

# SEWARD & KISSEL LLP

ONE BATTERY PARK PLAZA  
NEW YORK, NEW YORK 10004

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July 27, 2020

## VIA EMAIL

Richard H. Friedman, Esq.  
Friedman | Rubin  
1126 Highland Ave.  
Bremerton, WA 98337  
[rfriedman@friedmanrubin.com](mailto:rfriedman@friedmanrubin.com)

Re: United States v. Steven Donziger, 19 Cr. 561 (LAP)

Dear Mr. Friedman:

In accord with the Court's July 22, 2020 Order (Dkt. 108), we attach as Exhibit 1 to this letter the information specified by the Court in that order for disclosure:

For each paid invoice, (i) the invoice cover sheet showing the billing totals; (ii) the page of the billing statement showing "Total Hours," "Total Services," "Total Disbursements," and "Total Amount Due," and redacting any other information from that page, including any itemized time entries or narrative descriptions, as that information risks improperly revealing the prosecution's strategy before trial and thus falls outside the public right of access; and (iii) the final page of the invoice showing the hours, rates, and amount attributable to each individual lawyer.

Dkt. 108 at 3. Exhibit 1 contains the foregoing information with respect to Invoice Nos. 9160001034; 9160001601; 9160004202; 9160005377; 9160005797; 9160007264; 9160007716; 9160009516; 91600010576; and 91600012212.

Sincerely,

s/Rita M. Glavin  
Rita M. Glavin

Richard H. Friedman, Esq.  
July 27, 2020  
Page 2

Cc (via email):

Martin Garbus, Esq.  
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Lauren Regan, Esq.  
Civil Liberties Defense Center  
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Eugene, OR 97401  
[lregan@cldc.org](mailto:lregan@cldc.org)

# **EXHIBIT 1**

**SEWARD & KISSEL LLP**

ONE BATTERY PARK PLAZA  
NEW YORK, NY 10004  
(212) 574-1200

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6735 US vs Donziger, 19 Cr. 561

September 27, 2019  
Invoice Number 9160001034

For Professional Services Rendered through August 31, 2019:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	2,870.00	0.00	2,870.00

Invoice Date September 27, 2019

US vs Donziger, 19 Cr. 561

Invoice Number 9160001034

06735-0001

US vs Donziger

Through August 31, 2019

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Total Hours..... 11.40

Total Services.....\$ 2,870.00

Invoice Date September 27, 2019

Invoice Number 9160001034

Through August 31, 2019

US vs Donziger, 19 Cr. 561

06735-0001

US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	1.00	300.00	300.00
1363 BPM	Associate	Maloney, Brian	4.90	300.00	1,470.00
2009 SKA	Associate	Armani, Sareen K.	5.50	200.00	1,100.00
<b>Total</b>			<b>11.40</b>		<b>2,870.00</b>

**SEWARD & KISSEL LLP**

ONE BATTERY PARK PLAZA  
NEW YORK, NY 10004  
(212) 574-1200

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6735 US vs Donziger, 19 Cr. 561

October 17, 2019  
Invoice Number 9160001601

For Professional Services Rendered from September 1 through September 30, 2019:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	5,585.00	0.00	5,585.00

US vs Donziger, 19 Cr. 561

Invoice Date October 17, 2019

Invoice Number 9160001601

06735-0001

US vs Donziger

Through September 30, 2019

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Total Hours..... 26.25

Total Services..... \$ 5,585.00

**TOTAL AMOUNT DUE..... \$ 5,585.00**



**Invoice Date** October 17, 2019  
**Invoice Number** 9160001601  
**Through** September 30, 2019

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	4.15	300.00	1,245.00
1363 BPM	Associate	Maloney, Brian	6.20	300.00	1,860.00
2009 SKA	Associate	Armani, Sareen K.	8.90	200.00	1,780.00
2106 HF	Paralegal	Fayed, Hamsa	7.00	100.00	700.00
<b>Total</b>			<b>26.25</b>		<b>5,585.00</b>

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6735 US vs Donziger, 19 Cr. 561

November 29, 2019  
Invoice Number 9160004202

US vs Donziger, 19 Cr. 561  
None provided  
New York NY 10004

For Professional Services Rendered through October 31, 2019:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	29,530.00	0.00	29,530.00



