

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

RIDER, WEINER & FRANKEL, P.C.,

Plaintiff,

-against-

CONGREGATION YETEV LEV D'SATMAR,
INC., JENO KAHAN, INDIVIDUALLY AND
IN HIS CAPACITY AS PRESIDENT, AND
SOL PERLSTEIN, INDIVIDUALLY AND IN
HIS CAPACITY AS VICE PRESIDENT,

Defendants.

X

VERIFIED COMPLAINT

Index No.: 2007-10917

Assigned Judge:

Plaintiff Rider, Weiner & Frankel, P.C. ("RWF"), as its complaint alleges as follows:

1. Plaintiff RWF is a law firm and a professional corporation duly organized and existing in the State of New York, with a principal place of business at 655 Little Britain Road, New Windsor, New York 12553.
2. Defendant Yetev Lev D'Satmar ("Yetev Lev") is, upon information and belief, a religious corporation organized under the laws of the State of New York with a principal place of business at 152 Rodney Street, Brooklyn, New York 11211.
3. Defendant Jeno Kahan ("Kahan") is, upon information and belief, a citizen of the State of New York residing in Kings County, New York, and is the president of defendant Yetev Lev and can be reached care of Yetev Lev at 152 Rodney Street, Brooklyn, New York 11211.

4. Defendant Sol Perlstein ("Perlstein") is, upon information and belief, a citizen of the State of New York residing in Kings County, New York, and is the vice president of defendant Yetev Lev and can be reached care of Yetev Lev at 152 Rodney Street, Brooklyn, New York 11211.

5. Defendants Yetev Lev, Kahan and Perlstein, while residents, citizens or domiciliaries of the State of New York, retained the services of RWF to defend them in a lawsuit brought by Yetev Lev D'Satmar of Kiryas Joel, Inc. in New York State Supreme Court for the County of Orange under Index No. 4495/05 entitled Congregation Yetev Lev D'Satmar of Kiryas Joel, Inc. and Moshe Scher v. Congregation Yetev Lev D'Satmar, Inc., et al, Index No. 4495/2005, Supreme Court, County of Orange, New York, as set forth in the retainer agreement signed by defendants on or about August 10, 2005.

6. The retainer agreement sets forth in detail the scope of RWF's services and the basis for RWF's fees, chargeable at the firm's usual hourly rates. (A true and accurate copy of the retainer agreement executed by defendants is annexed hereto as Exhibit "A"; a copy of defendant Yetev Lev's remittance of the \$25,000 prepaid retainer fee is annexed hereto as Ex. "B"). The required statement of the clients' rights is attached to the retainer agreement.

7. RWF promptly and diligently performed the agreed upon services for the defendants, as set forth in RWF's periodic statements sent to defendants. RWF appeared in Court on several occasions for defendants, coordinated the defense of defendants in the underlying lawsuit, and the presentation of their counterclaims. Defendants met personally and conferred telephonically on numerous occasions with members and associates of RWF during the course of the litigation and otherwise performed all services requested by defendants. RWF drafted legal documents, and court papers. RFW gave periodic status reports to defendants both telephonically and in cover letters forwarding RWF's statements. (True and

accurate copies of RWF's statements are annexed hereto as Ex. "C"; and true and accurate copies of RWF's correspondence are annexed hereto as Ex. "D"). and otherwise performed all services requested by defendants.

8. Defendants have failed or refused to pay for the legal services and disbursements incurred on their behalf, despite repeated requests on the telephone and in writing. (See Ex. "D").

FIRST CAUSE OF ACTION FOR BREACH OF CONTRACT

9. Plaintiff repeats and realleges its allegations in paragraphs "1" through "8" above as though set forth fully herein.

10. In consideration of defendants' offer and promise to pay plaintiff RWF for its legal services plaintiff RWF duly performed its services and incurred costs and disbursements on defendants' behalf, as set forth in the parties' retainer agreement dated August 10, 2005.

11. Plaintiff fully performed, and its services were accepted by defendants.

12. Defendants made partial payments in the total amount of \$50,000 but failed to pay the balance owed, despite repeated demand, claiming it was without funds to do so.

13. Defendants have accordingly breached its contract with plaintiff, causing plaintiff to suffer damages in a principal amount no less than \$37,888.92.

SECOND CAUSE OF ACTION FOR UNJUST ENRICHMENT

14. Plaintiff repeats and realleges its allegations in paragraphs "1" through "13" above as though set forth fully herein.

15. From on or about August 8, 2005 through October 19, 2007 plaintiff RWF, at defendants' specific request and instruction and with their full authorization and acceptance, provided legal services and incurred costs and disbursements on behalf of defendants, having an agreed upon and reasonable value of \$87,888.92, of which only \$50,000.00 has been paid, leaving due an unpaid principal amount of \$37,888.92.

16. Defendants, without valid legal excuse or justification, have failed or refused to make payment for said services and costs despite plaintiff's repeated demand.

17. Accordingly, defendants have received the value of plaintiff's services without paying therefor, thereby unjustly enriching defendants to plaintiff's detriment. Defendants are therefore liable to plaintiff in the principal amount of \$37,888.92.

THIRD CAUSE OF ACTION FOR AN ACCOUNT STATED

18. Plaintiff repeats and realleges its allegations in paragraphs "1" through "16" above as though set forth fully herein.

19. At defendants' request, plaintiff RWF, commencing on or about August 8, 2005 through July 31, 2007, provided legal services and incurred related costs and disbursements on defendants' behalf having an agreed upon and reasonable value of \$87,888.92.

20. Plaintiff regularly and periodically submitted its invoices for the legal services it rendered to defendants setting forth the nature of the work, identifying each of defendants' claims, and the amounts due pursuant to the parties retainer agreement and plaintiff's usual and customary rates.

21. Each invoice constitutes a separate item of plaintiff's claim hereunder. Each invoice is for amounts due for plaintiff's legal services and related costs as described above based on the agreed upon rates pursuant to the parties' retainer agreement. The invoices are set forth as follows with the respective invoice number, the reasonable value and agreed upon price of each item, and the date of each invoice:

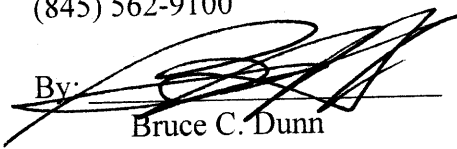
<u>Invoice No.</u>	<u>Amount</u>	<u>Date</u>
32692	\$27,001.00	August 31, 2005
33162	\$11,752.76	October 13, 2005
33453	\$13,625.00	November 4, 2005
33795	\$5,416.86	December 2, 2005
34295	\$7,730.04	January 30, 2006
34853	\$7,945.68	March 16, 2006
35167	\$1,066.08	April 12, 2006
35703	\$5,817.61	June 21, 2006
36703	\$2,897.38	October 20, 2006
37139	\$1,044.16	December 7, 2006
37945	\$ 459.60	March 1, 2007
38298	\$ 762.10	April 11, 2007
38689	\$1,587.10	May 18, 2007
39364	\$783.55	August 16, 2007

22. Defendants never objected to any of plaintiff's services or the invoices plaintiff submitted. Accordingly, there has been an account stated between plaintiff and defendants, pursuant to which plaintiff is entitled to judgment in a principal amount of no less than \$37,888.92 representing the actual amounts incurred of \$87,888.82 less defendants' prepaid retainer amount of \$25,000.00 and periodic payments totaling \$25,000.00.

