

Plaintiffs'
Exhibit
49

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)		
MARY PAT LAFFEY, <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	Civil Action
v.)	No. 2111-70
)	
NORTHWEST AIRLINES, INC.)	
)	
Defendant.)	
_____)		

FIRST AFFIDAVIT OF DANIEL A. REZNECK

CITY OF WASHINGTON)	
)	ss:
DISTRICT OF COLUMBIA)	

Daniel A. Rezneck, being duly sworn, voluntarily deposes and says:

1. I am a partner in the firm of Arnold & Porter. I am a member of the Bars of the District of Columbia and New York.

2. I graduated from Harvard College, B.A., in 1956, and from Harvard Law School, LL.B., in 1959. Following my law school graduation, I served as assistant to Professor Paul A. Freund of the Harvard Law School in 1959-1960 and as law clerk to Justice William J. Brennan of the United States Supreme Court in 1960-1961.

3. I was admitted to the Bar of the State of New York in 1959 and the District of Columbia in 1961. I was an Assistant U.S. Attorney for the District of Columbia from 1961 to 1964. I joined Arnold & Porter in 1964 and have been a partner there since 1969.

4. I have long been active in Bar affairs in the District of Columbia. In 1975-1976, I was President of the District of Columbia Bar. Since 1979, I have served as a member of the District of Columbia Commission on Judicial Disabilities and Tenure. I am also a Trustee of the Public Defender Service of the District of Columbia. I have been a member of the Judicial Conference of the District of Columbia Circuit and the Judicial Conference of the District of Columbia. I have served as a trustee of the D.C. Bar Foundation and have chaired or been a member of numerous committees appointed by the courts and the D.C. Bar.

5. My practice at Arnold & Porter has involved complex civil and criminal litigation, such as antitrust, securities, government contracts, constitutional and other civil rights, and white collar crime. I have also represented other attorneys and law firms in a number of matters. I have been involved in matters

involving the setting of attorneys' fees. I have represented both plaintiffs and defendants in complex federal court litigation. Through my practice and longstanding involvement in Bar activities, I am familiar with the standards of legal practice in the District of Columbia. I am also familiar with the standards for setting attorneys' fees and other costs of litigation.

6. For several years, I was in charge of our pro bono program at Arnold & Porter. In the course of that activity, I had overall supervisory responsibility for several employment discrimination matters in which our firm represented plaintiffs. I became generally cognizant of the characteristics and complexities of such cases, and I familiarized myself with the standards governing allowance of attorneys' fees under applicable federal statutes.

7. Arnold & Porter is engaged in a broad general practice, which involves substantial federal litigation in many areas of the law, including employment discrimination. Individual attorney time is customarily charged to clients on the basis of standard hourly rates determined by level of experience, without regard to the subject matter of the particular work or whether it involves litigation or some other form of legal

representation. In the context of litigation, our firm does not make any distinction for purposes of billing between in-court and out-of-court time or between or among other types of litigation activity; all are billed at the same standard hourly rates. Moreover, Arnold & Porter does not differentiate employment discrimination cases for fee-paying clients from other types of litigation with respect to billing; we customarily bill and collect from fee-paying clients in employment discrimination matters at the same standard hourly rates billed for other matters. Arnold & Porter customarily bills at the same standard hourly rate irrespective of the outcome of the litigation.

8. Fees in this litigation are being requested for attorneys from the firm of Bredhoff & Kaiser at the following rates:

(a) \$175 an hour for very experienced federal court litigators, e.g., lawyers in their 20th year after graduation from law school and thereafter. The following individuals are in this category for some of the years they worked on the Laffey case: Messrs. Gottesman, Bredhoff and Cohen. By far the largest number of hours in this group were worked by Mr. Gottesman.

(b) \$150 an hour for experienced federal court litigators, e.g., lawyers in their 11th through 19th years after graduation from law school. Messrs. Gottesman, Cohen, Weinberg and Petramalo are in this category for some of the years they worked on the Laffey case, as is associated counsel Gilbert Feldman.

(c) \$125 an hour for experienced litigators in their 8th through 10th years after graduation from law school. Messrs. Weinberg, Petramalo and Ms. Julia Penny Clark are in this category for some of the years they worked on the Laffey case.

(d) \$100 an hour for senior associates in their 4th through 7th years after graduation from law school. Mr. Weinberg, Mr. Petramalo, Ms. Clark, Dennis Clark, Jeremiah Collins, Mady Gilson, and James J. Brudney are in this category for some of the years they worked on the Laffey case.

