

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

RODIER & RODIER, P.A.,

CASE NO: CACE 13-07337 (21)

Plaintiff,

Fla. Bar No.: 657476

vs.

DAVID CASSIDY,

Defendant.

AMENDED COMPLAINT

Plaintiff, RODIER & RODIER, P.A., by and through the undersigned counsel, hereby
sues Defendant, DAVID CASSIDY, and states as follows:

1. This is an action for damages in excess of Fifteen Thousand Dollars
(\$15,000.00), exclusive of costs, interest and attorney's fees.

2. At all times material hereto, the Plaintiff, RODIER & RODIER, P.A., was and
is a corporation conducting business in Broward County, Florida.

3. At all times material hereto, Defendant, DAVID CASSIDY, was and is a
resident of Broward County, Florida.

4. At all times material hereto, Plaintiff was and is a law firm with its principle
place of business at 400 N. Federal Highway, Hallandale, Florida 33009.

5. Defendant requested Plaintiff to perform services on behalf of Defendant, to
wit, representing and defending Defendant against claims of material misrepresentation,
breach of oral contract, breach of fiduciary duty and unfair and deceptive trade practices in
the case of Edward Lipton v. David Cassidy, Broward County Case #2007-03197 CACE
(03).

COUNT I - BREACH OF AGREEMENT TO PAY FOR LEGAL SERVICES

6. Plaintiff and Defendant entered into an agreement for legal representation where Plaintiff agreed to perform legal services on behalf of Defendant and Defendant agreed to pay Plaintiff for said legal services and costs. Specifically, on or about November 28, 2006, Defendant contacted Plaintiff by telephone advising he was being threatened with a cause of action for damages arising out of the purchases and sales of thoroughbred race horses. Defendant requested Plaintiff to represent him and defend him in such action and Plaintiff agreed to represent and defend Defendant at the rate of \$400 per hour plus costs, which Defendant accepted. Accordingly, Plaintiff began legal representation and work at Defendant's direction.

7. Following the commencement of work, Plaintiff sent Defendant detailed billing invoices for the work performed. Defendant began making payments for legal services he hired Plaintiff to perform. The last payment for legal services was made by Defendant on March 26, 2010.

8. In all, Plaintiff performed legal services on behalf of Defendant from November 2006 through March 2011 and provided Defendant detailed billing invoices totaling \$134,221.50 for all legal services rendered and costs expended. A copy of Plaintiff's billing invoice is attached hereto as Exhibit "A". At all times up until April 18, 2012, defendant promised to pay but never did, and finally on April 18, 2012, defendant affirmatively represented that no payment would ever be made, thereby breaching the agreement.

9. Defendant breached his obligations to the Plaintiff by refusing or otherwise failing to pay Plaintiff in full for the legal services rendered. Specifically, Defendant has made only limited payments to Plaintiff in the amount of \$25,000.00. There is still a balance of \$109,221.50 due and owing, which Defendant promised to pay but has since refused to pay.

10. Accordingly, Plaintiff has been damaged and is entitled to recover the full value of the services that were provided to Defendant plus all applicable interest and costs. Prejudgment interest to date totals \$5,428.94 and continues to accrue.

COUNT II – QUANTUM MERUIT

11. In the alternative, Plaintiff is entitled to recover his legal fees from Defendant under the doctrine of Quantum Meruit.

12. The Defendant requested that Plaintiff perform legal services for the benefit of the Defendant. Specifically, on or about November 28, 2006, Defendant contacted Plaintiff by telephone advising he was being threatened with a cause of action for damages arising out of the purchases and sales of thoroughbred race horses. Defendant requested Plaintiff to represent him and defend him in such action and Plaintiff agreed to represent and defend Defendant at the rate of \$400 per hour, which Defendant accepted. Accordingly, Plaintiff began legal representation and work at Defendant's direction.

13. Plaintiff performed the legal services as requested to the satisfaction of the Defendant from November 2006 through March 2011 and provided Defendant detailed billing invoices totaling \$134,221.50 for all legal services rendered and costs expended. Plaintiff's billing invoice is attached hereto as Exhibit "A".

14. Defendant was aware that Plaintiff expected to be compensated.

15. The Defendant made only limited payments to Plaintiff totaling \$25,000.00 and has not paid the Plaintiff in full for the legal services rendered. Defendant has been unjustly enriched by reaping the benefits of the legal services he ordered and directed plaintiff to perform, but as of April 18, 2012, has affirmatively refused to pay for those services.

16. Accordingly, Plaintiff is entitled to the reasonable value of the legal services that were provided to Defendant plus all applicable interest and costs.

WHEREFORE, Plaintiff, RODIER & RODIER, P.A., demands judgment for damages against the Defendant, DAVID CASSIDY, interest, costs and whatever additional relief this honorable court deems equitable and just.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the within document was sent via e-mail to Andrew D. Wyman, Esq., 312 S.E. 17th Street, Second Floor, Fort Lauderdale, Florida 33316 @ awyman@lawspgh.com and jcolabelli@lawspgh.com on this 22nd day of APRIL 2013.

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By: 

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Fla. Bar No. 42250
R. BRIAN BOYD, ESQ.
Fla. Bar #: 0657476

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
11/28/2006	Phone Conference with David re initial facts and scope of representation	0.4
11/30/2006	Phone Conference with David re additional facts and urgency of contacting Lavin	0.2
11/30/2006	Letter of Representation to Lavin	0.2
12/1/2006	Extended detailed Teleconference with DC	0.65
12/1/2006	review of email pdf and jpeg attachments pertaining to dispute	0.25
12/3/2006	Extended TC with Gary re Ed Lipton, character, prior statements, etc.	0.5
12/3/2006	Review and memorialization of facts revealed by Gary	0.2
12/3/2006	Extended email to DC outlining all issues, theories and legal plan	0.5
12/4/2006	Rec of fax from DC, all prior emails between DC and EL	0.6
12/4/2006	Extended Telephone conference with DC	0.5
12/4/2006	Rec of email from DC	0.1
12/4/2006	Extended TC with Lavin re case aimed at resolution and posturing our position.	0.75
12/4/2006	Email to client	0.1
12/6/2006	Extended & detailed letter to Lavin re our position and analysis rejecting claim	0.4
12/6/2006	TC with DC re proposed letter to Lavin, style and substance	0.2
12/15/2006	TC with DC re Ed trying to get breeding records	0.2
12/20/2006	TC with DC	0.15
12/20/2006	2nd TC with DC	0
12/20/2006	3rd TC with DC	0.1
12/21/2006	Letter from Lavin re records and Half Heaven purse	0.2
12/21/2006	TC with Lavin re Half Heaven and records, global resolution for Purse proceeds	0.5
12/21/2006	TC with DC while in Ocala, TC with friend Ed re Lipton, fax of letters to DC	0.35
12/21/2006	Pull statute cited by Lavin, TC w/Lavin to advise only applies to registered entities	0.4
12/22/2006	Letter from Lavin, extended, re records and Lipton's refusal to sign release	0.3
12/22/2006	TC w/Lavin re mediation for global settlement, research validity of purse claim	0.4
12/29/2006	TC w/DC re case Status, could not talk, off to Detroit	0
2/9/2007	Rec of email from Andy Lavin, with lawsuit attached	0.2
2/9/2007	Detailed review of 12 page complaint and letter	0.6
2/9/2007	TC with Lavin re complaint, cannot agree to accept service w/our client consent	0.2
2/9/2007	TC with David to advise of complaint and Lipton's intentions, discussed merit	0.25
2/23/2007	Email to DC re complaint filed and Judge	0.2
2/23/2007	Further review of complaint for creation of file memo outlining allegations	1.25
2/27/2007	Email from Lavin, email forwarded to DC	0.2
3/15/07	TC with Andrew Lavin re extension to respond to complaint	0.25
3/15/07	Draft LT DAT requesting extension	0.2

