

EXHIBIT 10

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

IN RE:	}	MDL NO. 840
	}	No. 86-390
ESTATE OF FERDINAND E. MARCOS	}	No. 86-330
HUMAN RIGHTS LITIGATION	}	
THIS DOCUMENT RELATES TO:	}	DECLARATION OF
	}	PHILIP RAIBLE
Hilao et al v. Estate of Ferdinand	}	
E. Marcos,	}	
and	}	
DeVera et al v. Estate of Ferdinand	}	
E. Marcos.	}	

Philip Raible declares under penalty of perjury as follows:

1. I am a member of the firm Law Offices of Philip Raible LLP and, until November 1, 2016, was a member of Rayner Rowe LLP ("Rayner Rowe"), co-counsel for the Plaintiff Class in the above-captioned action.
2. I have acted as New York co-counsel for the Class with Robert Swift in the following cases:
 - a. *Duran v. Bautista et al.*, No. 654261/12 in the Supreme Court of New York County, New York, wherein the Class was seeking to execute on its judgments against the Marcos Estate, Imelda Marcos and Ferdinand R. Marcos with respect to, *inter alia*, assets seized by the District Attorney of New York
 - b. *Duran v. Bautista, Navalaksana, et al.*, No. 156335/113 in the Supreme Court of New York County, New York, wherein the Class was seeking to execute on its judgments against the Marcos Estate, Imelda Marcos and Ferdinand R. Marcos with respect to, *inter alia*, assets held by third parties received in connection with the sale of Marcos assets.
 - c. *District Attorney of New York County, et al. v. Republic of the Philippines, et al.*

14 CV 0890 (KPF) in the Southern District of New York wherein the Class, as Interpleader Defendant, litigated with and against multiple parties over interpleaded assets and other property, allegedly belonging to Imelda Marcos or traceable to her, aggregating in excess of \$20 Million.

- d. *The Republic of the Philippines, et al. v. Gavino Abaya, et al.* 14-cv-3829-(KPF) in the Southern District of New York wherein the Class, as Intervenor Plaintiff, sought recovery of amounts realized by third parties arising from the sale of a Monet painting allegedly belonging to Imelda Marcos.

3. My curriculum vitae is attached as Exhibit "A".

4. The compensation for the services rendered is wholly contingent.

5. During the period July 16, 2013 through December, 2018 I performed 1069.64 hours of work in connection with the litigations set forth above. Based upon current hourly rates ordinarily charged to the clients of Rayner Rowe and The Law Offices of Philip Raible LLC, the lodestar value of the time is \$564,416. Attached hereto as Exhibit "B" is a detailed list of the hours I devoted to the litigation and the nature of the services performed.

6. All of the services performed by Rayner Rowe and the Law Offices of Philip Raible LLP in connection with this litigation were in coordination with Mr. Swift, reasonably necessary in the prosecution of this case, and of the type which would be charged to an hourly fee paying client. There has been no unnecessary duplication of services.

7. My rates have increased over the nearly five and a half years encompassed by this application, from \$475 per hour to \$575 per hour. The rates set forth in this application are (and were) the rates charged to and paid by normal hourly rate paying clients of Rayner Rowe and the Law Offices of Philip Raible LLP, as the case may be. No adjustment was made, notwithstanding the complexity of the matters involved,

the opposition encountered, the preclusion of other employment, the delay in payment, or the factors present in this case which might justify a higher rate of compensation.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Brooklyn, New York
January 31, 2019


PHILIP RAIBLE

EXHIBIT A

PHILIP RAIBLE
917-364-1309
raiblelaw@gmail.com

PROFESSIONAL EXPERIENCE

LAW OFFICES OF PHILIP RAIBLE LLP – Brooklyn, New York – November 2016 - Present

RAYNER ROWE LLP - New York, New York – June 2009 – November 2016 –Head of Litigation

MINTZ & GOLD, LLP - New York, New York - January 1997 to September 2006 - Partner

**SQUADRON, ELLENOFF, PLESENT & SHEINFELD, LLP - New York, New York
-September 1986 to December 1996 - Litigation Associate**

Experience in a wide variety of civil litigation matters, arbitrations and federal criminal and administrative enforcement proceedings

Primary focus on (i) federal and state civil litigations with an emphasis on general commercial litigation; (ii) arbitrations before the New York Stock Exchange, American Arbitration Association and NASD (FINRA); (iii) representation of individuals and corporations in connection with investigations, enforcement proceedings and litigations commenced by the United States Securities and Exchange Commission and FINRA.

Extensive experience in trial preparation, writing pleadings, motions, memoranda and appeals, including briefs to the Second Circuit and the Appellate Division.

Practice also includes transactional work on behalf of individuals and businesses in connection with formation, merger, joint-venture, capital-raising and employment issues attendant to non-public companies.

ADG CAPITAL LLC, New York, New York September 2006 –May 2009 – Chief Legal Officer

Responsible for a wide variety of legal and business issues relating to the operation of a real-estate investment and development company, including the negotiation and preparation of operating agreements and purchase and sale agreements. Participated in the legal and business analysis of numerous potential real estate development projects presented to the company. Oversaw the retention and co-ordination of outside counsel in New York, Las Vegas and South Africa. Retained by the company's investors as the sole employee responsible for overseeing all aspects of winding up of company's affairs due to the widespread downturn in the real estate market.

EDUCATION

**BOSTON UNIVERSITY SCHOOL OF LAW J.D., *cum laude*, 1986. G. Joseph Tauro Scholar,
Paul J. Liacos Distinguished Scholar**

UNIVERSITY OF PENNSYLVANIA B.A. 1981. (Economics and International Relations)

Summary of Significant Experience

District Attorney of New York County v. Republic of the Philippines, et al.

Currently represent a class of nearly 10,000 Philippine Human Rights victims who obtained a judgment in the amount of \$363 million against Imelda Marcos. Litigated federal interpleader proceeding against various parties seeking to recover the proceeds of a Monet painting, allegedly belonging to Imelda Marcos and sold for \$32 million, and to obtain possession of additional paintings and assets seized or identified in connection with a criminal investigation arising from sale of the Monet.

Anonymous

Represented two individuals, the head of creative staff and a senior business manager, in a dispute with their former advertising agency in which agency sought to preclude clients from establishing a competing business and alleged misappropriation of confidential information and breach of fiduciary duty. Clients were permitted, with limited and agreed-upon restrictions, to commence business.

NYCAL v. United States of America

Represented plaintiff in action seeking lost profit damages arising from breach of an oil lease. The key factual issue in the case involved the quantity of recoverable oil from the oilfield, which lay one mile beneath the seafloor and as to which only limited exploratory data existed. Following trial, the Court rejected the Government's contention that there was 27 million barrels and concluded that 65 million barrels of oil was present in the field.

MAG Portfolio Consul GMBH v. Merlin Biomed Group

Represented claimant in arbitration and related federal court proceedings in connection with claim arising from buy-out of 50% interest in a hedge fund management company. Lead counsel in connection with all discovery (including depositions of all principal witnesses taken in Germany and New York), arbitration hearings and federal court proceedings, including Second Circuit appeal. Prevailed at bifurcated arbitration hearing on issue of liability leading to multi-million settlement in advance of damages phase.

Securities and Exchange Commission v. Frederick A. Moran and Frederick W. Moran

Successfully represented son, a Salomon Brothers analyst, alleged to have tipped his father in connection with the pending acquisition of a multi-billion dollar public company. The father, a money manager, purchased \$34 million of stock on the two days prior to the public announcement. Court decision exonerated client of any wrongdoing.