(e) \$75 an hour for junior associates in their 1st through 3rd years after graduation from law school. Mr. Clark, Mr. Collins, and Mr. Brudney are in this category for some of the years they worked on the Laffey case.

A chart showing the lodestar figures computed on the basis of these rates for work on the merits during the period up to and including February 28, 1983 for Bredhoff & Kaiser attorneys (and Mr. Feldman) is attached hereto as Exhibit A. A chart showing the lodestar figures computed on the basis of these rates for work on the attorneys' fee issue for the same period for Bredhoff & Kaiser attorneys is attached hereto as Exhibit A-1.

Compensation at the same rates for the same categories of experience is being requested for the attorneys at Arnold & Porter who have worked on the attorneys' fee issue, i.e., myself; Jeffrey A. Burt, a 1970 law school graduate; and Timothy J. Lindon, a 1980 law school graduate.

A chart showing the lodestar figures computed on the basis of these rates for Arnold & Porter attorneys up to and including February 28, 1983, is attached as Exhibit B hereto.

9. I have caused an inquiry to be made and have inquired into the billing rates of firms in Washington, D.C., which are engaged in active litigation practice in the federal courts. A number of attorneys from such firms have executed affidavits in this case giving

specific rate information, supporting and substantiating the rates described in paragraph 8, supra, and demonstrating that the requested rates are equal to or below prevailing market rates in the community for lawyers of similar skill and experience. Those affidavits are contained in Appendix II to this application. In addition, examination of the files and reports of cases in the District of Columbia and elsewhere has disclosed further substantial corroborative information as to prevailing market rates in the District of Columbia for complex federal litigation such as Laffey, and copies of affidavits and excerpts from affidavits filed in a number of such cases are summarized below and attached as exhibits to this affidavit. This is in accord with the statement of the U.S. Court of Appeals in National Association of Concerned Veterans, 675 F.2d 1319, 1326 (D.C. 1982) that: "Evidence submitted by attorney fee applicants in prior cases may also be relied on in compiling an attorney fee application. There is no requirement that each attorney develop all of the evidence for the hourly rate he seeks from scratch."

10. The examination I have caused to be conducted shows that the standard hourly rates of many lawyers in the District of Columbia, customarily billed and

collected, in complex federal litigation are \$200 an hour or more.

11. The standard hourly rates at Arnold & Porter, customarily billed and collected, are equal to or in excess of the rates requested here at the various levels of experience of attorneys for which application is made. I graduated from law school in the same year as Mr. Gottesman and am somewhat junior to Messrs. Bredhoff and Cohen at Bredhoff & Kaiser in year of graduation from law school and admission to the Bar. I became a partner at Arnold & Porter several years after Mr. Gottesman became a partner in the firm which is now Bredhoff & Kaiser. My current standard hourly billing rate, applicable to all civil litigation matters for fee-paying clients, is \$200 an hour. Mr. Burt is junior in year of graduation from law school and admission to the Bar to Messrs. Weinberg and Petramalo of Bredhoff & Kaiser. Mr. Burt's current standard hourly billing rate is \$160. Mr. Lindon's current standard hourly billing rate is \$95. During the entire time of my representation of plaintiffs on the attorney fee issue, to the best of my knowledge, all or virtually all of my time in all the other civil cases in which I have represented fee-paying clients has been billed at my

stated standard hourly rates. Furthermore, to the best of my knowledge all or virtually all of such time billed to and paid by such fee-paying clients has been paid at the stated standard hourly rates. None of these matters was handled on a contingent basis, and my standard hourly rate does not include an allowance for the contingent nature of any cases. The same is true of Messrs. Burt and Lindon.

12. Most other lawyers at Arnold & Porter of equivalent years of experience to myself and to the senior members of the Bredhoff & Kaiser firm that I have listed (Messrs. Gottesman, Bredhoff, and Cohen) also bill and collect from fee-paying clients at current standard rates of \$200 or \$190 an hour. The current standard billing rates at Arnold & Porter thus equal or exceed the \$175 and \$150 an hour rates requested for Messrs. Gottesman, Bredhoff and Cohen at their various levels of experience during the Laffey case.