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

3/15/07 DFT proposed order	0.2
3/16/07 RR 3/16/07 LF Lavin w proposed agreed order & website pages	0.3
3/16/07 TCT Lavin - left message	0.1
3/16/07 TCF Lavin - re his agreed order is fine	0.2
3/20/2007 TC with BB and Lavin, follow up email to DC	0.25
3/22/07 RR 3/19/07 Letter from opposing counsel to Judge w enclosed order	0.2
3/28/07 RR executed order from Judge	0.1
4/6/07 Research misrepresentation cause of action	0.6
4/6/07 Research breach of oral contract cause of action	0.55
4/6/07 Research breach of fiduciary duty cause of action	0.7
4/6/07 Research deceptive and unfair trade practices cause of action	1.15
DFT & RVS Motion to dismiss for failure to state a cause of action or in the alternative motion for more definite statement	1.45
4/6/07 DFT motion to stay discovery	0.3
4/25/07 Prepare argument outline for hearing on Motion to Stay	0.5
4/25/07 RS case law, Florida Rules of Court	1.5
4/25/07 DFT e-mail to BMR	0.3
4/26/07 TF office to Court House (rush hour)	0.7
4/26/07 AT hearing on Motion to Stay	0.65
4/26/07 Travel from courthouse to office	0.45
4/26/07 Calendar discovery response due date	0.1
TC with DC re case, meeting set via telephone for 5/9/07, discussed discovery and tasks to be completed prior to	
5/2/2007 conference	0.25
5/2/2007 email from Lavin	0.1
5/9/2007 review of discovery documents in preparation for conference with DC	0.75
TC w/DC re completing discovery responses and case strategy discussion, filing of PFS re Canadian win proceeds,	
5/9/2007 slander	0.8
5/9/2007 TC with Louise re production documents and information required	0.2
5/9/2007 Follow up TC with David re my TC with Louise, documents in his exclusive possession, filing of 57.105 motion	0.25
TC with Lavin re case, deadlines for discovery and extension request, timetable if extension cannot be met, requested	
5/9/2007 letter	0.25
Preparation of formal responses to interrogatories, file with court, served upon Lavin. Letter to Lavin re production	
5/14/2007 progress	0.65
5/14/2007 TC with Louise re items for production, discussed extent of what she had and she was directed to UPS package	0.2
5/16/2007 Rec and rev email letter from Lavin, cross ref to responses and email back reply	0.25

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

5/16/2007	Email to David re Lavin correspondence	0.05
5/24/07	RR 5/16/07 Letter from Lavin re: Motion to Compel	0.1
5/24/07	Multiple strategy emails with BMR	0.25
5/30/07	RR 5/23/07 Letter from Lavin	0.1
5/30/07	RR Motion to Compel and Proposed Order on the same	0.15
5/31/2007	rec of email ans attachment re May 19 article feature, email back to DC re clarification	0.75
6/5/07	RR Re-notice of hearing	0.1
6/5/07	RR order on Motion to Compel response to Request for Production	0.1
6/12/07	Receive and Analyze Notice of Production from Non-Party (RUSSELL)	0.25
6/12/07	Draft objection to Notice of Production from Non-Party (RUSSELL)	0.2
6/13/07	Revise response to request for production	1.15
6/13/07	RR Motion for Sanction & hearing	0.25
6/15/07	TCT Lavin re we already responded to their Request for Production and attempt to work out Motion to Compel	0.3
6/15/07	Draft E-Mail re better answers	0.2
6/18/07	RR letter from Lavin re 6/21/07 hearing	0.1
6/19/07	Prepare for hearing on Motion to Compel better answers	0.3
6/19/07	TF office to Court House (rush hour)	0.7
6/19/07	Attend hearing on Motion to Compel	0.7
6/19/07	TF Court house to Office	0.4
6/19/07	DEC to BMR detailing judge's order and need for further information	0.3
6/20/07	RR letter from Lavin re Motion to Compel hearing	0.1
6/20/07	TCT Lavin re responses and what he will likely raise as objections	0.25
6/21/07	Draft Memo to File re the likely objections	0.25
6/23/07	RR LF Lavin re proposed agreed order on Motion to Dismiss	0.1
6/23/07	RR LT Judge with proposed agreed order	0.2
6/23/07	RR Email from Lavin re proposed agreed order + letter	0.1
6/25/07	RR agreed order on motion to dismiss; cal response dates	0.2
6/26/07	RR Motion to Compel Better Response to Request for Production	0.35
6/26/07	Draft Memo to File	0.2
6/29/07	RR Notice of Hearing on hearing of 7/10/07	0.1
6/29/07	RR Motion to Compel (Request for Production) with attachments	0.25
7/5/07	RR Letter from opposing counsel re responses to Request for Production and Interrogatories	0.2
7/5/07	RR Motion to Compel Better Answers to Interrogatories	0.2
7/5/07	RR Notice of Hearing re Better Answers to Interrogatories	0.1
7/5/07	Draft Memo to File re need better Answers to Interrogatories per court order	0.2
7/9/07	RR Letter from Lavin re hearing of 7/10/07	0.2