WHEREFORE, plaintiff demands judgment as set forth herein against each defendant, jointly and severally, together with an award of interest, and attorneys fees and costs, and such other relief as the Court deems necessary.

Dated: November 6, 2007
New Windsor, NY

Rider, Weiner & Frankel, P.C.
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100

By: 

Bruce C. Dunn

RIDER, WEINER & FRANKEL, P.C.

ATTORNEYS & COUNSELLORS AT LAW

655 LITTLE BRITAIN ROAD
NEW WINDSOR, NEW YORK 12553

(MAILING ADDRESS:)

POST OFFICE BOX 2280
NEWBURGH, NEW YORK 12550

TEL. (845) 562-9100

FAX (845) 562-9126

DAVID L. RIDER
CHARLES E. FRANKEL
MICHAEL J. MATSLER
DONNA M. BADURA
MAUREEN CRUSH
MARK C. TAYLOR
RODERICK E. DE RAMON
M. JUSTIN RIDER (NY AND FL)
SHAY A. HUMPHREY
JEFFREY S.E. SCULLEY (NY AND IL)
MICHELLE F. RIDER (NY AND FL)

M.J. RIDER (1906-1968)
ELLIOTT M. WEINER (1915-1990)

STEPHEN P. DUGGAN, III
BRUCE C. DUNN, SR.
COUNSEL

MOACYR R. CALHELHA
CRAIG F. SIMON
DAVID E. TOWER
OF COUNSEL

firm@riderweiner.com
www.riderweiner.com

August 10, 2005

By Overnight Delivery
Federal Express

Hon. Jeno Kahan, President
Congregation Yetev Lev D'Satmar, Inc.
150-152 Rodney Street
Brooklyn, NY 11211-7703

Hon. Sol Perlstein, Vice President
Congregation Yetev Lev D'Satmar, Inc.
150-152 Rodney Street
Brooklyn, NY 11211-7703

Re: Congregation Yetev Lev D'Satmar, Inc. et al. adv.
Congregation Yetev Lev D'Satmar of Kiryas Joel, Inc.
Our File No. ~~1000~~37

Dear Messrs. Kahan and Perlstein:

Your counsels, Scott E. Mollen and Paul Rubin of the firm of Herrick, Feinstein LLP, have recommended that we be engaged as co-counsel in defending the lawsuit commenced in Orange County by the Congregation Yetev Lev D'Satmar of Kiryas Joel, Inc. We will appear on the return date of the order to show cause, currently set for August 17, 2005, and are prepared to do so in cooperation with Herrick, Feinstein who are preparing responsive papers.

Enclosed are our standard terms of engagement. By signing this letter, you acknowledge that you have read and agreed to these terms. The scope of our services shall include rendering legal advice and services and defending the above action up to settlement, judgment or verdict.

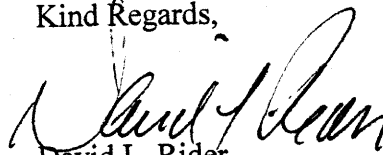
Most of our legal services will be performed by the undersigned, Bruce C. Dunn, III, Jeffrey S.E. Sculley or by paralegals whenever possible.

Please sign and return a copy of this letter, which will serve as our authorization to proceed on behalf of both the Congregation and each of the named individual defendants, including each of you and Messrs. Manual Mangual, Jacob Schoenfeld, Solomon Sander and John Does "1-50". The Congregation's check in the amount of \$25,000.00 will serve as the initial retainer to be applied as we work. We reserve the right to have the retainer fund replenished upon request.

Messrs. Kahan and Perlstein
August 10, 2005
Page Two

We look forward to assisting the Congregation in this matter.

Kind Regards,

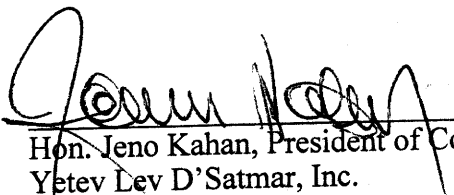


David L. Rider

encl.

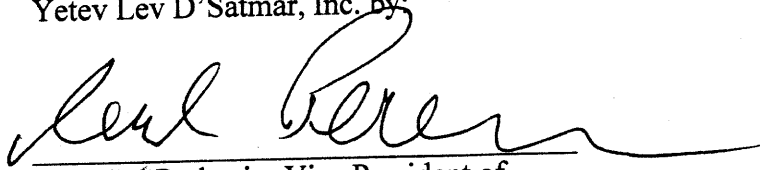
cc: Congregation Yetev Lev D'Satmar, Inc.
Scott E. Mollen, Esq.
Paul Rubin, Esq.
Bruce C. Dunn, III, Esq.
Jeffrey S.E. Sculley, Esq.

ACCEPTED AND AGREED
Individually and on behalf of Congregation
Yetev Lev D'Satmar, Inc. by:



Hon. Jeno Kahan, President of Congregation
Yetev Lev D'Satmar, Inc.

ACCEPTED AND AGREED
Individually and on behalf of Congregation
Yetev Lev D'Satmar, Inc. by:



Hon. Sol Perlstein, Vice President of
Congregation Yetev Lev D'Satmar, Inc.

DATE 8/4/05 1-2 53 210

PAY TO THE ORDER OF RIDER WEINER & FRANKEL, P.C.

\$ 10,000.00

TEN THOUSAND

DOLLARS

CHASE JPMorgan Chase Bank
210 Flushing Avenue
Brooklyn, NY 11205

FOR RETAINER

[Signature]

⑈001185⑈ ⑆021000021⑆053070621865⑈

FOR SECURITY PURPOSES, THE FACE OF THIS DOCUMENT CONTAINS A COLORED BACKGROUND AND MICROPRINTING IN THE BORDER



CONG. YETEV LEV D'SATMAR INC.
P.O. BOX 506
BROOKLYN, NY 11211

HSBC
HSBC BANK USA
BROOKLYN, NY 11211-6729

1-108/210 34549

DATE 9/6/2005

PAY TO THE ORDER OF Rider, Weiner & Frankel, P.C.

\$ 5,000.00

Five Thousand and 00/100 DOLLARS

Rider, Weiner & Frankel, P.C.
655 Little Britain Road
New Windsor, NY 12553

MEMO Retainer

[Signature]
AUTHORIZED SIGNATURE

⑈034549⑈ ⑆021001088⑆667901469⑈

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT ANGLE TO VIEW



CONG. YETEV LEV D'SATMAR INC.
P.O. BOX 506
BROOKLYN, NY 11211

HSBC
HSBC BANK USA
BROOKLYN, NY 11211-6729

1-108/210 34550

DATE 9/21/2005

PAY TO THE ORDER OF Rider, Weiner & Frankel, P.C.