13. Likewise, the current standard hourly rates applicable at Arnold & Porter to partners of comparable age and status to Messrs. Weinberg and Petramalo of Bredhoff & Kaiser equal or exceed the \$150, \$125 and \$100 per hour rates requested for the services of those attorneys at their various levels of experience during

the Laffey case. Mr. Weinberg is a 1968 law school graduate, a member of the D.C. Bar since 1969, and a partner at Bredhoff & Kaiser since 1977. Mr. Petramalo is a 1969 law school graduate, became a member of the D.C. Bar in that year, and has been a partner since 1978. Arnold & Porter's standard hourly billing rate for most partners in their 11th year after graduation from law school is \$150, and ordinarily increases thereafter with increased experience. The current standard rate for most partners of Mr. Weinberg's and Mr. Petramalo's years of experience is from \$160 to \$170 an hour. The current standard hourly rates at Arnold & Porter exceed the \$125 and \$100 rates requested at various levels of experience for J. Penny Clark, a 1973 graduate admitted to partnership in 1981. The current standard hourly rate for most partners in the 10th year after graduation from law school is \$145.

14. With respect to associates, Arnold & Porter's current standard hourly billing rates likewise exceed the rates requested here for associates Dennis Clark, Jeremiah Collins, Mady Gilson, and James J. Brudney. The current standard hourly rates for first-year associates are \$80, for fourth-year associates \$105, and for associates during the seventh year \$125. The

time of associates who graduated in 1976, the same year as attorneys Collins and Gilson, is currently billed at \$125 an hour. Thus the request of \$75 an hour for junior associates of Bredhoff & Kaiser who worked on Laffey during their first three years and of \$100 an hour for senior associates who worked on the case during their fourth through seventh years is below the current standard hourly rate that Arnold & Porter charges for the services of persons of equivalent experience.

15. Compensation for the services of paralegals and law clerks of Bredhoff & Kaiser is being requested at the rate of \$30 an hour. Arnold & Porter's customary hourly rates for paralegals are \$40 an hour after they have been at the firm for six months (\$32 an hour prior to that time) and \$45 an hour for the time of law clerks.

16. My examination and inquiry into the rates charged to fee-paying clients by many other firms and attorneys in Washington, D.C. engaged in complex litigation in the federal courts, including employment discrimination and other civil rights, antitrust, securities, tax, environmental, and general litigation, discloses rates consistent with the rates requested here. Appendix II contains numerous affidavits of practitioners as to current rates in Washington, D.C.

These affidavits state that employment discrimination cases are billed to fee-paying clients at the same standard hourly rates as all other complex federal litigation. In addition to the other affidavits filed with this application, I have set forth data derived from affidavits and pleadings filed in other cases in the paragraphs below, with attached exhibits. It should be noted that most of these affidavits were filed in cases prior to 1983, and current rates may be even higher.

(a) Thomas R. Ewald, admitted to practice in 1957, and Samuel Seymour, admitted to practice in 1962, both Washington, D.C. practitioners, were awarded fees for representing plaintiffs in a Title VII case at the lodestar rate of \$175 an hour on the basis of a specific finding by the Court that this was a reasonable hourly rate in Washington, D.C. for an experienced litigator as of 1980. Chrapliwy v. Uniroyal, Inc., 670 F.2d 760, 764, 768-69 (7th Cir. 1982).

(b) In affidavits filed in other Title VII cases, Jane McGrew, a member of the firm of Steptoe & Johnson, Chartered, who graduated from law school in 1970, became a partner in 1977, and has specialized in Title VII work, states that she routinely bills fee-paying clients at the rate of at least \$160 an hour, including employment

discrimination work. (Affidavits of Jane McGrew in Chewning v. Duncan, U.S.D.C. D.C., Civil Action No. 76-0334, and Kohne v. Imco Container Co., U.S.D.C. for the Western District of Virginia, Civil Action No. 74-C-110(H) attached as Exhibits C and D hereto.)

According to her affidavit, Ex. D, p. 4, the standard hourly rates of other lawyers of Steptoe & Johnson as of 1982 were as follows:

<u>Level of Seniority</u>	<u>Minimum Hourly Rate</u>
20 years or more	\$170
9 to 20 years	\$125 to \$200
4 to 8 years	\$ 95 to \$125
Less than 4 years	\$ 70 to \$ 95

According to Ms. McGrew, standard billing rates in 1982 at Steptoe & Johnson for paralegal time were \$45 to \$50 an hour. (Id.)