In the Matter of Howard A. Rubin

Wrote successful Wells Submission to the SEC on behalf of a trader of mortgage-backed securities. SEC staff alleged a violation of § 10b of the Securities Exchange Act of 1934, and Rule 10b-5, in connection with a loss by Merrill Lynch Government Securities, Inc. of \$250 million dollars from an allegedly undisclosed short sale of the interest-only component of mortgage-backed securities.

Prudential Securities and Pacific Resources v. Mark Rosenberg, et al.

Represented four respondents in an arbitration hearing lasting over 70 days in which claimants, alleging negligence and fraud in the hedging of a portfolio of zero-coupon municipal housing bonds with treasury bond futures and options, sought damages in excess of \$25 million. Prudential withdrew its \$20 million claim in its entirety after approximately 65 days of hearings and Pacific Resources was awarded just \$300,000 on its \$5 million claim, having rejected a \$600,000 settlement offer.

EXHIBIT B

PHILIP RAIBLE FEE APPLICATION SUMMARY

YEAR	HOURLY RATE	HOURS	FEES
2013	\$475	191.92	\$91,160
2014	\$500	243.83	\$121,915
2015	\$525	128.67	\$67,550
2016	\$550	268.67	\$147,769
2017	\$575	144.73	\$83,220
2018	\$575	91.83	\$52,802
TOTALS		1069.64	\$564,416

DATE	ACTIVITY	Hours	Minutes	Conv
7/16/13	Travel to and from Court. Retrieve from Clerk, review, conform and file Order To Show Cause in Second Turnover Proceeding	3	50	3.83
7/16/13	Serve papers upon Respondents. Prep Affidavits of Service	4	45	4.75
7/16/13	Serve Abaya Family. Prep Affidavit Serve		45	0.75
7/19/13	Serve Marcos in Philippine and her attys. Prepare post office documentation at post office Prep Affidavit Serve.	2	50	2.83
7/22/13	Serve papers upon Barbara Stone at office and apartment	3	20	3.33
7/23/13	Finalize and File Affidavits of Service (10)	1	45	1.75
7/24/16	Phone with Jack Hoffinger		45	0.75
9/5/13	Prepare and file motion to open discovery / modify stay re: service of third party subpoenas. Draft Christies Subpoena	2	50	2.83
9/9/13	Outline / legal research re: response to Cross Motion of Respondents and in Further Support of Order To Show Cause	5	45	5.75
9/10/13	Draft Memo in Opposition to Motion for Protective Order	5	15	5.25
9/11/13	Draft Memo in Opposition to Motion for Protective Order. Tel. Conf. Robert Swift	1	50	1.83
9/12/13	Prep for and attend Court Appearance - Judge Ramos	4	35	4.58
9/13/13	Letter to Ramos re: Request to lift stay to serve third party subpoenas		45	0.75
9/26/13	Letter to June Buch re: Anticipated Interpleader. Tel. Conf. Robert Swift	1	45	1.75
10/7/13	Attend Criminal Trial of Bautista	3	45	3.75
10/8/13	Legal research re removal from trial. Tel. Conf. Robert Swift	1	50	1.83
10/17/13	Legal research / letter to Judge White re Attendance at trial. Tel. Conf. Robert Swift	3	45	3.75
10/21/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	20	7.33
10/22/13	Summarize trial events. Tel. Conf. Robert Swift	1	45	1.75
10/23/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	50	7.83

DATE	ACTIVITY	Hours	Minutes	Conv
10/24/13	Travel to and Attend Criminal Trial of Bautista/Compile notes. Tel. Conf. Robert Swift	7	45	7.75
10/25/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	6	45	6.75
10/29/13	Field press inquiry. E-mail / t/c with Alexandra Shookoff re: Press Inquiry	1	15	1.25
10/30/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	20	7.33
10/31/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	45	7.75
11/1/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	6	35	6.58
11/4/13	Draft Order re: Third Party Discovery (Ramos Stay)	1	20	1.33
11/6/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	15	7.25
11/7/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	25	7.42
11/8/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	6	45	6.75
11/13/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	35	7.58
11/14/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	30	7.50
11/15/13	Travel to and Attend Criminal Trial of Bautista/Compile notes.	7	20	7.33
11/19/13	Tel. Conf. Robert Swift re: discovery matters, stay of proceedings, moving forward post crim trial		25	0.42
11/20/13	Letter to Judge White re Ownership of Paintings. Tel. Conf. Robert Swift re 3rd party subpoenas. Ph/ Cardenes re: Criminal trial recap	1	45	1.75
11/21/13	Letter to Ramos re Criminal Case /Stay of Civil Proceedings. Tel. Conf. Robert Swift re: discovery. Letter to Herrick Feinstein re: Criminal Case / Stay of Civil Proceedings / Subpoena Compliance	1	45	1.75
11/22/13	Tel. Conf. Robert Swift re: discovery		25	0.42

DATE	ACTIVITY	Hours	Minutes	Conv
11/25/13	Review Ramos Order re: Lifting Stay / Third Party Subpoenas. Legal research re: Discovery from DANY / Grand Jury materials	1	45	1.75
12/3/13	Review Roger Bernstien Motion to Withdraw (Barbara Stone)		45	0.75
12/5/13	Legal research - Conversion / Unjust enrichment / discovery from DANY - Grand Jury Materials	2	45	2.75
12/6/13	Tel. Conf. Robert Swift re: strategy / discovery.		35	0.58
12/11/13	Tel. Conf. Robert Swift re: lis pendens		25	0.42
12/16/13	Review / categorize Herrick Feinstein documentation - 19,000 pages	7	20	7.33
12/17/13	Review / categorize Herrick Feinstein documentation - 19,000 pages	3	50	3.83
12/17/13	Prep for / travel to and attend Court Appearance (Ramos) re: need for continued stay	4	50	4.83
12/17/13	Draft Discovery Requests All Parties / Ramos	1	45	1.75
12/18/13	Draft Discovery Requests All Parties / Ramos	4	50	4.83
12/19/13	Review / categorize Herrick Feinstein documentation - 19,000 pages	4	35	4.58
12/20/13	Review / categorize Herrick Feinstein documentation - 19,000 pages. Draft and serve Notice of Settlement - Consolidation Order	4	35	4.58
TOTAL HOURS 2013				191.92
1/2/14	Draft and file Christies Subpoena	1	20	1.33
1/6/14	Review / categorize Herrick Feinstein documentation - 19,000 pages	5	30	5.50
1/6/14	Ph w/ Hoffinger. E-mail Swift re Bautista Sentencing		45	0.75
1/9/14	Letter/ Affidavit and Exhibits to Judge White re: Criminal Trial Exhibits	4	10	4.17
1/13/14	Attend sentencing of Bautista	2	45	2.75
1/14/14	Review Judge White Order re Criminal Trial Exhibits. File with Ramos		25	0.42
1/14/14	Incorporate changes -Confidentiality Stip		45	0.75
1/14/14	Draft form of Order - Judge White re: production of Criminal Exhibits	1	20	1.33
1/14/14	Prep for, travel to and attend Court Appearance before Ramos	3	25	3.42