\$ 10,000.00

Ten Thousand and 00/100 DOLLARS

Rider, Weiner & Frankel, P.C.
655 Little Britain Road
New Windsor, NY 12553

MEMO Retainer

[Signature]
AUTHORIZED SIGNATURE

⑈034550⑈ ⑆021001088⑆667901469⑈

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT ANGLE TO VIEW

RIDER, WEINER & FRANKEL, P.C.
ATTORNEYS & COUNSELORS AT LAW
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100 Fax (845) 562-9126
Tax ID 14-1660010

October 13, 2005

Invoice No. 33162
Our File No. 3167-00001 BCD
Billing Through: 10/13/05

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

8/24/05	DLR	Group meeting, Abe D. & companion, strategy re: UTA & background. Receive engagement \$ @ of 3 postdated checks.
8/25/05	DLR	Review outstanding issues of coord., UTA.
8/31/05	JSS	Aggregate time: provide status report re coordination of security arrangements with Plaintiff's Counsel and law enforcement; UTA Kiryas Joel retention of counsel; coordination of preparation of amended Answer.
8/31/05	BCD	Telephone call to M. Mangual for assessment at cemetery; discussion with B. Ostrer, Esq. re intervention action; discussion with Jeffrey Sculley, Esq. re Herrick & Feinstein and Amended Answer; telephone call from Rachel Engelstein, Esq.; telephone call to M. Mangual.
9/1/05	BCD	Review email from A. Friedman re THR article; review email from Rachel Engelstein, Esq.; telephone call to A. Deutsch.
9/2/05	JSS	Analyze possible counterclaim and best strategy for presenting both ecclesiastical and secular arguments supporting declaration that 2001 deed is invalid and 1988 deed is the bona fide recordation of clients interest in cemetery property.
9/2/05	JSS	Prepare draft Counterclaims for inclusion in Amended Verified Answer.
9/6/05	JSS	Prepare new draft of Counterclaims for Amended Answer per BCD review; prepare final draft of above per R. Englestein review; conference with A. Deutsch re client approval of above and required revisions; personally serve Amended Answer on R. Mahon (Plaintiff's Counsel).
9/6/05	BCD	Review draft of Amended Answer; draft revisions; review re-drafted version; conference with J. Sculley, Esq. and Rachel Engelstein, Esq.; review final version; telephone call to J. Teitelbaum; fax to J. Teitelbaum; memo to Terri and Jeffrey Sculley, Esq.; telephone call to A. Deutsch; execute Verification; check service.
9/8/05	JSS	Conference with J. Khan re J. Khan acknowledged receipt of Amended Answer and provision of preferred address for mailing of future correspondence.
9/10/05	BCD	Telephone call from B. Ostrer, Esq. re Amended Complaint and strategy for UTA and Congregation.
9/12/05	JSS	Receipt and review of letter from Plaintiff's Counsel and 2nd Amended Complaint adding cause of action against UTA Defendants.
9/13/05	JSS	Receipt and review of Answer submitted by Dissident Faction purportedly on behalf of Brooklyn Congregation.
9/13/05	JSS	Conference with Rachel Engelstein notifying her of above and Plaintiff's 2nd Amended Complaint.
9/13/05	BCD	Telephone conferences with Herrick & Feinstein; office conference with J. Sculley, Esq.
9/14/05	DLR	Review conf., UTA property owners with rest of us. Application for which entity is the

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

defendant.

9/14/05 BCD Conference with Co-Counsel (morning); appearance in Supreme Court; telephone conference with Herrick & Feinstein; telephone conference call with all Attorneys (7:30 pm - 8:30 pm).

9/15/05 BCD Telephoen call to Ben Ostrer, Esq. (left message).

9/19/05 BCD Retrieve emails: 9/19; 9/21; 9/22; 9/23; 9/24; 9/25 and 9/26 to review of materials re UTA & UTS.

9/21/05 JSS Receipt and review of client Affidavits Counsel Affirmation/Memo of law in Opposition to Article 81 proceedings.

9/21/05 BCD Telephone conference with Herrick & Feinstein (NO CHARGE).

9/22/05 JSS Receipt and review of transcript of 9/14/05 hearing before Judge Rosenwasser.

9/22/05 JSS Prepare correspondence (x2) transmitting transcription and raw radio audio of above hearing to Co-Counsel.

9/28/05 BCD Worked Performed by Terri Burns, Assistant to Bruce Dunn: Receive Motion, supporting papers and exhibits by email from Herrick & Feinstein; receive overnight pages and exhibits; prepare Affidavit of Service; Notice of Motion; litigation covers; email Notice of Motion to Herrick & Feinstein; scan lit covers and email to Herrick & Feinstein.

9/28/05 BCD Telephone call to/from Herrick & Feinstein; email to/from Herrick & Feinstein; draft Notice of Motion; dictate final Notice of Motion; review Affirmations and exhibits; certify papers; serve R. Mahon, Esq.; deliver Motion papers to Orange County Clerk's Office; present papers to Supreme Court Clerk.

9/29/05 BCD Forward Affidavit of Service to Herrick & Feinstein.

9/30/05 BCD Review Affidavit of Service; instructions to Secretary to file with Court.

10/3/05 BCD Affirmation of Service of P. Rubin to Supreme Court Clerk.

10/4/05 BCD Email regarding Goldberg letter.

10/6/05 BCD Telephone call with Court; telephone conference with Herrick & Feinstein.

10/7/05 BCD Telephone call with Herrick & Feinstein (morning); telephone call with Herrick & Feinstein (evening); cellular call from Herrick & Feinstein.

10/8/05 BCD Download and review Smith, Buss & Jacobs emailed Affirmations and exhibits.

10/9/05 BCD Download and review Goldberg's emailed UTA Affirmations and exhibits.

10/10/05 BCD Telephone calls with Attorneys at Herrick & Feinstein; draft correspondence to Court; review draft from Herrick & Feinstein; prepare final letter to Court.

10/11/05 BCD Letter from Buss, Smith & Jacobs re election certification; draft letter to Judge Rosenwasser; deliver letter to Chambers; telephone conference with Counsel.

10/11/05 BCD Telephone call to Attorney R. Mahon (left message); hand deliver letter to Court; telephone call with Attorneys at Herrick & Feinstein (x2) (mobile phone); telephone calls (x3) with Attorneys at Herrick & Feinstein (office); instructions to Secretary.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Amount</u>
BCD Dunn Sr., Bruce C.	4.50	\$517.50
BCD Dunn Sr., Bruce C.	28.20	\$7,397.50
DLR Rider, David L.	2.00	\$700.00
JSS Sculley, Jeffrey S. E.	14.20	\$2,769.00
Total fees for this matter	48.90 hrs	\$11,384.00

DISBURSEMENTS

8/18/05	Delivery Charge	14.40
9/6/05	Delivery Charge	24.46

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

9/7/05	Postage	2.58
9/16/05	RWF ck # 8150, Payable to: Grace Zipprich, Registered Merit Reporter, Transcripts - Yetev Lev	62.50
10/13/05	Duplication	173.80
10/13/05	RWF ck # 8253 - Payable to: BCD for Reimburse receipt to O.C. County Clerk - Filing Fee - Notice of Motion w/ OCCO	45.00
10/13/05	Telefax Fees	16.00
Total disbursements for this matter		\$338.74

