

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

DONALD J. TRUMP,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 2:22-cv-14102-DMM
)	
HILLARY R. CLINTON, ET AL.,)	
)	
)	
Defendants.)	
)	

**CHARLES DOLAN’S MEMORANDUM IN SUPPORT OF HIS MOTION FOR
SANCTIONS PURSUANT TO FED. R. CIV. P. 11**

Defendant Charles Halliday Dolan, Jr hereby moves this Court, by and through counsel, for entry of an Order of sanctions against the Plaintiff, Donald Trump pursuant to Fed. R. Civ. P. 11(b), and in support thereof, states as follows:

I. INTRODUCTION

Defendant Charles Halliday Dolan, Jr has been dragged into this lawsuit via speculation, rumor and innuendo. Large and small matters are falsely and cavalierly presented in Plaintiff’s pleadings; any one of these false statements is grounds for sanction.

The original complaint falsely presented Mr. Dolan as a former Chairman of the DNC. Complaint, ¶96. Undersigned counsel sent a Rule 11 letter to Plaintiff’s counsel noting, among other things, that statement was false. See Exhibit A. The Amended Complaint now describes Mr. Dolan as the former Chairman of a “national democratic political organization.” Amended Complaint, ¶96. That does not fix the problem, as Mr. Dolan was never the Chairman of any such organization. Mr. Dolan’s resume is available online and could have been easily checked.

The new, Amended Complaint further complicates its prior error by now identifying Mr. Dolan for the first time as a citizen and resident of New York, Amended Complaint, ¶20. This is a new allegation that is not true at all, and again could have been easily checked. Mr. Dolan lives and has lived for most of his adult life in Virginia. Mr. Dolan already submitted a declaration identifying himself as an Arlington, Virginia resident.

Mr. Dolan is alleged to be the ultimate source of a rumor that Mr. Trump engaged in salacious sexual activity at a Moscow hotel. This is also not true, and there is no basis for this rumor. It is true that Mr. Dolan stayed in a Moscow hotel, and relayed information based on public sources, including the publication Politico and Fox News, about Paul Manafort's resignation none of which were related to the Plaintiff and are considered accurate by most media reports, but that does not make him the source of any rumor as to the Plaintiff's sexual activities. Plaintiff depicts Mr. Dolan as intimately involved in the 2016 Clinton campaign. Actually, Mr. Dolan's involvement was limited to knocking on doors in New Hampshire as a volunteer. See Declaration at Exhibit B. There is no evidence or allegation that he talked to any other defendant, during this period except Mr. Danchenko. In fact, in the indictment of Mr. Danchenko, the Special Prosecutor specifically stated that "according to PR Executive-I, individuals affiliated with the Clinton Campaign did not direct, and were not aware of, the aforementioned meetings and activities with **DANCHENKO** and other Russian nationals."

Given this limited involvement, there is no basis to think that Mr. Dolan knew about any plot to bring false information to the FBI, even assuming that action might conceivably lead to a cognizable cause of action. Again, in the indictment of Mr. Danchenko, the Special Prosecutor stated that "According to PR Executive- I, he (PR Executive- I) was not aware at the time of the specifics of **DANCHENKO's** "project against Trump," or that **DANCHENKO's** reporting would

be provided to the FBI.” If a plaintiff wants to file a large complaint dragging parties in from all over the world, Plaintiff needs to undertake at least minimal diligence to confirm its alternative facts.

Essentially, Plaintiff’s lawsuit seeks to settle political scores via the judicial system. Plaintiff’s 193-page Amended Complaint alleges a flurry of claims that rely on conjecture and speculation to concoct various causes of actions, which Plaintiff asserts injured his presidency. But Plaintiff admits that his injury was political, e.g. “[Plaintiff] seeks damages for the cost of dealing with legal issues and **political issues...**” Amended Complaint at ¶118 (Emphasis added). Dealing with political issues is part and parcel of running for President and being President in the United States. Plaintiff does not get to sue for the rigors of a job he campaigned for.

Plaintiff fails to allege a particular agreement between Mr. Dolan and any of the Defendants tortiously to injure him or his presidency. Rather, he relies on an indictment of Mr. Danchenko that relays certain conversations and then fills in the gaps with conjecture and speculation, despite objective investigations and publicity that disprove Plaintiff’s claims.

