

# Robert Patrick Sticht

Attorney At Law

Law Offices of Robert Patrick Sticht  
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July 7, 2008



Dear : 

Enclosed is my invoice for professional services rendered during the period May 8, 2008 through July 6, 2008 for reviewing, evaluating, and investigating your case, developing a strategy, responding to the government's voluminous discovery requests, and performing related litigation services.

Please call with any questions.

Very truly yours,

A handwritten signature in black ink that reads "Robert Patrick Sticht".

Robert Patrick Sticht

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Robert Patrick Sticht  
P.O. Box 49457 Los Angeles CA 90049  
(310)889-1950

July 7, 2008

Matter: United States v. [REDACTED] et al.

Professional services

	Hours	Amount
5/8/08 Initial exchange of emails with [REDACTED] regarding us v [REDACTED] et al; review documents posted on the web	0.50	175.00
5/9/08 Telecon with [REDACTED]; discuss case and background	1.00	350.00
Email from [REDACTED] regarding conversation today	0.10	0.00
5/10/08 Teleconference with [REDACTED] and [REDACTED]; discuss potential conflicts, issues and difficulty, discovery, engagement and substitution of counsel	1.00	350.00
Research parties; review local rules; prepare and circulate engagement letter	1.90	665.00
Research procedural history of the case; review and download docket report, court orders, some pleadings; prepare and circulate substitution of attorney forms; prepare proposed orders on request for substitution of counsel; email to [REDACTED] et al	2.50	875.00

	Hours	Amount
regarding govt move to serve sunland by publication and obtain default judgment against sunland; attach govt application and court order		
5/12/08 Emails from [REDACTED] re sunland, parties, engagement, substitution of counsel; telecon with [REDACTED] regarding document scan; discuss necessary parties issue, party addresses, additional background information, notice to atty [REDACTED] court scheduling order, and sensitive tax issues; send confirming email to [REDACTED]	1.50	525.00
5/13/08 Exchange emails with [REDACTED] regarding defenses and unconventional remedies	0.50	175.00
Exchange emails with [REDACTED] re coordinating file transfer	0.10	0.00
5/14/08 Meeting with [REDACTED] to take delivery of legal file; review file; discuss defense, tax filings	0.50	175.00
Email from [REDACTED] regarding 5/11 conversation and signatures; exchange emails with [REDACTED]: re contact; telecon with [REDACTED] discuss case involvement, name change and lost passport; email from [REDACTED] regarding signatures	0.70	245.00
5/15/08 Email from [REDACTED] regarding statute of limitation under ca ufta; review and research govt allegations and analyze issue; memo; send reply to [REDACTED] et al	2.50	875.00
5/19/08 Review and compare pleading file from atty [REDACTED] with court docket (missing docs 3-15, 17-18, 30-37, 42); note	3.00	1,050.00

	Hours	Amount
two documents not on court docket (proof of service acknowledgment signed by atty [REDACTED] 10/19 and stipulation to extend usa response to written discovery); conform file		
5/19/08 Review 5/14 letter from atty [REDACTED] to [REDACTED] re files; compare documents received from [REDACTED]; review discovery deadlines; set up discovery file	2.00	700.00
Finalize, file, and serve requests for substitution of attorney and related orders on behalf of [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] trustee, [REDACTED] trustee, [REDACTED] trustee; emails to judge gutierrez; prepare hard copies for chambers	1.50	525.00
Prepare and fax letter to ausa ford requesting copies of documents (discovery and pleading) and asking govt to file with court its proof of service by mail on [REDACTED] and [REDACTED]	0.50	175.00
Download documents missing from atty lurie file; letter to ca atty griffin requesting copy of state's answer; email to [REDACTED] et al regarding activities, attach related documents	3.00	1,050.00
5/22/08 Various emails from court; review and download orders granting substitution of counsel; update file; emails x2 from [REDACTED]; intake attached documents; prepare, scan and email letter to ausa ford regarding possible msj against govt on count 3 of complaint for statute of limitations violation; letter to ausa	3.50	1,225.00

	Hours	Amount
ford regarding postponing discovery deadlines; email to [REDACTED] et al re orders on substitution, work, strategy, and [REDACTED]'s inquiries about msj; review local rules re time		
5/23/08 Email and fax x2 from ausa ford; review attached 5/23 letters opposing msj on statute of limitations and scheduling govt msj conference on 5/30; forward copies to [REDACTED] et al; research some of the cases on point	1.00	350.00
5/27/08 Telecon with [REDACTED]; discuss strategy, refund suit, his conversation with [REDACTED] re proof, burden of proof (production and persuasion), discovery, statute of limitations cases, 5/23 letter from ausa ford re msj, and [REDACTED]'s 5/24 draft letter to ausa ford	1.00	350.00
Memo to file	0.50	175.00
5/28/08 Telecon with ausa ford regarding discovery, deadlines, premature time to discuss msj, adjustment of tax and resolution; memo; fax from ausa ford; review attached copy of first set of interrogatories to trust ([REDACTED] and [REDACTED] trustees); email to [REDACTED] et al re conversation with ford and significance; attach discovery	1.50	525.00
5/29/08 Email x2 from [REDACTED] re underlying tax issue; note attached documents; print notice of deficiency	0.20	70.00
5/30/08 Exchange emails with ausa ford regarding stipulation to extend discovery deadlines; review discovery, calendar, and court order	1.80	630.00