Invoice Date November 29, 2019

Invoice Number 9160004202

Through October 31, 2019

US vs Donziger, 19 Cr. 561

06735-0001

US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	58.60	300.00	17,580.00
1363 BPM	Associate	Maloney, Brian	12.70	300.00	3,810.00
2009 SKA	Associate	Armani, Sareen K.	39.10	200.00	7,820.00
2106 HF	Paralegal	Fayed, Hamsa	3.20	100.00	320.00
<b>Total</b>			<b>113.60</b>		<b>29,530.00</b>

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NEW YORK, NY 10004

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6735 US vs Donziger, 19 Cr. 561

January 10, 2020  
Invoice Number 9160005377

For Professional Services Rendered through November 30, 2019:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	28,160.00	0.00	28,160.00

Invoice Date January 10, 2020

US vs Donziger, 19 Cr. 561

Invoice Number 9160005377

06735-0001

US vs Donziger

Through November 30, 2019

[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
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[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Total Hours..... 116.00  
Total Services..... \$ 28,160.00  
TOTAL AMOUNT DUE..... \$ 28,160.00

**Invoice Date** January 10, 2020  
**Invoice Number** 9160005377  
**Through** November 30, 2019

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	44.10	300.00	13,230.00
1363 BPM	Associate	Maloney, Brian	7.80	296.15	2,310.00
2009 SKA	Associate	Armani, Sareen K.	62.10	200.00	12,420.00
2106 HF	Paralegal	Fayed, Hamsa	2.00	100.00	200.00
<b>Total</b>			<b>116.00</b>		<b>28,160.00</b>

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6735 US vs Donziger, 19 Cr. 561

January 24, 2020

Invoice Number 9160005797

For Professional Services Rendered through December 31, 2019:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	39,700.00	54.00	39,754.00



06735-0001

US vs Donziger, 19 Cr. 561

US vs Donziger

Invoice Date January 24, 2020  
Invoice Number 9160005797  
Through December 31, 2019

Total Hours..... 179.70

Total Services..... \$ 39,700.00

**Disbursements Recorded Through December 31, 2019**

██████████ ..... ██████████  
Total Disbursements..... \$ 54.00

**TOTAL AMOUNT DUE..... \$ 39,754.00**

**Invoice Date** January 24, 2020  
**Invoice Number** 9160005797  
**Through** December 31, 2019

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	59.70	300.00	17,910.00
1363 BPM	Associate	Maloney, Brian	24.50	300.00	7,350.00
2009 SKA	Associate	Armani, Sareen K.	50.30	200.00	10,060.00
2106 HF	Paralegal	Fayed, Hamsa	43.80	100.00	4,380.00
<b>Total</b>			<b>179.70</b>		<b>39,700.00</b>

**SEWARD & KISSEL LLP**

ONE BATTERY PARK PLAZA

NEW YORK, NY 10004

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6735 US vs Donziger, 19 Cr. 561

March 10, 2020

Invoice Number 9160007264

For Professional Services Rendered through January 31, 2020:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	23,525.00	0.00	23,525.00

06735-0001

US vs Donziger, 19 Cr. 561

US vs Donziger

Invoice Date

March 10, 2020

Invoice Number

9160007264

Through

January 31, 2020

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Total Hours.....	91.25
Total Services..... \$	23,525.00
<b>TOTAL AMOUNT DUE..... \$</b>	<b><u>23,525.00</u></b>

**Invoice Date** March 10, 2020  
**Invoice Number** 9160007264  
**Through** January 31, 2020

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	47.75	300.00	14,325.00
1363 BPM	Counsel	Maloney, Brian	6.00	300.00	1,800.00
2009 SKA	Associate	Armani, Sareen K.	36.50	200.00	7,300.00
2106 HF	Paralegal	Fayed, Hamsa	1.00	100.00	100.00
<b>Total</b>			<b>91.25</b>		<b>23,525.00</b>

**SEWARD & KISSEL LLP**

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NEW YORK, NY 10004  
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6735 US vs Donziger, 19 Cr. 561

March 30, 2020  
Invoice Number 9160007716

For Professional Services Rendered through February 29, 2020:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	9,880.00	0.00	9,880.00