(c) This Court in Connors v. Drivers, Chauffeurs & Helpers Local Union 639, Civ. Act. 82-1840, March 4, 1983, awarded the following rates to Steptoe & Johnson lawyers, which it found to be the actual rates charged by the firm during 1982:

J.D. Hutchinson, a 1968 law school graduate -- \$190 an hour.

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P.J. Ondrasik, Jr., a 1975 law school graduate -- \$115 an hour.

A.B. Ianniello, a 1980 law school graduate -- \$80 an hour.

(d) Roger Warin, who is a 1970 law school graduate, became a partner in Steptoe & Johnson in 1978, and has handled numerous employment discrimination and other civil rights matters, states that in 1982 his normal billing rate was \$150 an hour. (Affidavit of Roger E. Warin, Bachman v. Miller, U.S.D.C. D.C., Civil Action No. 76-0079, p. 3, Exhibit E hereto.) He further states that John R. Labovitz, a 1969 law school graduate who became a partner at Steptoe & Johnson in 1979, also had a normal billing rate in 1982 of \$150 an hour. (Id., p. 7)

(e) Nathan Lewin, of Miller, Cassidy, Larocca & Lewin, an experienced litigator who is a 1960 law school graduate and frequently handles civil rights matters in this and other courts, ordinarily charged fee-paying clients in 1982 at the standard rate of \$250 an hour for his services. (Affidavit of Jamie S. Gorelick, National Public Radio v. Copyright Royalty Tribunal, U.S. Court of Appeals for the D.C. Circuit, Docket No. 80-2281, pp. 9-10, Exhibit F hereto.)

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(f) Partners of the Washington office of White & Case have stated their hourly rates as of 1982 as follows:

John W. Barnum, a 1957 law school graduate,
\$225;

John J. McAvoy, a 1958 law school graduate,
\$210;

Paul L. Friedman, a 1968 law school
graduate, \$180.

(In re AOV Industries, Inc., U.S. Bankruptcy Court for the District of Columbia, Case No. 81-00617 et al., Fifth Application of White & Case for Interim Compensation and Reimbursement of Expenses, December 15, 1982, p. 4, Exhibit G hereto.)

(g) David I. Shapiro of the firm of Dickstein, Shapiro & Morin billed at the standard hourly rate of \$200 in 1981. (Exhibit B to Affidavit of David I. Shapiro in In re Ampicillin Antitrust Litigation, U.S.D.C. D.C., M.D.L. Docket No. 50 (Misc. 45-70), 526 F. Supp. 494 (D.D.C. 1981), Exhibit H hereto.)

(h) Joseph D. Tydings, who became a partner in the firm of Danzansky, Dickey, Tydings, Quint & Gordon in 1971, is now a member of the firm of Finley, Kumble, Wagner, Heine, Underberg, and Casey, and is an experienced litigator, also billed at the rate of \$200 an hour for

litigation services as far back as 1980. (Affidavit of Joseph D. Tydings, In re Corrugated Container Antitrust Litigation, U.S.D.C. Southern District of Texas, M.D.L 310, Exhibit I hereto.)

(i) The standard billing rate to fee-paying clients for an experienced litigator at Covington & Burling, was at least \$180 an hour in 1982. (Smith v. Pro-Football, Inc., U.S.D.C. D.C., Civ. Act. No. 1643-70, Tagliabue Affidavit, ¶ 8, cited in Memorandum of Estate of Stuart H. Johnson, Jr., in Support of Plaintiff's Motion for an Award of Attorney's Fees and Costs and in Response to Objections of Defendant National Football League, Sept. 9, 1982, pp. 28-29.)

(j) Timothy J. Waters of the firm of Peabody, Lambert & Meyers, who graduated from law school in 1968, became a partner in 1973, and is a litigator, had a standard billing rate of \$150 an hour in antitrust litigation as of 1982. (Affidavit of Timothy J. Waters, Smith v. Pro-Football, Inc., supra, p. 3, Exhibit J hereto.)

(k) The time of Arthur F. Matthews, an experienced litigator at the firm of Wilmer, Cutler & Pickering, who graduated from law school and was admitted to the

D.C. Bar in 1962, was billed at \$185 an hour in 1982. The time of his partner, Stephen F. Black, who graduated in 1968, was a law school classmate of Robert M. Weinberg Bredhoff & Kaiser, and was admitted to the D.C. Bar in 1969, is billed at the rate of \$170 an hour. The time of Stephen P. Doyle, a 1976 graduate, is billed at \$120 an hour; the time of associates who graduated in 1979, Richard Goodstein, Kathy B. Weinman, and Robert M. Pozin, is billed at \$105 an hour. (See the submission of Wilmer, Cutler & Pickering in the OPM Leasing Services fraud investigation, Reorganization No. 81-B-10533, U.S. Bankruptcy Court for the Southern District of New York, attached as Exhibit K hereto.)

