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**From:** Olens, Samuel S. <samuel.olens@dentons.com>  
**Sent:** Tuesday, July 12, 2022 11:27 AM  
**To:** Bryan Webb  
**Subject:** Re: Global Cyber & Dagon  
**Attachments:** image002.jpg; image003.png; image004.png; image005.png; image002.jpg;  
image003.png; image004.png; image005.png

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Thanks Bryan. Have a nice day.

Sam Olens

Sent from my iPhone

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Samuel S. Olens

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On Jul 12, 2022, at 5:00 PM, Bryan Webb <bwebb@law.ga.gov> wrote:

[WARNING: EXTERNAL SENDER]

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Good morning,

Thanks. . .I was out on leave and just wanted you to know I received this and will take a look at it.

Thanks

bkw

[image002.jpg]<<http://law.ga.gov>>

[image003.png]<<http://www.facebook.com/GeorgiaAttorneyGeneral>>

[image004.png]<[http://www.twitter.com/georgia\\_ag](http://www.twitter.com/georgia_ag)>

Bryan Webb  
Deputy Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3542  
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40 Capitol Square SW  
Atlanta, Georgia 30334

From: Olens, Samuel S. <[samuel.olens@dentons.com](mailto:samuel.olens@dentons.com)>  
Sent: Thursday, July 7, 2022 4:16 PM  
To: Bryan Webb <bwebb@law.ga.gov>  
Subject: Global Cyber & Dagon

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Bryan, please see attached additional background information.

Thank you!

Sam  
[image005.png]

Samuel S. Olens

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July 7, 2022

Bryan Webb, Esq.  
Deputy Attorney General  
Office of Attorney General Chris Carr  
Government Services & Employment  
State of Georgia  
40 Capitol Square SW  
Atlanta, GA 30334

RE: David Dagon DOAS Claim for Legal Fees Associated with Criminal Investigation

Dear Bryan:

As you know, I have submitted a claim with the Department of Administrative Services (“DOAS”) on behalf of David Dagon for payment of his legal fees associated with the Durham investigation. Under the DOAS General Liability Contract (“Contract”) Section A. 1., Mr. Dagon is a “covered party” eligible for payment of legal fees under Section B. SUPPLEMENTARY PAYMENTS, Reimbursement for Legal Fees for Criminal Defense. That section states:

DOAS will reimburse any eligible Covered Party (as specified in O.C.G.A. §45-9-1) for reasonable legal fees and other expense incurred in the successful defense of a criminal action directly related to the performance of the Covered Party’s official duties, **provided the legal fees and the other expenses are approved by the Attorney General of the State of Georgia.** (emphasis added)

Section F. CONDITIONS, 12. Reimbursement of Expenses states in part:

Reasonable reimbursement of expenses incurred by a Covered Party at the request of the Attorney General or DOAS in the investigation or defense of any claim or “lawsuit” will be paid for the Covered Party.

### **Reasonableness of Fees**

One important question is whether or not the fees charged by Global Cyber Legal (“GCL”), Mr. Dagon’s counsel, are, in fact, “reasonable.” This was an extremely high-profile matter that involved some of the country’s top white collar criminal counsel, many of whom charge over \$1,000 per hour. GCL’s hourly rate of \$395/hour is not only “reasonable,” but it represents a

substantial discount over its normal hourly rate of \$595/hour. Additionally, GCL further discounted its rate to the State of Georgia to \$350/hour. Moreover, it is significantly less than the \$770/hour charged (and paid by Georgia Tech) by Washington, D.C. criminal counsel for representation of Georgia Tech employee Manos Antonakakis in the same proceedings.

According to the most recent report by the Georgia Attorney General, the Attorney General's Office reimbursed attorneys representing the Board of Regents for the Georgia Institute of Technology who were appointed as SAAG's more than the rate that we have requested. For example, Derin Dickerson (construction lawyer) was reimbursed at a rate of \$550/hour, John Hutchins (intellectual property attorney) at \$525/hour, Petrina McDaniel (Patton Boggs class action litigator) at \$695/hour, and Christine Savage (King and Spalding, export attorney) at \$495/hour – all for their work as Special Assistant Attorney's General working on behalf of Georgia Tech. Moreover, when the Georgia Attorney General's Office is a "prevailing party" in a case in which a statute authorizes the payment of attorney's fees, these fees are paid at the "fair market rate for an attorney with similar experience for this type of litigation."

### **Approaches to Determining Reasonableness**

While there is no established method of determining reasonableness of fees in criminal matters, in civil cases, Georgia courts have looked the "lodestar" test prescribed by the Third Circuit, the Fifth Circuit's "twelve-factor method," or the "percentage of a fund" method to determine whether fees are reasonable. This is not a common fund case, so that method is inapplicable, but the lodestar and twelve factors do provide guidance when considering reasonableness.

The Georgia Court of Appeals noted:

"Under ... the 'lodestar' method of computing fees, a trial court must multiply the number of hours reasonably spent by trial counsel by a reasonable hourly rate. This figure can then be adjusted upward or downward for certain factors known as multipliers, such as contingency and the quality of the work performed, to arrive at a final fee."

*Friedrich v. Fidelity Nat. Bank*, 247 Ga. App. 704, 706 (545 SE2d 107) (2001), cited in *Cajun Contractors v. Peachtree Prop. Sub, LLC*, 360 Ga. App. 390, 407, 861 S.E.2d 222, 240 (2021), Ga. App. LEXIS 366, \*35, 2021 WL 2678343.

The Fifth Circuit's twelve factors are:

1. Time and labor required
2. Novelty and difficulty of the questions
3. Skill requisite to perform the legal services properly
4. Preclusion of other employment by the attorney due to acceptance of the case
5. Customary fee
6. Whether the fee is fixed or contingent
7. Time limitations imposed by the client or the circumstances

8. Amount involved and the results obtained
9. Experience, reputation, and ability of the attorneys
10. “Undesirability” of the case
11. Nature and length of the professional relationship with the client
12. Awards in similar cases.

*Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (1974).

Some of the foregoing factors are obviously inapplicable in a criminal case. The *Friedrich* court noted that, “under both the ‘lodestar’ and twelve-factor methods, the ‘most heavily weighted’ criteria are the ‘time and labor required.’” The facts of this matter have been applied to the twelve factors above:

1. **Time and labor required.** A total of 1245.5 hours was required to represent Mr. Dagon in this matter over a two year period. Only two attorneys were involved: Jody Westby and Mark Rasch.
2. **Novelty and difficulty of the questions.** The case raised difficult issues regarding how the domain name system (DNS) works, how data is collected and replicated globally among DNS providers, the types of traffic records in DNS data (that can be indicators of purpose), who has access to such data, whether such access violates wiretap, pen register, or stored communications laws, how it is analyzed, whether it can be spoofed or generated, etc.
3. **Skill requisite to perform the legal services properly.** Representation of Mr. Dagon in this matter required both criminal defense and communications traffic expertise and how such traffic data is used by cybersecurity researchers. Mr. Rasch and Ms. Westby have the blend of experience necessary to represent Mr. Dagon in this matter, which is why he selected them. Mr. Rasch worked at Department of Justice prosecuting criminal and cybercrime cases for a decade, and Ms. Westby advised the U.S. Government for eight years on the legal use of communications traffic data by cybersecurity researchers, and published two books on the subject, funded by the U.S. Government.
4. **Preclusion of other employment by the attorney due to acceptance of the case.** This matter required nearly full time attention during peak periods of activity, which prevented Mr. Rasch and Ms. Westby from taking on additional work during those periods.
5. **Customary fee.** \$595/hour, discounted to State of Georgia to \$350/hour.
6. **Whether the fee is fixed or contingent.** Not applicable in criminal matter.
7. **Time limitations imposed by the client or the circumstances.** Counsel for Mr. Dagon was handicapped by Georgia Tech’s refusal to enter into a joint defense agreement, even though any criminality by an employee acting in the scope of employment would be attributable to them. Moreover, Georgia Tech refused to share subpoenas they received or documents that they produced. This required GCL to coordinate extensively with joint defense counsel, all of whom were coordinating and cooperating with each other, in order

to maintain an understanding of where the case was going and knowledge of what had been produced.