II. LEGAL STANDARD

Rule 11 allows a court to impose sanctions on a party who has presented a pleading, motion, or other paper to the court with facts that lack evidentiary support or for “any improper purpose.” *See* Fed. R. Civ. P. 11(b). Specifically, all factual contentions must have evidentiary support or will likely have evidentiary support after a reasonable opportunity for further investigation or discovery. *Id.* “The purpose of Rule 11 is to deter frivolous and baseless filings in district court and thus streamline the administration and procedure of federal courts.” *Peer v. Lewis*, 606 F.3d 1306, 1311 (11th Cir. 2010). “When an attorney files a pleading in federal court, the attorney signs the pleading to certify that, among other things, (1) the pleading is not being presented for an

improper purpose; (2) the legal contentions are warranted by existing law or a nonfrivolous argument to change existing law; and (3) the factual contentions have evidentiary support or will likely have evidentiary support after discovery." *Peer*, 606 F.3d at 1311 (citing Fed. R. Civ. P. 11(b)).

Initially, there is no way Plaintiff will ever show that Mr. Dolan is a New York resident or former chairman of a national political organization. Plaintiff apparently did not bother with an internet search or background check.

In assessing the propriety of Rule 11 sanctions for allegations lacking a factual basis, this Court asks whether the party's claims lacked a factual basis, and whether the lawyer should have been aware that the claims were frivolous. *Latele Prods. v. Tv Azteca*, No. 16-CV-25347-MORE, 2021 U.S. Dist. LEXIS 23431, at *32 (S.D. Fla. Feb. 5, 2021); *Latele Prods. v. Tv Azteca*, No. 16-CV-25347-MORE, 2021 U.S. Dist. LEXIS 23431, at *32 (S.D. Fla. Feb. 5, 2021). Under the test established by Eleventh Circuit law, the court must now consider whether, despite facts that lack a reasonable basis, Plaintiff's counsel conducted a reasonable inquiry to determine the propriety of the claim. *Jones v. Int'l Riding Helmets, Ltd.*, 145 F.R.D. 120, 124 (N.D. Ga. 1992), *aff'd*, 49 F.3d 692 (11th Cir. 1995). If Plaintiff's attorney failed to make a reasonable inquiry as to whether Plaintiff's claims were objectively frivolous, then the Court must impose sanctions despite the attorney's good faith belief that the claims were sound. *Worldwide Primates v. McGreal*, 87 F.3d 1252, 1254 (11th Cir. 1996) at 1254.

III. ARGUMENT

A. Plaintiff and His Attorneys Should Be Sanctioned for the Obvious Factual Errors and Unfounded Accusations as to Mr. Dolan

There was no factual basis to allege that Mr. Dolan was ever Chairman of the DNC, or former Chairman of any national democratic political organization, and no basis to allege he has

ever been a resident of New York. There apparently was not a scintilla of due diligence on the part of the plaintiff's attorneys. These false statements alone merit sanction, especially since undersigned counsel warned Plaintiff's counsel of a potential Rule 11 motion via letter. These false facts are indicative of a lack of reasonable diligence generally.

B. Plaintiff Does Not Allege an Agreement, and Therefore There is No Conspiracy

1. Plaintiff Exaggerates Mr. Dolan's Credentials

Plaintiff's claims are utterly deficient because they do not allege an agreement concerning Mr. Dolan, and therefore are without merit, and this lawsuit is for the improper legal purpose of settling political scores. All of Mr. Trump's claims against Mr. Dolan are based on unfounded speculation and appear to be supported because they wrongly thought Mr. Dolan was a former Chairman of the DNC and was "intimately" involved with the Clinton campaign (which he was not), therefore, he must have spread a rumor knowing that this rumor would make its way into a report that was destined for the FBI. There is just no basis for that fallacious leap of logic.

2. The Danchenko Indictment Does Not Allege That Dolan Was the Source of Any Salacious Sexual Activity Rumor

The other issue is that Mr. Dolan is identified as the source of an allegation regarding Mr. Trump engaging in salacious sexual activity in a Moscow hotel. The Complaint and Amended Complaint seem to rely on the Danchenko Indictment for that allegation, but nowhere does that document identify Mr. Dolan as the source of such allegation. Mr. Dolan is identified as the source of rumors about Mr. Manafort's resignation, but that political analysis, though recounted in the Amended Complaint, is not relevant to any defamation of the Plaintiff or conspiracy to have Plaintiff investigated.

