

# Anderson J. Duff

02/01/2018	FFL123.com	Federal Litigation	Draft settlement proposal and correspond with client concerning same; discuss settlement with attorney EM; correspondence with opposing counsel concerning discovery production.	0.40
02/02/2018	FFL123.com	Federal Litigation	Correspondence with client concerning settlement proposal; correspond with opposing counsel concerning our settlement proposal and discovery production; review court order and correspond with client concerning same.	0.30
02/06/2018	FFL123.com	Federal Litigation	Review correspondence with client; correspondence with client concerning updated instructions.	0.20
02/07/2018	FFL123.com	Federal Litigation	Review signed declaration from Mahdi; draft and send declaration to Maddox for signature; review signed declaration.	0.30
02/08/2018	FFL123.com	Federal Litigation	Review letter filed by opposing counsel; correspond with client concerning defendants' letter, declarations, and motions; legal research on motions to compel and motion to stay proceedings; draft declarations for Brandon, Akey, Mahdi, Duff; draft and revise memorandum opposing defendants' motion for stay; phone call to FBI; correspondence with FBI; file response and declarations; mail courtesy copies of all filings to J. Abrams and Mag. J. Pitman; draft motion to compel discovery.	8.30
02/09/2018	FFL123.com	Federal Litigation	Mailing courtesy copies of all filings to J. Abrams and Mag. J. Pitman.	1.00
02/09/2018	FFL123.com	Federal Litigation	Draft, revise, and file letter-motion requesting pre-motion to compel conference with J. Pitman.	1.20
02/12/2018	FFL123.com	Federal Litigation	Review correspondence from clerk of court concerning discovery conference before J. Pitman; correspond with clerk concerning discovery conference.	0.20
02/13/2018	FFL123.com	Federal Litigation	Review letter and corrected letter filed by opposing counsel; correspond with client concerning same and upcoming hearing.	0.20
02/14/2018	FFL123.com	Federal Litigation	Correspondence with opposing counsel concerning recent filing; correspond with client concerning same.	0.10

02/14/2018	FFL123.com	Federal Litigation	Review declarations and Reply brief filed by opposing counsel; review our response brief and supporting documents; correspond with client concerning same.	1.60
02/15/2018	FFL123.com	Federal Litigation	Correspondence with client concerning opposing counsel's translation.	0.10
02/26/2018	FFL123.com	Federal Litigation	Review discovery production from defendant; review plaintiffs discovery requests; correspond with client concerning same.	1.70
02/27/2018	FFL123.com	Federal Litigation	Review discovery production and compare to discovery requests; correspond with opposing counsel concerning same.	1.50
02/28/2018	FFL123.com	Federal Litigation	Correspondence with London Police and NoComment owner; legal research concerning use of privileged materials in SDNY; legal research concerning deposition of non-citizen abroad.	1.40
03/02/2018	FFL123.com	Federal Litigation	Correspondence with client concerning deficient document production from defendant.	0.30
03/05/2018	FFL123.com	Federal Litigation	Correspond with UK contact concerning police reports; prepare for hearing; review discovery requests.	1.50
03/06/2018	FFL123.com	Federal Litigation	Prepare for hearing and attend hearing on motion to compel and defendant's motion to stay proceedings.	1.00
03/09/2018	FFL123.com	Federal Litigation	Review instructions from client concerning sanctions; legal research concerning sanctions; draft motion and memorandum in support of sanctions.	5.20
03/12/2018	FFL123.com	Federal Litigation	Revise declaration of Di Giacomo; revise declaration of Anderson Duff; revise memorandum in support of motion for sanctions.	0.40
03/13/2018	FFL123.com	Federal Litigation	Mailing courtesy copies to judges.	1.00

03/13/2018	FFL123.com	Federal Litigation	Revise and file declarations of Anderson Duff and John Di Giacomo; draft and file second motion for sanctions; revise and file memorandum in support of second motion for sanctions; correspond with client concerning same.	1.30
------------	------------	-----------------------	--	------

03/15/2018	FFL123.com	Federal Litigation	Review motion for stay and supporting documents; correspond with client concerning same; discuss same with attorney JAD.	0.40
------------	------------	-----------------------	--	------

03/16/2018	FFL123.com	Federal Litigation	Draft response to second motion for stay.	1.90
------------	------------	-----------------------	---	------

03/19/2018	FFL123.com	Federal Litigation	Correspondence with client concerning timing for response to defendants' renewed motion to stay.	0.20
------------	------------	-----------------------	--	------

03/21/2018	FFL123.com	Federal Litigation	Correspondence with opposing counsel concerning motion for sanctions.	0.20
------------	------------	-----------------------	---	------