- 8. Amount involved and the results obtained.** The amount of time (1245.5 hours) was very reasonable in light of the fact that GCL was able to obtain full statutory immunity for Mr. Dagon, which resulted in him having to prepare for and meet multiple times with the prosecutor and his team and testify before the grand jury on three days. GCL and Mr. Dagon drew upon their expertise in the meetings with prosecutors to educate them on DNS data and other theories the prosecutor was exploring, which caused the prosecutor to drop allegations that the data was false. This substantially reduced criminal exposure to Georgia Tech. In addition, the prosecutor pressured Mr. Dagon on numerous occasions, threatening him with prosecution for perjury if he did not answer in a way that fit the prosecutor's narrative. GCL strongly defended Mr. Dagon against these tactics, including writing a letter to Mr. Durham and the Attorney General Merrick Garland. Mr. Dagon was not charged with perjury. The case involved the review of tens of thousands of pages of documents, and analysis of forensic reports, reviews of articles about the researchers' work, analysis of potential expert witnesses, review of grand jury testimony and documents, and coordination with joint defense counsel.
- 9. Experience, reputation, and ability of the attorneys.** As noted above, Rasch and Westby have a combined 60 years of experience directly relevant to the criminal investigation. The combined expertise of Rasch and Westby was clearly respected by the prosecutors.
- 10. "Undesirability" of the case.** Mr. Dagon and Mr. Antonakakis received threats from third parties for their involvement in this case, which resulted in Mr. Antonakakis receiving police protection for two weeks and caused him to move his family to a gated community and close the Astrolavos lab at Georgia Tech for a period of time. Former President Trump referred to the indictments, which resulted from this investigation, as "a scandal far greater than Watergate" and stated that those involved were guilty of "treason" and that "in a stronger period of time in our country, this crime would have been punishable by death."
- 11. Nature and length of the professional relationship with the client.** Mr. Dagon had worked with Ms. Westby during the time she advised the U.S. Government and was also an acquaintance of Mr. Rasch and was familiar with his cybercrime expertise for decades.
- 12. Awards in similar cases.** We do have data to provide any further details here, but public records indicate that Georgia Tech has paid Manos Antonakakis's lawyers' fees in full, which totalled over \$100,000. Mr. Antonakakis did not retain counsel for over a year because he thought Georgia Tech was representing him. As far as we can tell, Mr. Antonakakis's lawyer never entered into a joint defense agreement, never provided data or information to other counsel or to the prosecutors, and Mr. Antonakakis never testified before the grand jury or met with the prosecutors. Moreover, it does not appear that Mr. Antonakakis's lawyer ever retained or interviewed expert witnesses, reviewed the tens of thousands of pages of technical documents, reports, and testimony.

As we have previously noted, the former Ethics in Government Act required the Independent Counsel to reimburse the "reasonable" legal fees of persons (like Mr. Dagon) who had been identified as "subjects" of an Independent Counsel investigation. While the IC statute has since expired (and the role of the Independent Counsel assumed by the Special Counsel) a trio of cases under the prior statute discussed the "reasonableness" of fees incurred under the old statute. *In re Mullins (Tamposi Fee Application)*, 84 F.3d 1439, 1441 (D.C.Cir.1996); *In re Pierce (Olivas Fee Application)*, 102 F.3d 1264, 1265 (D.C.Cir.1996); *In re North (Cave Fee Application)*, 57 F.3d 1117, 1119 (D.C.Cir.1995). In each of these cases, the Court found reasonable all of the legal expenses incurred from the initiation of the investigation until its completion at a reasonable and customary hourly rate.

Based on any method, the fees GCL has charged are clearly reasonable. The case involved a high-stakes political investigation that involved cybersecurity researchers at Georgia Tech and other universities and organizations across the country, thousands of complicated technical documents, emails and memoranda, as well as half a terabyte of data. The case was prosecuted by an aggressive and well-funded team of FBI agents and Special Counsel, with substantial federal resources. The case raised novel legal and factual issues, involved information collected by the Mueller special counsel, the DOJ Office of Inspector General, the Senate Intelligence Committee and multiple outside organizations. The case was extraordinarily high profile, being scrutinized by observers around the world. The Government's theory of liability was similarly novel.

Because Georgia Tech refused to share any of the documents they produced to the grand jury, a joint defense agreement with other counsel was the only way Mr. Dagon's counsel could know what information the prosecutors and grand jury knew, what documents had been provided, what statements had been made by other witnesses, and what questions were being asked by the FBI and others. This type of "joint defense," "common defense" or "common interest" privileged relationship with counsel representing other witnesses who were either subjects, targets, or witnesses in the case permitted the sharing of otherwise privileged documents and communications without resulting in an unethical waiver of the relevant privilege.

This is a common practice in complex white collar cases involving multiple parties, particularly where, as here, the actual criminal liability of each party is unclear and the necessity of information sharing is greater. The joint defense agreement permitted us to share information, share privileged documents and records, and discuss strategy and learn of the status of the investigation from multiple sources. *It also substantially reduced our costs by permitting us access to legal research conducted by other counsel, and leveraged the analysis of other counsel on both legal and factual matters.*

GCL represented Mr. Dagon for the greater part of two years. The bills and invoices reflect only a portion of the time GCL counsel spent on matters related to Mr. Dagon's defense. GCL generally did not include in time logs the numerous hours spent responding to journalists' inquiries or interacting with the print, electronic and social media -- despite the fact that this was extremely helpful and furthered the cause of defending its client. (*But see, In re North (Cave Fee Application)*, *supra* (defensive monitoring of witnesses and related prosecutions reimbursable as



reasonable)). GCL's fees for the defense of Mr. Dagon were, at all times, reasonable, necessary, and essential. GCL achieved a successful defense of Mr. Dagon, and he was the only witness in this three-year investigation to have been granted immunity by the Court under 28 USC § 6001.

The hours expended and rates charged by GCL are not only commensurate with the complexity and difficulty of the investigation, but also with the sensitivity and political nature of the Special Counsel investigation, the number of moving parts, and the need to protect the integrity not only of Mr. Dagon, but of the research that he and Mr. Antonakakis perform in their scope of employment at Georgia Tech.

Special Counsel investigations are fundamentally different from other criminal investigations, involve multiple agencies and departments, are highly political, and involve complex legal and factual issues. Indeed, they are more complex than other federal criminal investigations conducted by the Department of Justice. As one commentator noted:

... an increasing number of government officials who have done nothing illegal have been called before grand juries and congressional committees and have been subjected to other internal administrative investigations to answer questions about their alleged participation in or witnessing of the wrongdoing of others. The government has poured significant resources into the investigation of wrongdoing. Congress has set up special committees to conduct sometimes lengthy hearings, and independent counsels ("ICs") have been quite expansive and expensive in conducting their investigations. The political stakes are high in these investigations, and the government officials involved have felt the need to hire attorneys to advise them, even if they have not been charged with any wrongdoing. Officials have racked up tens of thousands of dollars - and, in some cases, hundreds of thousands of dollars - in legal bills to defend against specific charges and to defend their reputations. \*\*\*

There are several reasons why these legal fees are so high. First, officials often face multiple investigations regarding the same allegations: by the Justice Department, by an [Independent Counsel], and by congressional committees. Second, in responding to investigations that are so easily politicized, government officials naturally want to retain white collar criminal defense lawyers who have expertise in dealing with politics. These lawyers are generally able to command high fees. ... A former IC has stated that "lawyers must be hired, even by the most insignificant witnesses. The dire consequences of merely misspeaking, which could result in a false-statement charge, are high, given the [IC's] vast powers." Many others have noted that IC investigations often become politically charged. In such an atmosphere, it is not surprising that even "mere witnesses" feel the need for someone to look out for their best interests.

Kathleen Clark, "Paying the Price for Heightened Ethics Scrutiny: Legal Defense Funds and Other Ways That Government Officials Pay Their Lawyers," 50 Stan. L. Rev. 65, 1997 (emphasis added), available at: [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=110533](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=110533). It is clearly in

the interest of the State of Georgia for a person who was a subject of the Special Counsel investigation regarding actions taken in the performance of their State duties to have their reasonable attorney's fees reimbursed.

Thank you for your attention to this matter. Please let me know when we can have a call to discuss this matter further.

Sincerely,



Sam Olens

cc: David Dagon  
Global Cyber Legal LLC

SO:tn

---

**From:** bwebb@law.ga.gov  
**Sent:** Thursday, August 11, 2022 10:23 AM  
**To:** samuel.olens@dentons.com  
**Subject:** RE: Dagon

Good morning,

Thanks for letting me know.

bkw



**Bryan Webb**  
Deputy Attorney General  
Office of the Attorney General Chris Carr  
Government Services & Employment  
(404) 458-3542  
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Atlanta, Georgia 30334

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**From:** Olens, Samuel S. <samuel.olens@dentons.com>  
**Sent:** Thursday, August 11, 2022 10:10 AM  
**To:** Bryan Webb <bwebb@law.ga.gov>  
**Subject:** Dagon

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Good morning Bryan. We are meeting with Commissioner Sullivan on August 24 at 11 a.m.