3. There Is No Agreement Alleged to Concoct a Report to Take to the FBI

Plaintiff's allegations rely on extrapolation and unfounded speculation to concoct a cause of action against Mr. Dolan. Plaintiff fails to allege an agreement by Mr. Dolan with any other Defendant to fabricate information to induce the FBI to investigate. This is an issue as to lack of factual basis for a claim, but also the lack of legal basis. Throughout Plaintiff's 193-page Amended Complaint, Plaintiff does not allege any agreement with any Defendant, however all of his claims against Mr. Dolan are based on conspiracy theories: Count II (RICO Conspiracy); Count IV (Conspiracy to Commit Injurious Falsehood); Count IV (Conspiracy to commit Malicious Prosecution).

For a civil conspiracy to exist, there must be some specific, concrete allegation of an agreement between two or more parties to act unlawfully. *EMI Sun Village, Inc. v. Catledge*, 779 Fed. Appx. 627, 637 (11th Cir. 2019) ("A civil conspiracy requires: (1) an agreement between two or more parties; (2) to do an unlawful act or to do a lawful act by unlawful means; (3) the doing of some overt act in pursuance of the conspiracy; and (4) damage to plaintiff as a result of the acts done under the conspiracy.") Here, there are no allegations tying Mr. Dolan to any other Defendant besides Mr. Danchenko, and no allegation that Mr. Dolan and Mr. Danchenko entered into an agreement to do anything unlawful.

Plaintiff's counsel has verbally cited the Danchenko Indictment, referenced throughout the Amended Complaint, as a source of their allegations as to Mr. Dolan, but neither the Amended Complaint nor the Indictment allege that there was an agreement between Mr. Dolan and any Defendants to instigate criminal proceedings against Plaintiff. For example, the Amended Complaint states that Mr. Dolan sought to create a "dossier to smear Donald J. Trump" but that allegation relies and cites the Danchenko Indictment, which states that Mr. Dolan engaged Mr.

Danchenko “in discussions regarding potential business collaboration...on issues relating to Russia...” in addition to their generally trying to develop business together and staying at the same hotel in Moscow. There is no mention of a dossier, report, memorandum or any other document, nor any particular allegation, throughout the indictment nor the Amended Complaint, that Mr. Dolan participated in an agreement with other Defendants to smear Plaintiff and start criminal proceedings. Plaintiff makes no reference or allegation to any agreement between Mr. Dolan and Mr. Danchenko to implicate Plaintiff in criminal proceedings.

As noted previously, and in an effort to save judicial economy and unwarranted costs, counsel for Mr. Dolan advised Plaintiff’s counsel of these deficiencies and put Plaintiff’s counsel on notice that Plaintiff’s frivolous conduct warrants rule 11 sanctions. *See* Exhibit A (“Rule 11 letter”). As part of that communication, Mr. Dolan also provided Plaintiff’s counsel with an investigative media report noting that Mr. Dolan himself considered the allegations of the Steele Dossier “fake news.” *See* news report attached to Exhibit A.

C. Plaintiff’s Complaint’s Sloppiness Confirms a Lack of Reasonable Diligence

Plaintiff makes other allegations confirming that Plaintiff failed to make a reasonable inquiry as required by Fed. R. Civ. P. 11(b). For example, Plaintiff alleges that Mr. Dolan is a resident of New York. Amended Complaint at ¶20. However, a simple Google search would reveal that Mr. Dolan is based in Arlington, Virginia. Mr. Dolan’s residency is further emphasized in this lawsuit, where Mr. Dolan readily declared that he is a resident of the Commonwealth of Virginia. *See* Exhibit 1 of Docket entry 163 at ¶1.

IV. CONCLUSION

As a preliminary matter, Plaintiff’s Complaint against Mr. Dolan should be dismissed with prejudice. However, sanctions are also warranted, and the Court should grant this motion and

assess legal fees to be determined based on undersigned's time records against both Plaintiff and counsel.

Respectfully submitted,

/s/ George R. A. Doumar

George R.A. Doumar

Admitted Pro Hac Vice

Jonathan E. Levine, Esquire

Florida Bar No. 937711

Mahdavi Bacon Halfhill & Young, PLLC

11350 Random Hills Road, Suite 700

Fairfax, Virginia, 22030

Tel: (703) 352-1300

Fax: (703) 352-1301

Email: gdoumar@doumarmartin.com

Attorneys for Charles H. Dolan

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2022, I electronically served the foregoing on counsel of record for the Plaintiff.

