

**FILED**

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ST-2021-RV-00005

TAMARA CHARLES

CLERK OF THE COURT

# Government Exhibit 2

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1	01/31/20	Representation of Estate	Further drafting supp. brief, and opp. to intervention brief and conferences same.	\$630.00 hr	6.4	6.4	\$4,032.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
2	02/02/20	Representation of Estate	Correspondence re corrected briefs re intervention and supplemental in support of program and related correspondence.	\$630.00 hr	2.1	2.1	\$1,323.00	Vague; block billing - amount of time spent on each activity not specified  Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)  Unrelated Activity ("program" appears to be reference to victims compensation fund)
3	02/08/21	Representation of Estate	Review motion papers, research same and correspondence reply to emergency motion freeze assets	\$660.00 hr	4.3	4.3	\$2,838.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
4	02/09/21	Representation of Estate	Strategize on opposition to AG motion to freeze assets and standard and research same and related advice to clients	\$660.00 hr	5.9	5.9	\$3,894.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
			r r dr		18.7	18.7	\$12,087.00	
			r dr			\$0	\$0.00	
			r dr				\$12,087.00	
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5	01/23/20	Representation of Estate	Review Motion for Intervention and Opposition to Claims Program, research re the same, and strategize response.	\$500.00 hr	2.8	2.8	\$1,400.00	Vague; block billing - amount of time spent on each activity not specified  Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)  Unrelated Activity (Opposition to Claims Program)
6	01/29/20	Representation of Estate	Review / edit Opposition to Motion for Intervention.	\$500.00 hr	1.6	1.6	\$800.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)

7	01/30/20	Representation of Estate	Preparation for hearing including proposed agenda, proposed witnesses, and hearing binders, and review of quarterly accounting and edit of the same.	\$500.00 hr	2.9	2.9	\$1,450.00	Vague; block billing - unclear to which "hearing" the entry refers and amount of time spent on each activity not specified  Unrelated Activity (quarterly accounting; 2/4/20 hearing (if, in fact, that is the hearing being referenced) related to multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets)  Clerical (hearing binders)
8	01/31/20	Representation of Estate	Incorporation of final edits to Opposition to Motion to Intervene, Supplemental Brief, and Reply to Opposition to Motion for claims Program.	\$500.00 hr	4.8	4.8	\$2,400.00	Vague; block billing - amount of time spent on each activity not specified  Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)  Unrelated Activity ("Opposition to Motion for claims program appears to be reference to victims compensation fund)
9	02/03/20	Representation of Estate	Preparation for hearing.	\$500.00 hr	4.5	4.5	\$2,250.00	Vague - unclear to which hearing this entry refers  Unrelated Activity (2/4/20 hearing (if, in fact, that is the hearing being referenced) related to multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets)
10	02/04/20	Representation of Estate	Appearance at hearing for Estate.	\$500.00 hr	4.5	4.5	\$2,250.00	Vague - unclear to which hearing this entry refers  Unrelated Activity (2/4/20 hearing (if, in fact, that is the hearing being referenced) related to multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets)
11	02/04/21	Representation of Estate	Review Motion to Freeze assets filed by AG and consider response to the same.	\$500.00 hr	0.3	0.3	\$150.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
12	02/08/21	Representation of Estate	Edits to opposition to A.G. Motion for Emergency Relief (including related research).	\$500.00 hr	7.4	7.4	\$3,700.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
13	02/09/21	Representation of Estate	Review revised Opposition to Motion to Freeze Assets and final version for filing the same.	\$500.00 hr	0.7	0.7	\$350.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
14	02/18/21	Representation of Estate	Preparation for in camera hearing.	\$500.00 hr	1.6	1.6	\$800.00	Vague - unclear to which hearing this entry refers  Unrelated Activity (Presumably this relates to Hearing Re EVC Fund and GVI Motion listed in entry below; EVC fund not related to Government's Motion to Intervene or Government's Motion to Freeze Assets)
15	02/19/21	Representation of Estate	Appearance at in camera hearing re EVC fund and GVI Motion	\$500.00 hr	1.6	1.6	\$800.00	Vague - unclear to which "GVI Motion" this entry refers (presumably the Government's Motion to Freeze Assets)  Unrelated Activity (Hearing Re EVC Fund)