We note that Tech paid the legal fees related to the civil litigation, but once again, has not paid our client's fees for same.

Thank you.

Sam

 **Samuel S. Olens**

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**From:** Olens, Samuel S. <samuel.olens@dentons.com>  
**Sent:** Friday, August 5, 2022 9:55 AM  
**To:** bwebb@law.ga.gov  
**Subject:** Global Cyber

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Good morning Bryan.

As you know, I represent Global CyberLegal in connection with their efforts to have their reasonable legal bills incurred in connection with the representation of Georgia Tech employee David Dagon reimbursed either by Georgia Tech or by the Department of Administrative Services.

Yesterday, pursuant to an Open Records Act request, we learned that the legal fees of other Georgia Tech employees, namely Manos Antonatakis and Angelos Keromytis, which related to the investigation which lead to the indictment in United States v. Sussman, were promptly and fully reimbursed by Georgia Tech, and that the payment of these fees was approved by the Office of Attorney General.

In that regard, Mr. Dagon has been attempting to have his legal expenses related to these matters reimbursed. Please let me know whether the Office of Attorney General has approved the payment of these expenses either by Georgia Tech or by DoAS, or both. At this point -- more than two years' in, we do not know whether the logjam is. Specifically, we would like to know whether your office has found that the fees of GCL are "reasonable" and subject to reimbursement.

Thank you.

Sam

 Samuel S. Olens

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**From:** Olens, Samuel S. <samuel.olens@dentons.com>  
**Sent:** Wednesday, August 24, 2022 7:52 AM  
**To:** rebecca.sullivan@doas.ga.gov; logan.winkles@doas.ga.gov; logan.winkles1@doas.ga.gov; bwebb@law.ga.gov  
**Subject:** Prof. Dagon  
**Attachments:** DAGON - TIME LOG Start - End FINAL CRIM.pdf

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Attached please find an invoice that solely covers the criminal matter.

Thank you.

Sam

 Samuel S. Olens

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**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
8/5/2020	Westby	T/c w/ D. Dagon re GJ subpoena & representation; t/c w/ M. Rasch re same.	1.7
8/6/2020	Westby	Review email from D. Dagon & docs; reply	1.5
8/7/2020	Westby	Email to D. Dagon re info needed; t/c w/ D. Dagon; t/c w/ M. Rasch; review doc from D. Dagon	2.5
8/9/2020	Rasch	T/c w/ Common Counsel review white papers; Review Just Security article; revise letter to AUSA; identify expert witnesses;	3.3
8/10/2020	Westby	Review email from M. Rasch & draft response to subpoena; t/c w/ D. Dagon & M. Rasch	2.0
8/11/2020	Westby	Review notes from D. Dagon & docs	2.0
8/12/2020	Westby	T/c w/ D. Dagon; review docs from D. Dagon; review email from M. Rasch to K. Wasch	2.5
8/13/2020	Rasch	Revise letter to AUSA; call to T. Fuhrman	3.5
8/16/2020	Westby	T/c w/ D. Dagon	1.0
8/17/2020	Rasch	Response to K. Wasch; t/c w/ J. Westby	2.8
8/17/2020	Westby	T/c w/ D. Dagon; t/c w/ K. Wasch	2.0
8/18/2020	Rasch	Draft subpoena; review docs/articles	1.7
8/19/2020	Rasch	Eft subpoena response; review documents, legal research re joint defense	4.4
8/19/2020	Westby	T/c w/ D. Dagon; review doc from D. Dagon; edit response to subpoena	2.5
8/23/2020	Rasch	Refine letter; review Senate Intel rpt; review Ankura and Mandiant rpts;	3.6
8/24/2020	Rasch	T/c w/ AUSA; review docs; research	1.8
8/24/2020	Westby	Review note from D. Dagon & doc; t/c w/ AUSA	2.0
8/25/2020	Rasch	Call w/ Common counsel t/c w/ D. Dagon; review documents & online research	3.3
8/25/2020	Westby	Review note from D. Dagon & article at link; email joint defense counsel & respond to reply; email K. Wasch	1.0
8/26/2020	Rasch	T/c w/ Common counsel; review GT policies; draft response re scope of investigation; prepare response to AUSA	4.7
8/26/2020	Westby	Review note from D. Dagon & reply; t/c w/ joint defense counsel (2); email joint defense counsel	3.5
8/27/2020	Rasch	F/up w/ Common counsel (2); review Senate Intel rpt; review Dagon info; t/c w/ K. Wasch	3.1
8/27/2020	Westby	T/c w/ D. Dagon; review articles from links from D. Dagon; review email from K. Wasch; t/c w/ K. Wasch & M. Rasch;	3.5

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
		review reply from joint defense counsel; emails w/ joint defense counsel	
8/28/2020	Rasch	T/c w/ joint defense; review civil subpoena demands; review strategy; revise response; t/c w/ D. Dagon	6.8
8/28/2020	Westby	Review notes and doc from D. Dagon; t/c w/ joint defense attys; t/c w/ D. Dagon	3.0
8/29/2020	Rasch	Review articles; review draft white paper; t/c w/ D. Dagon; develop strategy re DNS records	4.9
8/31/2020	Westby	Review docs from D. Dagon; t/c w/ D. Dagon	2.5
9/1/2020	Westby	Call Common Counsel; review email from joint defense counsel & reply	0.5
9/2/2020	Westby	Review note from D. Dagon; review articles; email joint defense counsel re sharing response to AUSA; email joint counsel re draft letter; emails w/ joint defense counsel; t/c w/ joint defense counsel	2.5
9/3/2020	Westby	Review email from joint defense counsel; review PA & FL civil cases; email D. Dagon & joint defense counsel re same	1.5
9/4/2020	Westby	Review note from D. Dagon; t/c w/ D. Dagon; edit response to letter to AUSA; send letter to K. Wasch for GT review; reply note to D. Dagon; t/c w/ joint defense counsel	3.5
9/5/2020	Westby	Send note to D. Dagon; review email from joint defense counsel & white papers; review white papers; share draft letter to AUSA w/ joint defense counsel	1.5
9/7/2020	Westby	Review note from D. Dagon; reply; review email from joint defense counsel & reply	0.6
9/8/2020	Westby	Review third white paper from joint defense counsel; send note to D. Dagon; t/c w/ D. Dagon; t/c w/ joint defense counsel	2.5
9/10/2020	Westby	Review email from joint defense counsel and anonymous email; t/c w/ joint defense counsel; t/c w/ M. Rasch; email K. Wasch	2.0
9/11/2020	Westby	T/c w/ D. Dagon; t/c w/ joint defense counsel	2.0
9/12/2020	Westby	T/c w/ M. Rasch; t/c to Common Counsel; email joint defense counsel & respond to reply	0.8
9/14/2020	Rasch	Review letter from joint counsel; t/c w/ D. Dagon	1.0
9/14/2020	Westby	T/c w/ D. Dagon; review email from joint defense counsel & reply; t/c w/ joint defense counsel (2); review anonymous vmail;	3.5
9/15/2020	Rasch	T/c w/ D. Dagon	0.8
9/15/2020	Westby	T/c w/ D. Dagon; research articles; email D. Dagon re anonymous vmail; review email from joint defense counsel & civil subpoenas; t/c w/ joint defense counsel	4.0



