	Review voicemail re Smith subpoena and email D. Burke re same.	.10	925.00	92.50
3/17/21	MMM	Confer with D. Burke re remaining depositions.	.20	925.00	185.00
3/17/21	MMM	Call with J. Mitchell (SRZ) re H. Huang and draft email re same.	.30	925.00	277.50
3/17/21	MMM	Draft email to H. Huang counsel re potential deposition appearance and internal emails re counsel's response to same.	.30	925.00	277.50
3/17/21	MMM	Draft email to H. Huang regarding potential deposition appearance and document subpoena.	.40	925.00	370.00
3/17/21	ZNF	Review and analyze memo from P. Fitzgerald and related correspondence on damages.	.40	565.00	226.00
3/17/21	ZNF	Confer with G. Orseck and Analysis Group to discuss Stamm report.	.40	565.00	226.00
3/17/21	ZNF	Review Baskett report to respond to questions from Analysis Group.	.60	565.00	339.00

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3/18/21	CF	Send documents to Analysis Group.	1.80	660.00	1,188.00
3/18/21	CF	Draft outline for Dan Kim deposition.	6.30	660.00	4,158.00
3/18/21	DB	Review revised draft of Stamm report.	.80	925.00	740.00
3/18/21	DB	Call with Analysis Group team re revisions to Stamm report.	.50	925.00	462.50
3/18/21	DB	Circulate draft Stamm report to clients.	.20	925.00	185.00
3/18/21	DB	Review draft sections of summary judgment brief.	1.00	925.00	925.00
3/18/21	DIW	Technical assistance with discovery.	2.00	290.00	580.00
3/18/21	GAO	Call with AG re Stamm rebuttal report.	.70	975.00	682.50
3/18/21	GAO	Discussions with Wilmer over deposition plans.	.30	975.00	292.50
3/18/21	GAO	Read and edit near-final draft of Stamm report.	.80	975.00	780.00
3/18/21	LCE	Correspond with team on dates for Dan Kim deposition.	.20	660.00	132.00
3/18/21	LCE	Review Cole transcript for confidentiality designations.	.80	660.00	528.00
3/18/21	LCE	Gather materials for O'Malley deposition and review for relevant uncited materials in O'Malley Report for M. Madden.	3.80	660.00	2,508.00
3/18/21	MMM	Call with Wilmer regarding depositions and other open items and email internally re same.	.70	925.00	647.50
3/18/21	MMM	O'Malley deposition prep.	1.70	925.00	1,572.50
3/18/21	MMM	Emails re deposition scheduling.	.10	925.00	92.50
3/18/21	MMM	Edit Stamm rebuttal report.	1.60	925.00	1,480.00
3/18/21	MMM	Call with Analysis Group re Stamm rebuttal report.	.50	925.00	462.50
3/18/21	ZNF	Review document productions for evidence of why certain of BFM's prospective customers cancelled their transactions.	2.30	565.00	1,299.50
3/18/21	ZNF	Review latest draft of Stamm damages report.	1.10	565.00	621.50
3/18/21	ZNF	Email L. Esbrook regarding Casepoint issues.	.20	565.00	113.00
3/18/21	ZNF	Coordinate review of most recent BFM productions with D. Sarti.	.50	565.00	282.50
3/18/21	ZNF	Collect internal comments on Stamm draft and email Analysis Group regarding omission of contrary evidence arguments.	1.50	565.00	847.50
3/18/21	ZNF	Confer with G. Orseck, D. Burke, M. Madden, and Analysis Group regarding contrary-evidence arguments in Stamm report.	.40	565.00	226.00
3/19/21	CCC	Revise master chart of deposition exhibits.	2.10	290.00	609.00
3/19/21	CF	Participate in call with C. Porter re Kim deposition (.2)	.20	660.00	132.00
3/19/21	CF	Draft outline for Dan Kim deposition.	6.90	660.00	4,554.00
3/19/21	CF	Revise H. Huang subpoena and notice.	.80	660.00	528.00
3/19/21	DB	Work on finalizing Stamm report, including review of revised draft and exhibits, call with P. Fitzgerald, call with Analysis Group, and associated emails.	2.00	925.00	1,850.00

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3/19/21	GAO	Final review of L. Stamm report.	.50	975.00	487.50
3/19/21	GAO	Emails regarding Huang deposition.	.20	975.00	195.00
3/19/21	MMM	Edit H. Huang document subpoena and emails re strategy, notice, and service of same.	2.10	925.00	1,942.50
3/19/21	MMM	Emails regarding deposition schedule.	.20	925.00	185.00
3/19/21	MMM	Draft email to P. Fitzgerald re deposition schedule.	.20	925.00	185.00
3/19/21	MMM	Call with C. Porter (Cal AG) re D. Kim deposition.	.20	925.00	185.00
3/19/21	MMM	Emails with opposing counsel re discovery extension and deposition scheduling.	.40	925.00	370.00
3/19/21	ZNF	Review second draft of exhibits to the Stamm report.	1.20	565.00	678.00
3/19/21	ZNF	Review produced documents to substantiate cites in Stamm exhibits.	.70	565.00	395.50
3/19/21	ZNF	Draft email to Analysis Group conveying comments on most recent Stamm report draft.	.30	565.00	169.50
3/19/21	ZNF	Review final draft of Stamm report and coordinate discussion with AG regarding exhibit omissions.	1.80	565.00	1,017.00
3/19/21	ZNF	Call and email D. Glick regarding missing exhibits in Stamm report.	.10	565.00	56.50
3/19/21	ZNF	Confer with Analysis Group to discuss comments to Stamm report exhibits.	.30	565.00	169.50
3/19/21	ZNF	Finalize and serve Stamm report.	.20	565.00	113.00
3/20/21	CF	Draft outline for Dan Kim deposition.	3.40	660.00	2,244.00
3/21/21	CF	Review M. Madden comments.	.40	660.00	264.00
3/21/21	MMM	Edit D. Kim deposition outline.	3.30	925.00	3,052.50
3/21/21	MMM	Emails re D. Kim deposition scheduling.	.20	925.00	185.00
3/21/21	ZNF	Review and revise draft response brief.	.40	565.00	226.00
3/22/21	CCC	Deposition matters.	.10	290.00	29.00
3/22/21	CF	Review M. Madden comments.	1.90	660.00	1,254.00
3/22/21	CF	Confer with M. Madden re Kim deposition.	.80	660.00	528.00
3/22/21	CF	Correspond with court reporter and C. Chase Carpino re deposition schedule.	.40	660.00	264.00
3/22/21	CF	Review and respond to correspondence.	.50	660.00	330.00
3/22/21	CF	Review produced documents.	2.30	660.00	1,518.00
3/22/21	CF	Revise Dan Kim outline.	.90	660.00	594.00
3/22/21	DB	Review multiple emails from P. Fitzgerald re UCC issues and respond to same, including associated research.	1.00	925.00	925.00
3/22/21	DB	Review draft sections of summary judgment brief.	.80	925.00	740.00
3/22/21	DIW	Verify new BFM production and draft instructions for tech team.	.50	290.00	145.00

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3/22/21	GAO	Review D. Burke email to clients re defense legal theories.	.10	975.00	97.50
3/22/21	GAO	Emails re next steps with Schulte re expert discovery.	.30	975.00	292.50
3/22/21	MMM	Draft discovery-update email to clients and confirm details re same.	.60	925.00	555.00
3/22/21	MMM	Confer with G. Orseck re discovery items.	.20	925.00	185.00
3/22/21	MMM	Edit consent motion re discovery schedule and emails re same.	.70	925.00	647.50
3/22/21	MMM	O'Malley deposition prep.	2.60	925.00	2,405.00
3/22/21	MMM	Confer with C. Forstein re Kim deposition.	.70	925.00	647.50
3/22/21	MMM	Internal emails and with Wilmer and Analysis Group on scheduling expert depositions and prep sessions.	.80	925.00	740.00
3/22/21	MMM	Confer with C. Porter (Cal AG) re D. Kim deposition.	.30	925.00	277.50
3/22/21	MMM	Edit parties' master discovery schedule and email Wilmer re same.	.30	925.00	277.50
3/22/21	ZNF	Review documents produced by Blue Flame for relevance to litigation claims and defenses.	2.10	565.00	1,186.50
3/23/21	CF	Research 5th Amendment privilege (4.3).	4.30	660.00	2,838.00
3/23/21	CF	Draft summary judgment motion.	1.60	660.00	1,056.00
3/23/21	CF	Review and respond to correspondence.	.60	660.00	396.00
3/23/21	DIW	Identify unique and less similar documents in production BFM013 that will require review, batch same and email to Z. Ferguson.	1.20	290.00	348.00
3/23/21	GAO	Team meeting.	.70	975.00	682.50
3/23/21	GAO	Draft email to clients re our strategy on extension of discovery deadline.	.30	975.00	292.50
3/23/21	GAO	Emails with A. Schoenfeld re Huang deposition.	.20	975.00	195.00
3/23/21	LCE	Weekly team strategy meeting.	.50	660.00	330.00
3/23/21	LCE	Gather materials requested by client and send to same.	.30	660.00	198.00
3/23/21	LCE	Review transcripts for errata and confidentiality designations.	2.90	660.00	1,914.00
3/23/21	LCE	Review newly produced materials on Casepoint.	2.50	660.00	1,650.00
3/23/21	MMM	Plan for team meeting and address status of open tasks.	.40	925.00	370.00
3/23/21	MMM	Participate in team meeting.	.50	925.00	462.50
3/23/21	MMM	Emails with P. Fitzgerald re open discovery items, with opposing counsel re discovery extension, and internally re Huang deposition and other open issues.	1.70	925.00	1,572.50
3/23/21	MMM	Prepare for O'Malley deposition.	3.10	925.00	2,867.50
3/23/21	MMM	Confer with A. Schoenfeld (Wilmer) re discovery extension.	.30	925.00	277.50
3/23/21	MMM	Review P. White email about discovery schedule and confer with G. Orseck and email A. Schoenfeld (Wilmer) re same.	.40	925.00	370.00

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3/23/21	MMM	Email P. Fitzgerald re FedWire message coding discussion in Grice report.	.30	925.00	277.50
3/23/21	ZNF	Confer with Robbins Russell Chain Bridge team to discuss case developments and litigation strategy.	.70	565.00	395.50
3/23/21	ZNF	Review documents produced by Blue Flame for relevance to litigation claims and defenses.	1.60	565.00	904.00
3/24/21	CF	Revise Kim deposition outline.	5.80	660.00	3,828.00
3/24/21	CF	Draft summary judgment motion.	.70	660.00	462.00
3/24/21	DB	Call with Smith counsel re deposition issues, and follow-up re same.	.90	925.00	832.50
3/24/21	DB	Review summary judgment brief sections.	1.00	925.00	925.00
3/24/21	GAO	Multiple emails and discussions re wrangling over fact and expert discovery issues.	.50	975.00	487.50
3/24/21	LCE	Work with paralegal to set up file share for client.	.30	660.00	198.00
3/24/21	LCE	Review and respond to client emails.	.20	660.00	132.00
3/24/21	LCE	Review transcripts for confidential designations and errata.	1.10	660.00	726.00
3/24/21	LGW	Prepare electronic discovery/case materials for client with comments from L. Esbrook.	1.00	290.00	290.00
3/24/21	MMM	Confer with Wilmer and draft email to G. Orseck and D. Burke regarding discovery extension dispute with BFM.	.40	925.00	370.00
3/24/21	MMM	Prepare for and outline O'Malley deposition.	2.70	925.00	2,497.50
3/24/21	ZNF	Review documents produced by Chain Bridge for relevance to litigation claims and defenses	.80	565.00	452.00
3/25/21	CCC	Draft Cole, Brough erratas; draft Cole confidentiality designations; emails with L. Esbrook regarding changes.	1.50	290.00	435.00
3/25/21	CF	Revise Kim deposition outline.	2.80	660.00	1,848.00
3/25/21	CF	Correspond with M. Madden and G. Orseck re Kim deposition outline.	1.90	660.00	1,254.00
3/25/21	DB	Additional follow up re Smith deposition.	.50	925.00	462.50
3/25/21	GAO	Multiple emails re status of discovery.	.40	975.00	390.00
3/25/21	GAO	Review and comment on Kim deposition outline.	1.00	975.00	975.00
3/25/21	GAO	Emails with Schulte re deposition schedule.	.20	975.00	195.00
3/25/21	GAO	Emails back and forth with H. Huang.	.20	975.00	195.00
3/25/21	LCE	Finish transcript review for confidential designations and errata and send to paralegals for implementation.	1.30	660.00	858.00
3/25/21	LCE	Prepare materials for client and send to same.	1.00	660.00	660.00
3/25/21	LCE	Begin research for summary judgment brief tortious interference section.	.20	660.00	132.00
3/25/21	MMM	Edit D. Kim deposition outline.	2.60	925.00	2,405.00

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3/25/21	MMM	Prepare for and outline S. O'Malley deposition.	4.80	925.00	4,440.00
3/25/21	MMM	Draft and send email to H. Huang regarding deposition and document subpoena.	.40	925.00	370.00
3/25/21	MMM	Draft email to P. Fitzgerald regarding protective order and access to materials.	.30	925.00	277.50
3/25/21	MMM	Email C. Forstein re Kim deposition and communication with Cal. AG.	.10	925.00	92.50
3/25/21	MMM	Emails with Wilmer re discovery extension.	.20	925.00	185.00
3/25/21	ZNF	Review and mark Mojica deposition transcript for confidential material and errata.	3.20	565.00	1,808.00
3/26/21	CCC	Continue to draft Cole confidentiality designations; draft Brough confidentiality designations; emails with L. Esbrook regarding changes; draft Mojica, Evinger erratas; draft Mojica, Evinger confidentiality designations.	4.60	290.00	1,334.00
3/26/21	CF	Revise Kim deposition outline.	.40	660.00	264.00
3/26/21	CF	Review and respond to correspondence.	.50	660.00	330.00
3/26/21	DB	Follow up with counsel for S. Smith re documents and deposition.	.90	925.00	832.50
3/26/21	GAO	Emails and calls with M. Madden and D. Burke re depositions and summary judgment.	.60	975.00	585.00
3/26/21	LCE	Draft tortious interference portion of summary judgment brief for D. Burke.	5.50	660.00	3,630.00
3/26/21	LCE	Review errata sheets and confidentiality designations and send to M. Madden.	.40	660.00	264.00
3/26/21	MMM	Review scheduling email from SRZ and email G. Orseck and D. Burke re same.	.20	925.00	185.00
3/26/21	MMM	Confer with G. Orseck re Williamson deposition.	.20	925.00	185.00
3/26/21	MMM	Draft email re Williamson deposition and discovery extension.	.30	925.00	277.50
3/26/21	MMM	Email P. Fitzgerald re damages record.	.20	925.00	185.00
3/26/21	MMM	Confer with D. Evinger re discovery schedule and upcoming depositions.	.30	925.00	277.50
3/26/21	MMM	Prepare for O'Malley deposition.	7.30	925.00	6,752.50
3/26/21	MMM	Confer with D. Burke re Kim deposition, O'Malley deposition, discovery extension, and other items.	.30	925.00	277.50
3/26/21	ZNF	Email C. C. Carpino regarding confidentiality designations and errata on deposition transcripts.	.10	565.00	56.50
3/26/21	ZNF	Review and mark transcript of Evinger deposition for confidentiality designation and errata.	3.70	565.00	2,090.50
3/27/21	CF	Review and respond to correspondence.	.60	660.00	396.00
3/27/21	CF	Review P. Fitzgerald memo and comments.	.70	660.00	462.00

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3/27/21	CF	Prepare confidentiality designations and errata sheets for H. Schoeppe.	.60	660.00	396.00
3/27/21	MMM	Prepare for O'Malley deposition.	5.60	925.00	5,180.00
3/27/21	ZNF	Revise errata sheets and confidentiality designations for transcripts of Evinger and Mojica depositions.	1.50	565.00	847.50
3/27/21	ZNF	Email C. Forstein and L. Esbrook regarding confidentiality designations.	.20	565.00	113.00
3/28/21	CF	Confer with D. Burke.	.50	660.00	330.00
3/28/21	CF	Prepare deposition exhibits.	.50	660.00	330.00
3/28/21	CF	Revise Kim deposition outline.	4.80	660.00	3,168.00
3/28/21	CF	Correspond re deposition.	.90	660.00	594.00
3/28/21	DB	Prepare for D. Kim deposition, including call and emails with C. Forstein and comments on deposition outline.	2.50	925.00	2,312.50
3/29/21	CF	Participate in Kim deposition.	4.70	660.00	3,102.00
3/29/21	CF	Correspond with team and clients re Kim deposition.	.80	660.00	528.00
3/29/21	CF	Prepare for Kim deposition.	2.10	660.00	1,386.00
3/29/21	DB	Prepare for, attend, and follow-up to D. Kim deposition.	5.50	925.00	5,087.50
3/29/21	DIW	Verify JPMC production, instructions and data to tech team.	.70	290.00	203.00
3/29/21	GAO	Download on Daniel Kim deposition.	.20	975.00	195.00
3/29/21	LCE	Read through Kim deposition outline.	.30	660.00	198.00
3/29/21	LCE	Email with partners and upcoming tasks.	.10	660.00	66.00
3/29/21	MMM	Multiple emails re Stamm and Baxter depositions.	.40	925.00	370.00
3/29/21	ZNF	Email and call D. Burke regarding Littman referral agreement.	.20	565.00	113.00
3/29/21	ZNF	Attend deposition of Dan Kim.	3.20	565.00	N/C
3/29/21	ZNF	Review produced documents for evidence of Stephanie Smith's role in California N95 deal.	1.10	565.00	621.50
3/30/21	CF	Confer with D. Burke.	.20	660.00	132.00
3/30/21	CF	Prepare confidentiality designations and errata sheets for H. Schoeppe.	4.50	660.00	2,970.00
3/30/21	CF	Review and respond to correspondence.	.70	660.00	462.00
3/30/21	DB	Work on addressing decision on discovery extension, including call with G. Orseck and M. Madden, review of dockets for scheduling insight, and call with C. Forstein re deposition preparation.	1.50	925.00	1,387.50
3/30/21	DB	Review summary judgment draft.	1.20	925.00	1,110.00
3/30/21	GAO	Review court order.	.10	975.00	97.50
3/30/21	GAO	Multiple calls and emails re next steps in discovery.	.80	975.00	780.00
3/30/21	LCE	Read through Kim transcript.	.40	660.00	264.00

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3/30/21	LCE	Emails and communications with team on case strategy.	.40	660.00	264.00
3/30/21	MMM	Review court's scheduling order and confer with G. Orseck and D. Burke re strategy for discovery under that order.	.60	925.00	555.00
3/30/21	MMM	Email M. Littman's counsel re pending subpoenas.	.30	925.00	277.50
3/30/21	ZNF	Review documents produced by JPMC for relevance to litigation claims and defenses.	1.30	565.00	734.50
3/30/21	ZNF	Review transcript and video of 30(b)(6) deposition of California State Controller's Office.	3.90	565.00	2,203.50
3/31/21	CCC	Final Kim transcript matters.	.30	290.00	87.00
3/31/21	CF	Prepare and file pro hac vice motion.	.60	660.00	396.00
3/31/21	CF	Review and respond to correspondence.	.60	660.00	396.00
3/31/21	CF	Research EDVA procedural questions.	2.70	660.00	1,782.00
3/31/21	DB	Prepare for and attend team meeting re response to scheduling order.	.80	925.00	740.00
3/31/21	DB	Prepare for M. Faulkner deposition.	1.20	925.00	1,110.00
3/31/21	DB	Emails with counsel for S. Smith re deposition and document production.	.80	925.00	740.00
3/31/21	DIW	Technical assistance with discovery.	.10	290.00	29.00
3/31/21	GAO	Team meeting to address pre-trial conference, deposition planning.	.80	975.00	780.00
3/31/21	GAO	Emails with JPMC and Schulte re expert deposition schedule.	.30	975.00	292.50
3/31/21	GAO	Planning for completion of discovery.	.30	975.00	292.50
3/31/21	LCE	Weekly strategy meeting.	.80	660.00	528.00
3/31/21	LCE	Draft amended notice of depositions.	.40	660.00	264.00
3/31/21	LCE	Draft Baxter deposition outline.	3.80	660.00	2,508.00
3/31/21	LCE	Correspond with team on pre trial conference tasks.	.30	660.00	198.00
3/31/21	LCE	Read and analyze client emails on summary judgment motion.	.30	660.00	198.00
3/31/21	LCE	Draft letter to opposing counsel on deposition rescheduling.	.40	660.00	264.00
3/31/21	LCE	Draft calendar and task list.	.30	660.00	198.00
3/31/21	LCE	Update calendar with new conferences.	.20	660.00	132.00
3/31/21	LCE	Correspond with C. Chase Carpino on gathering exhibits for exhibit list.	.30	660.00	198.00
3/31/21	MMM	Participate in team meeting to discuss strategy for remaining discovery under court's scheduling order.	.80	925.00	740.00
3/31/21	ZNF	Research legal questions re pro hac vice admission in EDVA.	.30	565.00	169.50
3/31/21	ZNF	Review and highlight O'Malley reports for Williamson deposition prep.	1.20	565.00	678.00