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

7/10/07 Prepare for hearing on Def's Motion to Compel better response to Request for Production	0.4
7/10/07 TF office to Court House (rush hour)	0.7
7/10/07 Attend hearing	0.9
7/10/07 TF Court House to office	0.6
7/10/07 Note file re results of hearing & calendar to do	0.2
7/11/07 RR Letter from Lavin with attached order	0.1
7/13/07 RR letter from Lavin re Motion to Dismiss	0.2
7/13/07 Analyze complaint to Prepare for phone call with opposing counsel	0.25
7/13/07 TC with opposing counsel	0.25
7/13/07 TC with opposing counsel re agreed order in lieu of hearing	0.2
7/16/07 RR 7/11/07 Letter from Lavin	0.1
7/16/07 DFT Proposed Agreed Order on Motion to Dismiss	0.2
7/16/07 DFT Letter to Lavin	0.2
7/16/07 TCT Pam @ Lavin's office	0.2
7/16/07 Draft E-Mail to opposing counsel with attachments,	0.1
7/16/2007 Review of interrogatories supplemental deficiencies to be addressed	0.5
7/17/07 TCF Lavin in Colorado re Motion to Dismiss	0.3
7/17/2007 email from DC re Contessa and Seltzer	0.05
7/18/07 TCT Lavin re Motion to dismiss	0.2
7/18/07 Draft and Revise agreed order	0.2
7/20/07 Revise Letter to lavin re revised Agreed Order	0.2
7/20/07 FN revised Agreed order	0.1
7/20/07 TC with opposing counsel	0.2
7/20/07 TCF lavin - he will be sending me a revised agreed order	0.2
7/20/07 RR Letter from Lavin and proposed agreed order	0.2
7/20/07 TCT opposing counsel to request extension to respond to Interrogatories & agreed order is ok	0.2
7/20/07 RR letter from Lavin to Judge	0.1
7/20/2007 TC with David re case, rogs and status update	0.5
7/20/2007 review of lavin letter re agreed order and his new version of order giving us more definite statement of his claims	0.2
7/23/07 Receive E-Mail from lavin re going to hearing tomorrow	0.1
7/23/07 TCT Lavin to work out issues in lieu of hearing	0.3
7/23/07 Receive proposed agreed order for hearing of 7/24/07	0.2
7/23/07 TCT lavin re changes	0.2
7/23/07 RR revised proposed order and letter to judge	0.2
7/23/07 TC with David Cassidy, conference in Ed Seltzer draft notes to respond to interrogatories	0.8
7/23/07 DFT Memo to File re seltzer	0.35

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

7/23/07	Begin draft of Amended Answer to Interrogatories	0.35
7/24/07	Continued draft of Amended Answers to Interrogatories	0.35
7/24/07	Initial TCT Louise Russell re introduction and necessity of documents	0.3
7/24/07	Draft E-Mail to Louise	0.1
7/24/07	Prepare documents for Louise	0.2
7/24/07	Fax from Cassidy re Lipton's convictions	0.2
7/25/07	Complete draft of Interrogatories responses	0.35
7/25/07	Receive E-Mail from Louise x2	0.2
7/25/07	Draft E-Mail to Louise x2	0.2
7/25/07	Fax to Louise	0.1
7/25/07	TCF Louise re all horses or just the ones owned by the parties	0.3
7/25/07	TCT BMR - discuss court's ruling	0.2
7/26/07	FN amended Interrogatories	0.2
7/26/07	TCT Louise re production of additional documents	0.2
7/26/07	TCF BMR re Amended Answers to Interrogatories	0.2
7/26/07	TCT Ed Seltzer re deposition dates	0.2
7/26/07	Draft E-Mail to BMR re depo of seltzer	0.2
7/26/07	DFT Notice of Taking Deposition Ed Seltzer	0.2
7/31/07	TCT Cassidy re jurat page and review of	0.25
7/31/07	FN Amended Answers to Interrogatories	0.2
7/31/07	Receive E-Mail from Louise Russell	0.1
7/31/07	TCT Louise Russell	0.2
8/1/07	Receive E-Mail from Louise that documents are being sent	0.2
8/3/07	Initial review of documents sent from Louise for production re horses in common	1.85
8/6/07	Initial review of documents sent from Louise for production re horses NOT in common	2.3
8/6/07	TCT Lavin	0.2
8/6/07	DFT Letter to Lavin re production	0.2
8/6/07	DFT Amended Response to Request for Production	0.25
8/6/07	TCT Copy service	0.2
8/7/07	RR Executed Agreed Order on Add'l production and rogs	0.1
8/7/07	RR Invoice for copies of add'l production, DFT Letter to Lavin, fax	0.25
8/7/07	TCT Lavin's office - Pam re payment of invoice prior to picking up documents	0.2
8/10/07	Pick up copies from Sav Quick	0.3
8/10/07	RR check and letter from Lavin	0.1
8/13/07	TCT Lavin re pick up documents	0.2
8/13/07	T/C from Lavin's office that they are sending their courier for docs.	0.1

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

8/20/07 opposing counsel requesting seltzer to be rescheduled.	0.1
8/20/07 TCT Lavin	0.25
8/20/07 TCT Seltzer	0.1
8/20/07 DFT Subpoena Duces Tecum Seltzer	0.2
8/20/07 DFT Amended Notice of Taking Deposition Seltzer	0.1
8/20/07 Draft E-Mail to BMR	0.1
8/20/07 DFT Notice of Taking Deposition of Lipton	0.2
8/22/07 RS affirmative defenses for answer to amended complaint	1.85
8/22/07 DFT and FN answer to amended complaint	0.8
8/22/07 Draft E-Mail to BMR re amended complaint	0.1
8/22/07 Receive E-Mail from BMR re extension	0.1
8/22/07 TC with opposing counsel	0.2
8/22/07 Draft E-Mail to BMR	0.1
8/23/07 cover letter for 2 Notice of Taking Deposition to Lavin	0.2
8/30/07 RR Letter of August 28, 07 from Lavin	0.1
8/31/2007 Extended TC with DC re finalizing response to amended answer and affirmative defenses	0.75
8/31/2007 Formal editing and final prep and scan of answer to amended complaint	0.35
9/3/2007 email to David re Answer	0.1
9/10/07 RS Plea for Attorney's Fees under Fla. Stat 501.2105	0.95
9/17/07 Multiple TCs with opposing counsel re deposition of Lipton	0.55
9/19/07 DFT Proposal for Settlement	1.1
9/19/07 DFT Plea for Attorney's Fees	0.3
9/19/07 RR 9/19/07 Letter from Lavin	0.2
9/19/07 RR 57, 105 Motion (proposed)	0.25
9/23/2007 Letter from Lavin	0.2
9/23/2007 TC with Lavin re Contessa; arrangement for him to come to Florida	0.25
9/23/2007 Review of file to begin track of to do items; evidence needed to complete MSJ on Statute of Fraud	1.25
9/24/07 RR 9/19/07 Letter from opposing counsel	0.1
9/24/07 RR mailed OJ (we already received the faxed version); verify no changes	0.5
9/24/07 RR 9/20/07 Letter from opposing counsel	0.1
Multiple TC with Seltzer re: subpoenas; verify service on Seltzer; letter to Lavin; letter to Esquire; 2 Amended NTD-DT;	
9/24/07 2 Subpoenas	0.85
9/24/07 TCT opposing counsel re moving depositions due to Hurricanes & Moving seltzer deposition	0.2
10/2/07 DFT Letter to court with amended Notice of Taking Deposition	0.2
10/2/07 Draft Duces Tecum for Notice of Taking Deposition Lipton	
10/3/07 RR letter from OC re objection to production and Motion for Protective Order	1.35