(1) Bradley G. McDonald, a 1961 law school graduate, stated in an affidavit in the D.C. professional tax case, Superior Court of the District of Columbia, Tax Division, Docket No. 2362, Bishop v. District of Columbia, that he had a standard billing rate, as of 1980, of \$150 an hour (Affidavit of Bradley G. McDonald, p. 3, Exhibit L hereto); his practice included Title VII cases as well as other forms of complex federal court litigation. Other regular billing rates set forth in the affidavits filed in that case include John M. Bixler of Miller & Chevalier at \$160 an hour as of 1980, and

\$200 for other senior partners of Miller & Chevalier, a firm specializing in tax matters. (Bishop v. District of Columbia, supra, Affidavit of John M. Bixler, Exhibit M, pp. 3-4.)

(m) Arthur W. Leibold, Jr., a partner in the Washington office of Dechert Price and Rhoads, states that as of 1982 his rate was \$195 an hour and several of his partners and senior partners had rates of \$200 and \$225 an hour. (Affidavit of Arthur W. Leibold, In re National Student Marketing Litigation, U.S.D.C. D.C., M.D.L. Docket No. 105, Exhibit N hereto.)

(n) Gilbert Hahn, Jr., a senior litigator formerly at the firm of Wolf, Amram and Hahn, stated in his submission in Metropolitan Washington Coalition for Clean Air v. District of Columbia, Civil Action Nos. 1424-73 and 1844-73 (D.D.C. 1981) that his hourly rate as far back as 1980 was \$175. He was awarded fees by this Court at that lodestar rate.


(o) Eldon V.C. Greenberg, formerly of the Washington office of Tuttle & Taylor, who is a 1969 law school graduate and has handled substantial environmental litigation, had a standard billing rate

of \$155 an hour to fee-paying clients as of 1982.

(Declaration of Eldon V.C. Greenberg, National Wildlife Federation v. Watt, U.S.D.C., D.C. Civil Action No. 82-0320, p. 1, Exhibit O hereto.)


Daniel A. Rezneck

Subscribed and sworn to before
me this 17 day of March, 1983.


Notary Public

My Commission Expires:

Nov 21 1984

EXHIBIT 1

EVIDENCE OF HOURLY RATES CHARGED BY ATTORNEYS
FOR COMPLEX LITIGATION IN THE DISTRICT OF COLUMBIA

Lodestar 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 ¹	1959	\$200 (current) \$190 (in 1982)
Other attorneys of equivalent experience to Mr. Rezneck ²		\$190-200 (current)
James A. Dobkin ³	1964	\$180
Jeffrey A. Burt ⁴	1970	\$160 (current) \$150 (in 1982)
Partner in the 11th year after graduation ⁵		\$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 ⁶		\$145 (current)
Seventh-year associate ⁵		\$125 (current)
Fourth-year associate ⁵		\$105 (current)
Timothy J. Lindon ¹	1980	\$ 95 (current)
First-year associate ⁵		\$ 80 (current)
BARNETT & ALAGIA		
William A. Carey ⁶	1957	\$150 (current)
CAPLIN & DRYSDALE		
Irving Salem ⁷	1960	\$200 (current)
Cono R. Namorato ⁷	1968	\$185 (current)
Peter Van N. Lockwood ⁷	1966	\$175 (current)
Robert C. Pozen ⁷	1972	\$150 (current)
Partners ⁷		\$120-300 (current)
Associates ⁷		\$ 75-105 (current)
COVINGTON & BURLING		
Experienced partner ⁸	1947	\$180 minimum (in 1982)
DECHERT PRICE & RHOADS		
Senior partners ⁹		\$200-225 (in 1982)
Arthur W. Leibold ⁹	1956	\$195 (in 1982)
Senior associate ⁹		\$110 (in 1982)
Associate ⁹		\$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 ¹⁰		\$225-250 (current)
Experienced partners ¹⁰		\$150-200 (current)
David I. Shapiro ¹¹	1949	\$200 (in 1981)
James vanRoden Springer ¹⁰	1962	\$170 (current)
EWALD, THOMAS R.	1957	
Experienced D.C. litigator		
Fee award by Court ¹²		\$175 (in 1980)
FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & CASEY		
Joseph D. Tydings ¹³	1953	\$200 (in 1980)
HAHN, GILBERT, JR.	1948	
Fee award by Court ¹⁴		\$175 (in 1980)
HOGAN & HARTSON		
Attorneys ¹⁵		Firm's 1983 rates are equivalent to requested rates*
KAYE, SCHOLER, FIERMAN, HAYS & HANDLER		
Kenneth R. Feinberg ¹⁶	1970	\$200 (current)
MCDONALD, BRADLEY G. ¹⁷	1961	\$150 (in 1980)
MILLER, CASSIDY, LARROCA & LEWIN		
Nathan Lewin ¹⁸	1960	\$250 (in 1982)
Senior partners ¹⁹		\$175-250 (current)