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Date	Tkpr	Description	Hours	Rate	Amount
3/31/21	ZNF	Review produced documents and deposition transcripts for material to include in Williamson deposition prep binder.	5.10	565.00	2,881.50
3/31/21	ZNF	Email M. Madden and D. Burke regarding Williamson deposition prep binder and revise binder.	.70	565.00	395.50
3/31/21	ZNF	Confer with G. Orseck, M. Madden, D. Burke, C. Forstein, and L. Esbrook regarding case developments and litigation strategy.	.80	565.00	452.00
TOTAL PROFESSIONAL SERVICES					\$ 449,812.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	43.30	925.00	40,052.50
Christine A Chase Carpino	CCC	20.00	290.00	5,800.00
Leslie Esbrook	LCE	111.00	660.00	73,260.00
Zachary N Ferguson	ZNF	161.20	565.00	91,078.00
Carolyn Forstein	CF	113.30	660.00	74,778.00
Matthew M Madden	MMM	104.60	925.00	96,755.00
Gary A. Orseck	GAO	65.70	975.00	64,057.50
Dana I. Wesley Sarti	DIW	9.30	290.00	2,697.00
Lyndsay G Webb	LGW	4.60	290.00	1,334.00
Total		633.00		\$ 449,812.00

EXPENSES

Description	Amount
Deposition Transcript Cost	3,298.69
Process Server & Subpoena Fees	850.00
Long Distance Telephone	94.91
Computer Research Charges	909.30
Courier/Overnight delivery	147.70
Litigation Support from Vendor	6,743.97
In-house copying charges	513.60
Miscellaneous/Other	25.00
TOTAL EXPENSES	\$ 12,583.17

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TOTAL THIS INVOICE

\$ 462,395.17

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Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

April 14, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201190
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 462,395.17

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins Russell, Englert, Orseck, Untereiner & Sauber LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201190, File # 0374 - 2001

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL
Robbins, Russell, Englert, Orseck, & Untereiner LLP

May 11, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201317
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: April 30, 2021.

RE: Blue Flame

Total Professional Services	\$ 643,686.00
Total Expenses	<u>\$ 52,905.96</u>
TOTAL THIS INVOICE	\$ 696,591.96

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May 11, 2021
Invoice #: 201317

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/01/21	CCC	Deposition matters.	.20	290.00	58.00
4/01/21	CCC	Research Williamson potential deposition materials for Z. Ferguson; prepare potential deposition materials for J. Williamson, Z. Ferguson, D. Burke, G. Orseck, M. Madden, B. Sharon; emails with Z. Ferguson regarding questions.	4.30	290.00	1,247.00
4/01/21	CCC	Draft potential exhibit list for L. Esbrook.	.90	290.00	261.00
4/01/21	CF	Correspond re EDVA procedures.	1.10	660.00	726.00
4/01/21	CF	Correspond re CalOES document request.	.50	660.00	330.00
4/01/21	CF	Draft M. Prisament deposition outline.	1.30	660.00	858.00
4/01/21	CF	Review and respond to correspondence.	.60	660.00	396.00
4/01/21	DB	Coordinate prep meetings and materials for upcoming depositions.	.50	925.00	462.50
4/01/21	DIW	Analyze BFM014 production, instructions to tech team for Casepoint, custom document export per Z. Ferguson and C. Chase Carpino.	.80	290.00	232.00
4/01/21	GAO	Emails with team re deposition prep plans.	.20	975.00	195.00
4/01/21	GAO	Review research re requirements for pretrial conference.	.10	975.00	97.50
4/01/21	LCE	Revise and send amended notices of depositions.	.20	660.00	132.00
4/01/21	LCE	Correspond with paralegals on preparation of Baxter exhibit binders.	.20	660.00	132.00
4/01/21	LCE	Gather and read through Baxter articles listed in CV for possible deposition questions.	3.10	660.00	2,046.00
4/01/21	LCE	Prepare Baxter deposition outline for G. Orseck.	6.50	660.00	4,290.00
4/01/21	MMM	Draft O'Malley deposition outline.	1.90	925.00	1,757.50
4/01/21	MMM	Email A. Touchton re Littman deposition.	.10	925.00	92.50
4/01/21	ZNF	Analyze CBB and BFM productions for documents to include in prep binder for Joanna Williamson.	.90	565.00	508.50
4/01/21	ZNF	Annotate expert reports of Charles Grice and Marc Prisament for Joanna Williamson deposition prep binder.	1.20	565.00	678.00
4/01/21	ZNF	Review documents produced by BFM that contain references to or correspondence with Stephanie Smith and draft outline of the same.	2.10	565.00	1,186.50
4/01/21	ZNF	Coordinate printing of Joanna Williamson deposition prep binder with C. Chase Carpino.	.30	565.00	169.50
4/01/21	ZNF	Review final deposition prep binder for Joanna Williamson.	.90	565.00	508.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/02/21	CCC	Continue to draft potential exhibit list; emails with L. Esbrook regarding questions and status.	.80	290.00	232.00
4/02/21	CCC	Continue to prepare potential deposition materials for J. Williamson, Z. Ferguson, D. Burke, G. Orseck, M. Madden, B. Sharon; emails with Z. Ferguson regarding questions.	3.60	290.00	1,044.00
4/02/21	CCC	Final Kim exhibit matters.	.20	290.00	58.00
4/02/21	CF	Draft M. Prisament deposition outline.	4.90	660.00	3,234.00
4/02/21	CF	Review BFM production.	3.80	660.00	2,508.00
4/02/21	CF	Review and respond to correspondence.	.70	660.00	462.00
4/02/21	DB	Emails with team re schedule for motion practice.	.50	925.00	462.50
4/02/21	DB	Emails with G. Orseck and M. Madden re potential mediation and pre-trial conference.	.50	925.00	462.50
4/02/21	DB	Review materials to prepare for M. Faulkner deposition.	2.00	925.00	1,850.00
4/02/21	DB	Emails with clients re JPM interrogatory responses.	.50	925.00	462.50
4/02/21	DB	Analysis of documents produced by Blue Flame.	1.20	925.00	1,110.00
4/02/21	GAO	Emails with D. Burke and M. Madden re discovery.	.20	975.00	195.00
4/02/21	GAO	Review JPMC Rog response.	.20	975.00	195.00
4/02/21	LCE	Correspond with team on deadlines for motions in limine.	.50	660.00	330.00
4/02/21	LCE	Send attendance lists for upcoming depositions.	.20	660.00	132.00
4/02/21	LCE	Close read Pesce report and consider questions for Pesce deposition.	3.50	660.00	2,310.00
4/02/21	LCE	Prepare draft exhibit list for final pre trial conference.	3.80	660.00	2,508.00
4/02/21	LCE	Continue preparation of deposition outline for Baxter deposition.	1.20	660.00	792.00
4/02/21	LGW	Research article for L. Esbrook.	.20	290.00	58.00
4/02/21	LGW	Research Baxter documents produced in discovery and audio recordings for L. Esbrook.	.90	290.00	261.00
4/02/21	MMM	Draft O'Malley outline.	.80	925.00	740.00
4/02/21	MMM	Call with A. Touchton re Littman deposition and team email re same.	.30	925.00	277.50
4/02/21	MMM	Emails re deposition prep, motions deadline, pretrial conference strategy, BFM request re Jack Henry information, and other open topics.	.70	925.00	647.50
4/02/21	MMM	Review newly produced documents, including Huang text messages, and email team re same.	.40	925.00	370.00
4/02/21	ZNF	Review documents produced by BFM in preparation or deposition of Stephanie Smith.	2.20	565.00	1,243.00
4/02/21	ZNF	Research grounds for filing discovery motions outside of time specified in scheduling order.	.40	565.00	226.00
4/02/21	ZNF	Coordinate deposition prep for Joanna Williamson.	.20	565.00	113.00

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Date	Tkpr	Description	Hours	Rate	Amount
4/02/21	ZNF	Draft short deposition prep outline for Joanna Williamson.	1.70	565.00	960.50
4/02/21	ZNF	Prepare for call with A. Prizgintas and M. Botero regarding defense of Stamm deposition.	.50	565.00	282.50
4/02/21	ZNF	Meeting with A. Prizgintas and M. Botero to discuss defense of Stamm deposition.	.40	565.00	226.00
4/02/21	ZNF	Email A. Prizgintas and M. Botero re outline of Stamm report and materials for Stamm's deposition defense.	.50	565.00	282.50
4/03/21	DB	Call with P. Fitzgerald re deposition issues.	.50	925.00	462.50
4/03/21	GAO	Emails re newly produced documents.	.30	975.00	292.50
4/03/21	GAO	Review P. Fitzgerald emails.	.20	975.00	195.00
4/03/21	GAO	Emails re expert depositions.	.20	975.00	195.00
4/03/21	LCE	Finish Baxter deposition outline and send to G. Orseck.	.20	660.00	132.00
4/03/21	LCE	Finish draft exhibit list for final pre trial conference and send to team.	1.30	660.00	858.00
4/03/21	LCE	Decide on and gather documents for G. Orseck's review in connection with the deposition of Thomas Baxter and correspond with paralegals on same.	1.10	660.00	726.00
4/03/21	LCE	Review and comment on M. Madden outline for the O'Malley deposition.	3.20	660.00	2,112.00
4/03/21	MMM	Draft O'Malley deposition outline.	1.50	925.00	1,387.50
4/03/21	ZNF	Draft short deposition preparation outline for Joanna Williamson.	1.60	565.00	904.00
4/03/21	ZNF	Email A. Prizgintas and M. Botero regarding defense of Stamm deposition.	.20	565.00	113.00
4/03/21	ZNF	No Charge - Confer with A. Strasser to discuss ethics questions regarding Stephanie Smith deposition.	.30	565.00	N/C
4/03/21	ZNF	No Charge - Research whether an attorney can take deposition of witness without admission (pro hac vice or otherwise) in related litigation's jurisdiction.	.50	565.00	N/C
4/03/21	ZNF	Draft outline for deposition of Stephanie Smith.	1.20	565.00	678.00
4/03/21	ZNF	Draft witness list for final pretrial conference.	1.10	565.00	621.50
4/04/21	DB	Review draft O'Malley deposition outline.	.90	925.00	832.50
4/04/21	GAO	Emails with team regarding discovery plans.	.20	975.00	195.00
4/04/21	LCE	Emails with associates on miscellany in case.	.20	660.00	132.00
4/04/21	LCE	Update O'Malley deposition outline.	.80	660.00	528.00
4/04/21	LCE	Update exhibit list.	.20	660.00	132.00
4/04/21	MMM	Review Pesce report and draft potential lines of questioning for deposition.	2.10	925.00	1,942.50
4/04/21	ZNF	Review JPMC's response to CBB's second set of interrogatories.	.30	565.00	169.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/04/21	ZNF	Draft outline for Stephanie Smith deposition.	2.20	565.00	1,243.00
4/04/21	ZNF	Review documents produced by BFM for exhibits to use in Stephanie Smith deposition.	2.00	565.00	1,130.00
4/04/21	ZNF	Revise Williamson deposition prep outline.	2.00	565.00	1,130.00
4/05/21	CCC	Deposition matters.	.30	290.00	87.00
4/05/21	CCC	Research potential Baxter deposition materials; revise Baxter outline; prepare Baxter materials for G. Orseck; emails with L. Esbrook regarding same.	3.60	290.00	1,044.00
4/05/21	CCC	Final Baskett transcript matters; emails with Alderson regarding exhibits and videos.	.30	290.00	87.00
4/05/21	CCC	Revise master chart of deposition exhibits.	.20	290.00	58.00
4/05/21	CF	Draft M. Prisament deposition outline.	6.90	660.00	4,554.00
4/05/21	CF	Review and respond to correspondence re exhibit and witness lists.	.70	660.00	462.00
4/05/21	CF	Review and respond to correspondence re depositions.	.60	660.00	396.00
4/05/21	DB	Prepare for J. Williamson deposition, including review of materials and initial prep meeting with J. Williamson and M. Madden.	2.50	925.00	2,312.50
4/05/21	DB	Review and comment on draft witness list.	.30	925.00	277.50
4/05/21	DB	Coordinate with counsel for S. Smith re document production and deposition logistics.	.40	925.00	370.00
4/05/21	DB	Prepare for M. Faulkner deposition.	4.00	925.00	3,700.00
4/05/21	GAO	Download on Pesce deposition.	.20	975.00	195.00
4/05/21	GAO	Review and comment on O'Malley deposition outline.	.60	975.00	585.00
4/05/21	LCE	Call with M. Madden and D. Burke on Pesce deposition questions and review questions in preparation for deposition.	1.50	660.00	990.00
4/05/21	LCE	Deposition of Teresa Pesce and send summary to team.	4.80	660.00	3,168.00
4/05/21	LCE	Determine which documents to include for Grice deposition prep binder and gather same.	2.90	660.00	1,914.00
4/05/21	LCE	Review M. Madden's final outline for O'Malley deposition and gather exhibits.	1.40	660.00	924.00
4/05/21	LCE	Correspond with paralegals and M. Madden on preparation of binders for Grice deposition.	.50	660.00	330.00
4/05/21	MMM	Confer with L. Esbrook and D. Burke re Pesce deposition.	.40	925.00	370.00
4/05/21	MMM	Confer with L. Esbrook during Pesce deposition break and email re prior testimony bearing on Pesce questions.	.20	925.00	185.00
4/05/21	MMM	Confer with D. Burke re Williamson deposition prep.	.20	925.00	185.00
4/05/21	MMM	Prepare for Williamson deposition prep session.	.30	925.00	277.50
4/05/21	MMM	Participate in initial deposition prep session with J. Williamson.	1.50	925.00	1,387.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/05/21	MMM	Emails re call with SRZ, Grice prep and deposition, and other open issues.	.30	925.00	277.50
4/05/21	MMM	Revise and expand outline for S. O'Malley expert deposition.	7.10	925.00	6,567.50
4/05/21	ZNF	Draft outline for deposition of Stephanie Smith.	.40	565.00	226.00
4/05/21	ZNF	Draft Rule 26 pretrial disclosure witness list.	.60	565.00	339.00
4/05/21	ZNF	Review deposition summaries and transcripts to determine which third-/counter-party witnesses to include on Rule 26 witness list.	2.10	565.00	1,186.50
4/05/21	ZNF	Research local and other federal rules pertaining to Rule 26 witness disclosures.	.90	565.00	508.50
4/05/21	ZNF	Revise Rule 26 pretrial witness disclosure.	.50	565.00	282.50
4/05/21	ZNF	Review BFM letter pertaining to CBB's responses to BFM's second RFPs and related correspondence.	.20	565.00	113.00
4/05/21	ZNF	Prepare for 2:30 p.m. call with BFM counsel regarding BFM's second RFPs.	.20	565.00	113.00
4/05/21	ZNF	Draft, revise, and serve subpoena for deposition of Mathew Littman.	.40	565.00	226.00
4/05/21	ZNF	Review materials in preparation for Joanna Williamson deposition prep session.	.40	565.00	226.00
4/05/21	ZNF	Confer with J. Williamson, D. Burke, M. Madden, and B. Sharon to discuss deposition logistics and themes of Williamson's deposition.	1.40	565.00	791.00
4/05/21	ZNF	Research difference between types of financial ratios at issue in litigation.	.40	565.00	226.00
4/05/21	ZNF	Update deposition summaries folder to reflect depositions taken to date.	.50	565.00	282.50
4/05/21	ZNF	Review emails from P.G. Fitzgerald and opposing counsel.	.20	565.00	113.00
4/05/21	ZNF	Meet and confer with BFM's counsel to discuss CBB's response and objections to BFM's second set of requests for production.	.80	565.00	452.00
4/06/21	CCC	Assist with research and preparation of Grice deposition materials.	.90	290.00	261.00
4/06/21	CCC	Final Baskett exhibit and video matters.	.60	290.00	174.00
4/06/21	CCC	Research and order book for L. Esbrook.	.20	290.00	58.00
4/06/21	CF	Draft M. Prisament deposition outline.	6.20	660.00	4,092.00
4/06/21	CF	Correspond with D. Burke re Prisament report.	1.40	660.00	924.00
4/06/21	CF	Review and respond to correspondence.	.40	660.00	264.00
4/06/21	CF	Review S. Smith documents.	.80	660.00	528.00
4/06/21	DB	Review and comment on revised draft of witness list.	.50	925.00	462.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/06/21	DB	Prepare for Faulkner deposition, including reviewing materials, work on outline, and discussion with Analysis Group team.	3.20	925.00	2,960.00
4/06/21	DB	Initial review of document production from S. Smith, including associated emails with clients and opposing counsel.	1.00	925.00	925.00
4/06/21	DB	Prepare for Prisament deposition, including review and comment on draft outline from C. Forstein and reviewing materials.	1.50	925.00	1,387.50
4/06/21	DIW	Review documents, prepare selected exports for L. Esbrook, C. Chase Carpino.	1.20	290.00	348.00
4/06/21	GAO	Download on O'Malley deposition.	.40	975.00	390.00
4/06/21	GAO	Prepare for Baxter deposition.	1.50	975.00	1,462.50
4/06/21	KRM	Prepare hightail of electronic materials for C. Grice.	.80	290.00	232.00
4/06/21	KRM	Prepare Grice deposition materials for M. Madden and C. Grice.	4.80	290.00	1,392.00
4/06/21	KRM	Research and prepare expert report materials considered for M. Madden and C. Grice	.80	290.00	232.00
4/06/21	LCE	O'Malley deposition and review of prepared exhibits for same.	9.90	660.00	6,534.00
4/06/21	LCE	Correspond with paralegals on binders for Grice deposition.	.50	660.00	330.00
4/06/21	MMM	Prepare for and depose S. O'Malley (AML expert).	9.90	925.00	9,157.50
4/06/21	MMM	Draft and circulate summary of O'Malley deposition.	.40	925.00	370.00
4/06/21	ZNF	Review expert reports of Sean O'Malley.	.50	565.00	282.50
4/06/21	ZNF	Research the circumstances under which courts permit/deny third-party and original actions to proceed as one trial and other research items pertaining to 4/15/21 pretrial conference.	1.90	565.00	1,073.50
4/06/21	ZNF	Attend deposition of Sean O'Malley.	4.40	565.00	N/C
4/06/21	ZNF	Verify and serve production from Stephanie Smith on BFM And JPMC.	.60	565.00	339.00
4/06/21	ZNF	Revise Defendants' Rule 26 witness list.	1.10	565.00	621.50
4/06/21	ZNF	Review production of documents from Stephanie Smith.	1.30	565.00	734.50
4/07/21	CCC	Assist with research and preparation of additional Grice materials.	.80	290.00	232.00
4/07/21	CCC	Deposition matters.	.40	290.00	116.00
4/07/21	CCC	Final Pesce transcript and exhibit matters.	.20	290.00	58.00
4/07/21	CCC	Revise master chart of deposition exhibits.	.40	290.00	116.00
4/07/21	CF	Revise M. Prisament deposition outline.	5.80	660.00	3,828.00
4/07/21	CF	Participate in team meeting.	.40	660.00	264.00
4/07/21	DB	Prepare for Faulkner deposition.	3.50	925.00	3,237.50
4/07/21	DB	Prepare for J. Williamson deposition.	2.00	925.00	1,850.00
4/07/21	DB	Further review of draft outline for Prisament deposition.	1.00	925.00	925.00