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

10/3/07 RR Motion for Protective Order	0.2
10/3/07 Lax to Mia travel	6.5
10/4/07 BMR 1 hour conversation with Seltzer	1
10/4/07 BMR 2 hour meeting with client	2
Deposition Preparation: Review documents produced in response to request for production, RS Count IV Trade	
10/4/07 Practice, Draft Topic outline; etc	5.25
10/5/07 TF office to deposition	0.5
10/5/07 AT deposition of Lipton (10:45 to 600)	7.3
10/5/07 TF depo to office	0.5
10/5/07 DFT deposition summary	1.55
10/8/07 TCF court reporter Katherine re ordering depo transcript - normal time.	0.1
10/8/07 DFT letter to lavin re copies of exhibits	0.2
10/8/07 Deposition of Ed Seltzer	2
10/8/07 FLL to LAX travel	6.5
10/10/07 RR 10/8/07 letter from lavin re exhibits	0.1
10/10/07 RR 10/8/07 Letter from Lavin re depo of Cassidy	0.1
10/11/07 RR Letter from lavin re e-mails	0.1
10/16/07 RR filed 57.105 motion	0.2
10/22/07 RR 10/15/07 Letter from opposing counsel re production	0.2
10/26/07 Multiple TC with OC's office for extension to answer 2nd Req/Prod	0.3
10/30/07 RR 10.25.07 Letter from Lavin re Cassidy's deposition	0.2
10/30/07 RR Notice of Taking Deposition	0.2
11/2/07 RR 10/31/07 Letter from lavin	0.1
11/2/07 DFT Letter to lavin re depo - haven't spoken to client - bear your own costs	0.2
11/2/07 RR 2nd Request for Production from Lavin	0.2
11/2/07 RR reply	0.15
11/2/07 DFT 1st RQ For Production	0.75
11/6/07 Draft cover ltr to opposing counsel	0.2
11/12/07 RR 11/5/07 letter from opposing counsel	0.1
11/12/07 RR Notice of Hearing on Motion to Compel	0.1
11/12/07 RR Motion to Compel	0.1
11/12/07 DFT Response to Second Request for Production	0.55
11/12/07 DFT Letter to opposing counsel	0.2
11/12/07 DFT Objection, DFT Motion for Clarification and extension of time	0.65
11/13/07 TCF Scott Tuck in Lavin's office. Discuss agreed order in lieu of hearing	0.3
11/13/07 RR proposed agreed order	0.15

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

11/13/07	Draft E-Mail to Scott Tuck - agreed order is ok	0.1
11/13/07	Receive E-Mail from scott tuck re deposition date	0.1
11/13/07	TCT Scott re we haven't been able to speak with our client - no depo date	0.2
11/13/07	RR Motion to Compel Deposition date (mailed)	0.1
11/13/07	DFT Letter to Cassidy re 2nd request and depo date	0.2
11/19/07	Return telephone call to Lavin	0.25
11/26/07	Analyze file re response to 2nd Request for Production	0.3
11/26/07	TCT Lavin re Response to 2nd Request for Production & Deposition date	0.3
11/26/07	DFT Letter to Lavin re Response to 2nd Request for Production	0.2
11/26/07	FN Response to 2nd Request for Production	0.15
12/3/07	E-mail re depo date for Cassidy	0.1
12/3/07	TCT Lavin's office re depo of Cassidy & cancellation of hearing	0.2
12/3/07	TCF Lavin's office re they want to go forward with the hearing unless we give them a December date	0.2
12/4/07	TF office to Court House	0.7
12/4/07	AT hearing on Motion to Compel Depo	0.2
12/4/07	TF Court House to office	0.45
12/10/07	TCF Lavin's office re extension to respond to Request for Production	0.2
12/10/07	RR Letter from opposing counsel re confirming extension	0.15
12/10/07	RR Notice of Hearing on Motion to Compel 1/7/07	0.1
12/10/07	Receive and Analyze Plaintiff Motion to Compel (for hearing on 1/7/07)	0.3
12/12/07	RR 12.10.07 Letter from opposing counsel re extension	0.1
12/12/07	RR Notice of Taking Deposition Cassidy's deposition	0.2
12/12/07	TCT Lavin's office re location of deposition	0.2
12/20/07	DFT M/Compel Response to Request for Production	0.4
12/21/07	TCF Lavin's office re extension to respond to Discovery	0.2
12/21/07	DFT proposed agreed order	0.2
12/21/07	DFT Letter to Lavin re proposed agreed order	0.2
12/21/07	DFT Letter to judge re agreed order	0.2
12/24/07	Receive E-Mail from opposing counsel with attached letter and proposed agreed order	0.25
12/24/07	TCT opposing counsel re our order was already sent to the judge	0.2
1/2/08	FU with opposing counsel re agreed order	0.2
1/2/08	RS FRCP and case law on separating production of documents to pp for hearing on Plaintiff Motion to Compel	0.45
1/2/08	DFT objection to PL's Motion to Compel & Prepare argument outline for hearing	0.35
1/4/08	RR response to Def's 1st Request for Production - no documents attached	0.2
1/4/08	DFT Motion for Sanctions & Motion to continue deposition	0.45
1/4/08	DFT Notice of hearing - add on	0.1

RODIER RODIER, P.A.

DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

1/17/2008 RR Letter from opposing counsel 1.7.08	0.1
1/17/2008 Draft Notice of Cancellation of Hearing	0.1
1/11/2008 RR Executed Order from Judge Granting Defendant Motion to Compel	0.1
1/11/2008 Draft Letter to opposing counsel Response to Request for Production	0.1
1/11/2008 TCF opposing counsel re discovery responses will be here next week	0.2
1/11/2008 Draft Memo to File & e-mail to BMR	0.1
1/14/2008 Draft Motion to Strike Pleadings for Failure to Comply with Discovery	0.75
1/14/2008 Rec and rev request for admissions, forward via email to DC with instructions	0.4
1/16/2008 RR 1.16.08 Letter from opposing counsel re documents responsive to Request for Production	0.1
1/16/2008 TC with Lavin re depositions and production	0.15
1/16/2008 TC with DC re deposition and production, setting Contessa and Louise, strategy, Request for admissions directions	0.25
1/16/2008 TC with Lavin re depositions again	0.15
1/16/2008 Rec and rev letter from Lavin re our letter regarding his failing to comply with promise to tender documents	0.2
1/17/2008 RR 1.17.08 Letter from opposing counsel re Cassidy deposition	0.1
1/17/2008 RR 1.17.08 Notice of Taking Deposition Cassidy	0.1
1/21/2008 TCF opposing counsel re documents responsive to RQ	0.2
1/21/2008 Draft Letter to opposing counsel	0.2
1/22/2008 TCF Lavin re \$0.15 per page	0.25
1/22/2008 TCT Sav-Quick Printing	0.2
1/22/2008 TCT Lavin	0.2
1/22/2008 Draft E-Mail to BMR re copies and moving deposition to Monday	0.1
1/22/2008 RR Letter from opposing counsel 1.22.08 re documents responsive to RQ	0.1
1/23/2008 RR 2nd Letter from opposing counsel 1.22.08 re production of documents	0.1
1/23/2008 RR 1.23.08 Letter from opposing counsel	0.1
1/23/2008 TCT Sav-quick re update on printing	0.2
1/23/2008 RR Request for Admission to Defendant	0.2
1/23/2008 RR Cassidy's e-mail re answers to admissions	0.2
1/23/2008 DFT response to Plaintiff's Request for Admission	0.5
1/23/2008 RR Notice of Depo Cassidy for Saturday (1.26.08)	0.1
1/23/2008 RR 1.17.08 Letter from opposing counsel re confirmation of no sanctions for moving depo	0.1
1/23/2008 Lax to Mia travel	6.5
1/24/2008 Receive E-Mail from Sav-Quick re copies	0.2
1/24/2008 RR Notice of Depo Cassidy for Monday	0.2
1/24/2008 TCT opposing counsel re when can we expect documents	0.2
1/25/2008 Draft Letter to client re response to Request for Production	0.1

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

1/25/2008	Review of Production documents, flag relevant and key emails, process off to DC	2.4
1/26/2008	Meeting with DC re depo prep	1.4
1/28/2008	Deposition of DC	8
1/29/2008	Continuation of Deposition of DC	3.75
1/30/2008	Memo and outline depo notes, further discovery plan	2
1/30/2008	Email to DC re settlement proposal	0.2
1/31/2008	MIA to LAX travel	6.5
2/1/2008	RR Letter from opposing counsel re Contessa and LeJume Depositions	0.1
2/1/2008	Additional email to DC	0.05
2/1/2008	Letter from Lavin re Contessa and LeJume Depositions, email response back to Lavin with cc to DC	0.35
2/14/2008	RR Notice re reading of deposition (Cassidy)	0.1
2/14/2008	TCT court reporters re extension to read as Cassidy is on tour	0.2
2/23/2008	Draft 2nd Request for Production	0.3
3/3/2008	RR 2.29.08 Letter from opposing counsel re Contessa's deposition	0.1
3/27/2008	RR 3.27.08 Letter from opposing counsel re PFS	0.1
3/27/2008	Rec and rev PFS for 200k, Analyze Proposal for Settlement and attached releases, Legal Research into validity	0.85
3/27/2008	Email letter to DC advising of Proposal for Settlement and opinion as to validity	0.35
	Rec and rev Lipton's response to our Request for Production, has audio messages of David, email to Boyd to ensure	
3/31/2008	we get copies	0.2
4/1/2008	TCT opposing counsel re production of voicemails	0.25
4/2/2008	RR Response to 2nd Request for Production	0.15
4/2/2008	TCT Lavin re producing phone messages, depositions, etc	0.25
4/3/2008	RR 4.3.08 Letter from opposing counsel re phone messages & depositions of Contessa, LeJume and Asbury	0.1
4/3/2008	Draft E-Mail to BMR re depositions	0.15
5/20/2008	RR 5.15.08 Letter from opposing counsel re breeder's award	0.2
5/20/2008	TCT opposing counsel re clarifying which horse he is talking about	0.2
7/11/2008	RR 7.11.08 Letter from opposing counsel	0.1
8/27/2008	RR 8.27.08 Letter from opposing counsel	0.1
9/10/2008	RR 9.10.08 Letter from opposing counsel	0.1
9/22/2008	RR Notice of Production from Non Party - NY State Thoroughbred	0.1
9/22/2008	RR Subpoena Duces Tecum to NY State Thoroughbred w attached exhibit A	0.25
9/22/2008	DFT Objection to Notice of Production from Non-party & Subpoena	0.2
9/29/2008	RR 9.29.08 Letter from opposing counsel	0.1
10/1/2008	Letter from Lavin re depositions and unilateral set	0.2
10/1/2008	TC with Lavin	0.3
10/3/2008	TC with DC re Contessa	0.2

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

10/3/2008 TC with Lavin to report on DC availability re Contessa depositions and any others	0.2
12/10/2008 RR 12.10.08 Letter from opposing counsel	0.1
12/10/2008 RR Notice of Taking Deposition Contessa	0.1
12/10/2008 Receive and Analyze Subpoena Duces Tecum Contessa	0.3
12/23/2008 RR Letter from opposing counsel dated 12/23/08	0.1
12/24/2008 RR Letter from opposing counsel dated 12/24/08	0.1
1/13/2009 RR 1.13.09 Letter from opposing counsel	0.1
1/14/2009 RR Re-Notice of Taking Deposition & Subpoena Contessa	0.25
1/15/2009 TC with David re speaking with Contessa for Prep	0.2
1/15/2009 TC with Contessa re case and Florida reschedule	0.3
1/30/2009 Draft Request for Copies Peterson & Smith Equine Hospital	0.25
3/2/2009 Partial Travel for Depo (plus \$680.00 cost below)	6
3/3/2009 Preparation for Contessa Depo, rev of Lipton depo and Selzer, arrange cross and outline of points, rev exhibits/emails	3
3/4/2009 Deposition of Contessa plus travel to/from office	6
3/5/2009 TC with David to advise outcome of Depo, case discussion	0.4
3/11/2009 Rec and rev letter from Lavin with depositions exhibit copies	0.2
6/4/2009 RR 6.4.09 Letter from opposing counsel	0.1
6/4/2009 RR Notice of Taking Deposition DT & SDT Asbury	0.25
6/4/2009 RR Notice of Taking Deposition DT & SDT Keenland	0.25
6/4/2009 RR Notice of Taking Deposition DT & SDT Daly	0.25
9/1/2009 RR 9.1.09 Letter from opposing counsel	0.1
9/1/2009 RR Notice of Taking Deposition DT & SDT Keenland	0.25
9/4/2009 rec and rev several trial subpoenas	0.4
9/30/2009 Preparation for deposition in KY	1.25
10/2/2009 Deposition of Wilkinson of Keenland	2.25
10/2/2009 Deposition of Carson Asbury	2.25
10/3/2009 Letter to client detailing depo - Deposition Summaries	1.5
10/6/2009 RR 10.6.09 Letter from opposing counsel with deposition exhibits	0.3
11/30/2009 RR Notice of Filing Affidavit of Lipton	0.1
11/30/2009 Receive and Analyze Affidavit of Lipton	0.3
11/30/2009 Rec and rev plaintiff's MSJ, attachments and affidavits, review law and statute cited	3
11/30/2009 email to DC	0.1
12/1/2009 Receive and Analyze Plaintiff MSJ	0.75
12/2/2009 RR 12.2.09 Letter from opposing counsel	0.1
12/3/2009 Tom Daly deposition	1.75

