

## EXHIBIT 1

EVIDENCE OF HOURLY RATES CHARGED BY ATTORNEYS  
FOR COMPLEX LITIGATION IN THE DISTRICT OF COLUMBIALodestar Rates Requested for  
Bredhoff & Kaiser and Arnold & Porter Attorneys

\$175 an hour for very experienced federal court litigators, e.g., lawyers in their twentieth year or more after graduation from law school;

\$150 an hour for experienced litigators, e.g., lawyers in their eleventh through nineteenth years after graduation from law school;

\$125 an hour for experienced litigators in their eighth through tenth years after graduation from law school;

\$100 an hour for senior associates in their fourth through seventh years after graduation from law school;

\$75 an hour for junior associates in their first through third years after graduation from law school.

<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
ARNOLD & PORTER		
Daniel A. Rezneck <sup>1</sup>	1959	\$200 (current) \$190 (in 1982)
Other attorneys of equivalent experience to Mr. Rezneck <sup>2</sup>		\$190-200 (current)
James A. Dobkin <sup>3</sup>	1964	\$180
Jeffrey A. Burt <sup>1</sup>	1970	\$160 (current) \$150 (in 1982)
Partner in the 11th year after graduation <sup>4</sup>		\$150 (current)

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<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
Partner in the 10th year after graduation <sup>6</sup>		\$145 (current)
Seventh-year associate <sup>5</sup>		\$125 (current)
Fourth-year associate <sup>5</sup>		\$105 (current)
Timothy J. Lindon <sup>1</sup>	1980	\$ 95 (current)
First-year associate <sup>5</sup>		\$ 80 (current)
<b>BARNETT &amp; ALAGIA</b>		
William A. Carey <sup>6</sup>	1957	\$150 (current)
<b>CAPLIN &amp; DRYSDALE</b>		
Irving Salem <sup>7</sup>	1960	\$200 (current)
Cono R. Namorato <sup>7</sup>	1968	\$185 (current)
Peter Van N. Lockwood <sup>7</sup>	1966	\$175 (current)
Robert C. Pozen <sup>7</sup>	1972	\$150 (current)
Partners <sup>7</sup>		\$120-300 (current)
Associates <sup>7</sup>		\$ 75-105 (current)
<b>COVINGTON &amp; BURLING</b>		
Experienced partner <sup>8</sup>	1947	\$180 minimum (in 1982)
<b>DECHERT PRICE &amp; RHOADS</b>		
Senior partners <sup>9</sup>		\$200-225 (in 1982)
Arthur W. Leibold <sup>9</sup>	1956	\$195 (in 1982)
Senior associate <sup>9</sup>		\$110 (in 1982)
Associate <sup>9</sup>		\$100 (in 1982)

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<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
DICKSTEIN, SHAPIRO & MORIN		
Senior partner <sup>10</sup>		\$225-250 (current)
Experienced partners <sup>10</sup>		\$150-200 (current)
David I. Shapiro <sup>11</sup>	1949	\$200 (in 1981)
James vanRoden Springer <sup>10</sup>	1962	\$170 (current)
EWALD, THOMAS R.	1957	
Experienced D.C. litigator		
Fee award by Court <sup>12</sup>		\$175 (in 1980)
FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & CASEY		
Joseph D. Tydings <sup>13</sup>	1953	\$200 (in 1980)
HAHN, GILBERT, JR.	1948	
Fee award by Court <sup>14</sup>		\$175 (in 1980)
HOGAN & HARTSON		
Attorneys <sup>15</sup>		Firm's 1983 rates are equivalent to requested rates*
KAYE, SCHOLER, FIERMAN, HAYS & HANDLER		
Kenneth R. Feinberg <sup>16</sup>	1970	\$200 (current)
MCDONALD, BRADLEY G. <sup>17</sup>	1961	\$150 (in 1980)
MILLER, CASSIDY, LARROCA & LEWIN		
Nathan Lewin <sup>18</sup>	1960	\$250 (in 1982)
Senior partners <sup>19</sup>		\$175-250 (current)

\* Requested rates are listed at the head of this table.