DATE	ACTIVITY	Hours	Minutes	Conv
1/15/14	Review, revise Proposed Confidentiality Order	2	45	2.75
1/16/14	Teleconference re: Confidentiality Order. Letter To Ramos.	1	30	1.50
1/16/14	Letter to Ramos Re: Confidentiality Stip. File Proposed Confidentiality Stip	1	25	1.42
1/17/14	Prepare and file Notice of Entry re: Order Consolidating State Court proceedings		35	0.58
1/18/14	Tel. Conf. Robert Swift re: interpleader		20	0.33
1/20/14	Travel to Court. File Order consolidating State Court proceedings with Trial Support Office and Clerk	2	45	2.75
1/21/14	Research re: provenance / Correspondence with Christies General Counsel (London) re auction sale of Henri Fantin-Latour Painting. Create comparison table.	4	10	4.17
1/22/14	Finalize letter to Christies and transmit to Nicholas Eldred		45	0.75
1/22/14	Review Schnapp objections to Confidentiality Stip		25	0.42
1/23/14	5 page letter to Ramos re: Schnapp objections to Confidentiality Stip	2	35	2.58
1/24/14	Letter to J. Buch. Cc: Ramos, all counsel re: potential federal interpleader	1	15	1.25
1/27/14	Ph w/ Christies London re: painting to be sold at auction, history of PCGG efforts / our list of paintings		40	0.67
1/29/14	Prep & participate in teleconference w/Ramos, all parties re: Confidentiality Stip	1	25	1.42
2/5/14	T/C June Buch re: Confidentiality Stip		20	0.33
2/5/14	T/C Fran Hoffinger re: Confidentiality Stip		25	0.42
2/5/14	Edits re: Confidentiality Stip	1	45	1.75
2/6/14	T/C , E-mail Fran Hoffinger re: Edits to confidentiality Stip		45	0.75
2/10/14	Edits re: Confidentiality Stip	1	35	1.58
2/12/14	Final Edits re: Confidentiality Stip		40	0.67
2/13/14	Review and Execute Final Version of Confidentiality Stip.		25	0.42
2/14/14	Review new Federal Interpleader filed by DANY		35	0.58
2/25/14	Tel. Conf. Robert Swift re: update		15	0.25

DATE	ACTIVITY	Hours	Minutes	Conv
2/26/14	Comments on Consent Order concerning transfer of assets to Fed Ct		45	0.75
2/27/14	Tel. Conf. Robert Swift re: Consent Order		20	0.33
2/28/14	Additional comments on Consent Order concerning transfer of assets to Fed Ct	1	15	1.25
3/7/14	Review DANY comments re Consent Order		15	0.25
3/9/14	Tel. Conf. Robert Swift re: Consent Order		20	0.33
3/24/14	Tel. Conf. Robert Swift re: next steps		15	0.25
3/31/14	Review Motion to Dismiss - State Court Proceeding - Affidavit & Memo of Law	1	30	1.50
4/1/14	Review Motion to Dismiss - State Court Proceeding - Affidavit & Memo of Law	4	50	4.83
4/4/14	Review case law cited in Respondents Memorandum	6	30	6.50
4/7/14	Tel. Conf. Robert Swift re: Opp Motion to Dismiss		25	0.42
4/9/14	Review Swift memo re: Opp to Motion to Dismiss or Stay	1	30	1.50
4/10/14	Legal Research. Draft Memo In Opp to Motion to Dismiss	7	35	7.58
4/11/14	Additional comments on Consent Order concerning transfer of assets to Fed Ct. Telephone Conference with Robert Swift re: same		50	0.83
4/14/14	Tel. Conf. Robert Swift re: Opposition to Motion to Dismiss		20	0.33
4/16/14	Review Swift edits Opp. Motion to Dismiss		45	0.75
4/17/14	Legal Research. Draft Memo In Opp to Motion to Dismiss	6	30	6.50
4/18/14	Legal Research. Draft Memo In Opp to Motion to Dismiss	5	30	5.50
4/22/14	Review Swift draft of Affidavit re: Opp Motion to Dismiss		35	0.58
4/23/14	Tel. Conf. Robert Swift re: Opposition to Motion to Dismiss/ Review edits to same. Legal research	4	15	4.25
4/25/14	Review motion papers, Memo of Law re: Transfer of Property from State to Federal Court		50	0.83
4/28/14	Swift pro hac vice motion (Fed Ct.) Review Memo	2	20	2.33
4/29/14	File Pro Hac papers		25	0.42

DATE	ACTIVITY	Hours	Minutes	Conv
4/30/14	Tel. Conf. Robert Swift re: Memorandum. Review same	1	5	1.08
5/2/14	Review Swift affidavit / memo re NYDA motion directing transfer of property. E-mails w/ Swift		45	0.75
5/5/14	Finalize and files Opp to NYDA Motion re: transfer to Federal Court. Compile all Exhibits, Affidavits / Memorandum of Law. Draft and circulate Stipulation for signature.	2	30	2.50
5/6/14	Legal Research. Draft Memo In Opp to Motion to Dismiss	7	35	7.58
5/7/14	Legal Research. Draft Memo In Opposition to Motion to Dismiss	8	50	8.83
5/8/14	Legal Research. Draft Memo In Opposition to Motion to Dismiss. Review Swift changes.	4	20	4.33
5/9/14	Finalize Opposition Motion to Dismiss / Review Swift Affidavit	3	20	3.33
5/9/14	Review DANY Memo in Further Support - Transfer of Property from State to Federal Court		45	0.75
5/11/14	Compile All Exhibits / Finalize Affidavits	6	30	6.50
5/12/14	Finalize and file Memorandum of Law, Swift Affidavit, Raible Affidavit + 21 Exhibits In Opposition to Motion to Dismiss (Ramos)	4	50	4.83
5/12/14	Review / edit memo of law re: Dismiss Federal Interpleader		45	0.75
5/13/14	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	7	35	7.58
5/14/14	Correct Table of Contents / Table of Authorities and reference to Ex V in Memo of Law. Refile corrected version	1	40	1.67
5/14/14	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	6	50	6.83
5/15/14	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	7	50	7.83

DATE	ACTIVITY	Hours	Minutes	Conv
5/16/14	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	6	20	6.33
5/23/14	Circulate first tranche of Criminal Trial Exhibits (Redacted w/ Footers) to all parties via WeTransfer.com		50	0.83
5/29/14	Comments upon and editing of party's submission to Court re: joint letter describing case, etc.	1	15	1.25
5/30/14	Prepare for, travel to and attend court Conference	4	45	4.75
6/3/14	E-E-Mail Fran Hoffinger re: ROP Anti-Corruption statute		10	0.17
6/23/14	Review Respondents Memorandum and Submission in further support of Motion to Dismiss. Review case law cited therein	4	50	4.83
6/24/14	Outline oral argument / review memorandum and caselaw	4	45	4.75
6/25/14	Prep for, travel to and attend court appearance (Ramos)	5	40	5.67
7/17/14	Phone calls Swift		35	0.58
7/24/14	Review Motion Papers - DANY - Leave to File Defensive Interpleader		35	0.58
7/27/14	Review all briefs / case law re: Motion to Dismiss. Prep. Oral argument / binder	3	55	3.92
7/28/14	Travel to and attend Court Appearance - Ramos - Oral Argument re : Motion to Dismiss	3	50	3.83
7/30/14	Review Crim trial Exhibits introduced by Bautista	2	45	2.75
8/11/14	Draft Affirmation in Support of Motion to consolidate State Ct proceedings. Ph w/ Swift	2	15	2.25
8/12/14	Revise Affirmation in Support of Motion to consolidate State Ct proceedings		25	0.42
8/13/14	Draft OTSC re: Consolidation		35	0.58
8/14/14	Research re: consolidation of Special Proceedings vs. Actions	2	15	2.25
9/10/14	Review Arbitration Pleadings. Alan Howard vs. Hazlett Gooden (Monet Painting)		30	0.50
9/11/14	T/C Robert Swift		10	0.17