BILLING SUMMARY

TOTAL FEES	\$11,384.00
TOTAL DISBURSEMENTS	\$338.74
INTEREST CHARGE ON PAST DUE BALANCE	\$30.02
TOTAL CHARGES FOR THIS BILL	<u>\$11,752.76</u>
BALANCE FORWARD AS OF BILL DATED 8/31/05	\$17,001.00
LESS PAYMENTS APPLIED	\$15,000.00
PLUS NET BALANCE FORWARD	<u>\$2,001.00</u>
TOTAL BALANCE NOW DUE	<u><u>\$13,753.76</u></u>

AR Aging:

<u>0 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121 & up</u>
\$0.00	\$2,001.00	\$0.00	\$0.00	\$0.00

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

RIDER, WEINER & FRANKEL, P.C.
ATTORNEYS & COUNSELORS AT LAW
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100 Fax (845) 562-9126
Tax ID 14-1660010

November 4, 2005

Invoice No. 33453
Our File No. 3167-00001 BCD
Billing Through: 11/3/05

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

10/14/05	BCD	Telephone conference from Paul Rubin; correspondence by Fedex from Smith, Buss & Jacobs; draft correspondence to Court; telephone conference with Rachel Englestein; telephone conference to Chambers; email to/from Rachel Englestein; telephone conference with Paul Rubin; complete correspondence to Court; instructions to Secretary to fax.
10/15/05	BCD	Download and print first draft of Scott Mollen Affidavit; review Affidavit.
10/15/05	BCD	Receive email from Rachel Englestein with draft Affidavit's; email to R. Engelstein; telephone conference with R. Englestein re Scott Mollen Affidavit; review S. Mollen Affidavit and papers to Court; serve Mahon; telephone conference with Chambers; telephone conference with Rachel Englestein.
10/15/05	BCD	Email to R. Engelstein re copies of Reply.
10/20/05	BCD	Review Affidavit of Service; instructions to Secretary for filing; telephone call from P. Rubin re Buss reply; fax to Rubin; Scher's Affidavit; draft letter to Court email to Herrick & Feinstein; email from Herrick & Feinstein.
10/21/05	BCD	Fax articles from Counsel; review draft correspondence; correspondence to Court; instructions to Secretary; telephone conference to/from Court; telephone conference with Rachel Engelstein.
10/22/05	BCD	Decision from email; telephone conferences with Paul Rubin and Abe Deutsch; emails re meeting.
10/23/05	BCD	Conference with clients; preparation of Affirmation of Sol Perlstein, Affirmation of B.Dunn; telephone conferences and emails with Co-Counsel; telephone conferences with B. Ostrer; telephone conferences with Judge Rosenwasser; correspondence to Court and Counsel; email and fax correspondence to Counsel; telephone messages left re 10/24/05 Court appearance.
10/24/05	JSS	Conference with J. Sheridan to coordinate filing of Notice of Appeal and supporting documentation.
10/24/05	JSS	Receipt and review of Judge Rossenwasser's Decision.
10/24/05	JSS	File Notice of Appeal; request for Appeallate Division intervention and Judge Rossenwasser's Decision with County Clerk's office in Goshen.
10/24/05	BCD	Conference with S. Mollen, Esq., conference with A. Deutsch; appearance in Supreme Court; telephone conferences with Co-Counsel; emails with client and Co-Counsel; review Notice of Appeal; review RAD1; draft Affidavit of Service; prepare Notice for filing and service; telephone conference with Co-Counsel; telephone conference with NY Police Dept; telephone conference with THR.
10/25/05	JSS	Investigate rumor of ex parte hearing before Judge Rosenwasser; conference with Court Clerk confirming next appearance is for 11/30/05.
10/25/05	BCD	THR article; discussion with Jack Sheridan, Marie and Elizabeth Holghan; discussion with

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10/26/05	DLR	Albano. Review corresp. & points on cemetery vs. school.
10/27/05	DLR	Review Rosenwasser "obiter dicta."
10/27/05	JSS	Conference with Court Clerk confirming that there is no hearing before Judge Rosenwasser.
10/27/05	BCD	Discussions with Attorney B. Ostrer; communication to Co-Counsel; receive and review correspondence from Judge Rosenwasser; conversation with Attorney B. Ostrer.
10/28/05	JSS	Conference with Court Clerk receiving notification of Court conference on 10/31/05 at 2:00 pm; analyze issues likely to arise at same and response to such issues.
10/28/05	BCD	Review articles from THR, NY Post, Daily News; telephone conference with Paul Rubin, Esq.; conversations with Co-Counsel and parties re developments concerning fax sent by unknown to Chambers; emails re subjects of developments.
10/31/05	JSS	Meeting with Scott Mollen of Herrick to prepare possible responses to Court inquiries at Court-Ordered conference; attend in-Chamber conference before Judge Rosenwasser in Goshen Supreme Court.
10/31/05	BCD	Discussions with S. Mollen, Esq. re meeting; discussion with R. Englestein re developments; appear in Court; meeting with S. Mollen; conference with client's representatives; telephone conference with R. Englestein re Court proceedings; telephone request for copies of Order to Show cause from Abe Deutsch; fax to Abe Deutsch.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>
BCD Dunn Sr., Bruce C.	43.40
DLR Rider, David L.	1.30
JSS Sculley, Jeffrey S. E.	5.80
Total fees for this matter	50.50 hrs

DISBURSEMENTS

10/24/05	Postage	4.98
10/24/05	RWF ck # 8321, Payable to: Orange County Clerk, Notice of Appeal	65.00
11/3/05	Telefax Fees	4.00
Total disbursements for this matter		\$73.98

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

BILLING SUMMARY

TOTAL FEES	\$13,521.00
TOTAL DISBURSEMENTS	\$73.98
INTEREST CHARGE ON PAST DUE BALANCE	\$30.02
TOTAL CHARGES FOR THIS BILL	<u>\$13,625.00</u>

BALANCE FORWARD AS OF BILL DATED 10/13/05	\$13,753.76
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TOTAL BALANCE NOW DUE	<u><u>\$27,378.76</u></u>
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AR Aging:

<u>0 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121 & up</u>
\$11,752.76	\$0.00	\$2,001.00	\$0.00	\$0.00

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

RIDER, WEINER & FRANKEL, P.C.
ATTORNEYS & COUNSELORS AT LAW
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100 Fax (845) 562-9126
Tax ID 14-1660010