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Date	Tkpr	Description	Hours	Rate	Amount
4/07/21	DB	Meeting with team re status of discovery and pre-trial tasks.	.70	925.00	647.50
4/07/21	GAO	Prepare for Stamm meeting.	.60	975.00	585.00
4/07/21	GAO	Prepare for Baxter deposition.	.70	975.00	682.50
4/07/21	GAO	Call with M. Madden re prep for pretrial conference.	.30	975.00	292.50
4/07/21	KRM	Continue to research and prepare expert report materials considered for M. Madden and C. Grice.	5.20	290.00	1,508.00
4/07/21	LCE	Weekly team strategy meeting.	.50	660.00	330.00
4/07/21	LCE	Review Pesce deposition for anticipated topics in Grice deposition.	1.30	660.00	858.00
4/07/21	LCE	Correspond with paralegals on binders for Grice deposition and e-binders for exhibit list.	.50	660.00	330.00
4/07/21	LCE	Prepare questions for Littman deposition.	1.50	660.00	990.00
4/07/21	LCE	Gather documents for Analysis Group and send.	.50	660.00	330.00
4/07/21	LCE	Read through Baxter ABA book for relevant material.	1.00	660.00	660.00
4/07/21	LCE	Gather documents for exhibit list review and review additional documents to add.	1.20	660.00	792.00
4/07/21	LGW	Research potential trial exhibits for L. Esbrook.	2.00	290.00	580.00
4/07/21	MMM	Emails re Grice prep.	.10	925.00	92.50
4/07/21	MMM	Draft email to client re O'Malley deposition.	.70	925.00	647.50
4/07/21	MMM	Prepare for and participate in team meeting.	1.20	925.00	1,110.00
4/07/21	MMM	Confer with D. Burke re deposition prep.	.10	925.00	92.50
4/07/21	MMM	Outline and prepare for C. Grice depo-prep session (liability).	4.50	925.00	4,162.50
4/07/21	MMM	Outline and prepare for C. Grice depo-prep session (indemnification).	1.00	925.00	925.00
4/07/21	ZNF	Review Smith production for deficiencies to raise with opposing counsel.	1.30	565.00	734.50
4/07/21	ZNF	Confer with M. Madden, D. Burke, L. Esbrook and C. Forstein to discuss case developments and litigation strategy.	.60	565.00	339.00
4/07/21	ZNF	Draft outline for deposition of Stephanie Smith.	3.50	565.00	1,977.50
4/07/21	ZNF	Email C. Forstein and L. Esbrook regarding Smith production and end-of-discovery logistics.	.40	565.00	226.00
4/07/21	ZNF	Draft and confirm attendance list for remaining depositions.	.50	565.00	282.50
4/07/21	ZNF	Review production from Stephanie Smith for content potentially harmful to CBB's case.	.90	565.00	508.50
4/07/21	ZNF	Review Stamm deposition prep outline draft from Wilmer Hale.	1.20	565.00	678.00
4/08/21	CF	Revise M. Prisament deposition outline.	6.60	660.00	4,356.00
4/08/21	CF	Correspond with Analysis Group re M. Faulkner prep.	1.80	660.00	1,188.00
4/08/21	DB	Prep meeting with J. Williamson.	5.00	925.00	4,625.00
4/08/21	DB	Prepare for meeting with J. Williamson.	1.00	925.00	925.00

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4/08/21	DB	Prepare for M. Faulkner deposition.	5.00	925.00	4,625.00
4/08/21	DB	Review and coordinate production of materials relating to hold on Blue Flame account.	.80	925.00	740.00
4/08/21	GAO	Attend Laura Stamm prep session.	3.30	975.00	3,217.50
4/08/21	GAO	Attend portion of Charles Grice prep session.	1.30	975.00	1,267.50
4/08/21	GAO	Download on Williamson prep.	.20	975.00	195.00
4/08/21	KRM	Redact potential deposition materials for D. Burke.	.20	290.00	58.00
4/08/21	LCE	Deposition preparation for Grice deposition.	7.50	660.00	4,950.00
4/08/21	LCE	Correspond with paralegals on exhibit list binders.	.30	660.00	198.00
4/08/21	LGW	Continue to research potential trial exhibits for L. Esbrook.	4.00	290.00	1,160.00
4/08/21	MMM	Outline and prepare for C. Grice depo-prep session (liability).	.90	925.00	832.50
4/08/21	MMM	Outline and prepare for C. Grice depo-prep session (indemnity).	.30	925.00	277.50
4/08/21	MMM	Prepare C. Grice for deposition (liability).	6.00	925.00	5,550.00
4/08/21	MMM	Prepare C. Grice for deposition (indemnity).	1.10	925.00	1,017.50
4/08/21	ZNF	Prepare expert witness Laura Stamm for deposition.	4.80	565.00	2,712.00
4/08/21	ZNF	Draft lines of questioning for Laura Stamm cross-examination practice.	1.80	565.00	1,017.00
4/08/21	ZNF	Review emails from client related to upcoming depositions and Article 4A arguments.	.20	565.00	113.00
4/08/21	ZNF	Draft outline for deposition of Stephanie Smith.	1.70	565.00	960.50
4/08/21	ZNF	Research bases for offensive and defensive motions in limine.	.40	565.00	226.00
4/09/21	CCC	Deposition matters.	.50	290.00	145.00
4/09/21	CCC	Final O'Malley video matters.	.60	290.00	174.00
4/09/21	CF	Participate in M. Faulkner deposition prep.	8.10	660.00	5,346.00
4/09/21	CF	Coordinate binder of M. Prisament materials.	.50	660.00	330.00
4/09/21	DB	Prepare for Faulkner deposition, including prep meeting and work on outline.	7.50	925.00	6,937.50
4/09/21	DB	Prepare for Prisament deposition.	3.50	925.00	3,237.50
4/09/21	DIW	Analyze 3rd party S. Smith production, stage same for technical team to load to review database.	.60	290.00	174.00
4/09/21	GAO	Prepare for Stamm deposition.	2.00	975.00	1,950.00
4/09/21	GAO	Check in and emails on Faulkner and Grice depositions.	1.00	975.00	975.00
4/09/21	GAO	Prepare for Baxter deposition.	1.00	975.00	975.00
4/09/21	KRM	Prepare Prisament deposition materials for D. Burke.	2.80	290.00	812.00
4/09/21	LCE	Deposition preparation with Charles Grice.	.80	660.00	528.00
4/09/21	LCE	Charles Grice deposition and follow up.	9.30	660.00	6,138.00
4/09/21	LCE	Prepare questions for Littman deposition.	2.70	660.00	1,782.00

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4/09/21	LCE	Correspond with associates on attendance lists and outstanding miscellany in case.	.50	660.00	330.00
4/09/21	LCE	Review Baxter published works in advance of deposition.	.70	660.00	462.00
4/09/21	LGW	Continue to research potential trial exhibits for L. Esbrook.	2.20	290.00	638.00
4/09/21	MMM	Outline pre-deposition reminders for C. Grice (indemnity).	.30	925.00	277.50
4/09/21	MMM	Prepare C. Grice for deposition (indemnity).	.50	925.00	462.50
4/09/21	MMM	Defend C. Grice deposition.	8.80	925.00	8,140.00
4/09/21	MMM	Confer with G. Orseck re Grice deposition.	.30	925.00	277.50
4/09/21	MMM	Confer with D. Burke re J. Williamson prep and deposition.	.50	925.00	462.50
4/09/21	MMM	Email A. Touchton re Littman deposition.	.20	925.00	185.00
4/09/21	ZNF	Draft and revise outline for deposition of Stephanie Daily Smith.	6.30	565.00	3,559.50
4/09/21	ZNF	Review emails to determine basis for SRZ's renewed objection to CBB's noticing an additional fact witness.	.30	565.00	169.50
4/09/21	ZNF	Revise notice and deposition subpoena for Stephanie Daily Smith and serve the same.	.40	565.00	226.00
4/09/21	ZNF	Coordinate weekend and Monday (4/12) deposition with Christine.	.20	565.00	113.00
4/09/21	ZNF	Attend mock cross examination of Laura B. Stamm.	.90	565.00	508.50
4/10/21	CF	Participate in M. Faulkner deposition prep.	6.20	660.00	4,092.00
4/10/21	CF	Prepare for M. Prisament deposition.	1.10	660.00	726.00
4/10/21	DB	Prep meeting for M. Faulkner deposition.	7.00	925.00	6,475.00
4/10/21	DB	Prepare for Parliament deposition.	3.80	925.00	3,515.00
4/10/21	GAO	Defend L. Stamm deposition.	3.80	975.00	3,705.00
4/10/21	GAO	Debrief with M. Madden re Grice and Stamm depositions.	.40	975.00	390.00
4/10/21	LCE	Prepare for upcoming depositions and deposition preparation.	1.10	660.00	726.00
4/10/21	LCE	Deposition prep with Charles Grice.	1.10	660.00	726.00
4/10/21	LCE	Charles Grice deposition.	4.40	660.00	2,904.00
4/10/21	LCE	Update exhibit list.	.80	660.00	528.00
4/10/21	MMM	Outline Grice prep on remaining testimony (indemnity).	.60	925.00	555.00
4/10/21	MMM	Prepare C. Grice for remaining testimony (indemnity).	1.20	925.00	1,110.00
4/10/21	MMM	Defend C. Grice deposition (indemnity).	4.20	925.00	3,885.00
4/10/21	MMM	Confer with G. Orseck on expert testimony.	.40	925.00	370.00
4/10/21	MMM	Draft client email regarding Grice depositions.	.40	925.00	370.00
4/10/21	MMM	Review and comment on goals for S. Smith deposition.	.20	925.00	185.00
4/10/21	ZNF	Debrief deposition with L. Stamm and G. Orseck.	.10	565.00	56.50
4/10/21	ZNF	Draft pretrial "cheat sheet" for G. Orseck.	1.00	565.00	565.00
4/10/21	ZNF	Defend deposition of Laura Stamm.	4.10	565.00	2,316.50
4/10/21	ZNF	Draft and serve attendance list for Monday's depositions.	.20	565.00	113.00

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Date	Tkpr	Description	Hours	Rate	Amount
4/10/21	ZNF	Email M. Madden and D. Burke re coverage for Monday's depositions.	.20	565.00	113.00
4/10/21	ZNF	Revise Smith deposition outline.	1.60	565.00	904.00
4/11/21	CF	Participate in M. Faulkner deposition.	4.70	660.00	3,102.00
4/11/21	CF	Prepare for M. Prisament deposition.	2.40	660.00	1,584.00
4/11/21	DB	Defend Faulkner deposition.	5.50	925.00	5,087.50
4/11/21	DB	Review and comment on outline for S. Smith deposition.	1.20	925.00	1,110.00
4/11/21	DB	Prepare for Prisament deposition.	6.00	925.00	5,550.00
4/11/21	GAO	Prepare for Baxter deposition.	4.50	975.00	4,387.50
4/11/21	GAO	Downloads on Faulkner and Williamson.	.30	975.00	292.50
4/11/21	GAO	Call with A. Schoenfeld re plans for pre-trial conference.	.50	975.00	487.50
4/11/21	LCE	Correspond with team on upcoming deposition assignments.	.30	660.00	198.00
4/11/21	LCE	Prepare exhibits for Littman deposition and send to M. Madden.	.30	660.00	198.00
4/11/21	LCE	Prepare exhibits for Baxter deposition.	.70	660.00	462.00
4/11/21	MMM	Outline pre-deposition prep with J. Williamson.	.50	925.00	462.50
4/11/21	MMM	Prepare J. Williamson for deposition.	.50	925.00	462.50
4/11/21	MMM	Defend J. Williamson deposition.	5.10	925.00	4,717.50
4/11/21	MMM	Edit outline of Littman deposition topics to send to counsel.	.70	925.00	647.50
4/11/21	MMM	Draft email to clients re Williamson deposition.	.20	925.00	185.00
4/11/21	ZNF	Defend deposition of Joanna Williamson	6.80	565.00	3,842.00
4/11/21	ZNF	Revise deposition outline for Stephanie Smith.	2.40	565.00	1,356.00
4/11/21	ZNF	Draft summary of Stamm deposition.	.90	565.00	508.50
4/12/21	CF	Review and respond to correspondence.	.40	660.00	264.00
4/12/21	CF	Participate in M. Prisament deposition.	6.90	660.00	4,554.00
4/12/21	DB	Prepare for and take Prisament deposition.	8.50	925.00	7,862.50
4/12/21	DB	Attend S. Smith deposition.	2.80	925.00	2,590.00
4/12/21	GAO	Prepare for and take Baxter deposition.	7.50	975.00	7,312.50
4/12/21	GAO	Multiple calls and emails re Prisament, Stephanie Lee, and Littman depositions.	.50	975.00	487.50
4/12/21	GAO	Emails and texts with clients re issues from depositions.	.30	975.00	292.50
4/12/21	LCE	Prepare for and second chair Baxter deposition.	7.80	660.00	5,148.00
4/12/21	LCE	Send Baxter deposition summary to clients.	.30	660.00	198.00
4/12/21	LCE	Analyze client emails and send supporting materials to client.	.40	660.00	264.00
4/12/21	MMM	Draft questions and otherwise prepare for Littman deposition, including close review of Littman-Smith text messages.	3.60	925.00	3,330.00
4/12/21	MMM	Confer with Z. Ferguson re Smith deposition.	.40	925.00	370.00
4/12/21	MMM	Depose M. Littman.	1.00	925.00	925.00

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Date	Tkpr	Description	Hours	Rate	Amount
4/12/21	MMM	Email clients re Littman deposition.	.20	925.00	185.00
4/12/21	MMM	Review Baxter transcript in real time.	.50	925.00	462.50
4/12/21	ZNF	Incorporate clients comments on draft deposition outline for Stephanie Smith.	1.40	565.00	791.00
4/12/21	ZNF	Attend deposition of Thomas Baxter.	2.60	565.00	1,469.00
4/12/21	ZNF	Revise draft witness list.	.20	565.00	113.00
4/12/21	ZNF	Prepare for deposition of Stephanie Smith.	3.20	565.00	1,808.00
4/12/21	ZNF	Take deposition of third-party witness Stephanie Smith.	2.60	565.00	1,469.00
4/12/21	ZNF	Draft summary of Stephanie Smith deposition.	.70	565.00	395.50
4/13/21	CCC	Final O'Malley, Grice Vol II transcript and exhibit matters; emails with Veritext regarding missing Grice audio exhibits.	.90	290.00	261.00
4/13/21	CCC	Revise master chart of deposition exhibits.	.50	290.00	145.00
4/13/21	CCC	Revise potential trial exhibits with comments from L. Esbrook.	1.10	290.00	319.00
4/13/21	CCC	Deposition matters.	.20	290.00	58.00
4/13/21	CF	Participate in team meeting.	.80	660.00	528.00
4/13/21	CF	Draft summaries of M. Faulkner and M. Prisament depositions.	4.70	660.00	3,102.00
4/13/21	DB	Attend team meeting re pre-trial filings.	1.10	925.00	1,017.50
4/13/21	DB	Review and revise draft witness list.	.60	925.00	555.00
4/13/21	DB	Review and revise draft factual stipulation.	1.50	925.00	1,387.50
4/13/21	DB	Review exhibit list.	1.00	925.00	925.00
4/13/21	GAO	Team meeting.	1.40	975.00	1,365.00
4/13/21	GAO	Call with A. Schoenfeld re strategy for pretrial conference.	.40	975.00	390.00
4/13/21	GAO	Prepare for and attend Board Meeting.	.80	975.00	780.00
4/13/21	GAO	Review pretrial conference filings.	.20	975.00	195.00
4/13/21	LCE	Draft exhibit list.	4.90	660.00	3,234.00
4/13/21	LCE	All team meeting.	1.10	660.00	726.00
4/13/21	LCE	Respond to team emails.	.50	660.00	330.00
4/13/21	MMM	Prepare for team meeting, including task planning for pretrial conference prep.	.40	925.00	370.00
4/13/21	MMM	Edit draft stipulation of facts.	2.30	925.00	2,127.50
4/13/21	MMM	Edit witness list and confer with D. Burke and Z. Ferguson re same.	.80	925.00	740.00
4/13/21	MMM	Participate in team meeting re fact-discovery results, preparation for pretrial conference, and planning for summary judgment.	1.30	925.00	1,202.50
4/13/21	MMM	Draft email to P. Fitzgerald re affirmative defenses.	.20	925.00	185.00
4/13/21	MMM	Confer with D. Burke re pretrial conference paperwork.	.20	925.00	185.00