<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
Jamie Gorelick <sup>19</sup>	1975	\$100-125 (current)
Associates <sup>19</sup>		\$ 70-110 (current)
MILLER & CHEVALIER		
Senior partner <sup>20</sup>		\$200 (in 1980)
John M. Bixler <sup>20</sup>	1954	\$160 (in 1980)
Associates <sup>20</sup>		\$ 90 (in 1980)
paralegals <sup>20</sup>		
Steven F. Black <sup>20</sup>		
NÜSSBAUM, OWEN & WEBSTER		
David N. Webster <sup>21</sup>	1958	\$180 (current)
"...experienced litigators for handling complex federal civil litigation..." <sup>21</sup>		\$135-185 (current)
PEABODY, LAMBERT & MEYERS		
Partners <sup>22</sup>		\$130-180 (current)
Charles T. Duncan <sup>22</sup>	1950	\$170 (current)
Timothy Waters <sup>22</sup>	1968	\$150 (in 1982)
Senior associates <sup>22</sup>		\$100 (in 1982)
Associates <sup>22</sup>		\$ 75-100 (current)
SEYMOUR, SAMUEL	1962	
Experienced D.C. litigator		\$175 (in 1980)
Fee award by Court <sup>12</sup>		
STEPTOE & JOHNSON		
J.D. Hutchinson <sup>25</sup>	1968	\$190 (in 1982)

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<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
Attorney with 20 or more years' experience <sup>24</sup>		\$170 (current minimum)
Attorney with 9 to 20 years' experience <sup>24</sup>		\$125-200 (current minimum)
Jane McGrew <sup>24</sup>	1970	at least \$160 (current)
Roger E. Warin <sup>26</sup>	1970	\$150 (in 1982)
John R. Labovitz <sup>26</sup>	1969	\$150 (in 1982)
Associate with 4 to 8 years' seniority <sup>26</sup>		\$ 95-125 (current minimum)
P.J. Ondrasik <sup>25</sup>	1975	\$115 (in 1982)
Associate with less than 4 years' seniority <sup>24</sup>		\$ 70-90 (current minimum)
A.B. Ianniello <sup>25</sup>	1980	\$ 80 (in 1982)
<b>TUTTLE &amp; TAYLOR</b>		
Eldon Greenberg <sup>27</sup>	1969	\$155 (in 1982)
<b>WHITE &amp; CASE</b>		
John W. Barnum <sup>28</sup>	1957	\$225 (in 1982)
John J. McAvoy <sup>28</sup>	1958	\$210 (in 1982)
Paul L. Friedman <sup>28</sup>	1968	\$180 (in 1982)
Senior Associate <sup>28</sup>		\$120-130 (in 1982)
Junior Associate <sup>28</sup>		\$ 65 (in 1982)

<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
WILLIAMS & CONNOLLY Partners & Associates <sup>23</sup>		Firm's current rates are "at least equivalent" to the requested rates*
WILMER, CUTLER & PICKERING James Robertson <sup>20</sup>	1965	\$185 (current)
Arthur F. Matthews <sup>21</sup>	1962	\$185 (in 1982)
Steven F. Black <sup>21</sup>	1968	\$170 (in 1982)
Stephen P. Doyle <sup>21</sup>	1976	\$120 (in 1982)
Associates <sup>21</sup>		\$105 (in 1982)
Partners and associates <sup>20</sup>		Firm's current rates are "at least equal to" requested rates*

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Paralegals and Law ClerksLodestar Rate Requested for Bredhoff & Kaiser  
and Arnold & Porter Law Clerks and Paralegals:

\$30 an hour

<u>Law Firm</u>	<u>Rate</u>
ARNOLD & PORTER paralegals <sup>22</sup>	\$32 in first six months, \$40 after six months' experience (current)
law clerks <sup>22</sup>	\$45 (current)
CAPLIN & DRYSDALE paralegals <sup>7</sup>	\$35-40 (current)
law clerks <sup>7</sup>	\$50 (current)
DECHERT PRICE & RHOADS paralegals <sup>8</sup>	\$32 (in 1982)
DICKSTEIN, SHAPIRO & MORIN paralegals <sup>18</sup>	\$40 (current)
HOGAN & HARTSON law clerks and paralegals <sup>18</sup>	Current firm rates are equivalent to re- quested rate*
NUSSBAUM, OWEN & WEBSTER paralegals and law clerks <sup>21</sup>	Requested rate* is in accordance with current pre- vailing rates

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\* Requested rate is listed at the head of this table.