DATE	ACTIVITY	Hours	Minutes	Conv
9/19/14	Review Swift Memo re potential crossclaims vs ROP		20	0.33
9/30/14	E-Mail / Phone w/ Swift re: Philippines case concerning Marcos Paintings		20	0.33
10/2/14	Research / e-mail Swift re Cross Claims unrelated to main action. Review Philippine Court Order and Motion re: Imelda paintings	1	25	1.42
10/13/14	Review articles sent by Swift re: Marcos / Paintings		15	0.25
10/22/14	Review / Send Notice of Removal of State Court Interpleader		10	0.17
10/27/14	T/C Swift re: removal State Court Interpleader		20	0.33
10/28/14	T/C Swift / Murphy removal. T/C Swift		15	0.25
10/30/14	T/C Swift and counsel		45	0.75
11/6/14	Prep for and participate in conference call with Judge Ramos re: potential remand of Interpleader back to State Court for purpose of consolidation and subsequent removal back to Federal Court	1	25	1.42
11/11/14	Review memo re: remand State Court		25	0.42
11/12/14	Edit Motion / Memorandum re: Remand removed interpleader	2	15	2.25
11/12/14	Revise Memo in Support of Motion to Remand	1	20	1.33
11/13/14	Review/edit chart of cases		35	0.58
11/16/14	Draft and file proposed Order re Consolidation of two proceedings before Judge Ramos	2	10	2.17
11/17/14	Draft and file Notice of Appearance federal Court (14 CV 8441) Draft Answer / Cross Claims re: Defensive Interpleader	2	45	2.75
11/18/14	Letter to Failla re: Time to Answer. Review revised Answer to NYDA Interpleader. Review Sweezy Decision	1	30	1.50
11/20/14	Finalize and file Motion to Remand (inc. Notice of Motion / Declaration	1	40	1.67
12/8/14	Review DANY Motion to stay State Court proceeding / Letter to Failla re removed Interpleader		30	0.50
12/9/14	Review ROP Opposition re Remand and in Support of Stay - Declaration and Memo of Law. T/C Swift	1	50	1.83

DATE	ACTIVITY	Hours	Minutes	Conv
12/10/14	T/C Swift		15	0.25
12/11/14	Review Reply Memo re: Remand		45	0.75
12/12/14	T/C Swift		10	0.17
12/13/14	Review New Changes Reply Memo re: Remand		20	0.33
12/15/14	Edit Memo re: DANY Interpleader	1	45	1.75
12/16/14	Final Edit re: DANY Interpleader motion / Declaration	2	5	2.08
12/21/14	Research re: Opposition to motion to stay. Draft response	6	20	6.33
12/22/14	Draft response re: motion to stay	2	15	2.25
12/23/14	T/C Swift re: Injunction/ Stay of Proceedings .Draft and E-Mail F. Hoffinger re: Stipulation clarifying 12/16/14 Declaration. Draft and file revised declaration	1	10	1.17
12/25/14	E-Mail Swift re holding in Major Oil case		35	0.58
12/30/14	File Motion papers re. Opposition Stay State Court Proceedings		45	0.75
TOTAL HOURS 2014				243.83
1/7/15	Review Murphy Reply re: Motion to Stay		45	0.75
1/14/15	Finalize and file Swift pro hac vice motion	1	25	1.42
2/19/15	Prep for, travel to and attend Oral Argument re: Motion to Remand / Stay	4	15	4.25
2/20/15	Phone Swift		15	0.25
3/2/15	Phone Swift		10	0.17
3/3/15	Research re: motion. Phone Swift	1	15	1.25
3/4/15	Review/edit letter to Failla / Create table comparing claims		45	0.75
3/6/15	E-mails re: Motion. Legal research	1	35	1.58
3/9/15	Swift E-mails re: motion. Review record re: Exhibits. Review June Buch letter re: carve-out	1	20	1.33
3/10/15	E-mails re: Motion. Legal research		30	0.50
3/11/15	Review/Edit MOL Re; Motion to Dismiss	1	25	1.42
3/12/15	Phone with Alexandra Shookoff (Hughes Hubbard & Reed) re Criminal trial exhibits. E mail June Buch.Letter to all counsel per Confidentiality Stip requirements. E-mail Swift	1	10	1.17
3/13/15	Phone with Alexandra Shookoff (Hughes Hubbard & Reed) re Criminal trial exhibits. E mail June Buch		45	0.75

DATE	ACTIVITY	Hours	Minutes	Conv
3/16/15	E-mail Swift re: presumption of ownership		20	0.33
3/17/15	Compile and E-Mail Swift re documentation establishing ownership. Review Fran Hoffinger letter re: carve-out of certain claims in state court proceeding		45	0.75
3/18/15	Edit Letter to Failla		20	0.33
3/19/15	Conference call w/ Swift & Murphy		20	0.33
3/20/15	Review Documents & Parlade Deposition/ E-Mail Swift re: Source of Imelda Wealth / Dates of ROP Employment		50	0.83
3/23/15	Review/ Edit Memo of Law re. Motion to dismiss inc. caselaw	1	45	1.75
3/28/15	E-Mail all parties re: issue concerning Confidentiality Stip and Motion Exhibits		35	0.58
4/2/15	Edit Memo of Law - Motion to Dismiss claims of Republic of Philippines	2	10	2.17
4/3/15	Form Order		15	0.25
4/6/15	Revise letter to Failla and Form Order		45	0.75
4/8/15	Review Ramos Decision re: Motion to Dismiss / E-mails Swift	1	15	1.25
4/8/15	Draft Notice of Entry and File re: Ramos Decision Motion to Dismiss		45	0.75
4/9/15	Review June Buch letters to Ramos and Failla		20	0.33
4/10/15	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	7	50	7.83
4/11/15	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	8	20	8.33
4/14/15	Prep for / travel to and attend Court appearance.	2	50	2.83
4/15/15	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip. Phone / Swift	7	45	7.75
4/16/15	Draft Notice of Motion re Motion to Dismiss ROP	1	20	1.33
4/16/15	Review Order staying State Proceeding		15	0.25

DATE	ACTIVITY	Hours	Minutes	Conv
4/20/15	Draft papers re: Withdraw Notice of Entry of Ramos Decision per Order of Fed Ct		50	0.83
4/20/15	Prep and file Motion to dismiss, Declarations, memo of Law. T/C Swift	1	15	1.25
4/21/15	Review Proposed Order re: Class Certification		10	0.17
4/22/15	Review Appellate Briefs re: Bautista Appeal Criminal Conviction. Ph. w/ Swift. E-mails-Swift	1	50	1.83
4/23/15	Edit Letter re: Confidentiality Order / Fed Ct filings		25	0.42
4/26/15	Review Criminal Trial Exhibits, inc. extensive financial history information) and redact all identifying account numbers and other protected information per Confidentiality Stip.	7	20	7.33
4/28/15	Finalize and circulate second tranche of Criminal Trial Exhibits (Redacted w/ Footers) to all parties via WeTransfer.com. E-mails / Swift	4	50	4.83
4/29/15	Draft Intervention Complaint	4	45	4.75
5/1/15	Further Edits re: Letter re: Confidentiality Order. E-mails / Swift		45	0.75
5/1/15	Draft Complaint in Intervention and Memo of Law in Support of Motion to Intervene	7	35	7.58
5/4/15	Draft Complaint In Intervention and Memo of Law re: Intervention	5	50	5.83
5/4/15	Review / edit proposed order re fling docs under seal per Confidentiality Stip	1	10	1.17
5/5/15	Draft Complaint in Intervention and Memo of Law in Support of Motion to Intervene	1	50	1.83
5/7/15	E Mails / Swift		25	0.42
5/8/15	Draft Complaint in Intervention and Memo of Law in Support of Motion to Intervene	2	25	2.42
5/11/15	Redlined suggested changes to Intervention Memo of Law	1	25	1.42
5/12/15	Finalize Draft and File Motion to Intervene in 14 CV 3829. E-mails Swift, Dan Schnapp, Roberto Cardenas. Draft and file affidavit of Service upon Cardenas and Schnapp	2	45	2.75
5/12/15	Finalize and file Motion to Intervene in related case	1	10	1.17
5/13/15	E-mails / Swift		15	0.25
5/15/15	E-mails / Swift		10	0.17