03/22/2018	FFL123.com	Federal Litigation	Correspondence and phone call with clerk of court concerning ex parte settlement letter and upcoming settlement conference; correspondence with opposing counsel concerning same.	0.20
------------	------------	-----------------------	---	------

03/22/2018	FFL123.com	Federal Litigation	Correspondence with client concerning settlement proposal; review history of settlement discussions with opposing counsel; draft confidential pre-conference settlement letter and fax to Magistrate Judge Pitman's chambers.	3.00
------------	------------	-----------------------	---	------

03/26/2018	FFL123.com	Federal Litigation	Courtesy copies of filings to judges.	1.00
------------	------------	-----------------------	---------------------------------------	------

03/26/2018	FFL123.com	Federal Litigation	Preparation for settlement conference; attend settlement conference; phone call with client concerning same.	3.00
------------	------------	-----------------------	--	------

03/26/2018	FFL123.com	Federal Litigation	Revise and file response to defendants' motion to stay with supporting declaration; correspond with client concerning same.	0.70
------------	------------	-----------------------	---	------

03/27/2018	FFL123.com	Federal Litigation	Correspondence with opposing counsel concerning absurd plan to bring in video testimony of doctor and our intent to move for additional sanctions if that happens.	0.30
------------	------------	-----------------------	--	------

04/05/2018	FFL123.com	Federal Litigation	Mailing courtesy copies of memos to judges.	1.00
04/05/2018	FFL123.com	Federal Litigation	Legal research on sanctions; draft, revise, and file third motion for sanctions, memorandum in support of third motion for sanctions, memorandum opposing defendants' motion for Rule 11 sanctions; draft second Rule 11 motion; draft letter concerning Plaintiff's second motion for Rule 11 sanctions; send motion and letter to opposing counsel.	5.20
04/08/2018	FFL123.com	Federal Litigation	Phone call with client concerning new evidence from investigator in Iran.	0.30
04/11/2018	FFL123.com	Federal Litigation	Phone call with attorney EM concerning ethical obligations and Iranian investigator as well as endgame litigation strategy; correspondence with Iranian investigator; correspondence with client; phone call with client concerning same.	1.30
04/17/2018	FFL123.com	Federal Litigation	Correspondence with Ebrahim concerning documents from Iran, declaration, and email from unknown email address.	0.20
04/18/2018	FFL123.com	Federal Litigation	Legal research concerning motion to strike in SDNY; review record; draft and file letter motion to strike defendants' reply brief and its supporting documents; file declaration of Brandon Maddox with letter motion; legal research concerning extension of deadline for dispositive motions in SDNY and sanctions for failure to meaningfully participate in discovery;	3.10
04/19/2018	FFL123.com	Federal Litigation	Review defendants' memorandum opposing our third motion for sanctions.	0.20
04/20/2018	FFL123.com	Federal Litigation	Review order from Judge Pitman granting our motion to admit Maddox declaration; review letter filed by opposing counsel; correspond with client concerning court order.	0.30
04/24/2018	FFL123.com	Federal Litigation	Courtesy copies of letter motion requesting pre-motion conference and extension to judges.	1.00
04/24/2018	FFL123.com	Federal Litigation	Legal research concerning extension of deadline for dispositive motions and discovery sanctions; draft and revise letter motion requesting pre-motion hearing and extension of upcoming deadline; correspondence with opposing counsel concerning consent for extension pursuant to J. Pitman's rules; correspondence with client concerning same; draft Proposed Revised Scheduling	1.60
04/24/2018	FFL123.com	Federal Litigation	Review correspondence from Iranian attorney; draft declaration for Iranian attorney's review and signature; research Iranian attorney; correspondence with client concerning same.	0.40