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

12/3/2009 Preparation for Tom Daly Depo, review file and notes, prep questions	2
12/3/2009 Tom Daly Deposition Attendance	3
12/3/2009 Post Deposition note review and Deposition summary letter to David	1.5
12/4/2009 RR 12.4.09 Letter from OC with deposition exhibits	0.3
12/10/2009 RR Notice of Hearing 2.24.10 - Plaintiff MSJ	0.1
2/2/2010 Email to DC	0.4
2/4/2010 TC with DC re case and status in response to email re MSJ	0.4
2/8/2010 TC with DC re Contessa and affidavits	0.2
2/8/2010 TC with Contessa re Lipton, Breeder's awards, Half Heaven and affidavit for MSJ	0.35
2/8/2010 Email to DC re pregnant horse sales to Lipton	0.1
2/8/2010 Email response from DC	0.1
2/11/2010 Re-review of MSJ, LR law and pleadings, TC with Marlene, Prep for MSJ defense	3.2
2/12/2010 TC with Silver re Affidavit	0.5
2/12/2010 Draft affidavit for Silver's signature	0.4
2/12/2010 Draft of Contessa Affidavit	0.5
2/12/2010 Draft of Cassidy affidavit	0.85
2/12/2010 TC with Cassidy re Affidavit	0.2
2/15/2010 Draft Letter to Judge re rescheduling MSJ	0.3
2/15/2010 Draft Motion to Continue MSJ	0.3
2/15/2010 Draft Order on Motion to Continue MSJ	0.2
2/15/2010 Amendments to Cassidy Affidavit, email to Sue	0.2
2/16/2010 Email from Silver, wants to add language to affidavit	0.2
2/16/2010 Email to Silver	0.1
2/17/2010 Fax to Contessa	0.1
2/17/2010 TC with Boyd re Contessa affidavit	0.15
2/17/2010 Email from Contessa re changes to his affidavit (4 emails), amendment to affidavit, email for approval	0.45
2/18/2010 Draft fax to opposing counsel	0.1
2/18/2010 Draft Notice of Filing Affidavit of Cassidy	0.1
2/18/2010 Draft Notice of Filing Affidavit of Contessa	0.1
2/18/2010 Draft Notice of Filing Affidavit of Silver	0.1
2/22/2010 Draft Notice of Filing Deposition of Lipton	0.1
2/22/2010 RS on Plaintiffs MSJ & RS to prepare for hearing	3.25
2/22/2010 Letter to Lavin	0.2
2/23/2010 Draft Letter to Judge re Defendant Memo in Opposition to MSJ	0.3
2/23/2010 Draft Memo in Opposition to Defendant MSJ (BMR)	2.5
2/23/2010 Prepare for Hearing on Plaintiffs MSJ	2.5

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

2/23/2010	Preparation of opposition memo to MSJ and delivery to Judge	3.5
2/24/2010	Attend Hearing on Plaintiff MSJ	1.75
3/4/2010	RR Order Denying Plaintiff MSJ	0.35
3/17/2010	RR Letter from opposing counsel to Judge re Motion for Reconsideration	0.1
3/17/2010	Receive and Analyze Plaintiff Motion for Reconsideration	1.25
3/18/2010	Draft Letter to Judge re Opposition to Plaintiff Motion for Reconsideration	0.3
3/18/2010	Draft Opposition to Plaintiff Motion for Reconsideration	2.75
3/18/2010	Draft Order Denying Plaintiff Motion for Reconsideration	0.2
4/20/2010	TCT JA re no ruling on Motion for Reconsideration	0.3
4/20/2010	Resubmit Opposition to Reconsideration	0.3
6/1/10	Receive and Analyze Order setting trial	0.5
8/12/10	Prep planning re expert witnesses & responding to expert Interrogatories	0.3
8/12/10	Objection to Expert Interrogatories #1-7 not yet finalized	0.15
8/18/10	TC with opposing counsel re extending trial deadlines	0.2
8/19/10	Receive E-Mail from opposing counsel re trial deadlines	0.1
8/20/10	RR Letter from opposing counsel re trial deadlines	0.1
8/20/10	Draft E-Mail to opposing counsel re proposed extensions	0.15
8/23/10	FU TC with opposing counsel re extending trial deadlines	0.2
8/24/10	TCF opposing counsel re extension of trial deadlines	0.1
8/24/10	Draft Letter to opposing counsel re agreement to extend trial deadlines	0.2
8/25/10	Letter from opposing counsel re agreement to extend trial deadlines	0.1
8/25/10	Receive E-Mail and letter from opposing counsel re selection of mediator; respond	0.2
9/1/10	Receive E-Mail from opposing counsel	0.1
9/1/10	RR Notice of Production from Non-Party and Subpoena Duces Tecum to Fasig-Tipton	0.25
9/9/10	Draft Objection to Plaintiff's Notice of Production from Non-Party to Fasig-Tipton	0.2
9/23/10	RR Letter from opposing counsel re selection of Bork as their expert	0.05
9/23/10	RR Letter from opposing counsel re Bork's opinions	0.1
9/28/10	Draft Motion to Compel	0.3
9/28/10	Receive Letter from opposing counsel re deposition of Lyn Rainbow	0.1
9/28/10	RR Notice of Taking Deposition Duces Tecum Lyn Rainbow	0.1
9/30/10	RR Amended Notice of Taking Deposition Lyn Rainbow	0.1
9/30/10	Prepare for Mediation; TC with and pre-meeting with client	2
10/1/10	Attend Mediation	4
10/1/10	Draft Notes to file re mediator's opinion	0.5
10/1/10	Draft Motion to Continue Jury Trial and Notice of Hearing	0.5
10/4/10	RR Letter from opposing counsel in response to Motion to Continue	0.1