16	03/18/21	Representation of Estate	Review Notice of Appeal and assist with responding to the same.	\$500 hr	0.5	0.5	\$250.00	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
17	03/23/21	Representation of Estate	Review draft response to notice of appeal and comments regarding the same as well as review of filing deadline issue.	\$500 hr	0.5	0.5	\$250.00	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
18	03/29/21	Representation of Estate	Review finalized response to notice of appeal for filing.	\$500 hr	0.2	0.2	\$100.00	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
19	02/07/22	Representation of Estate	Review of Order disposing of Government's appeal of orders of intervention and to freeze assets.	\$500 hr	0.3	0.3	\$150.00	
			r r r r r		34.2	34.2	\$17,100.00	
			r r r			\$0	\$0.00	
			r r r r				\$17,100.00	
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20	01/24/20	Representation of Estate	Researched intervention in probate matters and relevant Virgin Islands rules and statutes.	\$360.00 hr	2.2	2.2	\$792.00	
21	01/26/20	Representation of Estate	Researched law relating to opposition to Government's Motion to Intervene, including whether Estate may be named as party and whether Government may intervene in probate proceeding.	\$360.00 hr	4.3	4.3	\$1,548.00	
22	01/27/20	Representation of Estate	Continued drafting memorandum on Government's Motion to Intervene.	\$360.00 hr	0.9	0.9	\$324.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
23	01/27/20	Representation of Estate	Researched case law for opposition to Government's Motion to Intervene.	\$360.00 hr	1.1	1.1	\$396.00	
24	01/28/20	Representation of Estate	Drafted Opposition to Motion to Intervene.	\$360.00 hr	5	5	\$1,800.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
25	01/28/20	Representation of Estate	Began to prepare exhibits for February 4 hearing.	\$360.00 hr	0.2	0.2	\$72.00	Unrelated Activity (2/4/20 hearing related to multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets)
26	01/29/20	Representation of Estate	Reviewed Opposition to Government's Motion to Intervene.	\$360.00 hr	0.5	0.5	\$180.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)

27	01/29/20	Representation of Estate	Reviewed and revised Opposition to Motion to Intervene.	\$360.00 hr	0.9	0.9	\$324.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
28	01/30/20	Representation of Estate	Edits to Opposition to Government's Motion to Intervene.	\$360.00 hr	0.5	0.5	\$180.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
29	02/01/20	Representation of Estate	Prepared binders for February 4 hearing.	\$360.00 hr	5	5	\$1,800.00	Unrelated Activity (2/4/20 hearing related to multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets) Clerical Work
30	02/08/21	Representation of Estate	Reviewed citation in AG's emergency motion to title 15, "section 302(b)" and reviewed title 15 of the Virgin Islands Code.	\$360.00 hr	0.6	0.6	\$216.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
			r M r r		21.2	21.2	\$7,632.00	
			r M r r			\$0	\$0.00	
			r M r r				\$7,623.00	
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31	01/31/20	Representation of Estate	Further Revised Opposition to Motion to Intervene	\$400 hr	1.2	1.2	\$480.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
32	02/01/20	Representation of Estate	Corrected Opposition to GVI's Motion to Intervene; revised proposed agenda for February 3, 2020; reviewed pending motions	\$400 hr	2.2	2.2	\$880.00	Vague; block billing - unclear to which "pending motions" this entry refers and amount of time spent on each activity not specified  Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)  Unrelated Activity (proposed agenda for February 3, 2020; reviewed pending motions)
33	02/04/21	Representation of Estate	Calendared deadline for response to GVI's emergency motion; tried to gain access to court website for docket; called clerk's office to determine when GVI emergency motion was filed; communication w/team re strategy.	\$400 hr	1.8	1.8	\$720.00	Vague; block billing - unclear what is meant by "communication w/team re strategy" and amount of time spent on each activity not specified  Clerical Work (calendared deadline; tried to gain access to court website for docket; called clerk's office)
34	02/08/21	Representation of Estate	Researched re other probate cases and requests for injunctive relief; Reviewed Feb. 4 hearing transcript re AG's standing in probate for inclusion in opposition	\$400 hr	3.1	3.1	\$1,240.00	