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4/13/21	MMM	Conduct legal research on issues including trial bifurcation, potential motions in limine, and other issues that might arise at pretrial conference.	2.70	925.00	2,497.50
4/13/21	MMM	Emails re misc pretrial open items, including exhibit list.	.40	925.00	370.00
4/13/21	ZNF	Confer with D. Burke and M. Madden to discuss draft witness list.	.30	565.00	169.50
4/13/21	ZNF	Confer with RR Chain Bridge team to discuss case development and litigation strategy.	1.50	565.00	847.50
4/13/21	ZNF	Revise draft witness list.	.60	565.00	339.00
4/13/21	ZNF	Research statutory, case law, and secondary sources to determine factors relevant to Judge Brinkema's decision whether to bifurcate case and apply factors to this case to generate analysis for G. Orseck.	4.40	565.00	2,486.00
4/13/21	ZNF	Research dockets and secondary sources to try to determine the mechanics and other details of trial bifurcation.	2.30	565.00	1,299.50
4/13/21	ZNF	Evaluate fraud-in-the-inducement argument and hypothesize BFM's responses.	.40	565.00	226.00
4/14/21	CCC	Revise potential trial exhibits with comments from L. Esbrook; conferences with D. Burke regarding trial exhibits status and logistics for branding; conferences with D. WesleySarti and L. Esbrook regarding trial exhibit branding; assist with preparation of trial exhibits.	2.80	290.00	812.00
4/14/21	CCC	Deposition matters.	.30	290.00	87.00
4/14/21	CCC	Revise master chart of deposition exhibits.	.90	290.00	261.00
4/14/21	CCC	Final Faulkner, Grice Vol I, Smith, Stamm, Williamson transcript and exhibit matters.	1.90	290.00	551.00
4/14/21	CF	Prepare exhibit lists with L. Esbrook.	5.20	660.00	3,432.00
4/14/21	CF	Draft summary judgment brief.	2.60	660.00	1,716.00
4/14/21	DB	Review and coordinate filing of exhibit list, including associated emails with team and clients.	3.50	925.00	3,237.50
4/14/21	DB	Follow up re Blue Flame inquiries re second set of RFPs, including discussions with clients and Jack Henry, and emails with opposing counsel.	2.50	925.00	2,312.50
4/14/21	DB	Prepare for pre-trial conference.	1.00	925.00	925.00
4/14/21	DIW	Project planning for branding trial exhibits, handle very large native file to be used as exhibit, identify and endorse trial exhibits, compress and prepare for service on counsel.	4.20	290.00	1,218.00
4/14/21	GAO	Review and edit stipulation of undisputed facts.	.30	975.00	292.50
4/14/21	GAO	Prepare for pretrial conference.	1.00	975.00	975.00
4/14/21	GAO	Review and discuss exhibit list.	.30	975.00	292.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/14/21	LCE	Draft exhibit list and gather exhibits for final pre trial conference.	11.00	660.00	7,260.00
4/14/21	LCE	Supervise production of trial exhibits.	.50	660.00	330.00
4/14/21	MMM	Multiple rounds of edits to stipulation of facts and emails re same.	2.40	925.00	2,220.00
4/14/21	MMM	Confer with D. Burke re FPTC documents.	.10	925.00	92.50
4/14/21	MMM	Review bifurcation research in prep for FPTC and email G. Orseck re same.	.60	925.00	555.00
4/14/21	MMM	Draft bullets for answers to potential questions at FPTC.	1.20	925.00	1,110.00
4/14/21	MMM	Review exhibit list and emails re same.	.90	925.00	832.50
4/14/21	MMM	Email clients and reply to questions re exhibit list and stipulation.	.70	925.00	647.50
4/14/21	ZNF	Review deposition exhibits and other documents produced during discovery for inclusion in exhibit list.	4.90	565.00	2,768.50
4/14/21	ZNF	Review revisions to pretrial conference cheat sheet for Gary.	.40	565.00	226.00
4/14/21	ZNF	Review edits to stipulation of uncontested facts by BFM and JPMC.	.30	565.00	169.50
4/14/21	ZNF	Research whether judgments in bifurcated trials are separate or merge into a single judgment.	.40	565.00	226.00
4/15/21	CCC	Assist with finalization of trial exhibits.	1.10	290.00	319.00
4/15/21	CCC	Emails with Alderson regarding Baxter finals; emails with Vertitext regarding correction of Korpall deposition exhibit.	.20	290.00	58.00
4/15/21	CCC	Prepare JPMorgan SJ materials for D. Burke.	.60	290.00	174.00
4/15/21	CF	Draft summary judgment brief.	4.30	660.00	2,838.00
4/15/21	CF	Participate in final pre-trial conference.	.20	660.00	132.00
4/15/21	CF	Participate in call with Chain Bridge team meeting.	.50	660.00	330.00
4/15/21	DB	Prepare for and attend pre-trial conference.	.50	925.00	462.50
4/15/21	DB	Discuss summary judgment issues with G. Orseck.	.60	925.00	555.00
4/15/21	DB	Work on JPM summary judgment brief, including associated research and analysis.	4.50	925.00	4,162.50
4/15/21	DB	Call with clients re pre-trial conference.	.30	925.00	277.50
4/15/21	DB	Initial review of other parties' pre-trial filings.	.80	925.00	740.00
4/15/21	DB	Coordinate re finalizing factual stipulation.	.40	925.00	370.00
4/15/21	DIW	Edits to branded exhibits, re-compress and load to sftp for service, stage JPMC and PTX exhibits for trial team.	1.70	290.00	493.00
4/15/21	GAO	Prepare for and appear at pretrial conference.	1.50	975.00	1,462.50
4/15/21	GAO	Follow-up call with J. Brough, D. Evinger, J. Missner.	.40	975.00	390.00
4/15/21	GAO	Discuss Summary Judgment issues and strategy with D. Burke.	.60	975.00	585.00
4/15/21	LCE	Finalize exhibit list and witness lists and file.	3.20	660.00	2,112.00

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4/15/21	LCE	Final Pre Trial Conference.	.20	660.00	132.00
4/15/21	LCE	Client call to discuss final pre trial.	.30	660.00	198.00
4/15/21	LCE	Call with B. Sharon and follow up on sharing deposition transcripts.	.30	660.00	198.00
4/15/21	LCE	Review Grice deposition transcript for errata and confidentiality.	1.90	660.00	1,254.00
4/15/21	LCE	Email with team on miscellaneous matters for case.	.30	660.00	198.00
4/15/21	MMM	Respond to P. Fitzgerald emails re exhibits.	.20	925.00	185.00
4/15/21	MMM	Edit stipulation of facts and emails re same.	.60	925.00	555.00
4/15/21	MMM	Confer with G. Orseck and D. Burke re FPTC.	.50	925.00	462.50
4/15/21	MMM	Attend final pretrial conference.	.40	925.00	370.00
4/15/21	MMM	Confer with G. Orseck and D. Burke, following FPTC, about summary judgment and schedule.	.20	925.00	185.00
4/15/21	MMM	Confer with client re FPTC.	.30	925.00	277.50
4/15/21	MMM	Emails with Wilmer about transcript designations.	.20	925.00	185.00
4/15/21	ZNF	Attend pretrial conference.	.20	565.00	113.00
4/15/21	ZNF	Research re last-minute pretrial conference questions.	.30	565.00	169.50
4/15/21	ZNF	Email M. Madden and G. Orseck re standard for trial bifurcation under FRCP 42(b).	.10	565.00	56.50
4/15/21	ZNF	Confer with client to discuss pretrial conference and strategy moving forward.	.50	565.00	282.50
4/16/21	CCC	Final Pesce, Littman, Baxter video matters; final Littman, Baxter, Prisament transcript and exhibit matters.	1.60	290.00	464.00
4/16/21	CCC	Revise master chart of deposition exhibits.	.50	290.00	145.00
4/16/21	CF	Draft summary judgment brief.	9.20	660.00	6,072.00
4/16/21	CF	Coordinate ordering hearing transcript.	.50	660.00	330.00
4/16/21	DB	Revise JPM summary judgment brief.	4.50	925.00	4,162.50
4/16/21	MMM	Confer and exchange emails with Z. Ferguson re exhibit objections.	.60	925.00	555.00
4/16/21	ZNF	Review transcript of Baxter deposition for use in revising summary judgment motion.	2.40	565.00	1,356.00
4/16/21	ZNF	Confer with M. Madden to discuss objections to BFM and JPMC exhibits	.20	565.00	113.00
4/16/21	ZNF	Review Federal Rules of Evidence in connection with BFM/JPMC exhibit objections.	.50	565.00	282.50
4/16/21	ZNF	Review BFM exhibits for objections.	.40	565.00	226.00
4/16/21	ZNF	Review JPMC exhibits for evidentiary objections.	3.10	565.00	1,751.50
4/17/21	DB	Revise JPM summary judgment brief.	2.20	925.00	2,035.00
4/17/21	GAO	Call with P. Shiffman re strategy.	.50	975.00	487.50
4/19/21	CCC	Research and order transcript for C. Forstein.	.20	290.00	58.00

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May 11, 2021
Invoice #: 201317

Date	Tkpr	Description	Hours	Rate	Amount
4/19/21	CCC	Final Grice Vol I video matters; emails with Veritext regarding missing Grice Vol II video.	.80	290.00	232.00
4/19/21	CF	Draft summary judgment brief.	13.10	660.00	8,646.00
4/19/21	DB	Revise JPM summary judgment brief.	3.50	925.00	3,237.50
4/19/21	GAO	Review and edit Board Minutes.	.40	975.00	390.00
4/19/21	GAO	Emails re A. Schoenfeld's issues.	.20	975.00	195.00
4/19/21	MMM	Emails with team re summary judgment motions, exhibit objections, and other open matters.	.70	925.00	647.50
4/19/21	MMM	Read Baskett transcript to identify arguments for his exclusion.	1.20	925.00	1,110.00
4/19/21	ZNF	Review JPMC exhibits for evidentiary objection and draft exhibit objection list.	2.80	565.00	1,582.00
4/19/21	ZNF	Review BFM exhibits and draft evidentiary objection list.	5.60	565.00	3,164.00
4/19/21	ZNF	Email M. Forstein to discuss theory of damages under Counts I and II.	.20	565.00	113.00
4/20/21	CCC	Follow-up with court reporter regarding obtaining conference transcript.	.10	290.00	29.00
4/20/21	CF	Draft summary judgment brief.	4.60	660.00	3,036.00
4/20/21	CF	Participate in team meeting.	.40	660.00	264.00
4/20/21	DB	Revise summary judgment brief on Blue Flame claims.	2.50	925.00	2,312.50
4/20/21	DB	Revise JPM summary judgment brief.	1.50	925.00	1,387.50
4/20/21	DB	Attend weekly team meeting.	.80	925.00	740.00
4/20/21	GAO	Discussions re strategy for SJ motions.	.50	975.00	487.50
4/20/21	GAO	Weekly team meeting.	.80	975.00	780.00
4/20/21	LCE	Prepare Grice errata sheet.	2.00	660.00	1,320.00
4/20/21	LCE	Begin preparing objections to plaintiff's exhibit list.	.50	660.00	330.00
4/20/21	MMM	Prepare for and attend team meeting to discuss summary judgment, exhibit objections, and other open items.	.50	925.00	462.50
4/20/21	MMM	Call with Wilmer re summary judgment.	.40	925.00	370.00
4/20/21	MMM	Conduct legal research re grounds to exclude Baskett from testifying.	3.20	925.00	2,960.00
4/20/21	MMM	Emails re scheduling and noticing summary-judgment hearing.	.40	925.00	370.00
4/20/21	ZNF	Confer with RR Chain Bridge team to discuss case developments and litigation strategy.	.50	565.00	282.50
4/20/21	ZNF	Review Blue Flame exhibits for evidentiary objections.	7.30	565.00	4,124.50
4/20/21	ZNF	Email L. Esbrook re summary judgment briefing deadlines.	.10	565.00	56.50
4/21/21	CCC	Final Faulkner, Stamm, Prisament, Grice Vol II video matters; emails with Veritext regarding missing videos.	1.20	290.00	348.00
4/21/21	DB	Revise JPM summary judgment brief.	2.50	925.00	2,312.50
4/21/21	DB	Work on summary judgment as to Blue Flame claims.	3.00	925.00	2,775.00

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Date	Tkpr	Description	Hours	Rate	Amount
4/21/21	GAO	Multiple emails re timing and strategy on SJ motions.	.70	975.00	682.50
4/21/21	GAO	Review and analyze potential legal arguments for SJ as to BFM.	2.40	975.00	2,340.00
4/21/21	LCE	Prepare objections to plaintiff's exhibit list.	3.70	660.00	2,442.00
4/21/21	LCE	Prepare Grice errata sheet.	4.30	660.00	2,838.00
4/21/21	MMM	Conduct legal research re grounds to exclude Baskett from testifying.	3.20	925.00	2,960.00
4/21/21	MMM	Confer with D. Evinger and email G. Orseck and D. Burke re same.	.30	925.00	277.50
4/21/21	MMM	Outline potential Baskett arguments.	2.10	925.00	1,942.50
4/21/21	MMM	Emails re scheduling summary judgment hearing.	.20	925.00	185.00
4/21/21	ZNF	Email L. Esbrook re hearsay and exceptions to hearsay.	.50	565.00	282.50
4/21/21	ZNF	Review Blue Flame Medical exhibits for evidentiary objections.	6.50	565.00	3,672.50
4/22/21	CCC	Draft Grice 4/9 errata sheet for L. Esbrook; research video testimony against errata questions and transcript.	1.90	290.00	551.00
4/22/21	CF	Correspond with C. Chase Carpino and D. Burke re hearing transcript.	.50	660.00	330.00
4/22/21	DB	Call with G. Orseck and M. Madden re exhibit objections and summary judgment issues.	.50	925.00	462.50
4/22/21	DB	Revise JPM summary judgment brief.	2.00	925.00	1,850.00
4/22/21	DB	Revise Blue Flame summary judgment brief.	2.50	925.00	2,312.50
4/22/21	GAO	Call with M. Madden and D. Burke re SJ briefs.	.80	975.00	780.00
4/22/21	GAO	Emails with clients.	.20	975.00	195.00
4/22/21	GAO	Review and edit our draft objections to JPMC exhibits.	.50	975.00	487.50
4/22/21	GAO	Work on SJ motion.	2.00	975.00	1,950.00
4/22/21	LCE	No Charge - Coordinate file transfer to client.	1.80	660.00	N/C
4/22/21	LGW	Research and prepare materials for client review for L. Esbrook.	.70	290.00	203.00
4/22/21	MMM	Confer with G. Orseck and D. Burke re summary judgment motions.	.50	925.00	462.50
4/22/21	MMM	Review and edit objections to JPMC trial exhibits and emails re same.	1.90	925.00	1,757.50
4/22/21	ZNF	Revise CBB's objections to BFM's exhibits and perform secondary hearsay review.	6.20	565.00	3,503.00
4/22/21	ZNF	Review transcript of Baxter deposition for useful statements re CBB's summary judgment motion.	.40	565.00	226.00
4/22/21	ZNF	Call with M. Madden re objections to BFM's exhibits.	.40	565.00	226.00

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Date	Tkpr	Description	Hours	Rate	Amount
4/23/21	CCC	Continue to draft Grice 4/9 errata sheet; continue to research 4/9 video testimony against errata questions and transcript; draft Grice 4/10 errata sheet; research 4/10 video testimony against errata questions and transcript; emails with L. Esbrook regarding questions and status.	3.60	290.00	1,044.00
4/23/21	CF	Legal research into potential summary judgment argument.	1.90	660.00	1,254.00
4/23/21	DB	Revise JPM summary judgment brief and coordinate with Z. Ferguson re same.	1.00	925.00	925.00
4/23/21	DB	Work on Blue Flame summary judgment brief.	3.50	925.00	3,237.50
4/23/21	DB	Emails with clients in response to various summary judgment questions.	.80	925.00	740.00
4/23/21	GAO	Work on JPMC SJ brief.	2.00	975.00	1,950.00
4/23/21	MMM	Review and edit objections to BFM trial exhibits.	2.20	925.00	2,035.00
4/23/21	MMM	Outline and develop Baskett exclusion arguments.	1.30	925.00	1,202.50
4/23/21	ZNF	Review Baxter deposition transcript for material to incorporate into JPMC summary judgment motion.	2.40	565.00	1,356.00
4/23/21	ZNF	Revise JPMC summary judgment motion.	2.90	565.00	1,638.50
4/23/21	ZNF	Confer with D. Burke to discuss revisions to JPMC summary judgment motion.	.20	565.00	113.00
4/24/21	DB	Revise JPM summary judgment brief.	1.80	925.00	1,665.00
4/24/21	DB	Emails with G. Orseck and M. Madden re summary judgment issues.	.30	925.00	277.50
4/25/21	DB	Edit summary judgment brief on Blue Flame claims, including associated research.	2.80	925.00	2,590.00
4/25/21	GAO	Review and edit summary judgment brief as to third-party claims against JPMC.	2.30	975.00	2,242.50
4/25/21	GAO	Research and respond to emails from P. Fitzgerald.	.70	975.00	682.50
4/25/21	GAO	Review our list of objections to BFM exhibit list.	.30	975.00	292.50
4/25/21	MMM	Review and edit objections to BFM trial exhibits and emails re same.	4.50	925.00	4,162.50
4/26/21	CF	Review objections to BFM exhibit list.	4.20	660.00	2,772.00
4/26/21	DB	Call with G. Orseck, M. Madden, and Z. Ferguson re JPM summary judgment motion issues.	1.30	925.00	1,202.50
4/26/21	DB	Review objections to exhibit lists.	.40	925.00	370.00
4/26/21	DB	Edit summary judgment brief on Blue Flame claims.	6.50	925.00	6,012.50
4/26/21	DB	Call with G. Orseck and M. Madden re exhibit objections and summary judgment issues.	.40	925.00	370.00
4/26/21	GAO	Call with M. Madden, D. Burke, Z. Ferguson re SJ motion on third-party claim, objections to exhibits.	1.30	975.00	1,267.50
4/26/21	GAO	Review M. Madden edits to SJ brief.	.30	975.00	292.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/26/21	LCE	Review client emails.	.20	660.00	132.00
4/26/21	LCE	Review and spot check exhibit objection list.	1.70	660.00	1,122.00
4/26/21	LCE	Finalize Grice errata sheets.	1.50	660.00	990.00
4/26/21	MMM	Confer with G. Orseck and D. Burke re exhibit objections.	.50	925.00	462.50
4/26/21	MMM	Edit JPMC summary judgment brief.	5.90	925.00	5,457.50
4/26/21	MMM	Confer with G. Orseck, D. Burke, and Z. Ferguson re JPMC summary judgment brief.	1.30	925.00	1,202.50
4/26/21	MMM	Emails re finalization and filing of exhibit objections.	.60	925.00	555.00
4/26/21	ZNF	Revise and finalize CBB's objections to JPMC's and BFM's exhibits.	3.90	565.00	2,203.50
4/26/21	ZNF	Email C. Forstein and L. Esbrook regarding hearsay and other FRE objections to BFM's exhibits.	1.10	565.00	621.50
4/26/21	ZNF	Confer with G. Orseck, M. Madden, and D. Burke re revisions to summary judgment motion against JPMC.	1.20	565.00	678.00
4/26/21	ZNF	Research procedure for obtaining attorneys fees and availability of change-of-position defense to mistaken payment claim.	.60	565.00	339.00
4/26/21	ZNF	Finalize and file CBB's objections to BFM's and JPMC's trial exhibits.	.50	565.00	282.50
4/27/21	CF	Prepare errata sheet for M. Faulkner deposition.	1.80	660.00	1,188.00
4/27/21	DB	Revise summary judgment brief on Blue Flame claims, including associated research.	5.50	925.00	5,087.50
4/27/21	DB	Review revisions to JPM summary judgment brief from Z. Ferguson, including associated emails.	.50	925.00	462.50
4/27/21	GAO	Email with team and clients regarding various SJ arguments.	.50	975.00	487.50
4/27/21	LCE	Review client emails.	.20	660.00	132.00
4/27/21	MMM	Edit JPMC summary judgment brief.	1.70	925.00	1,572.50
4/27/21	ZNF	Revise summary judgment motion against JPMC.	8.20	565.00	4,633.00
4/28/21	CF	Prepare errata sheet for M. Faulkner deposition.	4.70	660.00	3,102.00
4/28/21	DB	Revise summary judgment brief on Blue Flame claims.	6.20	925.00	5,735.00
4/28/21	DB	Review revisions to JPM summary judgment brief, including associated emails with team.	.80	925.00	740.00
4/28/21	GAO	Work on JPMC SJ motion.	2.50	975.00	2,437.50
4/28/21	LCE	Errata sheet for Laura Stamm deposition.	2.10	660.00	1,386.00
4/28/21	LCE	Research on question of procedural order of adjudicating third party indemnification claim.	2.00	660.00	1,320.00
4/28/21	MMM	Edit JPMC summary judgment brief.	3.70	925.00	3,422.50
4/28/21	MMM	Review research re determination of indemnified losses and expenses and emails re same.	.70	925.00	647.50

