

Desa Ballard Harvey M. Watson III Stephanie Weissenstein Attorneys at Law

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Thursday, September 15, 2011

Via U.S. Mail and Email James Spencer 7001 Saint Andrews Road Box 183 Columbia, SC 29212

> Re: John Rakowsky vs. Adriann Falgione, et al. Case No: 2008-CP-40-6656

Dear Mr. Spencer:

In response to the multiple copies of your letter dated September 11, I assure you that snide remarks and attempts to harass counsel will not bear fruit. Our position as to your discovery requests has been made clear to you, on several occasions. Nevertheless, attached hereto is another copy of the accounting of the funds in trust.

Sincerely yours,

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Stephanie Weissenstein stephanie@desaballard.com

c. John Rakowsky Adrian Falgtione

(ATTACHMANN 1)

Deposits.....\$ 67500.00

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## Expenses: Thru 8/01/06

| S. Smith  | 1250.00   |
|---|---|
| postage   | . 23.65   |
| Forensic Analysis (S.Cain)  | 11000.00  |
| R. Serota (Expenses)  | 1050.00   |
| Equipment   | 613.00  |
| Copies  |   |
| Copies/Ikon   | 315.15  |
| M. Hardee   | 150.00  |
| Garber Reporting  | 379.45  |
| Garber Reporting  | 508.80  |
| Copies/Ikon   | 418.49  |
| Copies/Ikon   |   |
| Copies/Ikon   |   |
|   |   |
| Copies/Ikon   |   |
| -   |   |
| Copies/Ikon   | 73.22   |
| Copies/Ikon<br>J. Spencer (Personal Advance)  | 73.22<br>2500.00<br>1980.00   |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers   | 73.22<br>2500.00<br>1980.00<br>175.00   |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc  | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00   |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals  | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>   |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals<br>Long Distance   | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>78.53<br>2055.00   |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals<br>Long Distance<br>Marybeth Coller  | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>78.53<br>2055.00<br>6306.25  |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals<br>Long Distance<br>Marybeth Coller<br>Eugene Chewning   | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>78.53<br>2055.00<br>6306.25<br>6306.25                                     |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals<br>Long Distance<br>Marybeth Coller<br>Eugene Chewning<br>Glenn Harrison                             | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>78.53<br>2055.00<br>6306.25<br>6306.25<br>2646.18<br>175.00                |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals<br>Long Distance<br>Marybeth Coller<br>Eugene Chewning<br>Glenn Harrison<br>Federal Court            | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>78.53<br>2055.00<br>6306.25<br>6306.25<br>6306.25<br>2646.18<br>           |
| Copies/Ikon<br>J. Spencer (Personal Advance)<br>Kim Sellers<br>Clerk of Court./ Jury Info Misc<br>Ct. Of Appeals<br>Long Distance<br>Marybeth Coller<br>Eugene Chewning<br>Glenn Harrison<br>Federal Court<br>Postage | 73.22<br>2500.00<br>1980.00<br>175.00<br>170.00<br>78.53<br>2055.00<br>6306.25<br>6306.25<br>6306.25<br>2646.18<br>175.00<br> |

| Misc Supplies                   | 128.28     |
|---------------------------------|------------|
| Copies/Ikon                     | 365.30     |
| Long Distance                   | 374.50     |
| Gibson Moore Appellate Services |            |
| Sub Total Expenses Thru 8/01/06 | \$44547.41 |

8/01/06 Balance..... \$22,952.59

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| Allen Geoghgan                   |        |
|----------------------------------|--------|
| Misc. Supplies                   |        |
| J. Spencer (Personal Advance)    |        |
| Long Distance                    |        |
| John O'Leary                     |        |
| Forensic Tape AnalysisSteve Cain | 900.00 |
| Long Distance                    |        |
| J. Spencer                       |        |
| Adrian FalgioneCopies            | 600.00 |
| John RakowskyTravel Costs        | 697.50 |
| M & M Document Center            |        |
| Supplies, Binders, Copies        |        |
| AI Cannon                        |        |
| Adrian FalgioneLong Distance     |        |
| Southern Reporting               |        |
| Spectrum Reporting               |        |
| Rose Reporting                   |        |
| Creel Reporting                  |        |
| Spectrum Reporting               | 445.00 |
| Williams Reporting               |        |

| Spectrum Reporting13                   | 5.50  |
|--|-------|
| John O'Leary110                        | )6.40 |
| Sub Total Expenses Thru 9/01/07\$13,09 | 6.74  |