Respectfully submitted,

/s/ George R. A. Doumar

George R.A. Doumar

Admitted Pro Hac Vice

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Attorneys for Charles H. Dolan

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

Donald J. Trump,

Plaintiff,

v.

Hillary R. Clinton *et al.*,

Defendants.

Civil Action No. 2:22-14102-DMM

PRAECIPE

Defendant Charles Halliday Dolan (“Mr. Dolan”) files this praecipe in connection with his Rule 11 motion (“Motion”) against both Plaintiff and his counsel, jointly and severally.

Defendant Dolan through counsel has advised Plaintiff and his attorneys of Mr. Dolan’s intent to move for sanctions initially via a letter sent to Plaintiff’s attorneys on May 31, 2022. Plaintiff’s counsel refused to withdraw the Complaint against Mr. Dolan. On July 15, 2022 the Rule 11 Motion was served on Plaintiff’s attorneys. Plaintiff’s attorneys still declined to withdraw their allegations. On September 18, 2022, Defendant Dolan through counsel proposed a compromise amount to resolve this matter, and has still not heard back. Defendant Dolan also intends to seek sanctions under 28 U.S.C. §1927, but the Rule 11 motion was served on July 15 and is ripe for filing and decision now. Mr. Dolan reserves his right to join other defendants in their motions for sanctions under 28 U.S.C. §1927 as appropriate, provided fees and costs are collected under the Motion.

Indeed, the Amended Complaint made new false allegations as to Dolan, such as that he was a resident of New York, which reflects a complete lack of any reasonable inquiry or due diligence. Defendant Dolan has now incurred \$16,274.23 in attorneys’ fees, and has paid \$2,045 toward that balance, leaving a total outstanding of \$14,229.10. Invoices attached. More than 21

days have elapsed since service of the Rule 11 motion, which is now filed in the same form in which it was served, but now with a cover praecipe.

In accordance with Local Rule 7.3, Defendant Dolan files its Motion within 60 days of the Court's final ruling of September 8, 2022 as prescribed by Local Rule 7.3(a)(1).

As an aside, Mr. Dolan believes that the filing of this lawsuit and related adverse publicity has prevented Mr. Dolan from obtaining credit, and also led to a significant loss of consulting business.

In accordance with Local Rule 7.3(a)(5), attorneys for Mr. Dolan state the following: Counsel who worked on this matter for Defendant Dolan included attorneys George Doumar, Jonathan Levine, Mamoun Mahayni, Daniel Hernandez, and Robert Cimmino, most of whom billed minimal time on discrete areas. Most of the time was billed at a discounted, "low bono" rate of \$100 per hour, both as a favor to Mr. Dolan and in recognition that the lawsuit against him was unmerited.

Attorney Doumar has over 35 years litigating and trying cases. He was a member of the Virginia Law Review Editorial Board and Order of the Coif. Attorney Levine served as Florida counsel and has been practicing for 22 years. Attorneys Mamoun Mahayni and Robert Cimmino both graduated law school in 2019, and are recent members of the Virginia and New York bar respectively. Attorney Hernandez was licensed to practice law in 2020. Each of these junior attorneys were limited to discrete tasks.

Mr. Dolan seeks sanctions awarding him a total of \$16,274.23 in attorneys' fees and costs. To avoid any dispute over particular time entries, and resolve this quickly, Mr. Dolan is happy for the Court to deduct any time entries deemed duplicative, but strongly believes the overall amount is reasonable.

Certification of Attempt to Resolve

Counsel for Mr. Dolan has communicated with Plaintiff's counsel repeatedly to resolve this issue, including before serving the Rule 11 motion, and then before filing the Rule 11 motion.

Respectfully submitted,

/s/ George R. A. Doumar

George R.A. Doumar

Pro Hac Vice

Jonathan E. Levine, Esquire

Florida Bar No. 937711

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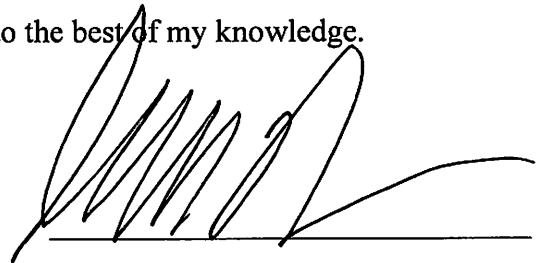
Fax: (703) 352-1301

Email: gdoumar@doumarmartin.com

Counsel for Charles H. Dolan

VERIFICATION

I hereby verify that the fees claimed have been incurred, that bills have been sent monthly to Mr. Dolan, and that the facts set forth above are true to the best of my knowledge.