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Date	Tkpr	Description	Hours	Rate	Amount
4/28/21	ZNF	Research whether motion for expenses under 4A-211(f) need be made before or after judgment.	2.10	565.00	1,186.50
4/28/21	ZNF	Research sequencing of summary judgment and proof of damages against JPMC vis-a-vis possible trial of BFM.	2.90	565.00	1,638.50
4/28/21	ZNF	Confer with M. Madden to discuss research re recovering expenses under UCC Section 4A-211(f).	.10	565.00	56.50
4/28/21	ZNF	Draft email of findings of 4A-211(f) expense and summary judgment/trial sequencing research.	1.10	565.00	621.50
4/28/21	ZNF	Email L. Esbrook re expenses and summary judgment/trial sequencing research.	.10	565.00	56.50
4/28/21	ZNF	Revise motion for summary judgment against JPMC.	.20	565.00	113.00
4/29/21	CCC	Draft Stamm errata; research video testimony against errata questions and transcript.	1.10	290.00	319.00
4/29/21	CCC	Final Williamson video matters.	.50	290.00	145.00
4/29/21	DB	Revise draft SJ motion against Blue Flame.	7.00	925.00	6,475.00
4/29/21	DB	Work on objection to witness lists, including review of draft and associated emails with team.	.50	925.00	462.50
4/29/21	DB	Review revisions to JPM summary judgment brief.	.50	925.00	462.50
4/29/21	GAO	Further work on JPMC SJ motion and related emails with M. Madden.	1.50	975.00	1,462.50
4/29/21	LCE	Draft and file objections to witness lists.	1.50	660.00	990.00
4/29/21	MMM	Edit and circulate JPMC brief; emails re same.	1.10	925.00	1,017.50
4/29/21	MMM	Conduct legal research re determination of indemnified losses and expenses and email Z. Ferguson re same.	.70	925.00	647.50
4/29/21	MMM	Emails re exhibit objections.	.30	925.00	277.50
4/29/21	ZNF	Research E.D. Va. case law re recovery of attorneys' fees pursuant to a contractual indemnification clause.	.70	565.00	395.50
4/29/21	ZNF	Review draft of JPMC summary judgment motion.	.40	565.00	226.00
4/29/21	ZNF	Email L. Esbrook re Rule 106 objection filing.	.20	565.00	113.00
4/30/21	CF	Review draft summary judgment brief.	1.30	660.00	858.00
4/30/21	DB	Revise draft summary judgment brief vs. Blue Flame claims.	2.50	925.00	2,312.50
4/30/21	DB	Call with G. Orseck re summary judgment issues.	.80	925.00	740.00
4/30/21	GAO	First read and edit of our SJ brief as to the BFM claims.	4.50	975.00	4,387.50
4/30/21	LCE	Review Stamm errata sheet and send to M. Madden.	.60	660.00	396.00
4/30/21	LCE	Send errata sheets to AG for experts and research issues that arose from same.	.80	660.00	528.00
4/30/21	LCE	Search and review SWIFT messaging indemnification and send resource to D. Burke.	.60	660.00	396.00
4/30/21	MMM	Review draft of BFM summary judgment brief.	1.60	925.00	1,480.00

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May 11, 2021
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TOTAL PROFESSIONAL SERVICES

\$ 643,686.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	171.70	925.00	158,822.50
Christine A Chase Carpino	CCC	41.00	290.00	11,890.00
Leslie Esbrook	LCE	139.10	660.00	91,806.00
Zachary N Ferguson	ZNF	172.20	565.00	97,293.00
Carolyn Forstein	CF	135.30	660.00	89,298.00
Matthew M Madden	MMM	132.20	925.00	122,285.00
Kate R Miller	KRM	14.60	290.00	4,234.00
Gary A. Orseck	GAO	64.30	975.00	62,692.50
Dana I. Wesley Sarti	DIW	8.50	290.00	2,465.00
Lyndsay G Webb	LGW	10.00	290.00	2,900.00
Total		888.90		\$ 643,686.00

EXPENSES

Description	Amount
Miscellaneous/Other	40.56
Court Fees	213.00
Deposition Transcript Cost	48,457.23
Long Distance Telephone	62.98
Computer Research Charges	2,100.46
Courier/Overnight delivery	445.78
In-house copying charges	1,585.95
TOTAL EXPENSES	\$ 52,905.96
TOTAL THIS INVOICE	\$ 696,591.96

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Robbins, Russell, Englert, Orseck, & Untereiner LLP

May 11, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201317
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 696,591.96

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201317, File # 0374 - 2001

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

June 11, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201464
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: May 31, 2021.

RE: Blue Flame

Total Professional Services	\$ 568,165.00
Total Expenses	<u>\$ 5,244.96</u>
TOTAL THIS INVOICE	\$ 573,409.96

ROBBINS|RUSSELL

June 11, 2021
Invoice #: 201464

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
5/01/21	DB	Edit JPM summary judgment brief in response to client comments.	2.50	925.00	2,312.50
5/01/21	DB	Edit Blue Flame summary judgment brief.	4.00	925.00	3,700.00
5/01/21	GAO	Work on SJ motions.	1.50	975.00	1,462.50
5/01/21	LCE	Review and revise draft summary judgment brief.	2.00	660.00	1,320.00
5/01/21	MMM	Edit BFM summary judgment brief, including calls with G. Orseck re same.	5.20	925.00	4,810.00
5/01/21	MMM	Edit JPMC SJ brief.	2.10	925.00	1,942.50
5/01/21	ZNF	Revise JPMC motion for summary judgment to highlight role of JPMC's investigation.	1.40	565.00	791.00
5/02/21	CF	Review draft summary judgment brief.	.80	660.00	528.00
5/02/21	CF	Correspond with L. Esbrook and D. Burke re draft brief.	.50	660.00	330.00
5/02/21	DB	Edit Blue Flame summary judgment brief in response to comments from G. Orseck, and circulate same to clients.	4.20	925.00	3,885.00
5/02/21	GAO	Work on BFM SJ brief and related calls with M. Madden and D. Burke.	3.30	975.00	3,217.50
5/02/21	LCE	Address partner comments in draft summary judgment brief.	2.00	660.00	1,320.00
5/02/21	MMM	Edit BFM summary judgment brief.	.80	925.00	740.00
5/03/21	CF	Participate in team meeting.	.40	660.00	264.00
5/03/21	CF	Draft J. Brough declaration.	2.10	660.00	1,386.00
5/03/21	DB	Review and revise draft motion to file audio recordings.	.40	925.00	370.00
5/03/21	DB	Review and revise Blue Flame summary judgment brief.	1.00	925.00	925.00
5/03/21	DB	Call with Wilmer team re summary judgment logistics.	.40	925.00	370.00
5/03/21	GAO	Review and edit new turn of JPMC summary judgment motion.	1.50	975.00	1,462.50
5/03/21	KRM	Cite check Memorandum in Support of Motion for Summary Judgment Against JPMorgan Chase.	6.80	290.00	1,972.00
5/03/21	LCE	Correspond with experts on signature pages and errata sheets.	.30	660.00	198.00
5/03/21	LCE	Call with D. Burke to discuss next steps on summary judgment brief.	.80	660.00	528.00
5/03/21	LCE	Draft notices, proposed orders, and motions for summary judgment brief and review local and federal rules for same.	4.70	660.00	3,102.00
5/03/21	MMM	Call with Wilmer.	.40	925.00	370.00

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Invoice #: 201464

Date	Tkpr	Description	Hours	Rate	Amount
5/03/21	MMM	Implement G. Orseck edits and comments to JPMC SJ brief and send same to clients.	2.30	925.00	2,127.50
5/03/21	MMM	Emails regarding numerous filing details and logistics, including confidential documents and exhibit declaration.	.70	925.00	647.50
5/03/21	MMM	Review list of call recordings and potential confidential information on them.	.40	925.00	370.00
5/03/21	MMM	Call with team re SJ filing logistics and open items among declaration, exhibits, sealing motion, etc.	.90	925.00	832.50
5/03/21	ZNF	Confer with M. Madden, D. Burke, L. Esbrook, and C. Forstein to discuss remaining summary judgment motion items.	.90	565.00	508.50
5/03/21	ZNF	Confer with D. Burke to discuss response to JPMC's audio recording motion.	.10	565.00	56.50
5/03/21	ZNF	Draft sealing motion, notice, proposed order, and memo in support of sealing motion.	3.10	565.00	1,751.50
5/03/21	ZNF	Revise JPMC's audio recording motion and correspond with RR team regarding the same.	3.30	565.00	1,864.50
5/04/21	CCC	Telephone conference with D. Burke regarding cite check status and exhibit preparation.	.20	290.00	58.00
5/04/21	CCC	Cite check Memorandum in Support of Defendants Motion for Summary Judgment; research and prepare exhibits to Summary Judgment.	8.90	290.00	2,581.00
5/04/21	CF	Review summary judgment brief.	2.60	660.00	1,716.00
5/04/21	CF	Revise J. Brough declaration.	1.40	660.00	924.00
5/04/21	DB	Review and comment on revisions to JPMC summary judgment brief.	.30	925.00	277.50
5/04/21	DB	Revise JPMC summary judgment brief to address cite-checking issues.	.80	925.00	740.00
5/04/21	DB	Review draft motion re filing audio recordings, including emails with opposing counsel.	.30	925.00	277.50
5/04/21	DB	Review and comment on drafts of ancillary filings for summary judgment motions (notices of motion, motions, proposed orders).	.60	925.00	555.00
5/04/21	GAO	Work on summary judgment motions.	1.20	975.00	1,170.00
5/04/21	LCE	Correspond with D. Burke on proposed arguments for state law claims section of brief.	.30	660.00	198.00
5/04/21	LCE	Begin preparing exhibits for summary judgment motion and revise draft notices and orders.	2.20	660.00	1,452.00
5/04/21	LCE	Correspond with paralegals on summary judgment cite checks.	.20	660.00	132.00
5/04/21	MMM	Implement client comments on JPMC Sj brief and make other edits to same.	2.10	925.00	1,942.50

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June 11, 2021
Invoice #: 201464

Date	Tkpr	Description	Hours	Rate	Amount
5/04/21	ZNF	Confer with JPMC's counsel to discuss filing of audio recordings with court.	.40	565.00	226.00
5/04/21	ZNF	Revise JPMC motion for summary judgment to incorporate RR and client revisions.	4.10	565.00	2,316.50
5/04/21	ZNF	Email M. Madden and D. Burke re call with JPMC about filing audio recordings with the court.	.20	565.00	113.00
5/04/21	ZNF	Email D. Sarti and M. McClain re logistics of filing audio recordings with the court.	.30	565.00	169.50
5/04/21	ZNF	Email L. Esbrook re sealing motions.	.20	565.00	113.00
5/04/21	ZNF	Review latest JPMC summary judgment motion draft.	.90	565.00	508.50
5/04/21	ZNF	Review final draft of joint motion for leave to file audio recordings.	.20	565.00	113.00
5/04/21	ZNF	Review draft Brough declaration.	.10	565.00	56.50
5/05/21	CCC	Continue to cite check Memorandum in Support of Defendants Motion for Summary Judgment; continue to research and prepare exhibits to Summary Judgment; prepare exhibits to Memorandum in Support of Third-Party Motion for Summary Judgment; various conferences with D. Burke and L. Esbrook regarding status and questions.	8.30	290.00	2,407.00
5/05/21	CF	Review comments to draft brief.	.80	660.00	528.00
5/05/21	CF	Revise J. Brough declaration.	.50	660.00	330.00
5/05/21	CF	Review and respond to correspondence.	1.00	660.00	660.00
5/05/21	DB	Emails with team and opposing counsel re sealing/confidentiality issues.	1.00	925.00	925.00
5/05/21	DB	Revise JPMC summary judgment brief.	1.50	925.00	1,387.50
5/05/21	DB	Revise Blue Flame summary judgment brief to address comments from client and cite checking edits.	4.20	925.00	3,885.00
5/05/21	GAO	Work on summary judgment motions.	1.70	975.00	1,657.50
5/05/21	GAO	Call with D. Burke and M. Madden re summary judgment motions.	.50	975.00	487.50
5/05/21	GAO	Implement P. Fitzgerald comments on brief as to BFM.	.50	975.00	487.50
5/05/21	GAO	Review and edit Brough declaration.	.20	975.00	195.00
5/05/21	KRM	Cite check revisions to Memorandum in Support of Motion for Summary Judgment Against JPMorgan Chase.	.80	290.00	232.00
5/05/21	LCE	Prepare exhibits and declaration, review paralegal cite checks, and finalize briefs for summary judgment.	10.90	660.00	7,194.00
5/05/21	MMM	Edit JPMC brief.	1.70	925.00	1,572.50
5/05/21	MMM	Confer with G. Orseck and D. Burke re SJ motions.	.30	925.00	277.50
5/05/21	MMM	Confer with D. Burke re BFM MSJ.	.30	925.00	277.50

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5/05/21	MMM	Attend to SJ filing logistics, including draft Brough declaration, additional brief edits, and discussions re confidential documents.	2.20	925.00	2,035.00
5/05/21	MMM	Confer with D. Evinger re summary judgment briefs.	.20	925.00	185.00
5/05/21	MMM	Call with SRZ and WH re filing confidential documents.	.30	925.00	277.50
5/05/21	MMM	Comments on draft BFM SJ brief.	1.60	925.00	1,480.00
5/05/21	ZNF	Review lists of CBB-produced documents that BFM and JPMC intend to rely on to determine need to file documents under seal.	3.70	565.00	2,090.50
5/05/21	ZNF	Draft list of exhibits CBB intends to introduce that were produced by BFM and JPMC	1.70	565.00	960.50
5/05/21	ZNF	Confer with L. Esbrook to discuss redaction of CBB documents.	.20	565.00	113.00
5/05/21	ZNF	Review latest draft of summary judgment motion against BFM	.90	565.00	508.50
5/05/21	ZNF	Review produced documents to find evidentiary support for arguments in motion for summary judgment against BFM.	1.00	565.00	565.00
5/05/21	ZNF	Review current set of CBB exhibits for confidential information.	1.10	565.00	621.50
5/05/21	ZNF	Email C. Forstein and L. Esbrook re motions for summary judgment.	.20	565.00	113.00
5/06/21	CCC	Revise exhibits with comments from D. Burke and L. Esbrook; research additional exhibits; research court requirement for filing of exhibits; prepare covers for filing; emails with D. Burke and L. Esbrook regarding status of exhibits; prepare for filing.	6.00	290.00	1,740.00
5/06/21	CF	Review and respond to correspondence.	.50	660.00	330.00
5/06/21	DB	Work on summary judgment filings, including revisions to draft briefs, reviewing and revising ancillary filings, reviewing proposed exhibits, and coordinating with team re finalizing and filing.	11.50	925.00	10,637.50
5/06/21	DIW	Review local court rules re ECF file size limits, technical steps to make files ECF-compliant, create optical disk with native audio files used as exhibits, triage and further processing of transcripts found to contain text describing URL seen by ECF system as a live and possibly malicious link.	6.30	290.00	1,827.00
5/06/21	GAO	Final review of two summary judgment briefs.	1.70	975.00	1,657.50
5/06/21	GAO	Initial review of JPMC's summary judgment brief and circulate initial comments.	1.60	975.00	1,560.00
5/06/21	LCE	Review, finalize, and file summary judgment motions and accompanying documents.	15.80	660.00	10,428.00
5/06/21	MMM	Edit and proofread briefs, emails and calls re filing logistics, review motions, declarations, proposed orders, etc.	10.70	925.00	9,897.50
5/06/21	ZNF	Apply FRCP 5.2 redactions to documents CBB intends to file.	2.00	565.00	1,130.00

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Date	Tkpr	Description	Hours	Rate	Amount
5/06/21	ZNF	Email D. Sarti re production of audio recordings.	.20	565.00	113.00
5/06/21	ZNF	Review documents CBB intends to file in connection with its motions for summary judgment for confidential information.	1.90	565.00	1,073.50
5/06/21	ZNF	Revise redactions to CBB documents.	.60	565.00	339.00
5/06/21	ZNF	Email opposing counsel re additional confidential documents CBB intends to rely on.	.50	565.00	282.50
5/06/21	ZNF	Review summary judgment briefs of JPMC and BFM.	1.10	565.00	621.50
5/06/21	ZNF	Coordinate and review tables of authorities for both CBB summary judgment briefs.	1.50	565.00	847.50
5/06/21	ZNF	Revise CBB summary judgment motions.	1.70	565.00	960.50
5/06/21	ZNF	Coordinate finalization of CBB exhibits with D. Sarti and C. Chase Carpino.	1.30	565.00	734.50
5/06/21	ZNF	Email D. Sarti re versions of summary judgment brief	.50	565.00	282.50
5/06/21	ZNF	Review CBB's summary judgment motions against JPMC and BFM for typos and formatting issues.	.60	565.00	339.00
5/07/21	CCC	Prepare courtesy copies of summary judgment papers for Court.	1.40	290.00	406.00
5/07/21	CF	Draft memo re sealing.	1.90	660.00	1,254.00
5/07/21	CF	Participate in team meeting.	.60	660.00	396.00
5/07/21	DB	Call with team re strategy for summary judgment opposition briefs.	.70	925.00	647.50
5/07/21	DB	Emails with team re drafting schedule for summary judgment oppositions.	.40	925.00	370.00
5/07/21	DB	Review summary judgment briefs filed by Blue Flame and JPMC, including related emails with team.	2.20	925.00	2,035.00
5/07/21	GAO	Read summary judgment briefs and circulate thoughts and reactions.	2.50	975.00	2,437.50
5/07/21	GAO	Team meeting.	.70	975.00	682.50
5/07/21	LCE	Review summary judgment motions.	1.00	660.00	660.00
5/07/21	LCE	Team strategy call to discuss summary judgment motions.	.50	660.00	330.00
5/07/21	LCE	Correspond with paralegals regarding hard copy filing.	.30	660.00	198.00
5/07/21	MMM	Review BFM SJ brief and G. Orseck comments re same.	1.60	925.00	1,480.00
5/07/21	MMM	Initial review of JPMC SJ and G. Orseck comments re same.	1.20	925.00	1,110.00
5/07/21	MMM	Team meeting to discuss opposing SJ briefs.	.70	925.00	647.50
5/07/21	MMM	Emails with Z. Ferguson regarding analysis of opposition to JPMC SJ motion.	.50	925.00	462.50
5/07/21	MMM	Research arguments in JPMC SJ motion and outline potential responses.	2.20	925.00	2,035.00
5/07/21	ZNF	Confer with Robbins Russell team to discuss summary judgment briefing and drafting of oppositions.	.40	565.00	226.00

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Date	Tkpr	Description	Hours	Rate	Amount
5/07/21	ZNF	Review motions for summary judgment filed by Blue Flame Medical and JPMorgan Chase.	1.10	565.00	621.50
5/07/21	ZNF	Research responses to JPMC's unjust enrichment argument.	5.30	565.00	2,994.50
5/08/21	CF	Draft memo re sealing.	1.70	660.00	1,122.00
5/08/21	DB	Review and comment on brief in support of motion to seal audio recording.	.20	925.00	185.00
5/09/21	CF	Revise memo re sealing.	1.90	660.00	1,254.00
5/09/21	LCE	Draft response to Blue Flame summary judgment state law claims section.	1.90	660.00	1,254.00
5/10/21	CF	Revise memo and proposed order re sealing.	2.70	660.00	1,782.00
5/10/21	CF	Correspond with D. Wesley Sarti re redaction.	.80	660.00	528.00
5/10/21	DB	Review and revise brief in support of motion to seal audio recording.	.70	925.00	647.50
5/10/21	DIW	Redact audio file for use as trial exhibit.	.40	290.00	116.00
5/10/21	GAO	Review and edit submission to Brinkema on filing materials under seal.	.20	975.00	195.00
5/10/21	GAO	Review materials for SJ briefing.	1.00	975.00	975.00
5/10/21	LCE	Draft response to Blue Flame fact section.	9.30	660.00	6,138.00
5/10/21	LGW	Prepare summary judgment materials for client with comments from L. Esbrook.	.70	290.00	203.00
5/10/21	LGW	Revise call transcript materials with comments from L. Esbrook.	.30	290.00	87.00
5/10/21	MMM	Draft Opp. to JPMC Mot. for SJ.	8.30	925.00	7,677.50
5/10/21	ZNF	Revise outline of response to JPMC's unjust enrichment argument.	.90	565.00	508.50
5/10/21	ZNF	Draft response to JPMC's argument against CBB's unjust enrichment count.	4.80	565.00	2,712.00
5/10/21	ZNF	Review JPMC's statement of undisputed facts for misstatements and misleading omissions.	1.60	565.00	904.00
5/11/21	CCC	Research Grice video testimony against errata and transcript for additional questions; emails with L. Esbrook regarding same.	.40	290.00	116.00
5/11/21	CF	Draft opposition brief.	7.30	660.00	4,818.00
5/11/21	DB	Review and revise memo and proposed order re motion to seal audio recording.	.50	925.00	462.50
5/11/21	LCE	Draft response to Blue Flame fact and state law claims sections.	9.20	660.00	6,072.00
5/11/21	LGW	Revise summary judgment materials for client with comments from L. Esbrook.	1.20	290.00	348.00
5/11/21	LGW	Research and prepare cited cases from expert reports for L. Esbrook.	1.20	290.00	348.00