35	02/10/21	Representation of Estate	Calendared in camera conference w/judge re GVI's Emergency Motion to Freeze Estate's Assets	\$400 hr	0.2	0.2	\$80.00	Clerical Work
36	02/12/21	Representation of Estate	Reviewed government's notice of complaint filing related to emergency motion to immediately freeze all estate assets and cash on hand.	\$400 hr	0.2	0.2	\$80.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
37	03/12/21	Representation of Estate	Reviewed docket and Order denying GVI's motion to intervene	\$400 hr	0.2	0.2	\$80.00	
38	03/23/21	Representation of Estate	Researched computation of time for response to appeal; reviewed court docket; reviewed and commented on draft response to notice of appeal.	\$400 hr	1.2	1.2	\$480.00	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing and drafting and/or editing response to the Government's Petition for Review)
39	04/07/21	Representation of Estate	Reviewed and circulated to clients clerk's notice re docketed appeal; email communication to clerk of court re impact of notice and already filed Estate's response to notice of appeal; communication w/clients and legal team re judicial assignment	\$400 hr	0.6	0.6	\$240.00	
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			r r dr d			\$0	\$0.00	
			r r dr d				\$4,280.00	

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40	01/31/20	Representation of Estate	Proofread/edit Supplemental Brief, Opposition to Motion to Intervene and Reply to Opposition to Claims Program; prepare same and First Quarter Account for filing with the Probate Court; hand deliver same; prepare mailing of all to Government; hand deliver to Post Office.	\$135.00 hr	2.5	2.5	\$337.50	Vague; block billing - amount of time spent on each activity not specified  Unrelated Activity (Reply to Opposition to Claims Program; prepare same and First Quarter Account for filing with the Probate Court; hand deliver same; prepare mailing of all to Government; hand deliver to Post Office."  Clerical Work (hand delivering documents to court and mailing documents to Government)
41	02/03/20	Representation of Estate	Proofread/edit/prepare Opposition to Claimants' Motion to Intervene and corrected Opposition to GVI's Motion to Intervene for filing with the Probate Court; hand deliver to Probate Court; hand deliver same to Probate Court; prepare mailings to counsel; receipt and review date stamped same.	\$135.00 hr	2	2	\$270.00	Vague; block billing - amount of time spent on each activity not specified  Clerical Work (hand delivering documents to court and mailing documents to counsel)
42	02/04/20	Representation of Estate	Assist with copies for hearing	\$135.00 hr	0.5	0.5	\$67.50	Clerical Work
43	02/28/20	Representation of Estate	Receipt and review original GVI's Opposition to Emergency Motion for Order Releasing Funds; file in Client file folder.	\$135.00 hr	0.2	0.2	\$27.00	Vague; block billing - amount of time spent on each activity not specified  Unrelated Activity (Motion for Order Releasing Funds)  Clerical Work (filing documents)

44	02/09/21	Representation of Estate	Receipt, review, placed in file GVI's Emergency Motion to Immediately Freeze Assets.	\$135.00 hr	0.2	0.2	\$27.00	Vague; block billing - amount of time spent on each activity not specified Clerical Work (filing documents)
45	02/10/21	Representation of Estate	Proofread/edit/prepare/e-file Opposition to AG's Emergency Motion to Freeze Assets.	\$135.00 hr	1.1	1.1	\$148.50	Clerical Work (proofreading; filing)
46	02/17/21	Representation of Estate	Receipt, review, and place in file date \$135.00 hr stamped Opposition to Emergency Motion.	\$135.00 hr	0.3	0.3	\$40.50	Vague; block billing - amount of time spent on each activity not specified Clerical Work (filing documents)
47	03/18/21	Representation of Estate	Receipt, review, and place in file AG's Notice of Appeal and Petition for Review.	\$135.00 hr	0.3	0.3	\$40.50	Vague; block billing - amount of time spent on each activity not specified Clerical Work (filing documents)
48	03/29/21	Representation of Estate	Proofread/edit/prepare/e-file Opposition to Notice of Appeal.	\$135.00 hr	1	1	\$135.00	Clerical Work (proofreading; filing)
49	03/31/21	Representation of Estate	Receipt, review, and place in file date stamped Response to Government's Notice of Appeal.	\$135.00 hr	0.4	0.4	\$54.00	Vague; block billing - amount of time spent on each activity not specified Clerical Work (filing documents)
			r r		8.5	8.5	\$1,147.50	
			r				\$0.00	\$0.00
			r					\$1,147.50
			r r					
			r r					\$42,246.50
			r d r		93.3	93.3	\$42,246.50	
			r r d	M	d			
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50	01/28/20		Communications with client group re February 4 hearing (.4); review draft opposition to AG's motion to intervene (1.1).	1,315.00	1.50		1,972.50	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)  Unrelated Activity (February 4 hearing involved multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets)
51	01/29/20		Revise draft opposition to USVI AG's motion to intervene.	1,315.00	2.70		3,550.50	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
52	1/30/20		Revise draft opposition to USVI AG's motion to intervene.	1,315.00	1.80		2,367.00	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
53	1/31/20		Revise opposition to USVI AG's motion to intervene.	1,315.00	0.9		1,183.50	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)
54	2/2/20		Revise draft opposition to claimants' motion to intervene in USVI proceeding.	1,315.00	2.3		3,024.50	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to drafting and/or editing opposition to the Government's Motion to Intervene)