DATE	ACTIVITY	Hours	Minutes	Conv
5/21/15	E-mails / Swift		5	0.08
5/22/15	E-mails / Swift		5	0.08
5/28/15	E-mail June Buch re: Criminal Trial Documents and Confidentiality Order		25	0.42
6/1/15	Review / Outline Sandigbanyan Decisions re: Marcos Assets / Income. Phone w/ Swift	1	25	1.42
6/2/15	E-mails / Swift		5	0.08
6/3/15	Review letter re Philippines demand for Bautista assets		10	0.17
6/3/15	Review ROP proposed Second Amended Answer, Emails / Swift		35	0.58
6/9/15	Review and edit reply memorandum of law in further support of motion to dismiss ROP claims. E-mails / Swift	2	20	2.33
6/11/15	Review and edit reply memorandum of law in further support of motion to dismiss ROP claims		50	0.83
6/11/15	Letter to Failla re: permission to file additional pages in reply memorandum. Phone / E-mails / Swift		45	0.75
6/12/15	Prepare and file Memo and Declaration re: Motion to Dismiss ROP Claims	1	10	1.17
8/6/15	E-mails / Swift		25	0.42
9/11/15	E-mail Swift re: Hazlett Docs to request		30	0.50
10/1/15	Review Response to NYDA Motion for Discharge		20	0.33
10/23/15	Review 1st Dep't Decision re: Bautista Appeal		25	0.42
11/5/15	Review decision re: Motion to intervene		20	0.33
11/6/15	T/C Swift		10	0.17
11/11/15	Review/ Edit Letter to Judge Failla. T/C Swift		25	0.42
11/17/15	File First Intervenor Complaint in 14 CV 3829		45	0.75
11/19/15	E-Mails / Swift		15	0.25
11/24/15	Prep for, travel to and attend Court appearance	5	35	5.58
11/30/15	T/C Swift		10	0.17
12/16/15	Draft Amended Intervention Complaint / Review Documents received from Herrick	3	15	3.25
12/16/15	Redline edit changes re: First Amended Intervention Complaint. Ph. / Swift	1	5	1.08
12/18/15	Telephone Conference/ Failla/all parties		25	0.42
12/21/15	Draft Amended Intervention Complaint	2	10	2.17
12/22/15	Revise Amended Complaint		45	0.75

DATE	ACTIVITY	Hours	Minutes	Conv
12/23/15	Prepare and File First Amended Complaint In Intervention (Fed Ct related case)		45	0.75
12/28/15	Prep for and participate in telephone conference/ Failla/all parties	1	30	1.50
TOTAL HOURS 2015 →				128.67
1/20/16	T/C Swift. Review Court decision	1	45	1.75
1/25/16	E-Mail / Swift		5	0.08
1/21/16	Edit Memo re: Vacate State Court Stay	1	20	1.33
1/21/16	Edit Letter to Failla		15	0.25
1/27/16	T/C Swift. E-mails to counsel		15	0.25
1/29/16	Review Court Order / T/C Swift		20	0.33
2/12/16	Draft Answer Crossclaims, Set Off - Interpleader Complaint	5	45	5.75
2/15/16	Draft Answer Crossclaims, Set Off - Interpleader Complaint	4	50	4.83
2/18/16	Review/ edit Swift changes to Interpleader Answer / Crossclaims.	1	10	1.17
2/25/16	Review answers filed by defendants in related case	2	50	2.83
2/10/16	T/C Swift		10	0.17
2/11/16	E Mails / Swift		15	0.25
2/18/16	Review Draft Answer/ crossclaims, etc. to Interpleader Complaint. T/C Swift	1	35	1.58
2/19/16	Revise prepare and File Answer to Interpleader Complaint	2	15	2.25
2/24/16	Prep for travel to and attend Court Appearance	4	45	4.75
2/25/16	T/C Swift		25	0.42
2/27/16	Draft Initial Case Management Orders - both cases.	3	0	3.00
2/29/16	T/C Swift		10	0.17
3/1/16	Draft Initial Case Management Orders - both cases. E-mail Swift	2	40	2.67
3/2/16	E-Mail / Swift		10	0.17
3/3/16	T/C Swift		10	0.17
3/4/16	Quarterback, as point person for all parties, Case Management Orders - both cases.	3	50	3.83
3/8/16	T/C Swift		10	0.17
3/9/16	Finalize and File Case Management Orders	1	15	1.25
3/9/16	Draft Document Request to ROP	2	20	2.33

DATE	ACTIVITY	Hours	Minutes	Conv
3/10/16	Edit / finalize and serve Document Request to ROP		50	0.83
3/11/16	Review and edit Answer to Republic's Crossclaims. T/C Swift	2	25	2.42
3/14/16	E-Mail / Swift		10	0.17
3/15/16	Prepare and file subpoenas (DANY and Hughes, Hubbard & Reed) and Notice of Intent to Serve Subpoenas	2	15	2.25
3/15/16	Draft Discovery Requests All Parties. E-mails Swift	3	50	3.83
3/17/16	Prep and Serve Discovery Requests	1	45	1.75
3/21/16	Edit Notice of Republic Undermining Court		45	0.75
3/23/16	Review / edit Duran Initial Disclosures. Conf Call Murphy/Swift re: ROP Discovery requests	1	5	1.08
3/24/16	Review / edit Request for Admissions to ROP. E-Mails / Phone w/ Swift	1	30	1.50
3/30/16	E-Mail / Swift		5	0.08
4/7/16	Review Casey Murphy letter to Judge Failla re: ROP Objections to Duran discovery requests, review caselaw cited		50	0.83
4/11/16	T/C Swift. E-Mails / Swift		15	0.25
4/14/16	Review / Edit 2nd Circuit Brief	1	30	1.50
4/19/16	E-Mail / Swift		10	0.17
4/18/16	Review Diane Dunne Response to Document Request		20	0.33
4/22/16	Prep for and attend Court hearing re: scope of ROP Document Production obligations. E-mail / Phone Swift re: results/ Review Deed of Assignment produced by Bautista.	5	30	5.50
4/26/16	Prep for and participate in Teleconference w/ Court re: Hazlitt Gooden & Fox issue regarding subpoena served on Hughes Hubbard		50	0.83
4/28/16	E-Mail / Swift		5	0.08
5/5/16	Draft proposed amended confidentiality stip	1	20	1.33
5/9/16	E-Mail / Swift		5	0.08
5/11/16	E-Mail / Swift		5	0.08
5/12/16	Phone w/ David Eisman re: ROP complaint filed in 1986		15	0.25
5/13/16	T/C Swift / E-mails Swift			0.00
5/16/16	Review ROP Production		30	0.50