December 2, 2005

Invoice No. 33795
Our File No. 3167-00001 BCD
Billing Through: 12/1/05

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

11/2/05	BCD	Email to Co-Counsel re KJ taxes; telephone conference with R. Engelstein re contemplated options.
11/7/05	BCD	Telephone conference with R. Engelstein re emails and letter for wording for Order to Show Cause; review letters re property transfers; email to Herrick Feinstein.
11/8/05	BCD	Review draft Answer and Cross Claim of UTA (Kissone); telephone conference with R. Engelstein, Esq. re procedural letter/draft to Judge Rosenwasser; telephone conference with B. Ostrer, Esq. re December 2nd Argument at Appellate Division.
11/9/05	BCD	Telephone conference with R. Engelstein, Esq. re proceedings/election/draft letter.
11/15/05	JSS	Receipt and review of Order dismissing Article 81 Guardianship Proceedings.
11/15/05	BCD	Email with articles; telephone conference with Paul Rubin and Rachel Engelstein re Article 81 decision; options in Orange County and Appellate Division; their conversation with clients and marshalling of evidence for Orange County hearing.
11/17/05	BCD	Telephone conference with Paul Rubin and Rachel Engelstein regarding option of Motion for reargument; developments of legal points covering Rabbinical Courts and draft letter to Court.
11/18/05	BCD	Finalize correspondence regarding November 30 and withdrawal of Order to Show Cause.
11/21/05	BCD	Correspondence from Attorney Buss; telephone call to Paul Rubin, Esq.
11/22/05	BCD	Telephone call to/from Paul Rubin re process and correspondence.
11/28/05	JSS	Conference with R. Engelstein re Rosenwasser's procedures for setting date for Motion to Reargue; conference with Court re above; prepare correspondence to R. Engelstein re above.
11/29/05	JSS	Submit Motion to Renew/Reargue with County Clerk in Goshen; hand carry same to Supreme Court pursuant to filing deadline.
11/29/05	JSS	Review Affirmation of Rabbi Zalmen in Support of Motion to prepare for conference.
11/29/05	BCD	Telephone call to R. Engelstein; review Motion and supporting papers; telephone call to R. Engelstein re 11/30/05 Court proceeding.
11/29/05	BCD	Appear in Supreme Court (Judge Rosenwasser) for Conference and Argument.
11/30/05	JSS	Attend Conference in Goshen Supreme Court re possibility of Grand Rabbi testifying before Court; confer with Co-Counsel to devise response to Plaintiff's characterization that Court's Order requires production of Grand Rabbi; prepare memo to file documenting Arguments to Court.

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH



Timekeeper Summary

<u>Name</u>		<u>Hours</u>
BCD	Dunn Sr., Bruce C.	12.90
JSS	Sculley, Jeffrey S. E.	8.30
Total fees for this matter		<u>21.20 hrs</u>

DISBURSEMENTS

11/29/05	RWF ck # 8482 - Payable to: Orange County Clerk - Yetev Lev Notice of Motion Filing Fee	45.00
Total disbursements for this matter		<u>\$45.00</u>

BILLING SUMMARY

TOTAL FEES	\$5,166.00
TOTAL DISBURSEMENTS	\$45.00
INTEREST CHARGE ON PAST DUE BALANCE	\$205.86
TOTAL CHARGES FOR THIS BILL	<u>\$5,416.86</u>
BALANCE FORWARD AS OF BILL DATED 11/4/05	<u>\$27,378.76</u>
PLUS NET BALANCE FORWARD	<u>\$27,378.76</u>
TOTAL BALANCE NOW DUE	<u><u>\$32,795.62</u></u>

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

January 30, 2006

Invoice No. 34295
Our File No. 3167-00001 BCD
Billing Through: 1/27/06

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

12/2/05	JSS	Check on status of preparation of hearing of 11/30/05; prepare correspondence to R. Englestein re above.
12/2/05	JSS	Conference with J. Landau re above; advised client representatives not to contact Court personnel in attempt to expedite completion of transcript.
12/3/05	JSS	Retrieve transcript of 11/30/05 Hearing from Clerk in Goshen, NY; prepare same for transmission to R. Engelstein.
12/5/05	BCD	Email to/from R. Engelstein, Esq.; telephone call to P. Rubin, Esq.; telephone call from P. Rubin re contents of Offer of Proof; telephone call to P. Rubin re strategy for Offer of Proof and content.
12/7/05	JSS	Hand delivery courtesy copy of Offer to Judge Rosenwasser and file same with Clerk of the Court in Goshen, NY.
12/7/05	JSS	Conference with R. Engelstein to arrange for filing of Offer of Proof and Supporting Affirmations; review S. Mollen's Affirmation in Support of Offer.
12/8/05	BCD	Receive and review documents from Buss & Jacobs; telephone call to/from Rachel Engelstein, Esq.
12/12/05	BCD	Receive and review new Affirmations.
12/13/05	JSS	Conference with R. Engelstein, Esq. to arrange for filing of Objection to Plaintiff's most recent filings; file Objection with Clerk of Court in Goshen and provide courtesy copy to Judge Rosenwasser's Chambers
12/13/05	BCD	Coordination with Secretary and J. Sculley, Esq. re filing of Affirmation.
12/16/05	JSS	Receipt and review of Mahon letter/brief objecting to offer of proof and analyzing alleged deficiencies in same.
12/16/05	BCD	Review correspondence from Mahan, Esq. as per email from Rachel Engelstein, Esq.
12/28/05	BCD	Telephone conference with R. Engelstein, Esq. re any decision.
12/30/05	BCD	Telephone call with R. Engelstein, Esq. re anticipated decision; telephone call to Abe Deutsch (left message); telephone call from Abe Deutsch to confirm contact members for decision if made.
1/9/06	BCD	Telephone call to Paul Rubin (left message).
1/11/06	BCD	Telephone call from Paul Rubin re Rosenberg's conviction and my 1/12 appearance to hope to mention.
1/13/06	BCD	Review email from Paul Rubin re Rosenberg's conviction and plea agreement; telephone call with Paul Rubin as to status and clients position; review contact that Richard Mahon, Esq. was out of case and new substituted counsel.
1/17/06	BCD	Review materials for indexing and filing.
1/19/06	BCD	Receive fax from Court; telephone call to R. Englestein, Esq. (left message); telephone call

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
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to P. Rubin, Esq. (left message); telephone call to Scott Mollen, Esq.; research cases cited in letter; telephone call from Rachel Engelstein, Esq.

1/19/06 BCD Telephone conference with R. Englestein, Esq., Paul Rubin, Esq. re letter from Judge Rosenwasser.

1/20/06 BCD Telephone conference with R. Englestein, Esq., Paul Rubin, Esq., and Scott Mollen, Esq.; telephone call to Court (J. Goldsmith) (left message); telephone call from J. Goldsmith; telephone call to R. Englestein, Esq.

1/20/06 BCD Telephone conference with Paul Rubin, Esq. and Rachel Engelstein, Esq.

1/20/06 BCD Telephone call to Law Clerk (left message).

1/23/06 BCD Telephone call to Attorney R. Englestein re formulation of submission re "summary judgment"

1/24/06 BCD Telephone call to Rachel Engelstein, Esq. re papers in response.

1/25/06 BCD Review and comment - Affirmation of Scott Mollen; Affirmation of S. Perlstein; Answer to 2nd Amended Complaint; telephone calls with Attorney R. Englestein; faxes to R. Englestein; review Affirmation of attorney I. Goldberg re UTA; travel to file and file documents at Goshen County Clerk and Supreme Court Clerk.

1/26/06 BCD Review of Affirmation submitted by Smith, Buss & Jacobs and Katlowitz; telephone call to Attorney R. Englestein; telephone conference with Attorney R. Englestein re content and strategy for remainder.

