

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

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

**SOCIAL LIFE NETWORK, INC.,**

Plaintiff,

v.

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

Defendants.

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

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

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## INTRODUCTION

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

## ARGUMENT

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

\* \* \*

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

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

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

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

### **CONCLUSION**

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

Dated: May 9, 2023

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

Respectfully submitted,

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

*Counsel for Defendants*

---

\* Admitted *pro hac vice*.

**LOCAL RULE 7.3 CERTIFICATE OF CONFERENCE**

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

Date: May 9, 2023

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

**VERIFICATION PURSUANT TO LOCAL RULE 7.3**

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

Date: May 9, 2023

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

**CERTIFICATE OF SERVICE**

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

/s/ Aaron Resnick

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

# Exhibit 1



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

**Federal Taxpayer ID #95-1611234**

**May 10, 2021**

**Invoice No. 2021051360**

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

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

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

**Remit By Wire To:**

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

**Remit By Mail To:**

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

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 this invoice with your payment in the  
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 proper credit.*

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

**Invoice Date: May 10, 2021**

**Invoice No. 2021051360**

**Due and Payable Upon Receipt**

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

**Federal Taxpayer ID #95-1611234**

**May 10, 2021**

**Invoice No. 2021051360**

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

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through April 30, 2021

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

On-Line Research (Westlaw)

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

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

**Federal Taxpayer ID #95-1611234**

**June 23, 2021**

**Invoice No. 2021063961**

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

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

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

**Remit By Wire To:**

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

**Remit By Mail To:**

Gibson, Dunn & Crutcher LLP  
 PO Box 840723  
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For assistance with your account, please contact us at 213-229-7333 or cbilling@gibsondunn.com.

**Invoice Date: June 23, 2021**

**Invoice No. 2021063961**

**Due and Payable Upon Receipt**



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

**Federal Taxpayer ID #95-1611234**

**June 23, 2021**

**Invoice No. 2021063961**

**REMITTANCE COPY**

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

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

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

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

Invoice Date: June 23, 2021

**Due and Payable Upon Receipt**

Invoice No. 2021063961

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through May 31, 2021

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

<b>Total Services</b>			<b>\$ 36,876.50</b>
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<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 0.50
ON-LINE RESEARCH (WESTLAW)	5,074.27
SPECIALIZED RESEARCH	<u>1.33</u>

<b>Total Costs/Charges</b>	<b><u>5,076.10</u></b>
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<b>Total Services, Costs/Charges</b>	<b>41,952.60</b>
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<b>BALANCE DUE</b>	<b><u>\$ 41,952.60</u></b>
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SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

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

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

Specialized Research

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

**Federal Taxpayer ID #95-1611234**

**July 14, 2021**

**Invoice No. 2021072491**

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

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

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

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
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**Invoice Date: July 14, 2021**

**Invoice No. 2021072491**

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**Federal Taxpayer ID #95-1611234**

**July 14, 2021**

**Invoice No. 2021072491**

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

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

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 Reply Envelope to ensure proper credit.*

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

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

**Invoice Date: July 14, 2021**

**Invoice No. 2021072491**

**Due and Payable Upon Receipt**



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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through June 30, 2021

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

<b>Total Services</b>			\$ 66,414.00
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<u>COSTS/CHARGES</u>	<u>TOTAL</u>
DOCUMENT RETRIEVAL SERVICE	\$ 29.12
ON-LINE RESEARCH (WESTLAW)	14,782.55
SPECIALIZED RESEARCH	<u>24.93</u>

<b>Total Costs/Charges</b>	<u>14,836.60</u>
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<b>Total Services, Costs/Charges</b>	81,250.60
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<b>Credit Applied</b>	<u>-47.40</u>
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<b>BALANCE DUE</b>	<u>\$ 81,203.20</u>
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SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

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

On-Line Research (Westlaw)

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

Specialized Research

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

**Federal Taxpayer ID #95-1611234**

**August 10, 2021**

**Invoice No. 2021081819**

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

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

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

**Remit By Wire To:**

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

**Remit By Mail To:**

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

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**Invoice Date: August 10, 2021**

**Invoice No. 2021081819**

**Due and Payable Upon Receipt**

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

**Federal Taxpayer ID #95-1611234**

**August 10, 2021**

**Invoice No. 2021081819**

**REMITTANCE COPY**

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

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

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

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**Invoice No. 2021081819**

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through July 31, 2021

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

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

On-Line Research (Westlaw)

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

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

**Federal Taxpayer ID #95-1611234**

**September 7, 2021**

**Invoice No. 2021092127**

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

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

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

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

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

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

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

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
 Name of account: Gibson, Dunn & Crutcher LLP  
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 ABA No: 121000248  
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**Invoice Date: September 7, 2021**

**Invoice No. 2021092127**

**Due and Payable Upon Receipt**

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

**Federal Taxpayer ID #95-1611234**

**September 7, 2021**

**Invoice No. 2021092127**

**REMITTANCE COPY**

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

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

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

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

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

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

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

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

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
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**Invoice Date: September 7, 2021**