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Date	Tkpr	Description	Hours	Rate	Amount
5/11/21	MMM	Draft Opp. to JPMC Mot. for SJ.	8.10	925.00	7,492.50
5/11/21	MMM	Prepare for and attend board meeting.	1.00	925.00	925.00
5/11/21	ZNF	Draft response to JPMC's argument against unjust enrichment count.	.70	565.00	395.50
5/11/21	ZNF	Revise unjust enrichment argument in response to feedback from M. Madden.	2.00	565.00	1,130.00
5/11/21	ZNF	Research differing unjust enrichment elements under Va. case law	.80	565.00	452.00
5/11/21	ZNF	Draft response to JPMC's statement of undisputed facts.	3.90	565.00	2,203.50
5/12/21	CCC	Cite check motion to seal audio recording; cite check proposed order.	1.10	290.00	319.00
5/12/21	CF	Draft opposition brief.	8.80	660.00	5,808.00
5/12/21	DB	Review draft sections and begin to edit opposition to Blue Flame SJ motion.	3.00	925.00	2,775.00
5/12/21	DB	Revise memo and proposed order re motion to seal audio recording to incorporate cite check edits.	.20	925.00	185.00
5/12/21	LCE	Finish draft of response brief fact and state law sections and send to D. Burke.	3.80	660.00	2,508.00
5/12/21	LCE	Finalize errata sheets.	.80	660.00	528.00
5/12/21	MMM	Draft Opp. to JPMC Mot. for SJ.	6.70	925.00	6,197.50
5/12/21	ZNF	Email C. Forstein re BFM's exhibits.	.10	565.00	56.50
5/12/21	ZNF	Draft counterstatement of undisputed facts re JPMC summary judgment brief.	7.20	565.00	4,068.00
5/13/21	CF	Finalize and file memo re sealing.	.70	660.00	462.00
5/13/21	CF	Correspond with D. Burke re draft brief.	.40	660.00	264.00
5/13/21	CF	Review and respond to correspondence.	.80	660.00	528.00
5/13/21	DB	Edit opposition to Blue Flame SJ motion.	8.00	925.00	7,400.00
5/13/21	LCE	Call with D. Burke on edits to summary judgment response and incorporate edits.	3.30	660.00	2,178.00
5/13/21	LGW	Prepare version of Blue Flame's summary judgment with paragraph numbers for L. Esbrook.	1.20	290.00	348.00
5/13/21	MMM	Draft Opp. to JPMC Mot. for SJ, including edits to counterstatement.	9.30	925.00	8,602.50
5/13/21	ZNF	Revise counterstatement of undisputed facts.	.40	565.00	226.00
5/13/21	ZNF	Revise draft of response to JPMC's summary judgment argument re CBB's unjust enrichment count.	2.30	565.00	1,299.50
5/13/21	ZNF	Review BSA memo written by P. Fitzgerald.	.40	565.00	226.00
5/14/21	CCC	Conference with D. Burke, M. Madden, Z. Ferguson, C. Forstein, K. Miller regarding summary judgment cite checks, exhibit preparation and projects.	.30	290.00	87.00

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Date	Tkpr	Description	Hours	Rate	Amount
5/14/21	CF	Draft section of brief on reasonable doubt.	3.50	660.00	2,310.00
5/14/21	CF	Correspond with D. Burke re draft brief.	.70	660.00	462.00
5/14/21	CF	Participate in filing planning call.	.30	660.00	198.00
5/14/21	DB	Review and comment on opposition to Blue Flame SJ motion, including related emails with G. Orseck and M. Madden.	1.00	925.00	925.00
5/14/21	DB	Edit opposition to Blue Flame SJ motion.	7.00	925.00	6,475.00
5/14/21	DB	Call with team to prepare logistics for filing SJ opposition briefs.	.20	925.00	185.00
5/14/21	GAO	Re-read both opening briefs on our third-party claim.	1.00	975.00	975.00
5/14/21	GAO	Edit and comment on our opposition to JPMC SJ motion.	3.00	975.00	2,925.00
5/14/21	KRM	Conference with D. Burke, M. Madden, C. Forstein, Z. Ferguson, C. ChaseCarpino regarding summary judgment filings, cite checks, exhibits and logistics.	.30	290.00	87.00
5/14/21	LCE	Correspond with D. Burke on edits to summary judgment response and call on same.	.60	660.00	396.00
5/14/21	MMM	Draft Opp. to JPMC Mot. for SJ.	2.70	925.00	2,497.50
5/14/21	MMM	Implement G. Orseck comments on JPMC SJ Opp.	1.90	925.00	1,757.50
5/14/21	MMM	Call with team re cite checks, new exhibits, and other logistics of finalizing briefs for filing.	.30	925.00	277.50
5/14/21	ZNF	Revise draft of opposition to JPMC's summary judgment brief.	3.00	565.00	1,695.00
5/14/21	ZNF	Confer with M. Madden, D. Burke, L. Esbrook, and C. Forstein re logistics of summary judgment opposition drafts.	.30	565.00	169.50
5/14/21	ZNF	Draft and file pro hac vice motion for Z. Ferguson.	.90	565.00	508.50
5/15/21	CF	Correspond with D. Burke re draft brief.	.80	660.00	528.00
5/15/21	DB	Edit opposition to Blue Flame SJ motion.	10.50	925.00	9,712.50
5/15/21	GAO	Work on our opposition to JPMC's Summary Judgment motion, and related emails.	2.50	975.00	2,437.50
5/15/21	LCE	Revise state law claims section of summary judgment brief and case law research for same.	2.60	660.00	1,716.00
5/15/21	MMM	Edit JPMC Opp.	2.60	925.00	2,405.00
5/16/21	DB	Review comments from G. Orseck on draft Blue Flame SJ opposition.	.50	925.00	462.50
5/16/21	DB	Edit opposition to Blue Flame SJ motion and related calls with G. Orseck.	5.50	925.00	5,087.50
5/16/21	GAO	Further edits on opposition to JPMC motion and related call with M. Madden.	.80	975.00	780.00
5/16/21	GAO	Edit opposition to Blue Flame motion and related calls with D. Burke.	4.00	975.00	3,900.00
5/16/21	LCE	Read emails on summary judgment brief strategy.	.20	660.00	132.00
5/16/21	MMM	Edit JPMC Opp. and confer with G. Orseck re same.	2.80	925.00	2,590.00

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Date	Tkpr	Description	Hours	Rate	Amount
5/16/21	ZNF	Review sources for JPMC factual assertions.	.40	565.00	226.00
5/16/21	ZNF	Email M. Madden and D. Burke re sources for JPMC's factual assertions.	.10	565.00	56.50
5/17/21	DB	Review and comment on draft JPMC SJ opposition.	.50	925.00	462.50
5/17/21	DB	Revise draft Blue Flame SJ opposition to address comments from G. Orseck.	3.50	925.00	3,237.50
5/17/21	GAO	Work on brief in opposition to Blue Flame's SJ motion.	3.50	975.00	3,412.50
5/17/21	GAO	Work on implementation of P. Fitzgerald comments and edits to our opposition to JPMC brief.	1.00	975.00	975.00
5/17/21	KRM	Cite check Memorandum in Opposition to JPMorgan Chase's Motion for Summary Judgment.	7.50	290.00	2,175.00
5/17/21	LCE	Review draft response briefs for new exhibits.	.70	660.00	462.00
5/17/21	LCE	Compile errata sheets and send to M. Madden for final sign off.	.30	660.00	198.00
5/17/21	MMM	Confer with D. Burke re opposition briefs.	.40	925.00	370.00
5/17/21	MMM	Edit JPMC brief in response to client and internal comments and edits.	5.60	925.00	5,180.00
5/17/21	ZNF	Review revised draft of opposition to JPMC's summary judgment motion.	.80	565.00	452.00
5/17/21	ZNF	Review comments by P. Fitzgerald to opposition to JPMC's summary judgment motion.	.40	565.00	226.00
5/17/21	ZNF	Review incorporation of P. Fitzgerald's comments into draft opposition brief.	.40	565.00	226.00
5/18/21	CF	Review draft opposition brief.	2.70	660.00	1,782.00
5/18/21	CF	Revise draft opposition brief.	3.60	660.00	2,376.00
5/18/21	CF	Confer with D. Burke.	.50	660.00	330.00
5/18/21	CF	Coordinate sending redacted exhibit to court.	1.70	660.00	1,122.00
5/18/21	CF	Research pending lawsuits involving BFM principals.	.40	660.00	264.00
5/18/21	DB	Revisions to Blue Flame SJ opposition, focused on fact section and Count II response, including follow-up on comments from clients.	2.50	925.00	2,312.50
5/18/21	DIW	Prepare optical disk with redacted audio exhibit to Motion for Summary Judgment.	.40	290.00	116.00
5/18/21	GAO	Work on our opposition briefs to BFM and JPMC SJ motions.	1.80	975.00	1,755.00
5/18/21	KRM	Cite check new version of Memorandum in Opposition to JPMorgan Chase's Motion for Summary Judgment.	.50	290.00	145.00
5/18/21	LCE	Careful read of fact section for response brief and propose revisions on same to D. Burke and respond to questions on same.	3.30	660.00	2,178.00
5/18/21	LCE	Review client edits on response brief and fill in missing cites.	.60	660.00	396.00

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5/18/21	LCE	Gather fact witness errata and send to client for review and signature.	1.10	660.00	726.00
5/18/21	MMM	Edit JPMC Opp., including implementation of cite check and additional client comments.	2.40	925.00	2,220.00
5/18/21	ZNF	Draft errata sheet and confidentiality designation for deposition of Joanna Williamson.	.30	565.00	169.50
5/18/21	ZNF	Prepare supplemental exhibits for opposition to JPMC brief.	.40	565.00	226.00
5/18/21	ZNF	Research supposed Gula lawsuit against John Thomas for embezzlement of BFM funds.	.40	565.00	226.00
5/18/21	ZNF	Add citations to and proof CBB opposition to JPMC summary judgment brief.	3.50	565.00	1,977.50
5/19/21	CF	Revise draft opposition brief.	.90	660.00	594.00
5/19/21	CF	Research pending lawsuits involving BFM principals.	.90	660.00	594.00
5/19/21	CF	Review comments to draft brief.	1.10	660.00	726.00
5/19/21	CF	Review and respond to correspondence.	1.80	660.00	1,188.00
5/19/21	DB	Revisions to Blue Flame SJ opposition, including in response to comments from P. Fitzgerald and G. Orseck and related discussions with team.	4.50	925.00	4,162.50
5/19/21	GAO	Review P. Fitzgerald comments and materials on our opposition to BFM motion, and address incorporation of edits.	1.00	975.00	975.00
5/19/21	GAO	Review new draft of opposition to JPMC motion.	1.50	975.00	1,462.50
5/19/21	KRM	Cite check Memorandum in Opposition to Blue Flame's Motion for Partial Summary Judgment.	9.50	290.00	2,755.00
5/19/21	LCE	Close read and analyze proposed revisions to response to Blue Flame summary judgment motion.	.60	660.00	396.00
5/19/21	LCE	Call with D. Burke on response briefs final revisions and research on possible cites from same.	.40	660.00	264.00
5/19/21	LCE	Additional correspondence with clients on errata sheets.	.20	660.00	132.00
5/19/21	LCE	Close read response brief to JPMorgan summary judgment motion and propose edits on same.	.60	660.00	396.00
5/19/21	LCE	Answer D. Burke questions on cites in brief and prepare exhibits and declaration for response briefs.	2.20	660.00	1,452.00
5/19/21	MMM	Edit and finalize JPMC Opp.	3.10	925.00	2,867.50
5/19/21	ZNF	Revise draft opposition to JPMC's summary judgment motion.	.60	565.00	339.00
5/19/21	ZNF	Format exhibits for opposition to JPMC summary judgment motion.	.90	565.00	508.50
5/19/21	ZNF	Review transcript of Williamson deposition for errata and confidential material.	1.90	565.00	1,073.50
5/19/21	ZNF	Review near-final draft of opposition to JPMC's summary judgment motion.	.80	565.00	452.00
5/19/21	ZNF	Review Pesce report for plausibly confidential material.	.40	565.00	226.00

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5/19/21	ZNF	Draft email to CBB and JPMC re confidential-designated material we intend to cite.	.20	565.00	113.00
5/20/21	CF	Proofread opposition brief.	.80	660.00	528.00
5/20/21	CF	Draft motion to seal and related filings.	2.90	660.00	1,914.00
5/20/21	CF	Review and respond to correspondence.	2.40	660.00	1,584.00
5/20/21	DB	Work on summary judgment oppositions, including edits to Blue Flame brief, review of related filings, and coordinating with team re finalizing and filing briefs.	7.50	925.00	6,937.50
5/20/21	DIW	Technical review and edits to exhibits for eFiling, redaction of PII, confer with L. Esbrook re same.	1.40	290.00	406.00
5/20/21	GAO	Final review of our briefs in opposition to BFM's and JPMC's SJ motions.	1.50	975.00	1,462.50
5/20/21	GAO	Emails with client re our opposition briefs.	.50	975.00	487.50
5/20/21	KRM	Cite check new version of Memorandum in Opposition to Blue Flame's Motion for Partial Summary Judgment; prepare exhibits to oppositions.	1.30	290.00	377.00
5/20/21	LCE	Research and respond to D. Burke questions on proposed edits to Blue Flame response brief.	.70	660.00	462.00
5/20/21	LCE	Revise exhibits and declarations, answer miscellaneous questions, supervise table preparation, prepare redactions, and file response briefs to Blue Flame and JPMorgan summary judgment motions.	6.70	660.00	4,422.00
5/20/21	MMM	Opposition briefs finalization, filing and logistics, including emails regarding BFM's motion to file under seal, exhibits, cross-references, and proofreading edits.	3.70	925.00	3,422.50
5/20/21	MMM	Initial review of JPMC Opp.	1.50	925.00	1,387.50
5/20/21	ZNF	Prepare exhibits for filing and coordinate BFM and JPMC confidentiality waiver.	1.60	565.00	904.00
5/20/21	ZNF	Review transcript of deposition of Joanna Williamson for errata and confidential material.	1.60	565.00	904.00
5/20/21	ZNF	Review draft sealing motions and related papers.	.40	565.00	226.00
5/20/21	ZNF	Review CBB documents identified by BFM and JPMC for filing for confidential material.	1.10	565.00	621.50
5/20/21	ZNF	Review, proof, and finalize CBB's memoranda in opposition to JPMC's and BFM's motions for summary judgment.	3.10	565.00	1,751.50
5/20/21	ZNF	Review and revise tables for CBB opposition memos.	.20	565.00	113.00
5/20/21	ZNF	Correspond with RR team re filing logistics and last-minute filing items.	.70	565.00	395.50
5/21/21	CF	Participate in team meeting.	.80	660.00	528.00
5/21/21	CF	Review and respond to correspondence.	.50	660.00	330.00
5/21/21	CF	Review BFM opposition brief.	1.70	660.00	1,122.00

ROBBINS|RUSSELL

June 11, 2021
Invoice #: 201464

Date	Tkpr	Description	Hours	Rate	Amount
5/21/21	DB	Review summary judgment opposition from Blue Flame and JPMC, including associated emails with team.	1.50	925.00	1,387.50
5/21/21	DB	Call with team re strategy for summary judgment replies.	.70	925.00	647.50
5/21/21	DB	Draft Blue Flame reply brief, including associated emails with L. Esbrook and C. Forstein.	7.00	925.00	6,475.00
5/21/21	GAO	Read JPMC and BFM briefs in opposition to our SJ motions.	2.50	975.00	2,437.50
5/21/21	GAO	Team meeting to consider and plan for our reply briefs.	1.20	975.00	1,170.00
5/21/21	GAO	Call with P. Fitzgerald re opposition briefs.	.80	975.00	780.00
5/21/21	GAO	Review research on Huang Declaration issue.	.30	975.00	292.50
5/21/21	LCE	Close read JPMorgan and Blue Flame response briefs and take notes on possible responses to same.	1.40	660.00	924.00
5/21/21	LCE	Correspond with associates and paralegals on filing courtesy copies and sealed document.	.60	660.00	396.00
5/21/21	LCE	Team meeting on strategy for reply.	.80	660.00	528.00
5/21/21	LCE	Analyze fact section of Blue Flame response brief and propose responses for D. Burke.	5.10	660.00	3,366.00
5/21/21	LCE	Research for state law claim section of reply brief.	1.00	660.00	660.00
5/21/21	LGW	Prepare opposition to summary judgment materials for client for L. Esbrook.	.50	290.00	145.00
5/21/21	MMM	Initial review of JPMC Opp.	1.50	925.00	1,387.50
5/21/21	MMM	Initial review of BFM Opp.	1.20	925.00	1,110.00
5/21/21	MMM	Team meeting re strategy and assignments for reply briefs.	.70	925.00	647.50
5/21/21	MMM	Draft JPMC reply brief, including emails and call with Z. Ferguson about research and drafting in support of same.	3.70	925.00	3,422.50
5/21/21	NTT	Prepare courtesy copies and sealed exhibit for L. Esbrook.	.50	290.00	145.00
5/21/21	ZNF	Review JPMC's and BFM's briefs in opposition to CBB's summary judgment motions.	1.70	565.00	960.50
5/21/21	ZNF	Research legality of Huang declaration under Chinese law.	1.90	565.00	1,073.50
5/21/21	ZNF	Confer with RR team (and M. Madden separately) to discuss reply briefs to JPMC's and BFM's briefs in opposition.	1.20	565.00	678.00
5/21/21	ZNF	Research and draft response JPMC's equitable estoppel argument.	4.40	565.00	2,486.00
5/22/21	CF	Draft section of reply brief.	3.80	660.00	2,508.00
5/22/21	DB	Draft Blue Flame reply brief.	3.00	925.00	2,775.00
5/22/21	GAO	Call with D. Burke re our response to Huang declaration.	.40	975.00	390.00
5/22/21	GAO	Email to clients re Huang declaration.	.20	975.00	195.00
5/22/21	LCE	Draft state law claim section of reply brief for D. Burke.	2.90	660.00	1,914.00
5/22/21	LCE	Communicate with associates on strategy for reply brief filing.	.20	660.00	132.00
5/22/21	MMM	Draft JPMC reply.	2.10	925.00	1,942.50

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June 11, 2021
Invoice #: 201464