1/27/06 BCD Review of emails; telephone call to R. Englestein re same and re expert/response and Verified Answer.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>
BCD Dunn Sr., Bruce C.	22.00
JSS Sculley, Jeffrey S. E.	5.10
Total hours for this matter	27.10 hrs

DISBURSEMENTS

12/2/05 Kathleen Jackson, SCR - Transcript Fee	184.00
1/25/06 Postage	1.59
1/27/06 Telefax Fees	12.00
Total disbursements for this matter	\$197.59

BILLING SUMMARY

TOTAL FEES	\$7,044.50
TOTAL DISBURSEMENTS	\$197.59
INTEREST CHARGE ON PAST DUE BALANCE	\$487.95
TOTAL CHARGES FOR THIS BILL	<u>\$7,730.04</u>
BALANCE FORWARD AS OF BILL DATED 12/2/05	<u>\$32,795.62</u>
PLUS NET BALANCE FORWARD	<u>\$32,795.62</u>
TOTAL BALANCE NOW DUE	<u><u>\$40,525.66</u></u>

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

RIDER, WEINER & FRANKEL, P.C.
ATTORNEYS & COUNSELORS AT LAW
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100 Fax (845) 562-9126
Tax ID 14-1660010

March 16, 2006

Invoice No. 34853
Our File No. 3167-00001 BCD
Billing Through: 2/28/06

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

1/27/06	DLR	Review account analysis. Project additional services. Request payment or necessary withdrawal.
1/30/06	BCD	Telephone call from R. Engelstein, Esq. re responsive Affirmations; review email drafts of Affirmations of Mollen and Freedman.
1/31/06	JSS	File Supplemental Affirmation of Rabbi Friedman and Scott Mollen with Supreme Court Clerk in Goshen, NY.
1/31/06	JSS	Prepare correspondence to R. Englestein confirming above; prepare PDF scan of date stamped documents per R. Engelstein's request.
2/1/06	JSS	Conference with R. Englestein re ensure that Judge Rosenwasser actually received papers; possibility of indication of timing of decision.
2/1/06	BCD	Telephone call with R. Engelstein, Esq.; review papers and documents.
2/2/06	BCD	Review last submission by Smith, Buss & Jacobs; telephone call to/from Abe Deutsch.
2/3/06	JSS	Conference with R. Engelstein re additional Affirmation by J. Buss, content of same and our response thereto.
2/3/06	BCD	Co-ordinate with Law Firm Herrick Feinstein for documents; reviewing papers.
2/6/06	BCD	Telephone conference with law firm.
2/7/06	JSS	Conference (multiple) with R. Engelstein, Esq. re limitations of RWF ability to participate in current filing; discuss merits of responding to Buss allegations notwithstanding Plaintiff's filing of same without Court permission.
2/8/06	BCD	Review final Affidavit delivered by FedEx; instructions to Secretary re service and file with Clerk and file courtesy copy.
2/9/06	JSS	Obtain from Records Office in Goshen a copy of Judge Rosenwasser's Final Order; review same to assist in preparing emergency application for stay.
2/9/06	BCD	Review SAR decision; telephone calls re same.
2/10/06	JSS	Review and revise Affirmation supporting application to Appellate Division for stay pending appeal.
2/10/06	JSS	File Notice of Appeal and RADl with County Clerk's office in Goshen, NY.
2/10/06	BCD	Discussions re Judge Rosenwasser's Decision and Notice of Appeal.
2/14/06	JSS	Review and revise draft Oer to Show Cause and Affirmation in Support of Request to be Relieved as Counsel.
2/15/06	CRC	Review files for dates of demands for payment; prepare copies of exhibits to motion for JSES
2/16/06	JSS	Conference with J. Sheridan re 2nd application for emergency injunctive relief.
2/16/06	JSS	Receipt and review of letter confirming above with each Counsel of record.

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH



2/6/06	JSS	Receipt and review of letters from Goldberg & Buss contesting procedural propriety of request for relief (x2).
2/16/06	BCD	Message from Attorney re reargument; correspondence by fax from Attorney Buss; fax from Attorney Buss; telephone call to Abe Deutsch.
2/17/06	JSS	Receipt and review of letter from Counsel Horn objecting to renewal of above application.
2/17/06	JSS	Receipt and review of Order to Show Cause and Supporting Affirmation to Renew Application for Emergency Injunctive Relief.
2/21/06	BCD	Telephone call to Attorney R. Englestein; receive email with Buss' Affirmation and Order to Show Cause.
2/22/06	BCD	Review Affirmation of Buss and Rubin;; review signed Order to Show Cause (x2) in Appellate Division; review fax from Buss; telephone call to Attorney R. Englestein re Herrick & Feinstein's response; review draft.
2/25/06	DLR	Review: Rosenwasser Decision, generally required conformity to orig. by laws OK ignores statutory requirements without basis.
2/27/06	BCD	Telephone call to Attorney Englestein (left message); telephone call to Attorney Rubin (left message); telephone call from Attorney re service copy of 2/10/06 Motion; fax to Attorney R. Englestein.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>
BCD Dunn Sr., Bruce C.	13.60
CRC Churney, Cheryl	0.60
DLR Rider, David L.	2.00
JSS Sculley, Jeffrey S. E.	10.30

Total hours for this matter

26.50 hrs**DISBURSEMENTS**

2/3/06	Delivery Charge	43.80
2/8/06	Delivery Charge	36.70
2/10/06	Delivery Charge	36.70
2/10/06	RWF ck # 8814 - Payable to: Orange County Clerk, For: Notice of Appeal	65.00
2/28/06	Duplication	122.40
2/28/06	Telefax Fees	65.00
Total disbursements for this matter		\$369.60

RIDER, WEINER & FRANKEL, P.C.
ATTORNEYS & COUNSELORS AT LAW
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100 Fax (845) 562-9126
Tax ID 14-1660010

April 12, 2006

Invoice No. 35167
Our File No. 3167-00001 BCD
Billing Through: 3/31/06

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

3/2/06	BCD	Correspondence from Kiryas Joel; instructions to Secretary to forward to Herrick & Feinstein.
3/3/06	BCD	Email from Attorney R. Engelstein with Decision and Order; telephone with R. Engelstein and Paul Rubin re Stay/Order; memo to DLR and Jeffrey Sculley; review Decision and Scheduling Order.
3/7/06	JSS	Receipt and review of Order granting Stay and expedited scheduling Order.
3/16/06	BCD	Review Order to Show Cause from October; instructions to Secretary.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>
BCD Dunn Sr., Bruce C.	1.80
JSS Sculley, Jeffrey S. E.	0.30
Total hours for this matter	<u>2.10</u> hrs

DISBURSEMENTS

3/31/06	Telefax Fees	25.00
Total disbursements for this matter		<u>\$25.00</u>

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH



RIDER, WEINER & FRANKEL, P.C.