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

10/11/10 Attend hearing on Motion to continue trial	0.75
10/18/10 E-mail from opposing counsel re resetting trial	0.05
10/21/10 RR Letter from opposing counsel with documents attached from Fasig Tipton	0.65
10/26/10 Receive and Analyze Proposal for Settlement	0.25
10/27/10 Draft Letter to client enclosing Proposal for Settlement	0.2
10/27/10 Draft E-Mail to client	0.05
10/28/10 TC with DC re OJ letter, doesn't have the cash to do pay, note file	0.25
10/29/10 Prepare for Deposition of Lynn Rainbow & review of documents produced by witness in advance	1.15
10/29/10 Deposition of Lynn Rainbow	1
11/4/10 BMR RS and analysis of Proposal for Settlement	0.4
11/5/10 Receive and Analyze new trial order	0.5
11/6/10 RR Letter from opposing counsel re new trial order	0.1
11/24/10 RR Letter from opposing counsel	0.1
11/29/10 E-Mails with opposing counsel re date for disclosure of experts	0.2
11/30/10 Receive E-Mail from opposing counsel re dates for experts	0.05
11/30/10 TCS with Lavh (6)	1.2
12/2/10 Receive and Analyze 3rd Request for Production	0.4
12/2/10 Receive and Analyze 2nd Interrogatories	0.3
12/2/10 RR Letter from opposing counsel re depositions of Wing, Peterson & Smith, Banderoff	0.15
12/2/10 Receive E-Mail from opposing counsel	0.1
12/3/10 Receive E-Mail from opposing counsel with Notice of Taking Deposition and Subpoena for Eric Wing	0.1
12/3/10 Receive E-Mail from opposing counsel with Notice of Taking Deposition and Subpoena for Craig Banderoff	0.15
12/3/10 Draft E-Mail to opposing counsel re court ordered mediation cannot attend 12/21 depositions	0.05
12/3/10 RR Re-Notice of Taking Deposition Eric Wing (location change only)	0.05
12/3/10 RR Notice of Taking Deposition Peterson & Smith	0.1
12/3/10 Draft E-Mail to opposing counsel re unilaterally set depositions	0.1
12/6/10 RR Letter from opposing counsel re dates for depositions	0.1
12/6/10 RR Notice of Taking Deposition Martin Kinsella	0.1
12/6/10 RR 2nd Set of Expert Interrogatories	0.2
12/7/10 RR Letter from opposing counsel re depositions for experts	0.1
12/8/10 Draft Motion for Protective Order, Notice of Hearing and Letter to Judge	1
12/8/10 Draft Notice of Trial Conflict	0.1
12/9/10 RR Order on Motion for Reconsideration on MSJ	0.2
12/9/10 RR Letter from opposing counsel re expert witness disclosure	0.1
12/10/10 Receive and Analyze Expert Witness Disclosure	0.3
12/10/10 Draft Expert Witness Disclosure	0.5

12/13/10	RR Letter from opposing counsel re Motion for protective order	0.2
12/14/10	Hearing on Motion for Protective Order	0.75
12/14/10	E-mail chain with Danny Levin re deposition dates per court order	0.25
12/15/10	RR Letter from opposing counsel re scheduling of experts	0.1
12/15/10	Receive and Analyze Motion to Strike Plaintiff's Experts	0.35
12/17/10	RR Notice of Hearing - Motion to Strike Plaintiff's Experts	0.1
12/20/10	RR Letter from opposing counsel re possibility of settlement	0.1
12/21/10	RR Letter from opposing counsel re order on MPO and depositions	0.15
12/22/10	RR Notice of Taking Deposition Kenny LeJume	0.1
12/22/10	RR Notice of Taking Deposition Craig Banderoff	0.1
12/22/10	RR Notice of Taking Deposition Steven Silver	0.1
12/22/10	RR Notice of Taking Deposition Jeffrey Burke	0.1
12/22/10	RR Notice of Taking Deposition Irv Weiner	0.1
12/22/10	RR Notice of Taking Deposition Eric Wing	0.1
12/22/10	RR Notice of Taking Deposition Peterson & Smith	0.1
12/22/10	RR Notice of Taking Deposition NY State Thoroughbred Breeding & Development	0.1
12/23/10	RR Letter from opposing counsel re Silver, Weiner and Burke depositions	0.1
12/23/10	RR Letter from opposing counsel re follow up with Lipton regarding settlement	0.1
12/23/10	RR Letter from opposing counsel re purpose of Eric Wing deposition	0.1
12/23/10	Receive, Analyze and Research Motion to Amend Complaint to Add Punitive Damages claim	2.5
12/23/10	RR Notice of Hearing - Motion to Amend for Punitive Damages	0.1
12/23/10	Receive E-Mail from opposing counsel re acceptance of service for experts	0.1
12/27/10	Draft Notice of Unavailability	0.1
12/28/10	RR Letter from opposing counsel re settlement & valuation of Plaintiff's claims	0.25
12/28/10	RR Letter from opposing counsel re exhibits to Lipton deposition	0.1
12/28/10	BMR Draft E-Mail to opposing counsel	0.2
12/28/10	TC from Danny Levin	0.2
12/29/10	RR Letter from opposing counsel re pre-trial stipulation	0.1
12/29/10	RR Letter from opposing counsel re various matters	0.2
12/29/10	RR Letter from opposing counsel re they want to keep trial date	0.1
12/30/10	Draft Emergency Motion for Protective Order, Motion to Continue Trial, Order and Letter to Judge	0.75
12/30/10	RR Letter from opposing counsel and analyze attached pre-trial stipulation	0.85
12/30/10	RR Plaintiff's 4th Request for Production	0.25
12/30/10	RR Plaintiff's 3rd Interrogatories	0.25
12/30/10	Draft E-Mail to DC re Expert Disclosure	0.4
12/30/10	Draft E-Mail to BMR re LeJume	0.3