A handwritten signature in black ink, appearing to read 'George R. A. Doumar', is written over a horizontal line.

George R. A. Doumar

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September, 2022, I caused a copy of the foregoing Defendants' Motion for Sanctions to be served on all counsel of record via CM/ECF. All parties required to be served have been served.

/s/ George R. A. Doumar

George R.A. Doumar

Pro Hac Vice

Jonathan E. Levine, Esquire

Florida Bar No. 937711

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Counsel for Charles H. Dolan

Doumar Martin PLLC

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INVOICE

Invoice # 651
Date: 06/24/2022
Due Upon Receipt

2861**Charles Dolan****Services**

Date	Attorney	Notes	Quantity	Rate	Total
05/02/2022	GRD	Updated filings in court, issues for potential briefing	0.40	\$100.00	\$40.00
05/03/2022	GRD	Review new filings	0.20	\$100.00	\$20.00
05/04/2022	GRD	Review cases re personal jurisdiction	0.50	\$100.00	\$50.00
05/06/2022	GRD	Review filings in Trump case re arguments for dismissal	0.40	\$100.00	\$40.00
05/09/2022	MM	Legal research	1.00	\$100.00	\$100.00
05/09/2022	GRD	Review briefs from Florida counsel, telcon re same,	0.70	\$100.00	\$70.00
05/10/2022	MM	Draft motion to dismiss	2.30	\$100.00	\$230.00
05/10/2022	GRD	Draft affidavit for Chuck/revise	0.50	\$100.00	\$50.00
05/11/2022	MM	Further draft motion	0.40	\$100.00	\$40.00
05/11/2022	GRD	Review current draft of brief	0.50	\$100.00	\$50.00
05/11/2022	RC	Telcon with GRD to receive instructions and case background {HH}	0.30	\$100.00	\$30.00
05/12/2022	MM	Continue drafting motion	4.50	\$100.00	\$450.00
05/12/2022	GRD	Review current draft of brief	0.50	\$100.00	\$50.00
05/13/2022	MM	Modify motion	0.60	\$100.00	\$60.00
05/13/2022	GRD	Brief changes, revisions, cases re extension, issues re extension	1.50	\$100.00	\$150.00
05/13/2022	RC	Review draft motion to dismiss; telcon with GRD {HH}	1.00	\$100.00	\$100.00

Invoice # 651 - 06/24/2022

05/16/2022	GRD	Review new filings for dismissal in Trump case	0.70	\$100.00	\$70.00
05/17/2022	GRD	Review Danchenko indictment for issues	0.90	\$100.00	\$90.00
05/17/2022	RC	Edit motion to dismiss; review GRD e-mails and telcon re same {HH}	1.30	\$100.00	\$130.00
05/18/2022	MM	Develop 12(b)(6) portion of motion	1.30	\$100.00	\$130.00
05/18/2022	GRD	Update draft	0.80	\$100.00	\$80.00
05/18/2022	GRD	Review new filings	0.20	\$100.00	\$20.00
05/18/2022	RC	Review complaint and edit motion to dismiss; legal research on ; draft e-mail to GRD {HH}	2.50	\$100.00	\$250.00
05/19/2022	MM	Review motion	2.10	\$100.00	\$210.00
05/19/2022	MM	Review indictment; confer with GRD	1.00	\$100.00	\$100.00
05/20/2022	MM	Draft motion	4.30	\$100.00	\$430.00
05/20/2022	GRD	Affidavit and brief changes	0.80	\$100.00	\$80.00
05/21/2022	GRD	Rewrite brief	3.00	\$100.00	\$300.00
05/21/2022	RC	Edit motion to dismiss and e-mail GRD re same {HH}	0.70	\$100.00	\$70.00
05/23/2022	MM	Modify and review motion; review local rules for filing; generate tables of content and authorities; finalize exhibits; draft proposed order	5.80	\$100.00	\$580.00
05/23/2022	GRD	Final changes, ready brief for filing	1.50	\$100.00	\$150.00
05/25/2022	GRD	Further filings re motions	0.20	\$100.00	\$20.00
05/27/2022	MM	Draft Rule 11 letter	2.30	\$100.00	\$230.00
05/27/2022	GRD	Rule 11 letter draft	0.40	\$100.00	\$40.00
05/28/2022	GRD	Light edits to Chuck edits, e-mail	0.30	\$100.00	\$30.00
05/31/2022	GRD	Review court filings re attempt to move status call date	0.30	\$100.00	\$30.00
05/31/2022	MM	Prepare Rule 11 notice letter for send out	1.90	\$100.00	\$190.00
05/31/2022	GRD	Finalizing and edit Rule 11 letter	0.60	\$100.00	\$60.00
Services Subtotal					\$4,820.00