ATTORNEYS & COUNSELORS AT LAW

655 Little Britain Road

New Windsor, NY 12553

(845) 562-9100 Fax (845) 562-9126

Tax ID 14-1660010

June 21, 2006

Invoice No. 35703
Our File No. 3167-00001 BCD
Billing Through: 6/14/06

Yetev Lev D'Satmar, Inc.
Attn: M. Kahan & A. Deutsch
150-152 Rodney St.
Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

4/7/06	BCD	Review Notice of Settlement with Proposed Judgment (Rosenwasser) telephone call to Attorney R. Englestein to discuss Proposed Judgment; fax to R. Englestein, Esq. of document.
4/12/06	BCD	Telephone call to Attorney R. Engelstein re opposition to proposed Order; memo from Secretary re response from Herrick, Feinstein.
4/13/06	JSS	Receipt and review of Affirmation in Opposition to Plaintiff's proposed Judgment.
4/13/06	BCD	Review submission in opposition to proposed Order.
4/25/06	JSS	Receipt and review of assorted correspondence re Judge Rossenwasser temporary restraining orders and application to vacate same.
4/25/06	BCD	Fax from Herrick & Feinstein re argument; telephone call to R. Englestein; fax from Herrick & Feinstein; receive and review Order to Show Cause and Argument before Appellate Division; highlight argument points.
4/26/06	BCD	Conference with Attorney's S. Molen and R. Engelstein before Court; appear at Supreme court for argument on Orders to Show cause; conference with client; instructions to Secretary re transcript; email and telephone call to Stenographer; telephone call to Attorney Engelstein.
4/28/06	JSS	Receipt and review of transcript of 4/26/06 Hearing before Judge Rosenwasser.
5/3/06	JSS	Receipt and review of correspondence from J. Landau re reassignment of case to Judge Owen.
5/4/06	BCD	Review Appellate briefs from Attorney R. Engelstein; telephone call to R. Engelstein.
5/11/06	JSS	Receipt and review of Affirmation Opposing Motion to strike portions of Joint Appendix re intent of Court vis-a-vis taking of testimony at November Court appearance.
5/11/06	BCD	Review Affirmations of Scott Mollen re response to Motion to Strike.
5/19/06	BCD	Email from Attorney Buss with Appellate Order appointing referee.
5/31/06	BCD	Telephone call to Attorney Engelstein and Paul Rubin re 6/5/06 O/S/C before Judge Owen; check with J. Sculley re availability.
6/5/06	JSS	Conference with R. Engelstein re new class action and signature of TRO by Judge Owen in same (multiple).
6/5/06	JSS	Attend Motion Conference in Goshen, NY on Order to Show Cause re Grand Rebbe's funeral and associated mourning periods; submit Affirmation opposing Order to Show Cause for filing and provide courtesy copy to Judge Owen; appear before Judge Owen re above.
6/5/06	BCD	Memo to/from Secretary re filing papers at Judge Owen's part; telephone call to R. Engelstein re new action; conversation with and email to M. Kahan.
6/6/06	BCD	Email to client M. Kahan and A. Deutsch; download and review Complaint in new case;

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
INTEREST AT A RATE OF 1.5% PER MONTH

		telephone call to client, M. Kahan.
6/7/06	DLR	Review circumstances of new action.
6/9/06	BCD	Telephone call to R. Engelstein, Esq. re days events in Appellate Division and discussion re Monday's Motion calendar.
6/12/06	BCD	Appear at Motion calendar of Judge Owen to clarify Appellate Division's vacatur of Judge Owen's O/S/C and TRO; telephone conference with P. Rubin and Attorney's telephone call to Herrick Feinstein re Order by email (includes Sunday's telephone conference with P. Rubin).
6/13/06	BCD	Telephone call to Attorney R. Engelstein; telephone call to Judge Owen's Law Clerk; review O/S/C in Kings County; print Motion in Orange County; email to client re bill.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>
BCD Dunn Sr., Bruce C.	14.20
DLR Rider, David L.	0.40
JSS Sculley, Jeffrey S. E.	5.10

Total hours for this matter

19.70 hrs**DISBURSEMENTS**

4/28/06	RWF ck # 9142, Payable to: Neil Bostock, For: Transcripts	110.00
Total disbursements for this matter		<u>\$110.00</u>

BILLING SUMMARY

TOTAL FEES	\$5,141.50
TOTAL DISBURSEMENTS	\$110.00
INTEREST CHARGE ON PAST DUE BALANCE	\$566.11
TOTAL CHARGES FOR THIS BILL	<u>\$5,817.61</u>
BALANCE FORWARD AS OF BILL DATED 4/12/06	<u>\$39,537.42</u>
PLUS NET BALANCE FORWARD	<u>\$39,537.42</u>
TOTAL BALANCE NOW DUE	<u><u>\$45,355.03</u></u>

655 Little Britain Road
 New Windsor, NY 12553
 (845) 562-9100 Fax (845) 562-9126
 Tax ID 14-1660010

October 20, 2006

Invoice No. 36703
 Our File No. 3167-00001 BCD
 Billing Through: 9/29/06

Yetev Lev D'Satmar, Inc.
 Attn: M. Kahan & A. Deutsch
 150-152 Rodney St.
 Brooklyn, NY 11211-770

adv. Yetev Lev D'Satmar of Kiryas Joel, Inc.

FOR PROFESSIONAL SERVICES RENDERED

6/23/06	BCD	Review transcript; instructions to Secretary; review Order with Notice of Entry.
7/11/06	BCD	Review emails and decisions; telephone conference with R. Engelstein; memo to DLR.
7/25/06	BCD	Telephone call to R. Engelstein and P. Rubin; receive emails re deed cancellation and new deed to CYL; travel to County Clerk's Office; research CYL; conversation with S. Hadden and Meg Bailey from County Attorney's office; telephone call to Attorneys; fax to R. Engelstein re CYL Cemetery Inc.
7/28/06	BCD	Email from Herrick Feinstein re Judge Owen's marked letter (Brett Linn); telephone call to Attorney R. Engelstein to discuss effect and plans.
8/1/06	BCD	Supreme Court County Clerk file request; records search; conversation with Law Clerk Brett Linn; telephone call to Attorney P. Rubin and R. Engelstein to conversation re filing Answer and comments of Law Clerk; telephone call from Attorney P. Rubin re results of contact with County Clerk.
8/9/06	BCD	Telephone call to/from Paul Rubin, Esq. re 8/10/06 appearance; telephone call to C. Thomas, Part Clerk re calendar; telephone call to R. Engelstein, Esq. re documents needed for appearance 8/10/06; review documents; prepare for 8/10 appearance.
8/10/06	BCD	Appear before Judge Owen at Supreme Court with S. Mollen re consolidation withdrawal.

Timekeeper Summary

<u>Name</u>	<u>Hours</u>
BCD Dunn Sr., Bruce C.	8.10

Total hours for this matter 8.10 hrs

DISBURSEMENTS

6/20/06	Lisa Tutwiler, RMR, Senior Court Reporter, For: Preparation of transcript, transcript supplied, copy to court, Reporting held on 6/12/06	25.00
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Total disbursements for this matter \$25.00

STATEMENTS OUTSTANDING FOR 30 DAYS WILL BE CHARGED
 INTEREST AT A RATE OF 1.5% PER MONTH

0 fill 3167.1

Bruce Dunn

From: abraham deutsch [abedeutsch2004@yahoo.com]
Sent: Wednesday, February 22, 2006 4:16 PM
To: Bruce Dunn
Subject: Re: cong. payments

Dear Bruce :

I am sorry i know what i have said but as you know what happened so i am busy running like crazy preparing papers for the stay it should be completed between. now and next Tuesday so i will call you next Tuesday after noon and i should have a check for you.