**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
9/16/2020	Rasch	T/c w/ joint counsel; review subpoena compliance; t/c w/ J. Westby re K. Wasch reply	2.7
9/16/2020	Westby	T/c w/ D. Dagon; t/c w/ joint defense counsel; review email from K. Wasch & reply	1.5
9/22/2020	Rasch	Research scope of employment, sovereign immunity duty to reimburse; draft letter to GT;	4.7
9/22/2020	Westby	T/c w/ D. Dagon; review email from M. Rasch; email joint defense counsel	2.3
9/23/2020	Rasch	T/c w/ joint counsel; research third party payment; draft letter to GT	1.0
9/23/2020	Westby	T/c w/ D. Dagon; review email from K. Wasch; draft letter to K. Wasch re Dagon employment & legal fees; review docs from D. Dagon; email joint defense counsel	3.5
9/24/2020	Rasch	Draft letter to GT re scope of employment; t/c w/ D.Dagon; t/c w/ joint counsel; review LW letter to AUSA; research DOJ policies & practices;	6.3
9/24/2020	Westby	T/c w/ D. Dagon; review notes from D. Dagon; emails w/ joint defense counsel	3.0
9/25/2020	Rasch	T/c w/ N. McQuaid	0.7
9/25/2020	Westby	Notes to/from D. Dagon; t/c w/ D. Dagon; t/c w/ joint defense counsel (2)	3.5
9/27/2020	Westby	Review notes from D. Dagon; review note from joint defense counsel & review draft letter; reply to joint defense counsel	0.8
9/28/2020	Rasch	Draft memo to GT on scope of employment; research DOJ policies/ t/c w/ D. Dagon	2.8
9/28/2020	Westby	T/c w/ D. Dagon; send draft letter to K. Wasch to D. Dagon for review; t/c w/ joint defense counsel re draft letter	2.5
9/29/2020	Westby	Review notes from D. Dagon; t/c w/ D. Dagon; review civil subpoenas; email joint defense counsel; email joint defense counsel; t/c w/ joint defense counsel; review email from joint defense counsel & reply	4.0
9/30/2020	Rasch	T/c w/ D. Dagon re Ankura rpt; review civil allegations, Senate Intel rpt, Mandiant rpt;	2.9
9/30/2020	Westby	T/c w/ D. Dagon & M. Rasch; review email from K. Wasch & reply	2.5
10/1/2020	Rasch	Tel call D. Dagon/J Westby Re expert witness and scope of employment; call w P Vixie Re: Data Availability and analysis	2.7
10/1/2020	Westby	T/c/ w/ D. Dagon; review notes and doc from D. Dagon; t/c w/ K. Wasch & L. Nie; email joint defense counsel re expert witnesses	5.0

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
10/2/2020	Rasch	Review Pastebin postings, public posting, articles; draft third party payor agreement	1.8
10/2/2020	Westby	T/c w/ D. Dagon; review notes & doc from D. Dagon; t/c w/ researcher; email joint defense counsel	6.0
10/4/2020	Westby	Review notes from D. Dagon	0.5
10/6/2020	Rasch	Zoom Meeting w J Westby Re Third Party Payor/Indemnification Agreement, scope of employment; tel cal w/ joint defense	6.8
10/6/2020	Westby	Review notes from D. Dagon; mtg w/ M. Rasch; draft Third Party Payor agreement; t/c w/ D. Dagon; review email from joint defense counsel & reply; email joint defense counsel	3.5
10/7/2020	Rasch	Draft Letter to Ling Ling/GT & K Walsh Re Joint Defense and Scope of Employment; review Filkins article; tel calls w/ joint counsel; tel cal w J. Westby	10.3
10/7/2020	Westby	T/c w/ D. Dagon re status; review new Filkins article; article on DOJ changing policy on election interference; emails to joint defense counsel; email L. Nie & K. Wasch;	3.5
10/8/2020	Rasch	Tel Call D Dagon, Review D Dagon Analysis, map claims to DNS records and D Dagon presentation; edit response to subpoena; tel call w J. Westby	4.7
10/8/2020	Westby	T/c w/ joint defense counsel; t/c w/ D. Dagon re status; prepare summary doc of claims/issues, utility of report; t/c w/ D. Dagon re same; email joint defense counsel re summary doc;	5.0
10/9/2020	Rasch	Tel Cal Common Counsel, J Westby -	1.6
10/9/2020	Westby	Arrange call w/ joint defense to discuss summary paper & strategy	0.5
10/10/2020	Rasch	Tel Cal Common counsel, J Westby	1.9
10/11/2020	Rasch	Review Mark Bradmy article, tel call w J Westby	2.9
10/12/2020	Westby	T/c w/ joint defense counsel (2); t/c w/ D. Dagon; review online postings	2.5
10/13/2020	Rasch	Tel Call J Westby, call we Common counsel; tel cal w D. Dagon	4.0
10/13/2020	Westby	T/c w/ joint defense counsel; T/c w/ D. Dagon; review email from K. Wasch; t/c w/ D. Dagon & M. Rasch re same; T/c w/ joint defense counsel; t/c w/ D. Dagon re anonymous writer;	4.0
10/14/2020	Rasch	Review Epoch Times posting, expert witness reports; tel cal D. Dagon J. Westby	2.2
10/14/2020	Westby	T/c w/ D. Dagon re anonymous docs; draft response to K. Wasch; email D. Dagon & M. Rasch re same	4.5

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
10/15/2020	Rasch	Research - scope of employment, GA state regulations, reimbursement policies, AG policies	3.8
10/15/2020	Rasch	Draft talking points memo - Tel Call J Westby	2.7
10/15/2020	Westby	T/c w/ joint defense counsel; t/c w/ D. Dagon & M. Rasch re response to GT; review memo from D. Dagon; email K. Wasch requesting t/c; research faculty handbook and GT research policies; develop talking points for call w/ GT; email to D. Dagon & M. Rasch for review;	6.5
10/15/2020	Rasch	Review GT Faculty Manual, GT Lawsuits and settlements, AG litigation, Restatement Agency, LOAS policies	2.9
10/16/2020	Rasch	Tel Call A. McReedy re IU reimbursement policy; tel cal w common counsel; legal research – privilege issues, foreign prosecution	4.8
10/16/2020	Westby	Review email from AUSA & subpoena; forward to D. Dagon; t/cs w/ joint defense counsel; review reply from K. Wasch & reply; t/c w/ D. Dagon; review amicus filing by EFF	4.5
10/17/2020	Westby	Review email from joint defense counsel & reply; email joint defense counsel	0.2
10/18/2020	Westby	Review report from joint defense counsel; t/c w/ D. Dagon; t/c w/ J. Levine; prepare Kovel agreement & email to J. Levine; review news articles & email to D. Dagon & M. Rasch	6.0
10/19/2020	Westby	T/c w/ K. Wasch & LL Nie; t/c w/ D. Dagon; t/c w/ M. Rasch;	2.5
10/20/2020	Westby	Draft letter to LL Nie; revise notes from M. Rasch	3.0
10/21/2020	Westby	Revise letter to LL Nie; t/c w/ M. Rasch re edits to draft; t/c w/ D. Dagon; email LL Nie;	6.0
10/22/2020	Westby	Review edits from D. Dagon; edit letter to LL Nie; review edits from M. Rasch; review legal research; finalize letter to LL Nie; email letter to LL Nie	5.5
10/23/2020	Westby	T/c w/ M. Rasch to prepare for call w/ AUSA; t/c w/ A. DeFilippis; t/c w/ M. Rasch & D. Dagon; t/c w/ joint defense counsel; review email re deadline for civil case ID of Jane/John Does	4.5
10/24/2020	Westby	Review email from A. DeFilippis & reply; t/c w/ M. Rasch; t/c w/ D. Dagon	2.0
10/27/2020	Westby	Email joint defense counsel re call; review docs in file	1.0
10/28/2020	Westby	T/c w/ joint defense counsel; t/c w/ M. Rasch	1.7
10/30/2020	Westby	Email LL Nie re response to letter	0.3
11/4/2020	Rasch	Tel Call Common counsel J Westby	0.2

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
11/4/2020	Westby	Review email from LL Nie; Email B. Webb; review reply from B. Webb to schedule call; t/c w/ D. Dagon; review email from joint defense counsel & reply	2.8
11/5/2020	Rasch	Review expert witness documents. Jones Report, tel cal D Dagon, J Westby, tel cal common counsel, tel cal B Webb, tel cal former GA State AG, revise scope of employment memo	10.8
11/5/2020	Westby	T/c w/ M. Rasch; t/c w/ B. Webb; t/c w/ D. Dagon; email B. Webb w/ 1st ltr and 3rd party payor agreement	2.3
11/9/2020	Rasch	T/c w/Common Counsel review media reports; review draft letter from Common Counsel; tel cal former GA AG, draft letter to DeFilippis, tel cal w J. Westby	8.4
11/9/2020	Westby	Joint defense counsel call; review draft letter to AUSA; edit letter; email letter to AUSA; review response & discuss w/ M. Rasch; emails to joint defense counsel	2.5
11/10/2020	Rasch	Tel Call Common Counsel J Westby, tel cal D. Dagon	2.4
11/10/2020	Westby	Review emails from AUSA re letter; emails to joint defense counsel; t/cs w/ joint defense counsel; email D. Dagon re same; draft reply letter to AUSA; t/c w/ M. Rasch re same; email AUSA w/ response	5.5
11/11/2020	Rasch	Tel Call A Fillipis, J Westby.Fuhrman, et al - re privilege and grand jury, draft letter to DeFilippis re privilege, tel calls common counsel J Westby	5.5
11/11/2020	Westby	T/c w/ AUSA; emails w/ joint defense counsel; t/cs w/ joint defense counsel; email to D. Dagon re signing document for AUSA;	4.0
11/12/2020	Rasch	Review DeFilippis letters to counsel; tel cal J Westby	2.2
11/12/2020	Westby	Email executed docs to AUSA; review email from AUSA re response to letter & FBI interviews; t/c w/ M. Rasch	2.0
11/15/2020	Westby	Email response to AUSA re FBI interviews	0.2
11/18/2020	Rasch	Tel Call common counsel Westby	1.0
11/18/2020	Westby	Email B. Webb re fee issue; t/c w/ joint defense counsel;	1.2
11/20/2020	Rasch	Tel Call common counsel Westby	0.9
11/24/2020	Westby	Email B. Webb re fee issue; arrange for t/c;	0.2
11/25/2020	Rasch	Redraft Third Party Payor Agreement/Tel Call B Webb J Westby	3.2
11/25/2020	Westby	T/c w/ B. Webb; revise third party payor agreement per t/c w/ B. Webb; email to B. Webb	1.0
11/26/2020	Rasch	Meeting with J Westby	0.5
12/7/2020	Rasch	Meeting w J Westby RE Status, call w B. Webb, Draft letter to B. Webb	2.0
12/7/2020	Westby	T/c w/ D. Dagon; email B. Webb re status;	0.6