Expenses

Date	Notes	Quantity	Rate	Total
05/31/2022	Lexis Nexis	1.00	\$111.53	\$111.53
05/31/2022	Consultant: Florida Counsel - Mahdavi Bacon Halfhill & Young,	8.10	\$300.00	\$2,430.00

Invoice # 651 - 06/24/2022

PLLC - May Invoice - Jon Levine

Expenses Subtotal	\$2,541.53
Subtotal	\$7,361.53
Invoice Discount	\$70.00
Total	\$7,291.53

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
745	07/12/2022	\$2,594.08	\$0.00	\$2,594.08
852	08/10/2022	\$1,643.49	\$0.00	\$1,643.49
966	09/08/2022	\$2,700.00	\$0.00	\$2,700.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
651	06/24/2022	\$7,291.53	\$0.00	\$7,291.53
Outstanding Balance				\$14,229.10
Total Amount Outstanding				\$14,229.10

IOLTA

Date	Type	Notes	Matter	Receipts	Payments	Balance
04/26/2022		Payment for trust request: #545	2861		\$1,000.00	\$1,000.00
IOLTA Balance					\$0.00	

Please make all amounts payable to: Doumar Martin PLLC

Payment is due upon receipt.

Doumar Martin PLLC

11350 Random Hills Road, Suite 700
 Fairfax, VA 22030

INVOICE

Invoice # 745
 Date: 07/12/2022
 Due Upon Receipt

2861**Charles Dolan****Services**

Date	Attorney	Notes	Quantity	Rate	Total
06/01/2022	GRD	Update review of filings, telcon Chuck re Rule 11 letter	0.50	\$100.00	\$50.00
06/02/2022	MM	Contact SD Florida to get link for status call	0.20	\$100.00	\$20.00
06/02/2022	GRD	Updates re filings	0.50	\$100.00	\$50.00
06/02/2022	GRD	Court hearing	0.50	\$100.00	\$50.00
06/03/2022	GRD	Follow-up with other defense counsel re status of hearing, defense counsel meeting	0.50	\$100.00	\$50.00
06/09/2022	GRD	Follow-up re Rule 11 letter, send to Trump's attorneys	0.60	\$100.00	\$60.00
06/09/2022	GRD	Telcon Chuck	0.30	\$100.00	\$30.00
06/10/2022	GRD	Court docket issues, filings	0.30	\$100.00	\$30.00
06/13/2022	GRD	Review new court filings	0.20	\$100.00	\$20.00
06/14/2022	MM	Meet and confer with GRD; research Steele dossier	1.30	\$100.00	\$130.00
06/14/2022	GRD	Follow-up telcon Chuck/filings	0.40	\$100.00	\$40.00
06/14/2022	GRD	Steele dossier issues and review	0.40	\$100.00	\$40.00
06/16/2022	GRD	Brief follow-up of talking points	0.40	\$100.00	\$40.00
06/16/2022	GRD	Follow-up Chuck	0.30	\$100.00	\$30.00
06/22/2022	MM	Review amended complaint	1.70	\$100.00	\$170.00
06/22/2022	GRD	Check court filings	0.20	\$100.00	\$20.00
06/23/2022	MM	Further review amended complaint	2.40	\$100.00	\$240.00