I really apologize you could all me on my cell today after 7:30

Thanks And Sorry

Abe Deutsch

Bruce Dunn <bdunn@rwfc.com> wrote:

Abe, Please call me or David this afternoon. We are way past the time when you assured me. Thank you.
Bruce

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IRS Circular 230 Disclosure: As required by U.S. Treasury Regulations, we advise you that any tax advice contained in this communication (including any attachments) is not intended to be used for, and cannot be used for, the purposes of avoiding penalties under the United States federal tax laws.

Bruce C. Dunn, Sr., Esq.
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655 Little Britain Road
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(845) 562-9100

bdunn@riderweiner.com

MADE GASTEN

2/22/2006

3167.1

Bruce Dunn

From: Bruce Dunn [bdunn@rwfc.com]
Sent: Wednesday, March 01, 2006 4:03 PM
To: 'abedeutsch2004@yahoo.com'
Subject: Tuesday

Dear Abe,

Going by your email we should have had our payment by today, and it was not in the mail and no one came by with it. I do not believe I can wait any longer before making our application to the Court to be relieved as counsel. Papers are coming in practically every day, and every day something seems to happen to take my time away from other clients. I have to have your answer very soon, please.

Bruce

This E-mail contains CONFIDENTIAL INFORMATION, which may be legally privileged and which is intended only for the use of the addressee(s) named. If you are not the intended recipient of this E-mail, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this E-mail is prohibited. If you have received this E-mail in error, please notify us by return E-mail and return the original to us at PO Box 2280, Newburgh, NY 12550 via the U.S. Postal Service. Thank You.

IRS Circular 230 Disclosure: As required by U.S. Treasury Regulations, we advise you that any tax advice contained in this communication (including any attachments) is not intended to be used for, and cannot be used for, the purposes of avoiding penalties under the United States federal tax laws.

**Bruce C. Dunn, Sr., Esq.
Rider, Weiner & Frankel, P.C.
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100**

bdunn@riderweiner.com

Bruce Dunn

From: abraham deutsch [abedeutsch2004@yahoo.com]
Sent: Thursday, June 15, 2006 4:27 PM
To: Bruce Dunn
Cc: Martin Kahan
Subject: Re: Yetev Lev

Dear Bruce :

Now taht this matter is done please email to me if possible today or tomorrow the final bill and once i will receice it i will call you to make payment arrangments.

I am thanking you for going out of way this week for us.

Thank You

Abe Deutsch

Bruce Dunn <bdunn@rwfc.com> wrote:

Dear Martin,

I just faxed a copy of Judge Owen's Order denying the Plaintiff's application that had been brought before Judge Rosenwasser at the time of the Grand Rebbe's passing, and referred to Judge Own after Rosenwasser left. This was in the first action - not the new class action. With that Order, though, the representation for which we had been retained has technically concluded, since the only thing left would be an appeal from it, as there is the appeal from Rosenwasser's other Order, and we were not retained for appeals. That being said, and especially since I have had no response to my emails asking for you to meet with us about our bill, it would be appropriate for us to say we no longer represent the Congregation if contacted by any Court or counsel from any firm. I truly wish you had been more willing to communicate with David and me, and make some better efforts at satisfying the bill. You could still call, if you want to, and I hope you do before we have to undertake routine collection measures.

Bruce

This E-mail contains CONFIDENTIAL INFORMATION, which may be legally privileged and which is intended only for the use of the addressee(s) named. If you are not the intended recipient of this E-mail, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this E-mail is prohibited. If you have received this E-mail in error, please notify us by return E-mail and return the original to us at PO Box 2280, Newburgh, NY 12550 via the U.S. Postal Service. Thank You.

IRS Circular 230 Disclosure: As required by U.S. Treasury Regulations, we advise you that any tax advice contained in this communication (including any attachments) is not intended to be used for, and cannot be used for, the purposes of avoiding penalties under the United States federal tax laws.

**Bruce C. Dunn, Sr., Esq.
Rider, Weiner & Frankel, P.C.
655 Little Britain Road
New Windsor, NY 12553
(845) 562-9100**

bdunn@riderweiner.com

6/15/2006

Bruce Dunn

From: Bruce Dunn
Sent: Wednesday, December 27, 2006 1:09 PM
To: 'bdeutsch13@sprintpcs.com'
Subject: RE: Meeting

1) Tomorrow, Thursday the 28th at 6:00 P.M. is good. I'll see you here at my office. Thank you.
Bruce

-----Original Message-----

From: bdeutsch13@sprintpcs.com [mailto:bdeutsch13@sprintpcs.com]
Sent: Wednesday, December 27, 2006 12:01 PM
To: Bruce Dunn; martinkahan@gmail.com
Subject: RE: Meeting

2) I would need to meet with you so I can get payments can we possible tomorrow late evening like 6:00

ABE DEUTSCH
A & D PLUMBING LLC
120 EVERGREEN AVE
BROOKLYN N.Y. 11206
718-602-2680 EXT. 13
917-693-4419

-----Original Message-----

From: Bruce Dunn <bdunn@riderweiner.com>
Subj: RE: Meeting
Date: Wed Dec 27, 2006 11:41 am
Size: 1K
To: bdeutsch13@sprintpcs.com

Abe,
Frankly, I have practically promised my partners to book the receipt from the Congregation before the end of the year, so your payment is important by Friday, and we can meet next week on Tuesday. I will be in Court from 5:00 P.M. until 8:30 P.M. and can meet after that if you want.
Bruce

-----Original Message-----

From: bdeutsch13@sprintpcs.com [mailto:bdeutsch13@sprintpcs.com]
Sent: Wednesday, December 27, 2006 11:31 AM
To: Bruce Dunn; martinkahan@gmail.com
Subject: RE: Meeting

3) Bruce Friday is tough
how about next Monday or Tuesday Monday (new years) any time Tuesday late evening

ABE DEUTSCH
A & D PLUMBING LLC
120 EVERGREEN AVE
BROOKLYN N.Y. 11206
718-602-2680 EXT. 13
917-693-4419

-----Original Message-----

From: Bruce Dunn <bdunn@riderweiner.com>
Subj: RE: Meeting
Date: Wed Dec 27, 2006 10:47 am
Size: 719 bytes
To: bdeutschl3@sprintpcs.com

Dear Abe,

Sorry, I was not in my office yesterday. Today I will be here until 3:00, tomorrow until 4:30, and I'm not sure about Friday yet. Let me know what is good for you and Martin. I look forward to meeting with you this week, and sincerely hope you will be bringing the first half part of the outstanding bill as I indicated earlier.

Bruce

-----Original Message-----

--- message truncated ---