DATE	ACTIVITY	Hours	Minutes	Conv
5/17/16	Review DANY Subpoena Production	4	35	4.58
5/17/16	Review / Edit Rule 56 Statement		35	0.58
5/17/16	Review ROP Production sent by Casey Murphy		50	0.83
5/18/16	Travel to and meet with Roberto Cardenes at his office re: Production of documents by Bautista	4	30	4.50
5/18/16	Review / edit draft Memo of Law in Support of Summary Judgment against ROP	2	15	2.25
5/19/16	Review 1986 Complaint ROP against Bautista, et al obtained from David Eisman		20	0.33
5/19/16	E-mail Swift re: Paintings found in Townhouse/ Vetheuil and Langland Bay per PCGG		25	0.42
5/21/16	Review Documents produced by ROP	3	25	3.42
5/23/16	Review / Edit Notice of Motion, Memo Of Law and Rule 56 re MSJ against ROP	3	45	3.75
5/27/16	Review Documents produced by ROP	2	50	2.83
5/31/16	Review ROP Production. E-Mail Swift re: ROP Docs	1	30	1.50
6/1/16	T/C Swift. File motion for Partial S.J. against ROP	1	25	1.42
6/2/16	Review Summary Judgment Motions filed by ROP / Bautista	3	15	3.25
6/6/16	E-Mail / Swift		10	0.17
6/16/16	Review Swift MOL / Rule 56 re: ROP Motion for S.J. Legal research	2	45	2.75
6/17/16	Response to Bautista Motion For Summary Judgment inc. Memo of Law and Rule 56 Counterstatement. Legal research.	6	45	6.75
6/18/16	E-mail Swift re Location of Water Lily - Trump Tower		20	0.33
6/21/16	Edit Response to Bautista Motion For Summary Judgment inc. Memo of Law and Rule 56 Counterstatement. Raible Declaration Legal research.	4	45	4.75
6/22/16	E-Mails with Swift re: Memo. Review Docs for info re: Bautista reps re: ownership of Veutheil, Langland and Algeria paintings. Edit MOL	1	45	1.75
6/30/16	Finalize prepare and file Opp to ROP Summary Judgment Motion. Finalize prepare and File Opp to Bautista Summary Judgment Motion	2	15	2.25

DATE	ACTIVITY	Hours	Minutes	Conv
7/5/16	Review Response filed by ROP in Opp to SJ inc. caselaw	1	45	1.75
7/8/16	T/C Swift		20	0.33
7/13/16	T/C Swift		15	0.25
7/15/16	Review Golden Budha / Roxas motion to intervene	1	15	1.25
7/16/16	Review / Edit Reply Memo of Law in Support of Summary Judgment	2	45	2.75
7/18/17	Edit MOL in further support MSJ against ROP	1	25	1.42
7/19/16	Edit opp to Motion to intervene	1	45	1.75
8/1/16	T/C Swift		20	0.33
8/2/16	Edit Letter to Failla		25	0.42
8/5/16	T/C Counsel re deposition scheduling. Review Swift outline	1	15	1.25
8/11/16	Prep outline / Exhibits Susan and Juan Abaya Depositions. T/C Swift	4	20	4.33
8/12/16	Susan Abaya Deposition - Final Prep and Conduct	2	30	2.50
8/12/16	Juan Abaya Deposition - Final Prep and Conduct	2	15	2.25
8/12/16	Travel to and attend Fed Ct Hearing re: Intervention, etc.	3	10	3.17
8/12/16	Review all Bautista Production	2	30	2.50
8/13/16	Prep outline / Exhibits Bautista Deposition	6	20	6.33
8/14/16	Prep outline / Exhibits Bautista Deposition	8	15	8.25
8/15/16	Vilma Bautista Deposition - Final Prep and Conduct	7	15	7.25
8/16/16	Vilma Bautista Deposition - Final Prep and Conduct	4	20	4.33
8/17/16	Vilma Bautista Deposition - Final Prep and Conduct	4	15	4.25
8/18/16	T/C Swift		25	0.42
9/1/16	Review / edit Duran Objections to ROP 2nd Request for Documents / Letter to Murphy re: discovery issues		30	0.50
9/2/16	Review GBC Answer to Interpleader		45	0.75
9/5/16	Review Dunne Doc Production	1	45	1.75
9/6/16	Vilma Bautista Deposition - Final Prep and Conduct	3	30	3.50
9/12/16	T/C Swift		15	0.25
9/25/16	Prep outline / Exhibits Diane Dunne Deposition	5	25	5.42

DATE	ACTIVITY	Hours	Minutes	Conv
9/26/16	Diane Dunne Deposition - Final Prep and Conduct	7	35	7.58
9/30/16	Prep outline / Exhibits Navalaksana and Hernandez Depositions	6	25	6.42
9/30/16	Ester Navalaksana Deposition Final Prep and Conduct	3	15	3.25
9/30/16	Leonor Hernandez Deposition Final Prep and Conduct	2	20	2.33
10/3/16	T/C Swift		10	0.17
10/4/16	Edit Proposed Order re: Sanctions. T/C Swift		30	0.50
10/5/16	Vilma Bautista Deposition - Final Prep and Conduct	5	30	5.50
10/10/16	E-Mail / Swift		15	0.25
10/11/16	Prep outline / Exhibits Gavino Abaya Deposition	4	25	4.42
10/12/16	Gavino Abaya - Final Prep and Conduct	8	35	8.58
10/14/16	Prepare and mail Notice of Deposition to Barbara Stone		50	0.83
10/17/16	T/C Swift		15	0.25
10/19/16	Edit Memo in Opposition to Motion for Bautista Grand Jury Testimony. T/C Swift	1	15	1.25
10/20/16	Legal research re: Fraudulent Conveyance. Draft Amended Answer / New Crossclaims. T/C Swift	5	50	5.83
10/21/16	Draft Amended Complaint asserting fraudulent conveyance claims	3	20	3.33
10/24/16	Finalize Amended Answer. Circulate for Consent	3	15	3.25
10/25/16	Prep for, travel to and appear at Fed Court	3	50	3.83
10/25/16	Draft Memorandum in Support of Motion to Amend	4	25	4.42
10/26/16	T/C Swift. E-Mails / Swift		35	0.58
10/28/16	T/C Swift		10	0.17
10/31/16	T/C Swift. Prepare, finalize and file Amended Answer		40	0.67
11/1/16	E-Mail / Swift		5	0.08
11/2/16	Outline / Prep Frank Lord Deposition	5	20	5.33
11/2/16	Prep Barbara Stone Deposition	1	45	1.75
11/3/16	Frank Lord Deposition -Final Prep and Conduct	4	35	4.58
11/3/16	Barbara Stone Deposition		30	0.50
11/7/16	Letter to Court re: Stone / Sanctions	1	10	1.17

DATE	ACTIVITY	Hours	Minutes	Conv
11/8/16	E-Mail / Swift		5	0.08
11/9/16	E-Mail / Swift		10	0.17
11/17/16	T/C Swift		15	0.25
11/21/16	Travel to and Attend 2nd Circuit Argument	2	15	2.25
11/22/16	E-Mail / Swift		5	0.08
11/30/16	E-Mail / Swift		10	0.17
12/2/16	Review ROP Response to sanctions. Legal research re: cases cited in letter. T/C , E-mails / Swift	1	45	1.75
12/6/16	E-Mail / Swift		5	0.08
12/7/16	E-Mails / Swift. Prep for and attend Conference call w/ Court re Stone		30	0.50
12/15/16	T/C Swift. E-Mails / Swift		15	0.25
12/19/16	E-Mail / Swift		10	0.17
12/20/16	E-Mail / Swift		5	0.08
12/21/16	E-Mail / Swift		10	0.17
	TOTAL HOURS 2016			268.67
1/3/17	Prep and file application re: Stone sanctions		15	0.25
1/3/17	T/C Swift		15	0.25
1/4/17	E-Mail / Swift		5	0.08
1/10/17	E-Mail / Swift		5	0.08
1/12/17	E-Mail / Swift		5	0.08
1/27/17	T/C Swift. E-Mails / Swift		30	0.50
1/28/17	Legal research re: adverse possession of chattels/ choice of law. E-mail Swift findings.	2	45	2.75
1/31/17	Legal research re choice of law, interests analysis. Review Expert Witness position. Review Initial Disclosures re: witnesses identified by ROP E-mail Swift	1	30	1.50
2/2/17	Travel to and meet with Ruben Carranza. E-mail re: contents of Agacoli affidavit	3	30	3.50
2/3/17	E-Mail / Swift		5	0.08
2/6/17	Comments re: Agacoili's Affidavit. E-Mail Swift	1	15	1.25
2/7/17	Compile Exhibits / Outline for Expert Witness Depositions. E-Mail Swift	1	50	1.83
2/8/17	Legal research re: NY Law on gifts, adverse possession. Draft memo	4	15	4.25
2/9/17	E-Mail / Swift		5	0.08