Invoice # 745 - 07/12/2022

06/23/2022	GRD	Review court updates	0.20	\$100.00	\$20.00
06/24/2022	MM	Continue amended complaint review	0.50	\$100.00	\$50.00
06/27/2022	MM	Amended complaint review	2.00	\$100.00	\$200.00
06/27/2022	GRD	Filings re possible extension	0.30	\$100.00	\$30.00
06/28/2022	MM	Review complaint; begin drafting Rule 11 motion	1.90	\$100.00	\$190.00
06/28/2022	GRD	Follow-up re extensions, review prior motion to dismiss	0.30	\$100.00	\$30.00
06/29/2022	MM	Legal research; further draft Rule 11 motion	2.50	\$100.00	\$250.00
06/30/2022	MM	Conduct legal research and continue drafting Rule 11 motion	5.00	\$100.00	\$500.00
06/30/2022	GRD	Make edits to Rule 11 motion, declaration	1.50	\$100.00	\$150.00
06/30/2022	GRD	Order and ancillary document drafting	0.50	\$100.00	\$50.00
Services Subtotal					\$2,540.00

Expenses

Date	Notes	Quantity	Rate	Total
06/30/2022	Lexis Nexis	1.00	\$104.08	\$104.08
06/30/2022	Consultant: Florida Counsel - Mahdavi Bacon Halfhill & Young, PLLC - June Invoice - Jon Levine	1.00	\$450.00	\$450.00
Expenses Subtotal				\$554.08
Subtotal				\$3,094.08
Invoice Discount				\$500.00
Total				\$2,594.08

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
651	06/24/2022	\$7,291.53	\$0.00	\$7,291.53
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Invoice # 745 - 07/12/2022

Current Invoice

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Total Amount Outstanding				\$14,229.10

IOLTA

Date	Type	Notes	Matter	Receipts	Payments	Balance
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IOLTA Balance					\$0.00	

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Payment is due upon receipt.

Doumar Martin PLLC

11350 Random Hills Road, Suite 700
Fairfax, VA 22030

INVOICE

Invoice # 852
Date: 08/10/2022
Due Upon Receipt

Charles Dolan

2861

Charles Dolan

Services

Date	Attorney	Notes	Quantity	Rate	Total
07/01/2022	MM	Draft motion to dismiss; declaration; review amended complaint and initial complaint	3.00	\$100.00	\$300.00
07/01/2022	GRD	Review filings, motions, e-mails, and draft motion to dismiss to be filed	1.20	\$100.00	\$120.00
07/05/2022	GRD	Further review of filings	0.30	\$100.00	\$30.00
07/07/2022	GRD	Follow-up re Danchenko counsel, matters	0.30	\$100.00	\$30.00
07/08/2022	MM	Review Rule 11 motion	1.20	\$100.00	\$120.00
07/08/2022	MM	Check federal rules for Rule 11 sanctions procedure	0.20	\$100.00	\$20.00
07/08/2022	GRD	Telcon Danchenko counsel	0.50	\$100.00	\$50.00
07/10/2022	MM	Review Rule 11 motion	0.60	\$100.00	\$60.00
07/10/2022	GRD	Briefing issues, e-mails	0.40	\$100.00	\$40.00
07/11/2022	GRD	Issues re updated motions filing	0.60	\$100.00	\$60.00
07/12/2022	GRD	E-mail follow-up, many lawyers	0.30	\$100.00	\$30.00
07/13/2022	GRD	E-mails re dispositive filings	0.40	\$100.00	\$40.00
07/14/2022	DH	Review and revise Rule 11 motion and motion to dismiss	0.90	\$250.00	\$225.00
07/14/2022	GRD	Finalize supplemental filing, Rule 11 motion	2.50	\$100.00	\$250.00
07/15/2022	DH	Review and revise Rule 11 motion	1.00	\$250.00	\$250.00
07/15/2022	GRD	Issues re Rule 11 filing, changes from Chuck/defense counsel call report	0.50	\$100.00	\$50.00

Invoice # 852 - 08/10/2022

07/16/2022	GRD	Follow-up and forward Rule 11	0.40	\$100.00	\$40.00
07/21/2022	GRD	Status call with defense attorneys	0.50	\$100.00	\$50.00
07/26/2022	GRD	Report on defense call	0.30	\$100.00	\$30.00
Services Subtotal					\$1,795.00

Expenses

Date	Notes	Quantity	Rate	Total
07/31/2022	Lexis Nexis	1.00	\$18.49	\$18.49
07/31/2022	Consultant: Florida Counsel - Mahdavi Bacon Halfhill & Young, PLLC - July Invoice - Jon Levine	1.00	\$330.00	\$330.00
Expenses Subtotal				\$348.49
Subtotal				\$2,143.49
Invoice Discount				\$500.00
Total				\$1,643.49

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
651	06/24/2022	\$7,291.53	\$0.00	\$7,291.53
745	07/12/2022	\$2,594.08	\$0.00	\$2,594.08
966	09/08/2022	\$2,700.00	\$0.00	\$2,700.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
852	08/10/2022	\$1,643.49	\$0.00	\$1,643.49
Outstanding Balance				\$14,229.10
Total Amount Outstanding				\$14,229.10

Invoice # 852 - 08/10/2022

IOLTA

Date	Type	Notes	Matter	Receipts	Payments	Balance
04/26/2022		Payment for trust request: #545	2861		\$1,000.00	\$1,000.00

IOLTA Balance \$0.00

Please make all amounts payable to: Doumar Martin PLLC

Payment is due upon receipt.

