

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

Case No. 17-012521 CACE (14)

PATRIOT NATIONAL, INC.,

Plaintiff,

v.

KASOWITZ BENSON TORRES LLP,

Defendant.

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**PLAINTIFF'S STATEMENT OF PARTICULARS**  
**IN FURTHER SUPPORT OF CLAIM FOR FRAUD**

Plaintiff, PATRIOT NATIONAL, INC. ("Patriot"), by and through its undersigned counsel, and in accordance with the Court's Order dated August 10, 2017, submits the following as its additional statement of particulars in further support of its claim for fraud (Count I) against Defendant, KASOWITZ BENSON TORRES LLP ("Kasowitz"), as follows:

1. Through its fraudulent billing scheme, Kasowitz amassed more than \$3.4 million in fees and expenses in just one year of representing Patriot in matters where no depositions were taken, where there was not a single day of trial, and where Kasowitz never produced a document. Kasowitz' employees did not actually spend the amount of time performing the tasks as is represented on its invoices to Patriot. Rather, the time entries were inflated in order to defraud Patriot and to churn the files to Patriot's detriment.

2. Kasowitz' fraudulent invoices include invoice numbers 1610121 and 1700455. The amount of these invoices alone totals \$1,094,010. In particular, these invoices contain representations that several billers routinely spent between 14 and 17 hour days performing legal work on Patriot matters. Several of Kasowitz' billers also represent that they worked on Patriot's