<u>Law Firm</u>	<u>Rate</u>
PEABODY, LAMBERT & MEYERS paralegals <sup>22</sup>	\$55 (current)
STEPTOE & JOHNSON paralegals <sup>26</sup>	\$45-50 (in 1982)
WHITE & CASE paralegals <sup>28</sup>	\$35 (in 1982)
WILLIAMS & CONNOLLY paralegals <sup>29</sup>	Firms' current rate is "at least equivalent to the requested rate"
WILMER, CUTLER & PICKERING paralegals <sup>31</sup>	\$48 (in 1982)
law clerks <sup>30</sup>	Firms' current rate is "at least equal to" to the requested rate*



Endnotes

1. Affidavit of Daniel A. Rezneck, ¶ 11.
2. Affidavit of Daniel A. Rezneck, ¶ 12.
3. Affidavit of James A. Dobkin, ¶ 5.
4. Affidavit of Daniel A. Rezneck, ¶ 13.
5. Affidavit of Daniel A. Rezneck, ¶ 14.
6. Affidavit of William A. Carey, ¶ 8.
7. Affidavit of Peter Van N. Lockwood, ¶ 5.
8. Affidavit of Daniel A. Rezneck, ¶ 16(i).
9. Affidavit of Daniel A. Rezneck, ¶ 16(m); Exhibit N, p.2.
10. Affidavit of James vanRoden Springer, ¶¶ 2-3.
11. Affidavit of Daniel A. Rezneck, ¶ 16(g); Exhibit H.
12. Affidavit of Daniel A. Rezneck, ¶ 16(a).
13. Affidavit of Daniel A. Rezneck, ¶ 16(h); Exhibit I.
14. Affidavit of Daniel A. Rezneck, ¶ 16(n).
15. Affidavit of David S. Tatel, ¶ 15.
16. Affidavit of Kenneth R. Feinberg, ¶ 6.
17. Affidavit of Daniel A. Rezneck, ¶ 16(l); Exhibit L, ¶ 3.
18. Affidavit of Daniel A. Rezneck, ¶ 16(e); Exhibit F, ¶ 16.
19. Affidavit of Jamie S. Gorelick, ¶ 5.
20. Affidavit of Daniel A. Rezneck, ¶ 16(l); Exhibit M, ¶¶ 3-5.
21. Affidavit of David N. Webster, ¶ 8.

22. Affidavit of Charles T. Duncan, ¶ 11.
23. Affidavit of Daniel A. Rezneck, ¶ 16(j); Exhibit J, ¶ 5.
24. Affidavit of Daniel A. Rezneck, ¶ 16(b); Exhibit C, ¶¶ 6-7; Exhibit D, ¶ 9.
25. Affidavit of Daniel A. Rezneck, ¶ 16(c).
26. Affidavit of Daniel A. Rezneck, ¶ 16(d); Exhibit E, ¶ 4, ¶ 8, ¶ 11.
27. Affidavit of Daniel A. Rezneck, ¶ 16(o); Exhibit O, ¶ 2.
28. Affidavit of Daniel A. Rezneck, ¶ 16(f); Exhibit G, ¶ 6.
29. Affidavit of Robert L. Weinberg, ¶ 6.
30. Affidavit of James Robertson, ¶ 4, ¶ 8.
31. Affidavit of Daniel A. Rezneck, ¶ 16(k); Exhibit K.
32. Affidavit of Daniel A. Rezneck, ¶ 15.