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
12/8/2020	Rasch	Call to K. Wasch; draft response to AUSA; call to J. Westby, redraft letter to B. Webb, mtg w J Westby	5.9
12/8/2020	Westby	T/c w/ joint defense counsel; review email from B. Webb & reply	0.7
12/20/2020	Rasch	Review Forbes Article Re Investigation, research Georgia constitution, gratuities clause	1.8
12/29/2020	Rasch	Tel Call w Common Counsel Re Investigation	1.0
12/29/2020	Westby	T/c w/ joint defense counsel re subpoenas to GJ	1.0
1/25/2021	Rasch	Tel cal w Common Defense, research BAA and joint defense issues,	1.0
1/25/2021	Westby	Email to B. Webb re legal fees; review BAA; forward to joint defense counsel; draft letter to B. Webb	2.7
1/26/2021	Westby	T/c w/ joint defense counsel re subpoena to GJ & documents produced; research reimbursement of legal fees by DOAS; draft letter to B. Webb	3.5
1/27/2021	Rasch	Draft Letter to Ling Ling Re: Scope of Independent Counsel Investigation, letter to B. Webb, DOAS policy and DARPA, Tel Call former GA AG Re: Indemnification	4.2
1/28/2021	Rasch	Research - scope of immunity, 18 USC 6001, act of production, agency	3.0
1/28/2021	Westby	Email joint defense counsel re 5th A & review replies; draft letter to B. Webb	4.5
1/29/2021	Rasch	Draft Letter to AG Webb RE Scope of Employment,	4.2
1/29/2021	Westby	Research gratuities clause; finalize letter to B. Webb; email B. Webb w/ letter	3.5
1/30/2021	Rasch	Research - Trump Russia Cyberattack reports, news articles	3.3
2/3/2021	Westby	T/c w/ joint defense counsel	0.5
2/23/2021	Westby	Email Ling-Ling re legal fees	0.2
2/26/2021	Rasch	Tel Call S. Common Defense Counsel, Email re legal fees, Joint defense call w J. Westby	1.2
2/26/2021	Westby	Review email from K. Wasch re legal fee payment; discuss w/ M. Rasch; joint defense call; t/c w/ D. Dagon	3.3
2/28/2021	Westby	Review email from joint defense counsel; reply	0.2
3/1/2021	Rasch	Revise Letter to G Tech re legal fees, tel cal w J. Westby and common counsel	1.8
3/1/2021	Westby	T/c w/ joint defense counsel; send docs to joint defense	0.8
3/2/2021	Westby	T/c w/ joint defense counsel; review file; send docs; draft letter to GT re legal fees	1.6
3/3/2021	Westby	Conduct research re applicability of DNS data to wiretap, PR/TT, Stored Comm Act; draft note re findings; email M. Rasch re prep for call w/ B. Webb; Review email from B. Webb re legal fees	2.5

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
3/4/2021	Rasch	Research DOAS policies/ Reimbursement, research SCA, trap and trace, tel cal w J. Westby; draft letter to AG re reimbursement, draft letter to LL, tel cal D Dagon	6.5
3/4/2021	Westby	T/c w/ D. Dagon; t/c w/ joint defense counsel; review letter to GT re legal fees; email D. Dagon re letter to GT re legal fees	3.0
3/5/2021	Westby	T/c w/ joint defense counsel (2); revise letter to GT to include DOAS reimbursement	2.5
3/6/2021	Westby	Research applicability of DNS data to pen register/trap trace & stored comm act; email joint defense counsel re same	1.3
3/9/2021	Rasch	T/c w/ joint defense counsel; t/c w/ DOAS; research DNS record availability;	2.9
3/9/2021	Westby	T/c w/ DOAS re legal fee reimbursement	0.5
3/10/2021	Westby	Review email from joint defense re docs from Alice; email K. Wasch & Ling-Ling re letter re legal fee offer	1.5
3/11/2021	Rasch	Tel call to D Dagon,	2.2
3/14/2021	Westby	Review emails from joint defense re 5th A & reply	0.6
3/17/2021	Rasch	Research GT Policies, review docs from K Wasch and Ling Ling, fee research	1.9
3/19/2021	Rasch	Review DARPA contract and policies, tel cal w consulting counsel re DARPA reimbursement policies, duty to defend contract	4.2
3/19/2021	Westby	Review research on FAR & payment of legal fees	0.5
3/20/2021	Rasch	Research FAR requirements reimbursement of attorney fees	3.8
3/22/2021	Rasch	Research - GA AG Policies - Conflict of Interest and dual representation,	2.7
3/23/2021	Westby	Email K. Wasch re call to discuss fees;	0.2
3/26/2021	Westby	Email Ling-Ling & K. Wasch re legal fees; review reply	0.2
3/29/2021	Rasch	Tel Call w Common Defense Counsel, tel cal w J. Westby, follow up research	1.0
3/29/2021	Westby	T/c w/ joint defense counsel	0.5
3/30/2021	Westby	Email joint counsel; T/c w/ joint defense counsel; research BAA	1.3
3/31/2021	Westby	Review email from joint counsel; research response; reply	0.8
4/1/2021	Westby	Email K. Wasch & Ling-Ling re legal fees; review email from D. Lunon re legal fees	0.9
4/2/2021	Westby	Email to D. Lunon; email joint defense counsel	0.3
4/5/2021	Westby	Review email from D. Lunon re legal fee status	0.1
4/9/2021	Rasch	Draft letter to GT counsel re scope of employment; t/c	1.3
4/15/2021	Westby	Review draft letter to DOAS	0.3
4/21/2021	Westby	Review email from joint defense counsel; reply	0.2
4/21/2021	Rasch	Letter to DOAS, common counsel email	0.5



**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
4/22/2021	Westby	Email D. Dagon re DOAS letter	0.2
4/26/2021	Westby	Email D. Lunon re legal fee issue	0.3
4/28/2021	Westby	Review email from D. Lunon re fees & reply	0.5
5/6/2021	Westby	Emails to joint defense counsel ; t/c w/ joint defense counsel	1.0
5/6/2021	Rasch	Tel Call w Common Defense Counsel re joint defense	1.4
5/7/2021	Westby	T/c w/ joint defense counsel; review emails from joint defense counsel & reply	1.0
5/8/2021	Rasch	Call w/ J. Westby re subpoena; review subpoena; call w/ D. Dagon re same	2.0
5/9/2021	Rasch	T/c w/ Common Counsel review white paper; review Tea Pain reports; draft response to AUSA; review DNS availability	5.5
5/10/2021	Westby	Review letter from K. Wasch re legal fees; t/c w/ joint defense counsel; emails w/ joint defense counsel	1.4
5/11/2021	Westby	T/c w/ joint defense counsel; draft response to GT letter re fees	3.5
5/12/2021	Westby	T/c w/ joint defense counsel; draft response to GT letter re fees; email D. Dagon	2.5
5/12/2021	Rasch	Tel Cal Common Counsel - letter to Wasch/Ling Ling	1.9
5/14/2021	Westby	Edit GT letter re fees; email D. Dagon	2.5
5/17/2021	Westby	Edit GT letter; email D. Dagon;	2.0
5/19/2021	Westby	Review email from D. Dagon; t/c w/ D. Dagon	1.6
5/20/2021	Rasch	Revise letter to Kate re legal fees	1.0
5/20/2021	Westby	Review edits to GT letter from M. Rasch; email M. Rasch re same	1.5
5/21/2021	Westby	Review edits to GT letter;	1.0
6/8/2021	Rasch	Research GJ & special counsel, review subpoena, prepare draft response	1.2
6/23/2021	Rasch	Common Interest Call w Common Counsel, research re scope of privilege, Klein issues	1.2
6/23/2021	Westby	T/c w/ joint defense counsel	0.5
6/24/2021	Westby	Review docs from joint defense counsel; email joint defense counsel	0.5
6/29/2021	Westby	T/c w/ joint defense counsel; email M. Rasch re same; email joint defense counsel	1.2
6/29/2021	Rasch	Research - Articles on Investigation, tel call J. Westby	2.7
6/30/2021	Westby	T/c w/ D. Dagon; t/c w/ joint defense counsel	1.6
6/30/2021	Rasch	Tel Call D. Dagon J. Westby	2.0
7/1/2021	Westby	T/c w/ joint defense counsel (3)	1.5
7/1/2021	Rasch	Tel Call w Common counsel - research caselaw	1.2