**Invoice No. 2021092127**

**Due and Payable Upon Receipt**

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through August 31, 2021

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

**Total Services** \$ 95,959.50

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

**Total Costs/Charges** 4,716.62

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

**BALANCE DUE** \$ 100,676.12



SOCIAL LIFE NETWORK LITIGATION  
74426-00001




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Detail Services:

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

2.00	Seibald, M. Jonathan	Revise opposition to motion for leave to amend and motion papers in support of sanctions; communicate with B. Goldsmith, H. Walker, and B. Richman regarding motion for leave to amend and motion for sanctions; communicate with opposing counsel regarding sanctions motion.
7.80	Richman, Brian A	Finalize brief in opposition to motion for leave to amend and in support of sanctions; coordinate filing re same.
6.30	Shi, Andrew A	Revise opposition to motion to amend; revise motion for sanctions; prepare papers for filing.
1.30	Raber, Steven	<div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div>
5.70	Santamaria, Ariel	Per B. Richman, check citations in memorandum in opposition to motion for leave to amend for attorney review; prepare exhibits to memorandum in opposition to motion for leave to amend.
08/06/21		
0.10	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
0.10	Richman, Brian A	Correspond with GDC team and A. Resnick re proposed order for court.
0.50	Shi, Andrew A	Research local rule.
08/09/21		
0.20	Seibald, M. Jonathan	Communicate with B. Richman regarding case strategy.
08/12/21		
0.50	Walker, Helgi C	Review reply on motion for leave and correspondence re same.
0.80	Seibald, M. Jonathan	Analyze Social Life leave to amend reply brief; communicate with B. Richman regarding reply brief.
1.10	Richman, Brian A	Review reply in support of motion for leave to amend; research re same; correspond with GDC team and client re same.
08/13/21		
0.20	Seibald, M. Jonathan	Communicate with B. Richman and client regarding motion for leave to amend and case strategy.
1.10	Richman, Brian A	Communicate with A. Shi re research re plaintiff's reply in support of motion for leave to amend.
4.60	Shi, Andrew A	Research voidable question; call with B. Richman re research.

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

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

On-Line Research (Westlaw)

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

Specialized Research

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

**Federal Taxpayer ID #95-1611234**

**April 11, 2022**

**Invoice No. 2022042161**

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

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

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

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

**Remit By Wire To:**

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 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
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 Account No: 4600-146039  
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**Invoice Date: April 11, 2022**

**Invoice No. 2022042161**

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**Federal Taxpayer ID #95-1611234**

**April 11, 2022**

**Invoice No. 2022042161**

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 Jason C. Goldstein  
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 Miami Beach, FL 33139

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

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

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

For Services Rendered Through March 31, 2022

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

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

**BALANCE DUE** \$ 10,191.50



SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

03/02/22		
0.20	WALKER, HELGI C	CORRESPONDENCE RE CASE UPDATES, REVIEW ORDERS.
1.30	SEIBALD, M. JONATHAN	ANALYZE COURT ORDERS; ANALYZE JUDGE GAYLES' LOCAL RULES; COMMUNICATE WITH B. GOLDSMITH, H. WALKER, B. RICHMAN, CLIENT, AND DARBIE COUNSEL REGARDING COURT ORDERS AND CASE STRATEGY.
0.10	DELEO, ROBYN L	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
03/03/22		
0.40	SEIBALD, M. JONATHAN	COMMUNICATE WITH DARBIE COUNSEL REGARDING WAIVER OF SERVICE AND MOTION TO DISMISS; COMMUNICATE WITH B. RICHMAN REGARDING MOTION TO DISMISS AND POTENTIAL RESOLUTION.
0.40	RICHMAN, BRIAN A	COMMUNICATE WITH J. GOLDSTEIN RE COURT RULING ON OPPOSITION TO MOTION FOR LEAVE TO FILE AMENDED COMPLAINT.
03/04/22		
0.10	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN REGARDING RESOLUTION STRATEGY.
0.40	RICHMAN, BRIAN A	COMMUNICATE WITH COUNSEL FOR PLAINTIFF RE SETTLEMENT.
03/05/22		
0.50	WALKER, HELGI C	CORRESPONDENCE RE SETTLEMENT, NEXT STEPS.
03/07/22		
0.20	SEIBALD, M. JONATHAN	COMMUNICATE WITH B. RICHMAN, DARBIE COUNSEL, AND CLIENT REGARDING MOTION TO AMENDED COMPLAINT AND MOTION TO DISMISS.