Doumar Martin PLLC

INVOICE

11350 Random Hills Road, Suite 700
Fairfax, VA 22030

Invoice # 966
Date: 09/08/2022
Due Upon Receipt

2861

Charles Dolan

Services

Date	Attorney	Notes	Quantity	Rate	Total
08/01/2022	GRD	Counsel e-mails	0.20	\$100.00	\$20.00
08/05/2022	RC	Downloading all responsive filings on Pacer	0.20	\$100.00	\$20.00
08/05/2022	RC	Meet and confer with GRD on reply brief	0.60	\$100.00	\$60.00
08/05/2022	RC	Call with defense counsels re reply to plaintiff's response to motion to dismiss	1.10	\$100.00	\$110.00
08/05/2022	RC	Draft reply to plaintiff's opposition to Dolan's motion to dismiss	0.70	\$100.00	\$70.00
08/05/2022	GRD	Update re defense counsel meeting, filings, and reply drafting	0.80	\$100.00	\$80.00
08/08/2022	RC	Further draft reply to plaintiff's opposition to Dolan's motion to dismiss	6.70	\$100.00	\$670.00
08/08/2022	GRD	Various e-mails, motion for longer brief, telcon Chuck re mysterious Jan 17 e-mails	0.80	\$100.00	\$80.00
08/09/2022	RC	Continue drafting reply to plaintiff's opposition to motion to dismiss	1.20	\$100.00	\$120.00
08/09/2022	RC	Discuss motion edits with GRD	0.30	\$100.00	\$30.00
08/09/2022	GRD	Separate brief edits, review omnibus brief	1.20	\$100.00	\$120.00
08/10/2022	RC	Review joint reply	0.60	\$100.00	\$60.00
08/10/2022	GRD	E-mails re reply, review draft reply and edit for Chuck	0.80	\$100.00	\$80.00
08/11/2022	RP	Revise reply re motion to dismiss amended complaint	1.40	\$100.00	\$140.00
08/11/2022	RC	Draft and file reply	5.50	\$100.00	\$550.00

Invoice # 966 - 09/08/2022

08/11/2022	GRD	Review briefing issues, filing	0.80	\$100.00	\$80.00
08/12/2022	RC	Research on timeliness of Rule 11 motions	0.50	\$100.00	\$50.00
08/12/2022	RP	Review RC e-mail re timeliness of Rule 11 motion	0.20	\$100.00	\$20.00
08/16/2022	GRD	Review filings	0.40	\$100.00	\$40.00
08/18/2022	GRD	Updated review of pleadings, motion to dismiss Neustar	0.60	\$100.00	\$60.00
Services Subtotal					\$2,460.00

Expenses

Date	Notes	Quantity	Rate	Total
08/31/2022	Consultant: Florida Counsel - Mahdavi Bacon Halfhill & Young, PLLC - August Invoice - Jon Levine	0.80	\$300.00	\$240.00
Expenses Subtotal				\$240.00
Subtotal				\$2,700.00
Total				\$2,700.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
651	06/24/2022	\$7,291.53	\$0.00	\$7,291.53
745	07/12/2022	\$2,594.08	\$0.00	\$2,594.08
852	08/10/2022	\$1,643.49	\$0.00	\$1,643.49

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
966	09/08/2022	\$2,700.00	\$0.00	\$2,700.00
Outstanding Balance				\$14,229.10
Total Amount Outstanding				\$14,229.10

Invoice # 966 - 09/08/2022

IOLTA

Date	Type	Notes	Matter	Receipts	Payments	Balance
04/26/2022		Payment for trust request: #545	2861		\$1,000.00	\$1,000.00
IOLTA Balance					\$0.00	

Please make all amounts payable to: Doumar Martin PLLC

Payment is due upon receipt.