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
7/2/2021	Rasch	Tel Call w Common Defense Counsel	1.2
7/2/2021	Westby	T/c w/ joint defense counsel; review letter from joint defense counsel	0.8
7/5/2021	Westby	T/c w/ joint defense counsel	0.5
7/6/2021	Rasch	Call w joint defense counsel	1.0
7/6/2021	Westby	Review email from DeFilippis & reply; t/c w/ De F; t/c w/ joint defense counsel (3); email to D. Dagon	2.8
7/7/2021	Westby	T/c w/ joint defense counsel; review email from DeF & proffer agreement; reply to DeF re same	1.2
7/7/2021	Rasch	Tel Cal Common Counsel - DeFilippis, J. Westby, proffer session	1.0
7/8/2021	Rasch	T/c w/ J. Westby; review subpoena response; draft response to subpoena	1.0
7/8/2021	Westby	T/c w/ joint counsel; Review emails from DeF & reply	0.7
7/9/2021	Rasch	Tel Call w D. Dagon; tel call common interest	3.9
7/9/2021	Westby	T/c w/ DeF; t/c w D. Dagon; review docs from D. Dagon;	3.0
7/10/2021	Rasch	Research on Prosecutorial Misconduct	4.0
7/10/2021	Westby	Draft letter to DeF; review email from DeF;	1.0
7/12/2021	Rasch	Tel call w A DeF - legal ethics, threats of prosecution	1.0
7/12/2021	Westby	T/c w/ S. Saltzburg; review doc from D. Dagon; edit letter to DeF; T/c w/ joint counsel	2.4
7/13/2021	Rasch	Common Interest Call w Counsel; tel cal D Dagon	4.8
7/13/2021	Westby	Review email from DeF & subpoena; t/c w/ D. Dagon; t/c w/ joint counsel(2); email S. Saltzburg; finalize letter to DeF & send; review email from DeF & reply; emails to D. Dagon; emails to joint defense counsel	4.7
7/14/2021	Rasch	Common Interest calls; tel cal D Dagon J Westby	5.3
7/14/2021	Westby	T/c w/ joint defense counsel (6); review email from DeF; t/c w/ DeF; review doc from D. Dagon	5.7
7/15/2021	Rasch	Letter to DeF; tel cal common interest; tel cal Christian F re fees	4.0
7/15/2021	Westby	T/c w/ C. Fuller re legal fees, Dagon status; review doc from D. Dagon; review draft letter to DeF; emails to S. Saltzburg; review emails from joint defense counsel; t/c w/ joint defense counsel; t/c w/ D. Dagon; email letter to DeF	4.5
7/16/2021	Rasch	Call w D Dagon	2.0
7/16/2021	Westby	Review email from DeF & reply; discuss dates for testimony; t/c w/ D. Dagon; t/c w/ DeF; send D. Dagon draft letter re immunity	3.5
7/17/2021	Rasch	Common Interest Call	1.0



**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
7/17/2021	Westby	Review email from DeF re testimony; t/c w/ D. Dagon; t/c w/ joint defense counsel	2.4
7/19/2021	Rasch	Grand Jury Prep	2.0
7/19/2021	Westby	T/c w/ joint defense counsel; email D. Dagon re DOJ reimbursement; emails w/ joint defense counsel	0.8
7/20/2021	Rasch	Subpoena duces tecum review; tel cal J Westby	4.0
7/20/2021	Westby	Review email from C. Fuller re note from DARPA GC & document production & reply; email DeF re testimony & documents; review email from DeF & reply; t/c w/ D. Dagon	4.8
7/21/2021	Rasch	FRCrim P 6 research; tel call common counsel, tel cal w GA AG Beth Young, tel cal w J Westby	5.3
7/21/2021	Westby	Review emails from DOJ; review emails from joint defense counsel; review email from E. Young & reply; t/c w/ E. Young; review email from DeF & reply; t/c w/ M. Rasch; t/c w/ D. Dagon; t/c w/ DeF; review email from E. Young & GT subpoena; draft email to DeF re document production	4.8
7/22/2021	Westby	Review doc from D. Dagon; review emails from joint defense counsel; t/c w/ D. Dagon	1.4
7/23/2021	Rasch	Draft letter to DeFilippis re DARPA; tel cal common counsel; tel cal J Westby	5.0
7/23/2021	Westby	Review emails from E. Young & reply; email De F re document production; email E. Young re responsive documents; email D. Dagon	1.2
7/24/2021	Rasch	Review document production; tel call common counsel	4.7
7/24/2021	Westby	Review email from DeF & reply; t/c w/ joint defense counsel; t/c w/ D. Dagon	4.0
7/25/2021	Westby	Email DeF;	0.2
7/26/2021	Rasch	Review documents; research, tel cal w D Dagon, J Westby to prep for mtg w DeF and GJ	8.0
7/26/2021	Westby	Review email from E. Young re doc production & reply; review doc from D. Dagon; Review email from DeF re immunity & reply; review file; mtg w/ D. Dagon	7.0
7/27/2021	Rasch	Tel Call D Dagon to prep; letter to GA AG re document production, review documents	7.0
7/27/2021	Westby	Mtg w/ D. Dagon re DeF meeting & testimony; review emails from E. Young re docs & reply	8.0
7/28/2021	Rasch	Mtg w DeFilippis, mtg w D Dagon, tel calls joint counsel	10.0
7/28/2021	Westby	Mtg w/ DeF; mtg w/ Dagon; review email from joint counsel; joint counsel calls	12.0
7/29/2021	Rasch	Mtg w DeFilippis, mtg w D Dagon, GJ testimony, review docs, tel calls common interest; review Rhamnusia logs	11.2

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
7/29/2021	Westby	Mtg w/ DeF; GJ testimony; mtg w/ Dagon; review immunity order; review emails from E. Young re Rhamnousia chat logs & reply; t/c w/ joint defense counsel	11.8
7/30/2021	Rasch	Tel calls joint counsel, review documents, tel cal D Dagon	4.0
7/30/2021	Westby	T/c w/ joint counsel; review docs from D. Dagon; review email from DeF & reply; t/c w/ D. Dagon	4.3
8/1/2021	Westby	Review email from DeF; t/c w/ DeF; t/c w/ Dagon;	1.7
8/2/2021	Rasch	Joint Defense call, tel cal D Dagon J Westby, review docs	4.0
8/2/2021	Westby	Review docs from D. Dagon; review emails from DeF; review emails from E. Young; t/c w/ D. Dagon; review emails from joint defense counsel; email joint defense counsel re docs needed	4.5
8/3/2021	Rasch	Witness preparation, review documents	4.0
8/3/2021	Westby	T/c w/ joint defense counsel (2); review docs from joint defense counsel; review email from DeF and docs; emails w/ DeF re mtgs & testimony; mtg w/ D. Dagon	8.8
8/4/2021	Westby	Mtg w/ D. Dagon; mtg w/ DeF;	11.0
8/4/2021	Rasch	Tel cal w D Dagon, tel cal w DeF & team	5.5
8/5/2021	Rasch	Tel call J Westby, D Dagon	1.7
8/5/2021	Westby	Review emails from joint defense counsel; mtg w/ D. Dagon; GJ testimony; t/c w/ joint defense counsel; review email from DoJ re reimbursement & reply	6.5
8/6/2021	Westby	Review emails from joint defense counsel & reply t/c w/ joint defense counsel (2);	2.0
8/9/2021	Rasch	Common Defense Call, document review	3.2
8/9/2021	Westby	Email DeF documents; t/c w/ joint defense counsel; email docs to joint defense counsel; review docs & file from GJ; review doc from D. Dagon	7.5
8/10/2021	Rasch	Tel cal w J Westby	1.0
8/10/2021	Westby	Review email from joint defense counsel;	0.5
8/11/2021	Rasch	Common Defense comms, tel cal D Dagon	1.5
8/11/2021	Westby	Review doc from D. Dagon; review email from joint defense counsel & reply;	1.0
8/12/2021	Westby	T/c & emails w/ joint defense counsel; t/c w/ D. Dagon	3.5
8/13/2021	Rasch	Review Grand Jury process; OSINT legal review	3.0
8/13/2021	Westby	Email joint defense counsel;	0.5
8/14/2021	Westby	Review email from joint defense counsel; draft letter to DeF; t/c w/ D. Dagon; email joint defense counsel	1.5
8/15/2021	Rasch	Draft letter DeFilippis, tel cal J Westby D Dagon	4.0
8/15/2021	Westby	Review doc from D. Dagon; t/c w/ M. Rasch; draft letter to DeF; review email from DeF w/ Qs to answer; t/c w/ D.	6.5