		Hours	Amount
	setting discovery, motion, and trial dates; prepare stipulation to extend written discovery and postpone depositions		
5/30/08	Exchange further emails with ausa ford regarding discovery stipulation; revise stipulation; sign, scan and email to ausa ford	0.20	70.00
5/31/08	Review and download documents provided by [REDACTED] on 5/29; email to [REDACTED] et al	2.00	700.00
6/2/08	Email from [REDACTED]	0.10	0.00
6/7/08	Intake and review notice of subpoenas x3 to utility companies; scan and email to [REDACTED] et al; research and prepare letter to ausa ford regarding objections to insufficient notice	1.30	455.00
	Continue legal research	1.00	350.00
6/11/08	Begin work on responses to government's discovery; exchange emails with [REDACTED] regarding same	1.00	350.00
6/16/08	Email from [REDACTED] regarding [REDACTED]'s brief; review attached brief; research vallalos and wright cases; email to [REDACTED] regarding bresson case and cooperation from [REDACTED], and in strategy including discovery and evaluating tax claim	1.30	455.00
6/17/08	Email from [REDACTED] with lengthy discussion of bresson case etc; defer same; email to [REDACTED], [REDACTED], and [REDACTED] regarding communicating on the status of the case	0.20	70.00

		Hours	Amount
6/18/08	Review and exchange emails with [REDACTED], et al regarding status, bresson case, discovery, and phone conference; review file, deadlines, etc	1.00	350.00
6/19/08	Teleconference x2 with [REDACTED], [REDACTED], and [REDACTED] to discuss facts, strategy, discovery	3.00	1,050.00
	Memo re conference call	0.50	175.00
6/20/08	Email from [REDACTED]; email from [REDACTED]; telecon with [REDACTED] regarding both emails; discuss facts and legal theories	0.80	280.00
	Review and compare clients initial drafts of answers to government's written discovery	0.80	280.00
	Review all newly-posted documents on the server	1.50	525.00
6/23/08	Review and analyze and compare documents for discovery purposes; prepare initial exhibit list and volume of exhibits; review local rules and orders; email x2 to [REDACTED] et al regarding progress and cooperation	9.00	3,150.00
6/24/08	Exchange emails with [REDACTED] and copy [REDACTED] regarding trust tax returns, disregarded trusts, priorities, and process	1.50	525.00
6/25/08	Prepare [REDACTED] et al objections and other responses to government's written interrogatories and requests for documents; study government's strategy; pull together voluminous drafts, notes, and documents; confront inconsistencies; formulate strategy in anticipation of	11.00	3,850.00

	Hours	Amount
depositions and trial; prepare exhibit binders; assemble and tag master documents and copies; serve responses on behalf of [REDACTED] to govt's first and second rounds of interrogatories and document requests		
6/25/08 Email from [REDACTED] with revised draft of memorandum on statute of limitations issue and responses to 6/24 advice	0.20	70.00
Email from [REDACTED]	0.10	0.00
6/26/08 Prepare and complete remaining discovery responses; serve usa and ag with responses on behalf of [REDACTED], [REDACTED], and [REDACTED] trustee to govt's first round of written discovery; scan and email to [REDACTED], [REDACTED], and [REDACTED]; revise and update discovery worksheet; prepare task list; organize discovery and evidence	7.50	2,625.00
Email from [REDACTED] acknowledging discovery responses and regarding communications	0.10	0.00
6/30/08 Email from ausa ford regarding discovery responses and payment of tax	0.10	35.00
7/2/08- Exchange various detailed emails with 7/3/08 [REDACTED], [REDACTED] regarding strategy, memorandum on statute of limitations, research task on issue of ownership, govt's anticipated motion for summary judgment	0.80	280.00
Total professional services	77.30	\$26,880.00

**Expenses:**

	Amount
5/9/08- Long distance germany	112.85
- Long distance brazil	4.62
5/21/08- Parking for court	10.50
6/18/08- Computer research 5/31	57.45
6/25/08- Postage re discovery	9.24
6/26/08- Postage re discovery	9.80
<b>Total expenses</b>	<b>\$204.46</b>
 <b>Total amount of this bill</b>	 <b>\$27,084.46</b>
6/19/08- Payment from account	(\$5,000.00)
6/19/08- Credit	(\$10,000.00)
7/2/08- Payment 6/27/08 #11985313983	(\$1,000.00)
7/2/08- Payment 6/27/08 #225084189	(\$2,900.00)
7/2/08- Payment 6/27/08 #11985313994	(\$1,000.00)
7/2/08- Payment 6/27/08 #11985319001	(\$100.00)
 <b>Total payments</b>	 <b>(\$20,000.00)</b>
 <b>BALANCE DUE</b>	 <b>\$7,084.46</b>
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Previous balance of client funds	\$0.00
6/2/08- Payment to account 5/27/08 #1076	\$5,000.00
6/19/08- Payment from account	(\$5,000.00)
 <b>New balance of client funds</b>	 <b>\$0.00</b>