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

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

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

**Federal Taxpayer ID #95-1611234**

**May 12, 2022**

**Invoice No. 2022052423**

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

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

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

**Remit By Wire To:**

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**Invoice Date: May 12, 2022**

**Invoice No. 2022052423**

**Due and Payable Upon Receipt**

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

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

**Federal Taxpayer ID #95-1611234**

**May 12, 2022**

**Invoice No. 2022052423**

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

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

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**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

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For Services Rendered Through April 30, 2022

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

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

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



SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

04/30/22

3.10 RICHMAN, BRIAN A

DRAFT MOTION TO DISMISS SECOND AMENDED  
COMPLAINT.

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

Detail Costs/Charges:

Document Retrieval Service

03/02/22 7.70 PACER USAGE MARCH 2022

03/31/22 0.60 PACER USAGE MARCH 2022

On-Line Research (Westlaw)

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

Specialized Research

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

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

**Federal Taxpayer ID #95-1611234**

**June 6, 2022**

**Invoice No. 2022060900**

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

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

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

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**Invoice Date: June 6, 2022**

**Invoice No. 2022060900**

**Due and Payable Upon Receipt**

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

**Federal Taxpayer ID #95-1611234**

**June 6, 2022**

**Invoice No. 2022060900**

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 Miami Beach, FL 33139

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

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

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SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through May 31, 2022

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


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



<b>Total Services, Costs/Charges</b>	<b>56,725.66</b>
<b>BALANCE DUE</b>	<b><u>\$ 56,725.66</u></b>

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

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



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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

Document Retrieval Service

04/30/22 3.90 PACER USAGE APRIL 2022

On-Line Research (Westlaw)

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

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

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

Specialized Research

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

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

**Federal Taxpayer ID #95-1611234**

**August 5, 2022**

**Invoice No. 2022081061**

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

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

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

**Remit By Wire To:**

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

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**Invoice Date: August 5, 2022**

**Invoice No. 2022081061**

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

**Federal Taxpayer ID #95-1611234**

**August 5, 2022**

**Invoice No. 2022081061**

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

For Services Rendered Through July 31, 2022

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

<b>Total Services</b>			\$ 6,180.50
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<b>Total Services, Costs/Charges</b>			6,180.50
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<b>BALANCE DUE</b>			<u>\$ 6,180.50</u>
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SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

**Federal Taxpayer ID #95-1611234**

**October 5, 2022**

**Invoice No. 2022101201**

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

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

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

**Remit By Wire To:**

Wells Fargo Bank  
 333 South Grand Avenue  
 Los Angeles, CA 90071-1515  
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**Invoice Date: October 5, 2022**

**Invoice No. 2022101201**

**Due and Payable Upon Receipt**

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

**Federal Taxpayer ID #95-1611234**

**October 5, 2022**

**Invoice No. 2022101201**

**REMITTANCE COPY**

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

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

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

**Remit By Wire To:**

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**Invoice Date: October 5, 2022**

**Invoice No. 2022101201**

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

---

For Services Rendered Through September 30, 2022

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

**Total Services, Costs/Charges** 223.00

**BALANCE DUE** \$ 223.00

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

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

**Federal Taxpayer ID #95-1611234**

**February 15, 2023**

**Invoice No. 2023022724**

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

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

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

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

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**Invoice Date: February 15, 2023**

**Invoice No. 2023022724**

**Due and Payable Upon Receipt**

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

**Federal Taxpayer ID #95-1611234**

**February 15, 2023**

**Invoice No. 2023022724**

**REMITTANCE COPY**

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

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

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

**PREVIOUS INVOICE STATEMENT BALANCES OUTSTANDING:**

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

Invoice Date: February 15, 2023

**Due and Payable Upon Receipt**

Invoice No. 2023022724

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through January 31, 2023

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

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

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:

On-Line Research (Westlaw)

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

Specialized Research

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

**Federal Taxpayer ID #95-1611234**

**March 17, 2023**

**Invoice No. 2023033198**

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

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

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

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**Invoice No. 2023033198**

**Due and Payable Upon Receipt**



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**Federal Taxpayer ID #95-1611234**

**March 17, 2023**

**Invoice No. 2023033198**

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

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

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

**Invoice Date: March 17, 2023**

**Invoice No. 2023033198**

**Due and Payable Upon Receipt**

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

SOCIAL LIFE NETWORK LITIGATION  
 74426-00001

For Services Rendered Through February 28, 2023

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

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

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

**BALANCE DUE** \$ 19,545.96

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Services:

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

02/27/23

0.50 WALKER, HELGI C

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

0.40 GOLDSMITH, BARRY R

ATTENTION TO OBJECTIONS TO MAGISTRATE  
DECISION

1.20 SEIBALD, M. JONATHAN

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

1.90 RICHMAN, BRIAN A

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

SOCIAL LIFE NETWORK LITIGATION  
74426-00001

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Detail Costs/Charges:  
Document Retrieval Service

01/18/23 1.80 PACER USAGE JANUARY 2023

01/20/23 0.60 PACER USAGE JANUARY 2023

On-Line Research (Westlaw)

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

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

# Exhibit 2

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

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



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

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

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

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

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

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

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



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



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

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

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

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

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

# Exhibit 3

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