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
		Dagon; review emails from joint defense counsel; emails to joint defense counsel	
8/16/2021	Rasch	Tel cal w common counsel, tel cal D Dagon	3.5
8/16/2021	Westby	T/c w/ joint defense counsel; t/c w/ D. Dagon; draft answers to DeF Qs;	7.5
8/17/2021	Rasch	Witness prep Dagon, research - 1001 caselaw, special counsel, tel cal common counsel	5.0
8/17/2021	Westby	Review doc from D. Dagon; t/c w/ joint defense counsel; edit answers to DeF Qs; email DeF with answers to Q; email joint defense counsel	5.0
8/18/2021	Rasch	Witness prep Dagon, draft responses to DOJ questions	6.5
8/18/2021	Westby	Review email from DeF; review email from M. Rasch re same; email DeF w/ answers; review email from DeF; t/c w/ D. Dagon; reply to DeF	4.8
8/19/2021	Rasch	Mtg w D Dagon, tel cal J Westby, Grand Jury testimony	6.5
8/19/2021	Westby	Review email from DeF; review email from M. Rasch; email DeF; t/c w/ M. Rasch; t/c w/ D. Dagon; review email from J. Eckenrode; t/c w/ M. Rasch; review doc from D. Dagon	4.3
8/20/2021	Rasch	Common Interest Call, tel cal D Dagon	2.0
8/21/2021	Westby	Joint defense counsel call;	0.5
8/23/2021	Rasch	Common Interest call, review docs from D Dagon	2.4
8/23/2021	Westby	Joint defense counsel calls (4); review file docs from D. Dagon;	3.5
8/24/2021	Rasch	Common Interest Call w Common Counsel	1.5
8/24/2021	Westby	Review docs from D. Dagon; t/c w/ joint defense counsel (2); email docs to joint defense counsel; draft letter to DeF	5.5
8/25/2021	Westby	Review doc from D. Dagon; t/c w/ D. Dagon; edit letter to DeF; email joint defense counsel;	5.4
8/26/2021	Westby	Draft & finalize letter to DeF; emails to joint defense counsel; email letter to DeF	6.5
8/27/2021	Rasch	Research scope of investigation, DOJ policies, draft letter to DeFilippis, Garland, Durham	5.0
8/27/2021	Westby	Send emails to joint defense counsel; t/c w/ joint defense counsel; review doc from D. Dagon	2.0
8/28/2021	Westby	Review doc from D. Dagon; emails to joint defense counsel & review replies	2.0
8/30/2021	Westby	T/c w/ joint defense counsel (2); emails to joint defense counsel;	2.8
8/31/2021	Westby	Email letter to AG Garland & Durham	0.5
9/1/2021	Rasch	Research draft letter to DeF re scope of investigation, tel cal joint counsel, review D. Jones litigation - report	6.2
9/3/2021	Rasch	Tel cal D Dagon J Westby, review docs from D Dagon	2.3

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
9/3/2021	Westby	Review docs in file; t/c w/ M. Rasch; t/c w/ D. Dagon	2.5
9/5/2021	Rasch	Review documents, emails re press reports	1.2
9/16/2021	Rasch	Common Interest Calls, review indictment, review D. Jones suit, tel cal D Dagon J Westby	5.5
9/16/2021	Westby	Review indictment; t/c w/ DeF; emails & t/c w/ joint defense counsel; t/c w/ D. Dagon; review email from J. Durham	3.5
9/17/2021	Rasch	Review Durham response & draft reply; tel call common counsel	3.7
9/17/2021	Westby	T/c w/ joint defense counsel; emails w/ joint defense counsel; review draft response to J. Durham;	3.0
9/19/2021	Westby	Emails w/ joint defense counsel;	0.5
9/20/2021	Rasch	Common Interest Call	1.2
9/20/2021	Westby	T/c w/ joint defense counsel; t/c w/ D. Dagon; review emails from joint defense counsel & reply	1.9
9/21/2021	Rasch	DOAS research	1.9
9/21/2021	Westby	T/c w/ joint defense counsel (2); t/c w/ D. Dagon & M. Rasch; review doc from D. Dagon	2.7
9/22/2021	Westby	T/c w/ joint defense counsel; t/c w/ D. Dagon	2.5
9/23/2021	Westby	Review docs from D. Dagon; review emails from joint defense counsel; t/c w/ joint defense counsel;	3.5
9/25/2021	Rasch	Research independent counsel statute	2.0
9/28/2021	Westby	T/c w/ C. Fuller & E. Young; review doc from D. Dagon;	1.5
9/28/2021	Rasch	Tel cal w Christian F & Beth Young, tel cal J Westby	1.5
9/30/2021	Westby	T/c w/ joint defense counsel; review docs; review doc from D. Dagon	1.3
10/1/2021	Rasch	OSC investigation research; tel call common counsel	3.3
10/20/2021	Westby	Email DOAS re ORR; emails w/ joint counsel	1.0
10/21/2021	Westby	Review email from joint counsel; t/calls w/ joint counsel; review email from joint counsel; prepare & submit ORR to GT; emails to D. Dagon;	2.5
11/10/21	Rasch	Tel call w joint defense US v Sussman, research data integrity and third party	0.8
12/30/21	Westby	Review email from Andrew DeF & reply; t/c/ w/ M. Rasch re same; t/c w/ D. Dagon	.5
12/30/21	Rasch	Tel Call J Westby, David Dagon	0.5
12/31/21	Westby	Emails to joint defense; t/c w/ D. Dagon	1.0
12/31/21	Rasch	Common interest call	1.0
1/2/22	Rasch	Common interest tel call	0.7
1/5/22	Westby	T/c w/ DeF; t/c w/ M. Rasch re same	.5
1/5/22	Rasch	Tel call w A. DeF/ J. Westby	0.5

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
1/6/22	Westby	T/c w/ joint defense counsel; review email & docs from joint defense counsel; review In re Sealed Motion case	3.8
1/6/22	Rasch	Tel cal -common interest, research grand jury secrecy issue	3.0
1/7/22	Westby	T/c w/ joint defense counsel	1.0
1/7/22	Rasch	Common interest call	1.0
1/9/22	Westby	Review doc from joint defense counsel; review file	1.5
1/9/22	Rasch	Common interest call	1.0
1/11/22	Westby	Review doc from FBI; T/c w/ Dagon	1.5
1/11/22	Rasch	Common interest call; call w J Westby; tel cal Dagon	1.4
1/12/22	Westby	T/c w/ joint defense	.5
1/13/22	Westby	T/c w/ joint defense; review file & doc production	2.0
1/13/22	Rasch	Common interest call, review discovery documents, protective order	1.2
1/18/22	Westby	T/c w/ joint defense counsel	1.2
1/18/22	Rasch	Zoom call - common interest	1.2
1/20/22	Westby	Review emails from joint defense counsel; reply	.4
1/31/22	Rasch	Review GT documents found online, review US v Sussman discovery pleadings	1.0
2/2/22	Rasch	Tel call J Westby, D Dagon, respond to pleading US v. Sussman by DeF	0.8
2/2/22	Westby	Review email from DeF & reply; forward to client; t/c w/ M. Rasch	.5
2/12/22	Westby	Review email from joint counsel; review motion by DeF; t/c w/ M. Rasch	1.0
2/12/22	Rasch	Tel call w J. Westby, common defense email review	0.8
2/13/22	Westby	T/c w/ joint counsel (2); t/c w/ client; review doc from client; prepare talking points	4.5
2/13/22	Rasch	Common defense calls; call w D Dagon, confirm DNS and other records	3.2
2/14/22	Westby	T/c w/ joint counsel (2); review documents from client; prepare talking points; review email from joint counsel; review filing by joint counsel;	4.5
2/14/22	Rasch	Review documents re US v Sussman pleading, prepare response to DeF arguments	3.0
2/15/22	Westby	T/c w/ joint counsel; email joint counsel	1.0
2/15/22	Rasch	Common defense Zoom call, emails, strategy meeting Re DiF	1.5
2/17/22	Westby	T/c w/ C. Soghoian; t/c w/ M. Rasch; review motion to dismiss;	2.0
2/17/22	Rasch	Tel Call, J. Westby. US v. Sussman motion to dismiss, Tel call w Senate Staff RE DNS privacy	1.2
2/18/22	Rasch	Common defense calls	1.1
2/18/22	Westby	T/c w/ joint counsel re DNS/EOP;	1.0