Date	Tkpr	Description	Hours	Rate	Amount
5/22/21	ZNF	Research and respond to questions posed by P. Fitzgerald.	1.10	565.00	621.50
5/22/21	ZNF	Research and draft outline for response to JPMC brief in opposition.	7.10	565.00	4,011.50
5/23/21	DB	Draft Blue Flame reply brief.	6.20	925.00	5,735.00
5/23/21	MMM	Draft JPMC reply, including review of unjust enrichment draft from Z. Ferguson and emails re same.	4.80	925.00	4,440.00
5/23/21	ZNF	Research case law re equitable estoppel, unjust enrichment, and payment by mistake.	3.30	565.00	1,864.50
5/23/21	ZNF	Draft and revise reply to JPMC's brief in opposition.	3.00	565.00	1,695.00
5/24/21	CF	Legal research for reply brief.	4.20	660.00	2,772.00
5/24/21	DB	Draft Blue Flame reply brief.	11.50	925.00	10,637.50
5/24/21	GAO	Emails with Matt and Donald re reply brief drafts.	.60	975.00	585.00
5/24/21	GAO	Review memos and materials from P. Fitzgerald.	.40	975.00	390.00
5/24/21	LCE	Send memo on errata sheets and confidentiality designation to client for review.	.30	660.00	198.00
5/24/21	LCE	Research for reply brief on Huang declaration illegality and inadmissible status.	2.50	660.00	1,650.00
5/24/21	LCE	Call with D. Burke on edits to reply briefs.	.20	660.00	132.00
5/24/21	LCE	Case law research for state law claims section of reply brief.	1.30	660.00	858.00
5/24/21	MMM	Draft JPMC reply.	14.30	925.00	13,227.50
5/24/21	ZNF	Review transcript of Williamson deposition for confidential information and errata.	1.10	565.00	621.50
5/24/21	ZNF	Research appropriate vehicle under 4th Cir. precedent for objecting to summary judgment affidavit.	1.10	565.00	621.50
5/24/21	ZNF	Research case law re whether Chinese law prohibits signing of declarations (rather than swearing of affidavits) to be used in foreign courts.	1.40	565.00	791.00
5/24/21	ZNF	Research grounds other than Chinese law on which to exclude the Huang affidavit.	2.90	565.00	1,638.50
5/24/21	ZNF	Review client emails.	.20	565.00	113.00
5/25/21	CF	Revise draft reply brief.	.50	660.00	330.00
5/25/21	CF	Review and respond to correspondence.	.80	660.00	528.00
5/25/21	DB	Confer with G. Orseck re Blue Flame reply brief.	.70	925.00	647.50
5/25/21	DB	Draft Blue Flame reply brief.	3.20	925.00	2,960.00
5/25/21	DB	Revise Blue Flame reply brief in response to comments from G. Orseck, and circulate same to clients.	2.50	925.00	2,312.50
5/25/21	GAO	Read and edit reply briefs on our SJ motions as to BFM and JPMC.	6.00	975.00	5,850.00
5/25/21	GAO	Calls with D. Burke and M. Madden re our briefs.	.50	975.00	487.50
5/25/21	GAO	Call with A. Schoenfeld re Huang declaration.	.30	975.00	292.50

ROBBINS|RUSSELL

June 11, 2021
Invoice #: 201464

Date	Tkpr	Description	Hours	Rate	Amount
5/25/21	LCE	Propose edits to D. Burke's draft of reply brief to BFM motion for summary judgment.	2.70	660.00	1,782.00
5/25/21	MMM	Edit BFM reply.	2.70	925.00	2,497.50
5/25/21	MMM	Edit JPMC reply, including implementation of edits and comments from G. Orseck and edits from Z. Ferguson.	2.90	925.00	2,682.50
5/25/21	MMM	Review edits to JPMC reply from P. Fitzgerald.	.30	925.00	277.50
5/25/21	ZNF	Email D. Burke, C. Forstein, and L. Esbrook regarding Huang affidavit.	.40	565.00	226.00
5/25/21	ZNF	Revise JPMC reply brief.	3.30	565.00	1,864.50
5/26/21	CF	Review and revise draft reply brief.	6.20	660.00	4,092.00
5/26/21	DB	Review and comment on JPMC reply brief.	1.00	925.00	925.00
5/26/21	DB	Revise Blue Flame summary judgment reply, including associated research re response on good-faith argument, and emails and discussions with team.	6.00	925.00	5,550.00
5/26/21	GAO	Read and edit revised draft of JPMC reply.	1.50	975.00	1,462.50
5/26/21	GAO	Call with D. Burke re various issues in our BFM reply.	.50	975.00	487.50
5/26/21	GAO	Review and address comments from clients.	.50	975.00	487.50
5/26/21	KRM	Cite check Reply in Support of Chain Bridge's Motion for Summary Judgment Against JPMorgan Chase.	4.50	290.00	1,305.00
5/26/21	KRM	Cite check Reply in Support of Defendants' Motion for Summary Judgment Against Blue Flame.	7.50	290.00	2,175.00
5/26/21	LCE	Prepare exhibits and declaration for reply brief filing.	1.50	660.00	990.00
5/26/21	LCE	Review proposed edits to reply brief and send to D. Burke, call with D. Burke on edits to reply brief draft and research from same.	.40	660.00	264.00
5/26/21	MMM	Edit JPMC reply brief in response to multiple rounds of client comments and internal suggestions.	5.00	925.00	4,625.00
5/26/21	MMM	Review new draft of BFM reply.	1.30	925.00	1,202.50
5/26/21	ZNF	Review and revise summary judgment reply briefs.	2.30	565.00	1,299.50
5/26/21	ZNF	Review CBB documents BFM intends to rely on for confidential information.	.40	565.00	226.00
5/27/21	CCC	Research briefing materials for G. Orseck.	.50	290.00	145.00
5/27/21	CF	Review and respond to correspondence re filing.	.80	660.00	528.00
5/27/21	DB	Work on summary judgment reply, including revisions to same, emails with clients, discussions with team, and review of brief for filing.	6.20	925.00	5,735.00
5/27/21	DIW	Technical analysis and revisions to exhibits for eFiling.	1.10	290.00	319.00
5/27/21	GAO	Final review and edits to our two SJ reply briefs.	4.50	975.00	4,387.50
5/27/21	KRM	Prepare and finalize exhibits for filing.	1.70	290.00	493.00

ROBBINS|RUSSELL

June 11, 2021
Invoice #: 201464

Date	Tkpr	Description	Hours	Rate	Amount
5/27/21	LCE	Call with G. Orseck on preparing binders for oral argument prep and begin compiling materials on same.	1.60	660.00	1,056.00
5/27/21	LCE	Proof, prepare, and file reply briefs, declarations, and exhibits.	8.20	660.00	5,412.00
5/27/21	LGW	Prepare briefing materials for G. Orseck.	1.30	290.00	377.00
5/27/21	MMM	Emails re edits to BFM reply and filing logistics and final checks.	.70	925.00	647.50
5/27/21	MMM	Edit JPMC reply, including in response to additional client comments.	2.60	925.00	2,405.00
5/27/21	MMM	Confer with D. Burke re final edits to briefs.	.30	925.00	277.50
5/27/21	ZNF	Review CBB documents JPMC intends to cite in its reply for confidential material.	.50	565.00	282.50
5/27/21	ZNF	Review CBB documents BFM intends to cite in its reply for confidential material.	.60	565.00	339.00
5/27/21	ZNF	Coordinate and review tables of authority for reply briefs.	.40	565.00	226.00
5/27/21	ZNF	Proof and revise reply briefs.	1.30	565.00	734.50
5/27/21	ZNF	Revise and finalize reply briefs.	.90	565.00	508.50
5/27/21	ZNF	Email C. Forstein and L. Esbrook re reply brief revisions.	.30	565.00	169.50
5/27/21	ZNF	Review reply briefs filed by BFM and JPMC.	.80	565.00	452.00
5/28/21	CCC	Revise briefing materials for G. Orseck.	.30	290.00	87.00
5/28/21	CF	Correspond with team members.	.60	660.00	396.00
5/28/21	CF	Review reply briefs.	1.00	660.00	660.00
5/28/21	DB	Review summary judgment replies.	1.50	925.00	1,387.50
5/28/21	DB	Emails with team re unjust enrichment issues.	.60	925.00	555.00
5/28/21	GAO	Read JPMC and Blue Flame reply briefs and plan for oral argument.	3.70	975.00	3,607.50
5/28/21	LCE	Arrange for files to be uploaded to iManage Share and courtesy copies to court.	.50	660.00	330.00
5/28/21	LGW	Continue to prepare briefing materials for G. Orseck.	1.50	290.00	435.00
5/28/21	LGW	Prepare courtesy copies for Court.	1.00	290.00	290.00
5/28/21	LGW	Prepare reply brief materials for client for L. Esbrook.	.30	290.00	87.00
5/28/21	MMM	Read JPMC's reply brief.	1.30	925.00	1,202.50
5/28/21	MMM	Emails re responses to points made in JPMC reply.	.30	925.00	277.50
5/28/21	ZNF	Research response to JPMC reply argument.	.50	565.00	282.50
5/28/21	ZNF	Review and analyze summary judgment reply briefs.	1.90	565.00	1,073.50
5/30/21	LCE	Close read reply briefs.	.80	660.00	528.00
5/31/21	LCE	Prepare list of case law and exhibits for G. Orseck to oral argument preparation.	1.60	660.00	1,056.00

TOTAL PROFESSIONAL SERVICES**\$ 568,165.00**

ROBBINS|RUSSELL

June 11, 2021
Invoice #: 201464

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	143.40	925.00	132,645.00
Christine A Chase Carpino	CCC	27.40	290.00	7,946.00
Leslie Esbrook	LCE	123.70	660.00	81,642.00
Zachary N Ferguson	ZNF	136.20	565.00	76,953.00
Carolyn Forstein	CF	84.10	660.00	55,506.00
Matthew M Madden	MMM	144.50	925.00	133,662.50
Kate R Miller	KRM	40.40	290.00	11,716.00
Gary A. Orseck	GAO	64.10	975.00	62,497.50
Dana I. Wesley Sarti	DIW	9.60	290.00	2,784.00
Nadia T Turner	NTT	.50	290.00	145.00
Lyndsay G Webb	LGW	9.20	290.00	2,668.00
Total		783.10		\$ 568,165.00

EXPENSES

Description	Amount
Litigation Support from Vendor	1,538.71
Court Fees	75.00
Long Distance Telephone	5.26
Computer Research Charges	2,977.31
Courier/Overnight delivery	282.98
In-house copying charges	365.70
TOTAL EXPENSES	\$ 5,244.96
TOTAL THIS INVOICE	\$ 573,409.96

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

June 11, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201464
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 573,409.96

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201464, File # 0374 - 2001

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

July 6, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201584
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: June 30, 2021.

RE: Blue Flame

Total Professional Services	\$ 24,159.50
Total Expenses	<u>\$ 9,997.32</u>
TOTAL THIS INVOICE	\$ 34,156.82

ROBBINS|RUSSELL

July 6, 2021
Invoice #: 201584

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
6/01/21	DB	Emails with team re argument schedule.	.30	925.00	277.50
6/01/21	DB	Attend team meeting re argument preparation.	.30	925.00	277.50
6/01/21	GAO	Discussion with team re hearing prep.	.30	975.00	292.50
6/01/21	GAO	Review of order from Judge Brinkema and related emails and calls re SJ scheduling.	1.50	975.00	1,462.50
6/01/21	GAO	SJ prep.	1.00	975.00	975.00
6/01/21	KRM	Prepare oral argument prep materials for G. Orseck.	1.70	290.00	493.00
6/01/21	KRM	Prepare summary judgment briefing materials for D. Burke, M. Madden.	1.60	290.00	464.00
6/01/21	LCE	Finalize binders for oral argument for G. Orseck.	2.30	660.00	1,518.00
6/01/21	LCE	Email with fact witnesses on errata sheets and signature pages.	.30	660.00	198.00
6/01/21	LGW	Research and prepare case law and statute materials for L. Esbrook.	5.50	290.00	1,595.00
6/01/21	LGW	Research exhibit materials for oral argument for L. Esbrook.	3.00	290.00	870.00
6/01/21	MMM	Participate in team meeting.	.30	925.00	277.50
6/01/21	MMM	Finalize and send edits to BOD minutes.	.20	925.00	185.00
6/01/21	MMM	Email and confer with G. Orseck, D. Burke, and client re hearing date and review draft motion re same.	1.50	925.00	1,387.50
6/01/21	ZNF	Confer with RR team to discuss summary judgment oral argument prep.	.30	565.00	169.50
6/01/21	ZNF	Select cases and other authorities for oral argument prep binder.	1.10	565.00	621.50
6/02/21	DB	Review and comment on draft motion re argument scheduling, including associated emails with M. Madden and G. Orseck.	.30	925.00	277.50
6/02/21	GAO	Emails and calls with BFM counsel and clients re scheduling of SJ hearing.	.60	975.00	585.00
6/02/21	GAO	Review consent motion.	.20	975.00	195.00
6/02/21	LCE	Send zip folder of oral argument prep binders to M. Madden and D. Burke.	.10	660.00	66.00
6/02/21	LCE	Correspond with client on updated errata sheet and signature page.	.20	660.00	132.00
6/02/21	LGW	Research additional potential exhibit materials for oral argument for L. Esbrook.	7.00	290.00	2,030.00
6/02/21	MMM	Emails re motion to adjourn hearing.	.70	925.00	647.50

ROBBINS|RUSSELL

July 6, 2021
Invoice #: 201584

Date	Tkpr	Description	Hours	Rate	Amount
6/02/21	MMM	Emails and calls with J. Brough and D. Evinger re hearing date.	1.00	925.00	925.00
6/03/21	GAO	Call with S. Weisbrod re status of summary judgment and issues re potential insurance claim.	.50	975.00	487.50
6/03/21	KRM	Prepare additional oral argument materials for G. Orseck.	2.60	290.00	754.00
6/03/21	LCE	Correspond with paralegals on preparing tables for prep binders.	.30	660.00	198.00
6/03/21	LGW	Continue to research additional potential exhibit materials for oral argument for L. Esbrook.	4.00	290.00	1,160.00
6/03/21	MMM	Review hearing-date order and email clients re same.	.10	925.00	92.50
6/03/21	MMM	Emails re supplemental production of SJ materials to government in response to subpoenas.	.20	925.00	185.00
6/07/21	LCE	Correspond with paralegals on oral argument binders.	.20	660.00	132.00
6/08/21	LCE	Think of hard questions for oral argument for G. Orseck and prepare draft answers to same.	2.00	660.00	1,320.00
6/09/21	LCE	Think of hard questions for oral argument for G. Orseck and prepare draft answers to same.	2.10	660.00	1,386.00
6/10/21	LCE	Finish draft questions and answers for G. Orseck oral argument prep.	1.00	660.00	660.00
6/17/21	CF	Conduct related case search.	.30	660.00	198.00
6/17/21	ZNF	Review Maximedi v. BFM complaint.	.90	565.00	508.50
6/22/21	LCE	Correspond with B. Sharon and D. Evinger on signature page and errata sheet signatures.	.20	660.00	132.00
6/25/21	LCE	Finalize confidentiality designations and send to D. Burke for sign off.	.60	660.00	396.00
6/28/21	DB	Review and comment on draft confidentiality designations for deposition transcripts.	.20	925.00	185.00
6/28/21	LCE	Proof and send confidentiality and errata sheets to court reporters.	.50	660.00	330.00
6/28/21	ZNF	Review highly confidential designations in Williamson deposition.	.20	565.00	113.00
TOTAL PROFESSIONAL SERVICES				\$ 24,159.50	

ROBBINS|RUSSELL

July 6, 2021
Invoice #: 201584

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	1.10	925.00	1,017.50
Leslie Esbrook	LCE	9.80	660.00	6,468.00
Zachary N Ferguson	ZNF	2.50	565.00	1,412.50
Carolyn Forstein	CF	.30	660.00	198.00
Matthew M Madden	MMM	4.00	925.00	3,700.00
Kate R Miller	KRM	5.90	290.00	1,711.00
Gary A. Orseck	GAO	4.10	975.00	3,997.50
Lyndsay G Webb	LGW	19.50	290.00	5,655.00
Total		47.20		\$ 24,159.50

EXPENSES

Description	Amount
Deposition Transcript Cost	6,131.07
Meals	26.18
Litigation Support from Vendor	2,421.10
Computer Research Charges	811.09
In-house copying charges	468.75
Courier/Overnight delivery	139.13
TOTAL EXPENSES	\$ 9,997.32
TOTAL THIS INVOICE	\$ 34,156.82

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

July 6, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201584
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE**RE: Blue Flame**

BALANCE DUE THIS INVOICE**\$ 34,156.82**

For payment by wire or ACH in USD:

United Bank
1776 K Street, NW
Washington, DC 20006
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201584, File # 0374 - 2001

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

August 10, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201703
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: July 31, 2021.

RE: Blue Flame

Total Professional Services	\$ 118,092.50
Total Expenses	<u>\$ 1,465.58</u>
TOTAL THIS INVOICE	\$ 119,558.08

ROBBINS|RUSSELL

August 10, 2021
Invoice #: 201703

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/01/21	GAO	Review record materials for argument.	3.70	975.00	3,607.50
7/02/21	GAO	Argument prep.	1.80	975.00	1,755.00
7/02/21	LCE	Correspond with G. Orseck on binder tabulation for summary judgment preparation.	.20	660.00	N/C
7/06/21	DB	Confer with G. Orseck re preparation for SJ argument and associated follow-up.	1.20	925.00	1,110.00
7/06/21	GAO	Review expert report for argument prep.	.70	975.00	682.50
7/08/21	DB	Follow up re court order rescheduling argument, including conference with G. Orseck and M. Madden and emails with opposing counsel.	.50	925.00	462.50
7/08/21	GAO	Review and respond to Brinkema's scheduling order and related phone calls.	.50	975.00	487.50
7/08/21	MMM	Confer with G. Orseck re JPMC arguments.	.20	925.00	185.00
7/08/21	MMM	Confer with G. Orseck and D. Burke re hearing-date change.	.10	925.00	92.50
7/09/21	DB	Review emails re rescheduling SJ hearing.	.20	925.00	185.00
7/09/21	GAO	Multiple emails with opposing counsel re re-scheduling of SJ argument.	.40	975.00	390.00
7/09/21	GAO	SJ argument prep.	.80	975.00	780.00
7/09/21	MMM	Review proposed filing re hearing date.	.20	925.00	185.00
7/12/21	MMM	Review briefs, conduct follow-up research, and draft Q&A regarding JPMC MSJ in preparation for oral argument.	4.70	925.00	4,347.50
7/13/21	CF	Research recent cases for summary judgment prep.	1.20	660.00	792.00
7/13/21	CF	Research California disclosure requirements and related law.	2.30	660.00	1,518.00
7/13/21	GAO	Review briefs and legal research for oral argument.	2.80	975.00	2,730.00
7/13/21	MMM	Review briefs, conduct follow-up research, and draft Q&A regarding JPMC MSJ in preparation for oral argument and confer with G. Orseck re same.	2.80	925.00	2,590.00
7/14/21	CF	Research recent cases for summary judgment prep.	4.30	660.00	2,838.00
7/14/21	GAO	Prepare for oral argument.	2.70	975.00	2,632.50
7/15/21	CF	Correspond with D. Evinger re recently filed lawsuit.	.40	660.00	264.00
7/15/21	GAO	Review record and briefs in preparation for oral argument.	4.50	975.00	4,387.50
7/16/21	CF	Research recent cases for summary judgment prep.	1.40	660.00	924.00
7/16/21	CF	Confer with D. Evinger.	.30	660.00	198.00
7/16/21	CF	Confer with G. Orseck.	.30	660.00	198.00