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

12/31/10 TC with DC re experts; FU Memo to File	0.5
12/31/10 December AL Teleconferences (7)	1
1/3/11 Attend hearing on Motion to Strike Expert Witnesses	1
Draft Emergency Motion for Protective Order, or in the Alternative, Motion to Continue trial, Notice of Hearing and letter	
1/3/11 to judge	2.15
1/3/11 Draft E-Mail to opposing counsel with attached protective order and addresses pursuant to court order	0.25
1/3/11 Draft Answers to Second Interrogatories	0.2
1/3/11 Attempted TC to DC; RS address and phone for Steven Silver; call to Steven Silver	0.75
1/3/11 Draft E-Mail to Steven Silver with affidavit attached	0.1
1/3/11 Draft E-Mail to opposing counsel re Steven Silver	0.05
1/3/11 Draft E-Mail to DC re appearance in court on Motion to Strike Experts	0.2
1/4/11 Draft Response to 3rd Request for Production	0.35
1/4/11 RR Re-Notice of Taking Deposition Steven Silver	0.1
1/4/11 RR Re-Notice of Taking Deposition Peterson & Smith Equine Hospital	0.1
1/4/11 RR Letter from opposing counsel re settlement 85k offer	0.25
1/4/11 RR Letter from opposing counsel re response to 2nd Interrogatories	0.1
1/4/11 Receive E-Mail from Steven Silver	0.1
1/4/11 Receive E-Mail from Lipton to SC	0.2
1/4/11 Receive E-Mail from opposing counsel re availability for depositions	0.1
1/4/11 Draft E-Mail to DC re assistance with Interrogatories	0.05
1/5/11 RR Supplemental Expert Witness Disclosure	0.2
1/5/11 RR Letter from opposing counsel re expert depositions, timing of	0.2
1/5/11 Draft Motion to Disqualify Counsel for the Plaintiff	1.5
1/5/11 Draft Response to 2nd Expert Interrogatories	0.3
1/5/11 Multiple TCs with opposing counsel re stipulation changes	0.5
1/5/11 BMR Tom Daly deposition summary	1.5
1/5/11 Attempted TCs to DC & Draft E-Mail to DC re witnesses for trial	0.3
1/5/11 Draft Witness & Exhibit list	1
1/6/11 Draft Notice of Taking Deposition Scott Hay	0.2
1/6/11 Draft Notice of Taking Deposition Alan Bork	0.2
1/6/11 Deposition of Steven Silver	1
1/6/11 Deposition of Craig Banderoff	1
1/6/11 Attend Calendar call	1.25
1/6/11 Draft Emergency Motion to Stay Proceedings and Continue Trial, letter to judge and notice of hearing	1.15
1/6/11 RS case law re evidentiary hearing not required for hearing	0.35
1/6/11 TC with Jeffrey Burke; e-mail documents in advance of deposition	0.6

1/6/11	BMR trial preparation; case review; TCs with opposing counsel	9
1/6/11	TC with Inv Weiner	0.35
1/6/11	RR Exhibits for Banderoff Deposition	0.35
1/7/11	RR documents e-mailed in advance of Eric Wing deposition	0.5
1/7/11	TC with Jeff Burke; Draft summary to BMR	0.6
1/7/11	Deposition of Eric Wing	1
1/7/11	Deposition of Kenny LeJune	1
1/7/11	Deposition of Jeffrey Burke	2
1/7/11	Draft Notice of Cancellation of 1/10/11 Hearing on MPO	0.1
1/7/11	RR Letter from Defendant confirming MPO hearing is cancelled	0.1
1/7/11	RR Motion to Require Discovery Responses	0.2
1/7/11	RR Notice of Hearing for 1/18	0.1
1/7/11	RR Motion to Compel Better Answers to 2nd Interrogatories	0.2
1/7/11	RR Letter from opposing counsel re Inv Weiner not available; discovery cutoff	0.1
1/7/11	BMR trial preparation; case review; TCs with opposing counsel	8
1/8/11	Letter to DC re current offer and trial risks	1.75
1/10/11	Draft Motion for Summary Judgment re Oral Agreement Mayan King	0.75
1/10/11	Draft Motion for Summary Judgment re Unfair & Deceptive Trade Practices	0.75
1/10/11	Draft Motion for Summary Judgment re Breach of Oral Agreement	0.75
1/10/11	Draft Notice of Reliance on Previously Filed Depositions in Opposition to MSJ	0.1
1/10/11	Trial preparation	3.5
1/11/11	Multiple TCs with opposing counsel settlement of case, commencing from beginning of Jan	1.75
1/11/11	Release from opposing counsel; revisions	0.5
1/11/11	Draft Notice of Cancellation of Hearing	0.1
1/11/11	Draft Notice of Cancellation of Depositions (Bork and Hay)	0.2
1/13/11	RR Letter from opposing counsel confirming settlement reached and attaching documents	0.25
1/18/11	RR Letter from opposing counsel re settlement, wire instructions, etc.	0.1
1/18/11	RR Letter from opposing counsel re dismissal and release	0.1
1/19/11	RR Letter from opposing counsel re proposed releases	0.1
1/21/11	Draft E-Mail and Receive E-Mail from DC re release (BMR)	0.2
1/24/11	RR Letter from opposing counsel with proposed lease for DC attached	0.3
	RR Letter from opposing counsel with general release executed by Ed Lipton and executed dismissal with prejudice	
2/4/11	attached	0.2
2/23/11	RR Letter from opposing counsel re replacement check	0.1
2/28/11	Receive E-Mail from opposing counsel and respond re copy of executed release	0.1

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

Receive E-Mail from opposing counsel and Draft E-Mail to opposing counsel re Voluntary Dismissal sent to Court for
3/7/11 filing

0.15

TOTAL HOURS 314.9
HOURLY RATE - \$400.00
TOTAL FEES \$125,960.00

COSTS

Courier to Courthouse 12/30/10	\$26.00
Mediation Services 10/1/10	\$555.50
Esquire 2/24/10 Hearing	\$99.00
Sav-Quick Printing #25041	\$270.30
CA Couriers, Inc.	\$25.00
Sav-Quick Printing #24014	\$62.18
Esquire Deposition Services	\$617.50
Esquire Deposition Services	\$711.30
Esquire Deposition Services	\$1,505.50
Compass Investigations	\$155.00
Discovery copies - Stacy Moran	\$44.90
UPS	\$16.26
LAX to MIA 10/3	\$506.20
Transfer to LAX	\$42.00
Car Rental	\$429.80
Transfer from LAX	\$55.00
FLL to LAX 10/8	\$389.00
Transfer to LAX	\$42.00
LAX to MIA 1/23/08	\$519.00
MIA to LAX 1/31	\$444.00
Auto	\$267.06
Transfer from LAX	\$55.00
March 2009 Contessa Depo Travel	\$1,160.00
Copies for Production	236
Courier	28
Total Costs	\$8,261.50

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DETAIL OF TIME AND COSTS

David Cassidy adv. Ed Lipton

TOTAL FEES AND COSTS \$134,221.50
LESS 3/10/08 Payment \$10,000.00
Less 3/26/10 Payment \$15,000.00
TOTAL OUTSTANDING \$109,221.50