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
2/23/22	Rasch	Tel Calls research and purpose of data collection, EOP DNS and internal/external	1.8
3/2/22	Westby	T/c w/ joint counsel; review email from joint counsel	.8
3/2/22	Rasch	Common defense t/c	1.0
3/3/22	Westby	Review email from joint counsel & reply; review email from D. Dagon & attachment; t/c w/ Dagon	1.2
3/3/22	Rasch	Review docs US v Sussmann, t/c w/ joint defense	1.3
3/4/22	Westby	T/c/ w/ joint counsel; review document from Dagon & reply	1.5
3/4/22	Rasch	Call w/ J. Westby	1.0
3/5/22	Rasch	Joint defense call/ review 900 pages of GT docs from ORR	1.2
3/6/22	Westby	Review ORR GT docs	1.2
3/7/22	Rasch	Review D. Dagon docs; joint defense call; t/c w/ J. Westby	2.5
3/7/22	Westby	T/c w/ joint counsel; t/c w/ M. Rasch re same; t/c w/ joint counsel; review doc from Dagon	2.0
3/8/22	Westby	Draft letter to DeF re Dagon testimony; email letter to DeF; review response	1.0
3/8/22	Rasch	Communication w/ DeF; draft letter re access to testimony	1.0
3/10/22	Westby	Review email from joint defense counsel; t/c w/ joint defense counsel; review info sent from joint defense	1.0
3/10/22	Rasch	Joint defense call; review docs from joint defense	1.0
3/11/22	Rasch	Call w/ joint defense; review GA Open Records Act	.2
3/15/22	Westby	Review email from OSC & reply; t/c w/ M. Rasch; t/c w/ D. Dagon	1.5
3/15/22	Rasch	Joint defense call/ call w/ D. Dagon; review GT emails	1.6
3/16/22	Westby	T/c w/ DeF & team; t/c w/ D. Dagon	1.0
3/16/22	Rasch	Call w/ DeF; joint defense call; review GT ORR docs	.9
3/17/22	Westby	Email w/ Joint defense counsel;	.2
3/17/22	Rasch	Review GT ORR docs; emails & call w/ J. Westby	.2
3/18/22	Westby	T/c w/ joint defense counsel;	.5
3/18/22	Rasch	Call w/ joint defense re emails and ORR docs	.5
3/19/22	Westby	Review email from D. Dagon & review attachment; t/c w D. Dagon	1.2
3/19/22	Rasch	Dagon document review; research	1.1
3/22/22	Westby	T/c w/ joint counsel; review email from joint counsel; email w/ OSC; t/c w/ Dagon	1.4
3/22/22	Rasch	Joint defense call; legal research; call w/ D. Dagon	1.5
3/24/22	Westby	Review email from joint counsel; review doc from Dagon	.5
3/24/22	Rasch	Review joint defense emails; email from D. Dagon	.5
3/25/22	Westby	Review email from joint counsel; review letter from GT; t/c w/ M. Rasch, Dagon	1.0
3/25/22	Rasch	Common defense emails; GT doc review; call w/ D. Dagon	1.0



**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
3/29/22	Westby	Email OSC re access transcripts; review ORR docs	4.3
3/29/22	Rasch	Draft pleading re access to GJ transcripts; GT doc review; emails re same	4.0
3/30/22	Westby	Tc w/ joint counsel; review information from joint defense; t/c w/ M. Rasch' review email from OSC & reply	1.3
3/30/22	Rasch	Call w/ J. Westby; call w/ joint counsel; doc review	1.6
3/31/22	Westby	Email joint counsel re docs to review;	.5
3/31/22	Rasch	Joint defense communications	.7
4/5/22	Westby	Review Sussmann motion re accuracy of data; review OSC filings;	.5
4/5/22	Rasch	Doc review; DeF filings, US v Sussmann	.5
4/6/22	Westby	Review email from joint counsel; review info re OSC position; t/c w/ M. Rasch	1.0
4/6/22	Rasch	Email from joint defense counsel	.9
4/7/22	Westby	Email M. Schamel & review reply	.2
4/7/22	Rasch	Review data re Manos Antonakakis	.3
4/11/22	Westby	T/c w/ M. Schamel; t/c w/ M. Rasch	.8
4/11/22	Rasch	Call w/ J. Westby; call w/ M. Schamel	.8
4/15/22	Westby	Review emails from joint counsel & reply re joint call; review court docs;	.6
4/15/22	Rasch	Review pleadings in Sussmann case; doc review ORR docs	.6
4/16/22	Westby	Review pleadings in Sussmann case; review ORR docs	1.0
4/16/22	Rasch	Review pleadings in Sussmann case; document review	1.0
4/18/22	Westby	Review emails from joint counsel; t/c w/ joint counsel & document; email expert witness; emails w/ joint counsel	2.8
4/18/22	Rasch	Review GT docs; joint defense call; review expert witness scope	3.0
4/19/22	Westby	T/c w/ joint counsel; review ORR docs; email joint counsel; t/c w/ M. Rasch; review draft from M. Rasch	2.5
4/19/22	Rasch	Review docs; joint defense call	2.3
4/25/22	Westby	Review order in Sussmann case; t/c w/ M. Rasch	1.0
4/25/22	Rasch	T/c w/ J. Westby; review pleadings/order	1.0
4/26/22	Westby	Review email from joint counsel & reply;	1.0
4/26/22	Rasch	T/c w/ J. Westby; review trial docs	.8
4/27/22	Westby	Review docs in Sussmann matter	4.5
4/27/22	Rasch	Sussmann doc review	4.5
4/28/22	Westby	Review emails w/ joint counsel; t/c w/ M. Rasch	.6
4/28/22	Rasch	Review transcript hearing scope of admissibility; call w/ J. Westby	.6
5/5/22	Westby	Review email from DeF & subpoena for trial testimony & reply; email D. Dagon re same	.5
5/5/22	Rasch	Review grand jury transcripts of D. Dagon; 302s, Jencks	.7

**GLOBAL CYBER LEGAL – TIME LOG FOR WESTBY & RASCH IN DAGON MATTER**

<b>Date</b>	<b>Personnel</b>	<b>Description of Activity</b>	<b>Hours</b>
5/6/22	Westby	Emails w/ DeF re testimony & transcripts; review court filings; email w/ M. Schamel re subpoena	1.5
5/6/22	Rasch	Review Jencks materials re testimony of witnesses	.8
5/7/22	Rasch	Review pleadings, scope of examination, GT ORR docs	1.4
5/9/22	Westby	Review court filings; email w/ M. Bosworth; t/c w/ DeF & team	1.5
5/11/22	Westby	Review court filings, witness lists; email joint defense counsel; t/c w/ joint defense counsel	1.3
5/11/22	Rasch	Review court orders re scope of direct/cross; t/c w/ Westby	1.0
5/12/22	Westby	Review court filings, court order	1.0
5/12/22	Rasch	Review order of court	1.0
5/13/22	Westby	Review court order	1.0
5/13/22	Rasch	Review testimony & trial briefs	1.0
<b>TOTAL</b>			<b>1029.9</b>

**TOTAL FEES CRIMINAL MATTER: 1029.9 hours @ \$350/HOUR = \$360,465.00**  
**(Discounted for GA from \$395/hour)**

**Total Hours To Date: 1029.9 hours @ \$395/hour = \$406,810.50**  
**Per retainer (reduced for Dagon from \$595/hour)**

**Total Hours to Date: 1029.9 hours @ \$595/hour = \$612,790.50**  
**Regular hourly rate**

**AMOUNT DISCOUNTED from \$395/hour = \$ 46,345.50**  
**AMOUNT DISCOUNTED from \$595/hour = \$252,325.50**

**TOTAL AMOUNT OWED CRIMINAL MATTER: \$360,465.00**