DATE	ACTIVITY	Hours	Minutes	Conv
2/10/17	Legal research re: Memo to Withdraw. Review ROP pleadings / sanctions motion response / draft MOL	2	15	2.25
2/13/17	Legal research re: Withdrawal of Murphy as atty. Draft memo of law in reply to Murphy motion to withdraw.	3	45	3.75
2/14/17	Edit MOL re: Motion to Withdraw. Deposition of Expert Witnesses (Skype)	3	15	3.25
2/15/17	Letter to Judge Failla RE: Expert Witness Depositions / SKYPE issues		35	0.58
2/16/17	Legal research sanctions	1	15	1.25
2/20/17	Expert Witness Depositions	1	15	1.25
2/21/17	T/C Swift		10	0.17
2/22/17	Pre for, travel to and attend Court hearing	4	15	4.25
2/23/17	T/C Swift		10	0.17
2/28/17	Edit Memo Of Law / Notice of Motion re: Reconsideration of 90 day stay. E-Mail / Swift		45	0.75
3/2/17	Legal research. Finalize Memo re Adverse possession chattels / Gift under NY law	3	15	3.25
3/9/17	E-Mail / Swift		5	0.08
3/13/17	E-Mail / Swift		5	0.08
3/17/17	Review order re reconsideration. E-mail Swift		15	0.25
3/28/17	E-Mail / Swift		5	0.08
3/29/17	E-Mail / Swift		5	0.08
4/25/17	E-Mail / Swift		5	0.08
5/10/17	E-Mail / Swift. Review memo re: constructive trust / equitable tolling / tracing		20	0.33
5/11/17	E-Mail Swift.		5	0.08
5/12/17	E-Mail/ T/C Swift re joint tortfeasors / affirmative defense / apportionment		15	0.25
5/16/17	T/C Swift		15	0.25
5/22/17	T/C Cardenas. E-mail Swift		25	0.42
5/23/17	E-Mail / Swift		5	0.08
5/24/17	Edit letter to Judge Failla / T/C Swift		25	0.42
5/25/17	T/C / E mails - Swift. Edit MOL, NOM, Declaration and Rule 56 Statement	2	35	2.58
5/26/17	T/C / E mails - Swift. Edit MOL, NOM, Declaration and Rule 56 Statement. Draft per-motion letter to Failla	2	45	2.75

DATE	ACTIVITY	Hours	Minutes	Conv
5/30/17	Edit and file pre-motion letter re: Golden Budha Summary Judgment motion. T/C Swift. T/C with Dan Brown	1	5	1.08
5/31/17	T/C Swift		10	0.17
6/3/17	Review docs (including trial testimony) produced by Golden Budha. E-mail Daniel Brown re: Buckley Deposition transcript apparently not produced	1	50	1.83
6/5/17	E-Mail / Swift		5	0.08
6/7/17	Review KC Murphy letter. E-Mails / Swift		25	0.42
6/9/17	Review Tuy submission / e-mail RAS		30	0.50
6/19/17	E Mail RAS re: Wildenstein Gallery documents (Marquet) and fact that it was listed in Imelda Deed of Assignment. T/C Swift		45	0.75
6/22/17	E-Mail / Swift. Review changes to SJ Motion.		25	0.42
6/23/17	Prep for, travel to and attend Court appearance	4	25	4.42
6/26/17	Research re: UN Anti-Corruption Treaty / retroactivity. Research UN resolutions, press release/ US Legislative history re: adoption of Treaty	3	20	3.33
6/27/17	Review / Edit Motion Summary Judgment	1	45	1.75
7/6/17	E-Mail / Swift		10	0.17
7/10/17	Review Sherry Broder Memo re: Convention Against Corruption		20	0.33
7/12/17	Review 9th Circuit case re: acquisition by prescription		15	0.25
7/19/17	Review July 7, 2017 Decision of ROP Court of Appeals (Manila)			
7/21/17	E-Mail / Swift		5	0.08
7/24/17	Final edits / File MSJ against Golden Budha	2	30	2.50
7/25/17	Review Motion For Summary Judgment filings of GBC	4	40	4.67
7/26/17	E-Mail / Swift. Review letter sent to Tuy		20	0.33
7/27/17	Review argument re: Opposition to Dismiss or Stay		30	0.50
7/28/17	Review Ruben Fruto memo re: Solicitor General authority over PCCG		20	0.33
8/1/17	Review 2nd Draft of MOL in opposition to ROP Motion to Dismiss or Stay		45	0.75
8/3/17	T/C / Emails - Swift		15	0.25

DATE	ACTIVITY	Hours	Minutes	Conv
8/9/17	Review endorsed letter (Failla) re: ROP Waiver sovereign Immunity. T/C RAS		15	0.25
8/11/17	Review Tuy Submission. E-mail all counsel.		10	0.17
8/18/17	Comments re: Arelma / Duran Settlement Agreement draft		35	0.58
8/19/17	Legal Research re: Reply to Golden Budha SJ Motion	7	50	7.83
8/20/17	Draft Reply Golden Budha SJ Motion. Legal research	6	50	6.83
8/21/17	Draft Reply Golden Budha SJ Motion. Legal Research inc. research re: admissibility of proffered evidence under FRE and caselaw.	7	30	7.50
8/22/17	Rule 56.1 Counterstatement; Legal research Re: effect of Hawaii judgment / collateral attack. E-mail RAS	5	50	5.83
8/23/17	Rule 56.1 Counterstatement, Legal research re: admissibility of exhibits proffered in support of motion. Work on MOL	5	50	5.83
8/24/17	Revise and update Rule 56.1 Counterstatement re: Golden Budha. Draft response to Republic of Philippines Rule 56.1 Statement of Facts. Draft Counterstatement ROP Rule 56 E-Mails / Swift	8	30	8.50
8/25/17	Legal research re GBC judgment, Rules of Evidence	2	15	2.25
8/28/17	E-Mail / Swift		5	0.08
8/29/17	E-Mail / Swift		10	0.17
8/30/17	Revise Reply Memo - Motion for Summary Judgment against GBC	3	45	3.75
8/31/17	Further revise Reply Memo - Motion for Summary Judgment against GBC	2	45	2.75
9/11/17	Finalize and File Motion papers	1	45	1.75
9/14/17	Settlement Bullet Points	1	50	1.83
9/14/17	Courtesy copy of all parties papers re Summary Judgment Motions compiled and sent to Judge Failla	6	45	6.75
9/18/17	Finalize Class Position Regarding Settlement		50	0.83
9/21/17	Review outstanding motions in prep for settlement conf.	1	50	1.83