**Invoice Date** March 30, 2020  
**Invoice Number** 9160007716  
**Through** February 29, 2020

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1363 BPM	Counsel	Maloney, Brian	3.50	428.57	1,500.00
1815 RMG	Partner	Glavin, Rita M.	24.60	300.00	7,380.00
2009 SKA	Associate	Armani, Sareen K.	5.00	200.00	1,000.00
<b>Total</b>			<b>33.10</b>		<b>9,880.00</b>



**SEWARD & KISSEL LLP**

ONE BATTERY PARK PLAZA

NEW YORK, NY 10004

(212) 574-1200

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6735 US vs Donziger, 19 Cr. 561

April 30, 2020  
Invoice Number 9160009516

For Professional Services Rendered through March 31, 2020:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	50,680.00	0.00	50,680.00

US vs Donziger, 19 Cr. 561

Invoice Date

April 30, 2020

Invoice Number

9160009516

06735-0001

US vs Donziger

Through

March 31, 2020

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Total Hours..... 191.10

Total Services..... \$ 50,680.00

**TOTAL AMOUNT DUE..... \$ 50,680.00**

**Invoice Date** April 30, 2020  
**Invoice Number** 9160009516  
**Through** March 31, 2020

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	78.80	300.00	23,640.00
1363 BPM	Counsel	Maloney, Brian	45.80	300.00	13,740.00
2009 SKA	Associate	Armani, Sareen K.	66.50	200.00	13,300.00
<b>Total</b>			<b>191.10</b>		<b>50,680.00</b>

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NEW YORK, NY 10004  
(212) 574-1200

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6735 US vs Donziger, 19 Cr. 561

May 31, 2020  
Invoice Number 9160010576

N/A  
N/A  
N/A  
N/A 12345

For Professional Services Rendered through April 30, 2020:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	41,180.00	0.00	41,180.00

Invoice Date

May 31, 2020

Invoice Number

9160010576

Through

April 30, 2020

US vs Donziger, 19 Cr. 561

US vs Donziger

06735-0001

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

Total Hours.....	156.60
Total Services..... \$	41,180.00
<b>TOTAL AMOUNT DUE..... \$</b>	<b><u>41,180.00</u></b>

Invoice Date May 31, 2020  
Invoice Number 9160010576  
Through April 30, 2020

06735-0001 US vs Donziger, 19 Cr. 561  
US vs Donziger

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	61.20	300.00	18,360.00
1363 BPM	Counsel	Maloney, Brian	37.40	300.00	11,220.00
2009 SKA	Associate	Armani, Sareen K.	58.00	200.00	11,600.00
<b>Total</b>			<b>156.60</b>		<b>41,180.00</b>

**SEWARD & KISSEL LLP**

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NEW YORK, NY 10004  
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6735 US vs Donziger, 19 Cr. 561

July 06, 2020  
Invoice Number 9160012212

For Professional Services Rendered through May 31, 2020:

<u>Matter Number</u>	<u>Matter Name</u>	<u>Fee Amount</u>	<u>Disbursement Amount</u>	<u>Total Amount</u>
06735-0001	US vs Donziger	21,900.00	0.00	21,900.00

06735-0001

US vs Donziger, 19 Cr. 561

US vs Donziger

Invoice Date

July 06, 2020

Invoice Number

9160012212

Through

May 31, 2020

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Total Hours..... 83.50

Total Services.....\$ 21,900.00

Disbursements Recorded Through May 31, 2020

[REDACTED] [REDACTED] 0.00

Total Disbursements.....\$ 0.00

TOTAL AMOUNT DUE.....\$ 21,900.00



US vs Donziger, 19 Cr. 561

Invoice Date

July 06, 2020

06735-0001

US vs Donziger

Invoice Number

9160012212

Through

May 31, 2020

<u>ATTY NO. / INIT.</u>	<u>TITLE</u>	<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
1815 RMG	Partner	Glavin, Rita M.	32.80	300.00	9,840.00
1363 BPM	Counsel	Maloney, Brian	20.20	300.00	6,060.00
2009 SKA	Associate	Armani, Sareen K.	29.50	200.00	5,900.00
2106 HF	Paralegal	Fayed, Hamsa	1.00	100.00	100.00
<b>Total</b>			<b>83.50</b>		<b>21,900.00</b>