04/24/2018	FFL123.com	Federal Litigation	Correspondence with opposing counsel concerning letter motion for extension; revise letter motion and proposed order; file letter motion and proposed order; correspondence with client concerning same.	0.50
04/30/2018	FFL123.com	Federal Litigation	Correspondence with client concerning declaration and Iranian investigation; revise declaration and send to Ehsan for review and signature; correspond with client concerning same.	0.30
05/01/2018	FFL123.com	Federal Litigation	Courtesy copies to Judges.	1.00
05/01/2018	FFL123.com	Federal Litigation	Draft and file letter motion requesting leave to submit Declaration of Ehsan; correspondence with client concerning same.	0.80
05/02/2018	FFL123.com	Federal Litigation	Review discovery production from Defendants.	3.00
05/02/2018	FFL123.com	Federal Litigation	Review defendant's discovery production and responses and objections to our discovery; prepare outline of argument for hearing and contemplated motion; attend hearing and win order on supplemental briefing from J. Pitman; phone call with client concerning same.	4.50
05/03/2018	FFL123.com	Federal Litigation	Review J. Pitman's order concerning supplemental memorandum to address discovery sanctions; discuss same with attorney JAD.	0.30
05/11/2018	FFL123.com	Federal Litigation	Review opposing counsel's motion to withdraw and supporting documentation; legal research concerning ability of opposing counsel to withdraw at this stage in the litigation.	0.40
05/13/2018	FFL123.com	Federal Litigation	Review notes on defendants' discovery responses and production of documents; draft supplemental brief on defendants' failure to comply with discovery obligations.	2.60
05/14/2018	FFL123.com	Federal Litigation	Review defendants' discovery production and responses; draft supplemental brief in favor of sanctions.	1.80
05/15/2018	FFL123.com	Federal Litigation	Review defendants' discovery production and responses; draft supplemental brief for sanctions in light of failure to produce required documents.	2.00

05/16/2018	FFL123.com	Federal Litigation	Draft supplemental memorandum regarding defendants' failure to produce discovery documents; correspondence with client concerning harassment of Iranian attorney; review all discovery documents; draft, revise, and file supplemental brief, declaration of AJD, and required excerpts from discovery documents.	11.50
05/21/2018	FFL123.com	Federal Litigation	Correspondence with client concerning attorney in Iran being threatened by Milad.	0.20
05/24/2018	FFL123.com	Federal Litigation	Review letter to J. Pitman filed by opposing counsel; review opposing counsel's pending motion to withdraw and J. Pitman's order contradicting opposing counsel's letter.	0.30
05/29/2018	FFL123.com	Federal Litigation	Correspondence from NoComment concerning harassment from Milad; correspondence with client concerning same; review court order concerning deadline for dispositive motions.	0.20
05/31/2018	FFL123.com	Federal Litigation	Courtesy copies of letter to judges.	1.00
05/31/2018	FFL123.com	Federal Litigation	Correspondence with Matt at NoComment; phone call with client concerning same and next steps, including motion for Rule 11 sanctions; draft and file letter to Magistrate Judge Pitman responding to opposing counsel's May 24, 2018 letter.	1.20
06/01/2018	FFL123.com	Federal Litigation	Correspondence with Matt at NoComment concerning avenues for obtaining police report from UK; review UK procedure for request to English High Court; review Hague Convention procedural timeline; phone call to NoComment concerning possible connection to UK journalist; correspondence with client concerning same.	0.60
06/15/2018	FFL123.com	Federal Litigation	Draft Rule 11 Memorandum.	1.50
06/18/2018	FFL123.com	Federal Litigation	Draft and file motion for Rule 11 Sanctions and supporting memorandum.	1.50
06/27/2018	FFL123.com	Federal Litigation	Correspondence with opposing counsel concerning extension of time to file dispositive motions.	0.20
08/29/2018	FFL123.com	Federal Litigation	Mailing courtesy copies of Letter Motion for Extension of dispositive deadlines to judges.	1.00

08/29/2018	FFL123.com	Federal Litigation	Draft and file letter motion to J. Abrams requesting extension of deadline for dispositive motions with proposed revised scheduling order.	0.70
09/05/2018	FFL123.com	Federal Litigation	Coordinate attempted personal service of Court's August 30, 2018 Order on Defendants; attempt service via various emails; prepare exhibits for letter to J. Abrams concerning attempted service.	0.70
09/07/2018	FFL123.com	Federal Litigation	Service of Court Order to Address for Platinum Holdings.	1.00
09/07/2018	FFL123.com	Federal Litigation	Draft and file letter concerning service of Court's August 30, 2018 Order; legal research concerning inability of corporation to proceed pro bono; send Court Order to additional email addresses from abusive emails to attorney AJD's mother.	1.70
10/24/2018	FFL123.com	Federal Litigation	Courtesy copy of letter motion and proposed orders to J. Pitman.	1.00
10/24/2018	FFL123.com	Federal Litigation	Draft, revise, and file letter motion for stay or extension of deadlines and proposed orders; send same to client; send courtesy copy to J. Pitman.	1.20
<b>AJD Total =</b>				97.40

**Eric Misterovich**

04/11/2018	FFL123.com	Federal Litigation	Discussion with AJD re case status, discovery of additional evidence, procedure strategy re dispositive motion deadline given pending outstanding motions.	1.00
04/24/2018	FFL123.com	Federal Litigation	Discuss with attorney AJD re status of case, review letter motion sent to court.	0.50

**EM Total =**

1.50

**Total for All Attorneys**

98.90