DATE	ACTIVITY	Hours	Minutes	Conv
9/22/17	Prep for and attend Settlement Conference / Failla	7	50	7.83
9/25/17	T/C Swift		15	0.25
10/20/17	Bautista appeal	1	4	1.07
12/5/17	E-Mail / Swift		5	0.08
TOTAL HOURS 2017				144.73
3/8/18	Compile Exhibits from Frank Lord Dep. Send, with transcript, for execution		45	0.75
3/23/18	T/C Swift		10	0.17
3/19/18	Compile/ Copy Exs. From Dunne, Navalksana and Hernandez Deps. Send, with transcripts, for execution	2	45	2.75
3/29/18	Review Failla Decision re: Motions For Summary Judgment	4	20	4.33
4/6/18	Revise Motion For Re-consideration / Draft Notice of Motion	1	45	1.75
4/19/18	E-Mail / Swift Broder		10	0.17
4/27/18	Review/ edit Swift Memo re prep for hearing		40	0.67
5/3/18	Prep for / travel to and attend Court appearance. Meet with counsel following appearance.	6	15	6.25
5/16/18	T/C Swift		15	0.25
5/17/18	Phone w/ Cesar DeCastro		35	0.58
5/18/18	Draft letter re: GBC motion to re-open discovery. Research re: contemporaneous articles concerning source of Marcos wealth	1	45	1.75
5/29/18	T/C Swift		30	0.50
6/5/18	E-Mail / Swift		15	0.25
6/6/18	T/C Swift		20	0.33
6/7/18	Draft Language re: potential ROP / Howard Settlement. Research NY General Obligations Law / CPLR re: effect or release / joint tortfeasors	1	10	1.17
6/12/18	T/C Swift		15	0.25
7/2/18	E-Mail / Swift		5	0.08
7/16/18	T/C Swift		15	0.25

DATE	ACTIVITY	Hours	Minutes	Conv
7/19/18	Review deposition and trial transcripts produced by Golden Budha / determine what was and wasn't produced.	2	45	2.75
7/20/18	Teleconference with Court and all parties		30	0.50
7/25/18	Ph. w/ R Swift Re: case status, settlement potential, ROP 2nd Circuit Appeal		15	0.25
7/26/18	Prep material for submission to 2nd Circuit dismissing appeal	1	45	1.75
7/27/18	Letter to Bill Baker re GBC Production. Phone with R. Swift.		55	0.92
8/2/18	Review GBC Production / trial transcript dates; E-mails Swift	1	15	1.25
8/3/18	e-mail Baker		15	0.25
8/6/18	Prep Settlement Conference, including compiling docs re: ROP knowledge of Monet in 1986 and assets. Ph w/ R. Swift	2	35	2.58
8/7/18	Prep for and attend Settlement Conference	8	45	8.75
8/8/18	Phone w/ R. Swift re: next steps - settlement		10	0.17
8/10/18	Phone w/ Harley Waltman (Christies)		35	0.58
8/13/18	Review and edit Christies Agreement. Phone with Hartley Waltman	2	15	2.25
8/20/18	Phone with NYC Sherriff. Letter to Fucito	1	45	1.75
8/22/18	Research re: Sheriff poundage	1	45	1.75
8/17/18	Phone w/ R. Swift re: next steps - settlement		10	0.17
8/30/18	Compile and create exhibits re: Stip and Order of Settlement	1	15	1.25
8/31/18	E-Mail / Swift		5	0.08
9/11/18	Prepare updated spreadsheets re: valuation of assets / allocation for settlement. Ph. w/ Swift re same	1	35	1.58
9/13/18	T/C Fucito, Swift, LaRose.E-mails re same.		45	0.75
9/19/18	T/C Cardenes		25	0.42
9/20/18	Revise proposed Order and Stip re 3 paintings to be auctioned by Christies. Send to Court. Prep for and participate in T/C with Court and all parties	3	20	3.33
9/21/18	Draft docs inc. Court Order/Stip, Assignment of Interests, Christies Agreement. Phone with Tuy,Cardenes, LeMire, Baker, Christies, Swift	7	35	7.58

DATE	ACTIVITY	Hours	Minutes	Conv
9/24/18	Revise Assignment and transmit to parties. E-mails with all parties & Court. Phone calls with Tuy, Baker & Cardenes. Review Christies agreement edits.	3	20	3.33
9/25/18	Finalize Assignment re: execution by parties. Review Court Order. Ph w/ Swift	1	45	1.75
9/26/18	Ph. w/ Swift. E-Mails. Review Redline Settlement Agreement. Review Edits to Schedule of Christies Property. Ascertain differences in separate auctions (Evening / Day)	1	45	1.75
9/27/18	Revise / edit settlement agreement		45	0.75
9/28/18	Ph. w/ Swift re: Settlement Agreement. Various e-mails re: parties position re: payment, terms. Valuation/ allocation calculations	1	5	1.08
10/1/18	Revise / edit settlement agreement. Review e-mails. T/C Cardenes	2	45	2.75
10/2/18	T/C Swift. Revise GBC / Bautista / Hernandez / Navalaksana language in settlement Agreement	1	10	1.17
10/9/18	E-Mail Gideon Hanft (Failla Clerk) re: Settlement status, provide draft for review		15	0.25
10/3/18	E-Mail / Swift re proceeds of liquidated annuity. Various e-mails re: parties position re: amounts payable		35	0.58
10/4/18	Revise / edit settlement agreement. Phone w/ Swift	1	15	1.25
10/5/18	Revise / edit settlement agreement / allocation spreadsheet. T/C Swift	1	30	1.50
10/8/18	Revise / edit settlement agreement/ allocation spreadsheet / Exhibits. T/C Swift. E-Mail Swift	1	45	1.75
10/9/18	E-mail Court T/C Swift, Cardenes, Baker & Brown. Review Dan Brown edits. E-mail Dan Brown	1	35	1.58
10/10/18	Ph. w/ Swift. Review e-mails re: Tuy Efforts		20	0.33
10/11/18	Slight edits to Settlement Agreement. Email Swift. Phone w/ Cardenes and Librera re: discontinuance of state court actions		45	0.75
10/12/18	Ph. w/ Swift. Slight modifications to execution copy of agreement. E-mail to all parties.		35	0.58
10/16/18	Ph. w/ Swift		10	0.17

DATE	ACTIVITY	Hours	Minutes	Conv
10/18/18	Phone w/ Cardenes. Review e-mails re: \$250,000 shortfall.		35	0.58
10/22/18	Phone with DeCastro re: settlement difficulties. Review e-mail re: same		15	0.25
10/26/18	Letter to Judge Failla re: trial availability. File same on PACER. E-mail Swift re: available dates		20	0.33
10/29/18	Additional Letter to Judge Failla re: trial availability.		15	0.25
11/7/18	T/C all parties and court re: auction		20	0.33
11/13/18	Update asset allocation worksheet (post auction). E-mail Swift. E-mail Special Master re: current balances. E-mail Cardenes		20	0.33
11/15/18	Phone w/ DeCastro. Review Cardenes and DeCastro e-mails.		25	0.42
11/16/18	Allocation sheet update - two tranches of distribution. E-mail Swift re same and ROP trial impediments		50	0.83
12/3/18	Ph. w/ Swift		25	0.42
12/17/18	Ph. w/ Swift		10	0.17
12/18/18	Legal Research_Pattern Jury Instructions re: fraudulent conveyance.	2	45	2.75
12/19/18	Review Settlement terms proposed by Golden Buddha		15	0.25
12/20/18	T/C all parties and court. T/C Swift. E-mail Swift re: updated numbers		25	0.42
12/21/18	Ph. w/ Swift. E-mails re: revised settlement agreement		15	0.25
	TOTAL HOURS 2018			91.83