55	2/4/20		Prepare for and attend USVI probate court hearing.	1,315.00	5.1		6,706.50	Unrelated Activity (2/4/20 hearing related to multiple motions - not just the Government's Motion to Intervene and Government's Motion to Freeze Assets)
56	2/5/21		Draft response to USVI AG's emergency motion.	1,251.00	4.4		5,504.40	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
57	2/6/21		Draft and revise opposition to USVI AG's emergency motion.	1,251.00	5.9		7,380.90	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
58	2/7/21		Draft and revise opposition to USVI AG's emergency motion.	1,251.00	6.2		7,756.20	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
59	2/8/21		Communications with USVI counsel and revise draft response to USVI AG's emergency motion to freeze assets and expenses.	1,251.00	4.8		6,004.80	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
60	2/9/21		Revise draft response to emergency motion.	1,251.00	5.1		6,380.10	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
61	2/10/21		Communications with R. Kahn, D. Indyke re opposition to USVI emergency motion, and revise same.	1,251.00	1.2		1,501.20	Duplication (Attorneys Weiner, Heymann, Kroblin, Whalen, and Andrade all bill time to reviewing, drafting, and/or editing opposition to the Government's Motion to Freeze Assets)
62	2/19/21		Prepare for and participate in USVI Probate Court conference re EVCP funding, and report to clients re same.	1,251.00	4.4		5,504.40	Unrelated Activity (conference relating to EVCP funding)
63	3/18/21		Review appeal filed by USVI AG and communications re same.	1,251.00	0.5		625.50	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and editing response to the Government's Notice of Appeal)
64	3/21/21		Draft response to USVI AG's appeals from Magistrate Judge's orders.	1,251.00	3.8		4,753.80	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
65	03/22/21		Revise draft response to USVI AG's appeal.	1,251.00	1.40		1,751.40	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
66	03/23/21		Revise draft response to USVI AG appeal, and communications with client team, USVI counsel re same.	1,251.00	0.80		1,000.80	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
67	03/25/21		Revise draft response to USVI AG's appeal, and communications with client team, USVI counsel re same.	1,251.00	1.10		1,376.10	Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
68	03/26/21		Revise draft response to USVI AG's appeal, and communications with USVI counsel re same.	1,251.00	0.70		875.70	Vague; block billing - unclear whether USVI counsel is Estate's local counsel or counsel for the Government and amount of time spent on each activity not specified  Duplication (attorneys Weiner, Kroblin, and Andrade all billed for reviewing, drafting and/or editing response to the Government's Notice of Appeal)
69	03/27/21		Respond to client inquiry re draft response to USVI AG appeal (.20); communications with USVI counsel re same (.10).	1,251.00	0.30		375.30	Vague - unclear whether USVI counsel is Estate's local counsel or counsel for the Government  Duplication (if USVI counsel refers to Estate's local counsel and there was a meeting with only attorneys for the Estate in attendance)

70	03/29/21		Communications with USVI counsel re opposition to USVI AG's appeal.	1,251.00	0.30		375.30	Vague - unclear whether USVI counsel is Estate's local counsel or counsel for the Government  Duplication (if USVI counsel refers to Estate's local counsel and there was a meeting with only attorneys for the Estate in attendance)
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