ROBBINS|RUSSELL

August 10, 2021
Invoice #: 201703

Date	Tkpr	Description	Hours	Rate	Amount
7/16/21	GAO	Review cases for oral argument prep.	2.70	975.00	2,632.50
7/19/21	DB	Review briefs and materials in preparation for SJ hearing.	2.00	925.00	1,850.00
7/19/21	LCE	Gather information for reserve requirement chart.	.30	660.00	198.00
7/19/21	MMM	Email L. Esbrook about argument prep regarding capital and reserve requirements.	.20	925.00	185.00
7/20/21	DB	Additional preparation for SJ hearing.	1.50	925.00	1,387.50
7/20/21	LCE	Draft reserve requirement chart for G. Orseck.	2.20	660.00	1,452.00
7/21/21	DB	Review materials and prepare argument questions for G. Orseck, including associated research.	3.00	925.00	2,775.00
7/21/21	GAO	Review prep questions from L. Esbrook and M. Madden on JPMC issues.	.40	975.00	390.00
7/21/21	LCE	Finish reserve requirement chart and send to G. Orseck.	2.50	660.00	1,650.00
7/21/21	LGW	Revise oral argument chart with comments from L. Esbrook.	.30	290.00	87.00
7/21/21	MMM	Prepare for JPMC oral argument.	2.10	925.00	1,942.50
7/22/21	DB	Further work on oral argument questions for G. Orseck.	1.50	925.00	1,387.50
7/22/21	GAO	Prepare for SJ argument.	4.80	975.00	4,680.00
7/22/21	MMM	Confer with G. Orseck re JPMC arguments.	.40	925.00	370.00
7/22/21	MMM	Research G/L activity questions in prep for oral argument.	.40	925.00	370.00
7/23/21	GAO	Prepare for oral argument.	5.50	975.00	5,362.50
7/23/21	MMM	Research account closing and indemnity-letter issues in preparation for oral argument.	1.50	925.00	1,387.50
7/24/21	GAO	Prepare for argument.	4.70	975.00	4,582.50
7/25/21	DB	Emails with G. Orseck re SJ preparations, including associated research.	1.20	925.00	1,110.00
7/25/21	GAO	Prepare for argument.	6.50	975.00	6,337.50
7/26/21	CF	Correspond re summary judgment prep.	.50	660.00	330.00
7/26/21	DB	Confer with G. Orseck re SJ preparations.	.40	925.00	370.00
7/26/21	DB	Emails with G. Orseck re SJ preparation, including associated research.	1.50	925.00	1,387.50
7/26/21	DB	Review and comment on draft outline for SJ argument.	1.50	925.00	1,387.50
7/26/21	GAO	Oral argument prep.	5.50	975.00	5,362.50
7/26/21	LCE	Respond to G. Orseck's fact questions to prep for SJ oral argument.	1.50	660.00	990.00
7/26/21	MMM	Review outline for JPMC argument and confer with G. Orseck re same.	2.60	925.00	2,405.00
7/26/21	ZNF	Review summary judgment briefing in anticipation of 7/28 hearing.	2.30	565.00	1,299.50
7/27/21	CF	Correspond re summary judgment prep.	1.20	660.00	792.00

ROBBINS|RUSSELL

August 10, 2021
Invoice #: 201703

Date	Tkpr	Description	Hours	Rate	Amount
7/27/21	DB	Comment on draft outline for SJ argument, including associated follow-up emails with G. Orseck.	1.00	925.00	925.00
7/27/21	DB	Emails with G. Orseck re response to open SJ preparation issues, including associated research.	2.00	925.00	1,850.00
7/27/21	GAO	Prepare for oral argument.	5.70	975.00	5,557.50
7/27/21	GAO	Call with A. Schoenfeld re argument issues.	.60	975.00	585.00
7/27/21	LCE	Assist with oral argument preparation for summary judgment hearing.	1.10	660.00	726.00
7/27/21	ZNF	Review summary judgment briefing in anticipation of 7/28 hearing.	2.10	565.00	1,186.50
7/28/21	CCC	Prepare oral argument materials for G. Orseck.	.20	290.00	58.00
7/28/21	CF	No Charge - Attend summary judgment hearing.	1.90	660.00	N/C
7/28/21	CF	Participate in team call.	.80	660.00	528.00
7/28/21	CF	No Charge - Arrive at summary judgment hearing.	1.50	660.00	N/C
7/28/21	DB	Confer with team re preparation for SJ hearing.	1.50	925.00	1,387.50
7/28/21	DB	Attend SJ hearing.	1.50	925.00	1,387.50
7/28/21	DB	Follow-up discussions and call with client re SJ hearing.	1.20	925.00	1,110.00
7/28/21	GAO	Prepare for argument.	5.50	975.00	5,362.50
7/28/21	GAO	Oral argument.	1.50	975.00	1,462.50
7/28/21	GAO	Post mortem calls and discussion.	1.60	975.00	1,560.00
7/28/21	LCE	No Charge - Summary judgment hearing at E.D.V.A.	1.90	660.00	N/C
7/28/21	LCE	No Charge - Drive to/from courthouse.	1.30	660.00	N/C
7/28/21	MMM	Prepare for, attend, and confer with client and board regarding oral argument on motions for summary judgment.	5.50	925.00	5,087.50
7/28/21	ZNF	Confer with client to debrief summary judgment hearing.	.90	565.00	508.50
7/28/21	ZNF	No Charge - Attend summary judgment hearing.	2.10	565.00	N/C
7/28/21	ZNF	No Charge - Drive to summary judgment hearing in Alexandria from DC	.60	565.00	N/C
7/28/21	ZNF	Review summary judgment briefing	.90	565.00	508.50
7/29/21	CCC	Research and order hearing transcript for C. Forstein.	.20	290.00	58.00
7/29/21	LCE	Provide statistics on discovery to J. Brough.	.30	660.00	198.00
7/30/21	CCC	Emails with C. Forstein and court reporter regarding timing for obtaining hearing transcript.	.20	290.00	58.00
7/30/21	MMM	Review shareholder-letter litigation disclosure and email P. Fitzgerald re same.	.20	925.00	185.00

TOTAL PROFESSIONAL SERVICES

\$ 118,092.50

ROBBINS|RUSSELL

August 10, 2021
Invoice #: 201703**SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	21.70	925.00	20,072.50
Christine A Chase Carpino	CCC	.60	290.00	174.00
Leslie Esbrook	LCE	7.90	660.00	5,214.00
Zachary N Ferguson	ZNF	6.20	565.00	3,503.00
Carolyn Forstein	CF	12.70	660.00	8,382.00
Matthew M Madden	MMM	20.90	925.00	19,332.50
Gary A. Orseck	GAO	62.90	975.00	61,327.50
Lyndsay G Webb	LGW	.30	290.00	87.00
Total		133.20		\$ 118,092.50

EXPENSES

Description	Amount
Litigation Support from Vendor	566.57
Meals	124.64
Local Transportation	10.00
Long Distance Telephone	2.66
Computer Research Charges	746.56
In-house copying charges	15.15
TOTAL EXPENSES	\$ 1,465.58
TOTAL THIS INVOICE	\$ 119,558.08

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

August 10, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201703
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 119,558.08

For payment by wire or ACH in USD:

United Bank
1100 Connecticut Ave, NW
Washington, DC 20036
202-293-6222
Routing: #056004445
Acct: #043331503 for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201703, File # 0374 - 2001

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

August 10, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201704
Client #: 0374
Matter #: 2002

INVOICE SUMMARY

For Professional Services Rendered for the period ending: July 31, 2021.

RE: Blue Flame-Defamation

Total Professional Services	\$ 1,560.00
Total Expenses	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,560.00

ROBBINS|RUSSELL

August 10, 2021
Invoice #: 201704

RE: Blue Flame-Defamation

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/23/21	GAO	Prepare for oral argument.	.60	975.00	585.00
7/24/21	GAO	Prepare for argument.	.40	975.00	390.00
7/25/21	GAO	Prepare for argument.	.60	975.00	585.00
TOTAL PROFESSIONAL SERVICES					\$ 1,560.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Gary A. Orseck	GAO	1.60	975.00	1,560.00
Total		1.60		\$ 1,560.00

TOTAL THIS INVOICE **\$ 1,560.00**

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

August 10, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201704
Client #: 0374
Matter #: 2002

REMITTANCE ADVICE

RE: Blue Flame-Defamation

BALANCE DUE THIS INVOICE

\$ 1,560.00

For payment by wire or ACH in USD:

United Bank
1100 Connecticut Ave, NW
Washington, DC 20036
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201704, File # 0374 - 2002

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

September 10, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201839
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: August 31, 2021.

RE: Blue Flame

Total Professional Services	\$ 39,330.00
Total Expenses	<u>\$ 1,174.95</u>
TOTAL THIS INVOICE	\$ 40,504.95

ROBBINS|RUSSELL

September 10, 2021
Invoice #: 201839

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
7/15/21	ZNF	Confer with client to discuss summary judgment hearing and related matters.	1.30	565.00	734.50
8/01/21	CF	Send hearing transcript to team.	.20	660.00	132.00
8/03/21	GAO	Review BFM's filing of supplemental authority.	.30	975.00	292.50
8/03/21	MMM	Review Blue Flame supplemental-authority filing.	.40	925.00	370.00
8/03/21	ZNF	Review BFM's motion for leave to file supplemental authorities.	.50	565.00	282.50
8/04/21	CF	Review BFM submission.	1.00	660.00	660.00
8/04/21	CF	Correspond with team re response.	1.70	660.00	1,122.00
8/04/21	CF	Confer with D. Burke.	.40	660.00	264.00
8/04/21	CF	Legal research for response brief.	2.00	660.00	1,320.00
8/04/21	DB	Review Blue Flame notice of supplemental authority, including associated emails with team.	1.00	925.00	925.00
8/04/21	GAO	Review and outline response to BFM's supplemental authority.	1.50	975.00	1,462.50
8/04/21	LCE	Research procedural questions for submission of memo in opposition to BFM's motion to file supplemental briefing.	.80	660.00	528.00
8/04/21	ZNF	Research pandemic-era cases in which a court compelled a deposition or rejected an affidavit/declaration where a deposition was impracticable	2.60	565.00	1,469.00
8/05/21	CF	Draft response brief.	9.10	660.00	6,006.00
8/05/21	GAO	Work on response to BFM's notice of supplemental authority.	.40	975.00	390.00
8/05/21	ZNF	Research pandemic-era cases in which a court compelled a deposition or rejected an affidavit/declaration where a deposition was impracticable	1.00	565.00	565.00
8/06/21	CF	Draft response brief.	2.40	660.00	1,584.00
8/06/21	DB	Initial review of draft response to notice of supplemental authority.	.40	925.00	370.00
8/07/21	DB	Edit draft response to notice of supplemental authority.	1.00	925.00	925.00
8/08/21	CF	Correspond re response brief.	1.60	660.00	1,056.00
8/08/21	DB	Revise draft response to notice of supplemental authority.	1.00	925.00	925.00
8/09/21	DB	Revise draft response to notice of supplemental authority, including associated review of cases and legal research.	4.00	925.00	3,700.00
8/09/21	GAO	Initial review of draft.	.80	975.00	780.00
8/10/21	CF	Revise response brief.	2.30	660.00	1,518.00

ROBBINS|RUSSELL

September 10, 2021

Invoice #: 201839

Date	Tkpr	Description	Hours	Rate	Amount
8/10/21	DB	Additional revisions to response to notice of supplemental authority, including associated discussion with G. Orseck and emails with team and clients.	1.40	925.00	1,295.00
8/10/21	GAO	Prepare for and call with team re response on supplemental authorities.	.60	975.00	585.00
8/10/21	GAO	Edit brief.	1.40	975.00	1,365.00
8/10/21	MMM	Call with B. Sharon re supplemental authority motion and SJ argument.	.20	925.00	185.00
8/10/21	MMM	Edit response to supplemental-authority motion.	.30	925.00	277.50
8/10/21	MMM	Confer with D. Burke re response to supplemental-authority motion.	.30	925.00	277.50
8/10/21	ZNF	Review draft response to BFM's notice of supplemental authority.	.70	565.00	395.50
8/11/21	CF	Correspond re response brief.	2.40	660.00	1,584.00
8/11/21	DB	Further edits to draft response to notice of supplemental authority, including associated emails with RR team and clients.	1.20	925.00	1,110.00
8/11/21	GAO	Further work on response to supplemental submission.	1.00	975.00	975.00
8/11/21	KRM	Cite check response to motion for leave to file supplemental authorities.	1.80	290.00	522.00
8/12/21	DB	Revise draft response to notice of supplemental authority in response to client comments.	1.00	925.00	925.00
8/12/21	DB	Coordinate filing of response to notice of supplemental authority.	.10	925.00	92.50
8/12/21	GAO	Review client edits to response brief and related adjustments to brief.	.60	975.00	585.00
8/12/21	KRM	File Defendants' Response to Motion for Leave to File Supplemental Authorities in E.D. Virginia.	.20	290.00	58.00
8/13/21	MMM	Call with B. Sharon.	.20	925.00	185.00
8/15/21	LCE	Read as filed response to supplemental authorities motion.	.20	660.00	132.00
8/16/21	DB	Review Blue Flame's reply in support of notice of supplemental authority.	.40	925.00	370.00
8/16/21	LCE	Read reply on supplemental authorities to send summary to team and client.	.30	660.00	198.00
8/16/21	ZNF	Review BFM's reply to CBB's response to supplemental authority notice.	.30	565.00	169.50
8/17/21	DB	Emails with G. Orseck and M. Madden re Blue Flame's reply in support of notice of supplemental authority.	.40	925.00	370.00
8/17/21	GAO	Read Blue Flame's reply on motion to submit supplemental authority.	.30	975.00	292.50

TOTAL PROFESSIONAL SERVICES**\$ 39,330.00**

ROBBINS|RUSSELL

September 10, 2021
Invoice #: 201839

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	11.90	925.00	11,007.50
Leslie Esbrook	LCE	1.30	660.00	858.00
Zachary N Ferguson	ZNF	6.40	565.00	3,616.00
Carolyn Forstein	CF	23.10	660.00	15,246.00
Matthew M Madden	MMM	1.40	925.00	1,295.00
Kate R Miller	KRM	2.00	290.00	580.00
Gary A. Orseck	GAO	6.90	975.00	6,727.50
Total		53.00		\$ 39,330.00

EXPENSES

Description	Amount
Litigation Support from Vendor	566.57
Deposition Transcript Cost	288.85
Computer Research Charges	301.53
In-house copying charges	18.00
TOTAL EXPENSES	\$ 1,174.95
TOTAL THIS INVOICE	\$ 40,504.95

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

September 10, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201839
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 40,504.95

For payment by wire or ACH in USD:

United Bank
1100 Connecticut Ave, NW
Washington, DC 20036
202-293-6222
Routing: #056004445
Acct: # [REDACTED] for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201839, File # 0374 - 2001

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.

ROBBINS | RUSSELLRobbins, Russell, Englert, Orseck & Untereiner LLP

October 13, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201972
Client #: 0374
Matter #: 2001

INVOICE SUMMARY

For Professional Services Rendered for the period ending: September 30, 2021.

RE: Blue Flame

Total Professional Services	\$ 26,714.50
Less Credit	<u>\$ -1,100.00</u>
Net Professional Services	\$ 25,614.50
Total Expenses	<u>\$ 1,065.55</u>
TOTAL THIS INVOICE	\$ 26,680.05

ROBBINS|RUSSELL

October 13, 2021
Invoice #: 201972

RE: Blue Flame

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
9/23/21	CF	Review court opinion.	.50	660.00	330.00
9/23/21	CF	Review and respond to correspondence.	.60	660.00	396.00
9/23/21	DB	Review summary judgment opinion, order, and judgment.	1.00	925.00	925.00
9/23/21	GAO	Read and analyze court's opinion, order and judgment.	1.50	975.00	1,462.51
9/23/21	GAO	Multiple calls and emails with individual clients and co-counsel.	3.00	975.00	2,925.00
9/23/21	MMM	Review summary-judgment opinion, order, and judgment and emails re same.	1.70	925.00	1,572.50
9/23/21	ZNF	Review District Court's summary judgment order and related RR correspondence.	.90	565.00	508.50
9/24/21	DB	Emails with P. Fitzgerald re court's judgment, including associated research.	.50	925.00	462.50
9/24/21	GAO	Multiple emails and calls re dealings with press and next steps on fee petition.	2.20	974.99	2,144.99
9/24/21	LCE	Read through summary judgment opinion.	.30	660.00	198.00
9/24/21	MMM	Emails, internally and with client, re summary judgment and next steps.	1.20	925.00	1,110.00
9/26/21	CF	Review and respond to correspondence.	.30	660.00	198.00
9/27/21	CF	Confer with M. Madden and Z. Ferguson.	.60	660.00	396.00
9/27/21	CF	Review case law related to JPM indemnification fees.	.50	660.00	330.00
9/27/21	GAO	Address outstanding legal issues regarding fees-for-fees.	.40	975.00	390.00
9/27/21	MMM	Emails and confer with associates re preparing fee submission.	.60	925.00	555.00
9/27/21	ZNF	Confer with M. Madden and C. Forstein to determine research tasks re potential JPMC fee litigation.	.50	565.00	282.50
9/28/21	CF	Review case law related to JPM indemnification fees.	5.30	660.00	3,498.00
9/28/21	GAO	Call with A. Schoenfeld re indemnification.	.50	975.00	487.50
9/28/21	GAO	Call with P. Fitzgerald re next steps.	.50	975.00	487.50
9/28/21	GAO	Oversee preparation of fee submission.	.50	975.00	487.50
9/28/21	MMM	Draft letter to JPMC re fees and expenses.	.90	925.00	832.50
9/29/21	CF	Analyze time entries to break out JPM fees and confer with M. Madden re same.	2.90	660.00	1,914.00
9/29/21	CF	Read letter to JPM counsel and related correspondence.	.40	660.00	264.00
9/29/21	DB	Review draft letter to Wilmer re indemnification, including related emails with G. Orseck and M. Madden.	.30	925.00	277.50
9/29/21	GAO	Call with S. Weisbrod re insurance issues.	.50	975.00	487.50

ROBBINS|RUSSELL

October 13, 2021
Invoice #: 201972

Date	Tkpr	Description	Hours	Rate	Amount
9/29/21	GAO	Edit letter to Wilmer re indemnification and related emails with M. Madden and D. Burke.	.50	975.00	487.50
9/29/21	MMM	Edit letter to JPMC re fees and expenses (including verification of fee and expense amounts).	1.30	925.00	1,202.50
9/29/21	MMM	Confer with C. Forstein re fees research.	.50	925.00	462.50
9/29/21	MMM	Confer with G. Orseck re letter to JPMC re fees and expenses.	.20	925.00	185.00
9/29/21	MMM	Edit shareholder update re litigation.	.20	925.00	185.00
9/30/21	CF	Review and respond to correspondence.	.50	660.00	330.00
9/30/21	DIW	Delete duplicate processing data and unreviewed records from eDiscovery database.	.30	290.00	87.00
9/30/21	GAO	Call with M. Madden re research on issues for our fee application.	.40	975.00	390.00
9/30/21	MMM	Confer with G. Orseck re research in support of fee submission, and email C. Forstein re same.	.50	925.00	462.50

TOTAL PROFESSIONAL SERVICES **\$ 26,714.50**

Less Credit \$ -1,100.00

NET PROFESSIONAL SERVICES **\$ 25,614.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Hours	Rate	Total
Donald Burke	DB	1.80	925.00	1,665.00
Leslie Esbrook	LCE	.30	660.00	198.00
Zachary N Ferguson	ZNF	1.40	565.00	791.00
Carolyn Forstein	CF	11.60	660.00	7,656.00
Matthew M Madden	MMM	7.10	925.00	6,567.50
Gary A. Orseck	GAO	10.00	975.00	9,750.00
Dana I. Wesley Sarti	DIW	.30	290.00	87.00
Total		32.50		\$ 26,714.50

EXPENSES

Description	Amount
Litigation Support from Vendor	552.40
Computer Research Charges	513.15

TOTAL EXPENSES **\$ 1,065.55**

TOTAL THIS INVOICE **\$ 26,680.05**

ROBBINS | RUSSELL

Robbins, Russell, Englert, Orseck & Untereiner LLP

October 13, 2021

Chain Bridge Bank, N.A.
David M. Evinger
1445A Laughlin Avenue
McLean, VA 22101

Invoice #: 201972
Client #: 0374
Matter #: 2001

REMITTANCE ADVICE

RE: Blue Flame

BALANCE DUE THIS INVOICE

\$ 26,680.05

For payment by wire or ACH in USD:

United Bank
1100 Connecticut Ave, NW
Washington, DC 20036
202-293-6222
Routing: #056004445
Acct: #043331503 for
Robbins, Russell, Englert, Orseck & Untereiner LLP

All checks should be made payable to:
(Please return this advice with payment.)

Robbins, Russell, Englert, Orseck & Untereiner LLP
Attn: Accounting
2000 K Street, N.W., 4th Floor
Washington, DC 20006

Please reference: Invoice 201972, File # 0374 - 2001

Please be advised that any changes to our payment instructions will come only from a member of our accounting department and should be confirmed verbally.

Thank you! Your business is greatly appreciated.