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

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<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
Jamie Gorelick ¹⁹	1975	\$100-125 (current)
Associates ¹⁹		\$ 70-110 (current)
MILLER & CHEVALIER		
Senior partner ²⁰		\$200 (in 1980)
John M. Bixler ²⁰	1954	\$160 (in 1980)
Associates ²⁰		\$ 90 (in 1980)
paralegals ²⁰		
Steven F. Black ²⁰		
NÜSSBAUM, OWEN & WEBSTER		
David N. Webster ²¹	1958	\$180 (current)
"...experienced litigators for handling complex federal civil litigation..." ²¹		\$135-185 (current)
PEABODY, LAMBERT & MEYERS		
Partners ²²		\$130-180 (current)
Charles T. Duncan ²²	1950	\$170 (current)
Timothy Waters ²²	1968	\$150 (in 1982)
Senior associates ²²		\$100 (in 1982)
Associates ²²		\$ 75-100 (current)
SEYMOUR, SAMUEL	1962	
Experienced D.C. litigator		\$175 (in 1980)
Fee award by Court ¹²		
STEPTOE & JOHNSON		
J.D. Hutchinson ²⁵	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 ²⁴		\$170 (current minimum)
Attorney with 9 to 20 years' experience ²⁴		\$125-200 (current minimum)
Jane McGrew ²⁴	1970	at least \$160 (current)
Roger E. Warin ²⁶	1970	\$150 (in 1982)
John R. Labovitz ²⁶	1969	\$150 (in 1982)
Associate with 4 to 8 years' seniority ²⁶		\$ 95-125 (current minimum)
P.J. Ondrasik ²⁵	1975	\$115 (in 1982)
Associate with less than 4 years' seniority ²⁴		\$ 70-90 (current minimum)
A.B. Ianniello ²⁵	1980	\$ 80 (in 1982)
TUTTLE & TAYLOR		
Eldon Greenberg ²⁷	1969	\$155 (in 1982)
WHITE & CASE		
John W. Barnum ²⁸	1957	\$225 (in 1982)
John J. McAvoy ²⁸	1958	\$210 (in 1982)
Paul L. Friedman ²⁸	1968	\$180 (in 1982)
Senior Associate ²⁸		\$120-130 (in 1982)
Junior Associate ²⁸		\$ 65 (in 1982)

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<u>Law Firm and/or Attorney</u>	<u>Year of Graduation</u>	<u>Hourly Rate</u>
WILLIAMS & CONNOLLY Partners & Associates ²³		Firm's current rates are "at least equivalent" to the requested rates*
WILMER, CUTLER & PICKERING James Robertson ²⁰	1965	\$185 (current)
Arthur F. Matthews ²¹	1962	\$185 (in 1982)
Steven F. Black ²¹	1968	\$170 (in 1982)
Stephen P. Doyle ²¹	1976	\$120 (in 1982)
Associates ²¹		\$105 (in 1982)
Partners and associates ²⁰		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 ²²	\$32 in first six months, \$40 after six months' experience (current)
law clerks ²²	\$45 (current)
CAPLIN & DRYSDALE paralegals ⁷	\$35-40 (current)
law clerks ⁷	\$50 (current)
DECHERT PRICE & RHOADS paralegals ⁹	\$32 (in 1982)
DICKSTEIN, SHAPIRO & MORIN paralegals ¹⁸	\$40 (current)
HOGAN & HARTSON law clerks and paralegals ¹⁸	Current firm rates are equivalent to re- quested rate*
NUSSBAUM, OWEN & WEBSTER paralegals and law clerks ²¹	Requested rate* is in accordance with current pre- vailing rates

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

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