UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WEATHERFORD INTERNATIONAL SECURITIES LITIGATION

11 Civ. 1646 (LAK) (JCF)

CLASS ACTION

DECLARATION OF CURTIS V. TRINKO IN SUPPORT OF LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES FILED ON BEHALF OF THE LAW OFFICES OF CURTIS V. TRINKO, LLP

Curtis V. Trinko, declares as follows:

- 1. I am the managing partner of the law firm entitled the Law Offices of Curtis V. Trinko, LLP. I submit this declaration in support of my firm's application for an award of attorneys' fees in connection with services rendered in the above-captioned action (the "Action"), as well as for reimbursement of expenses incurred by my firm in connection with the Action.
- 2. My firm served as Local Counsel for the Plaintiffs and the Class in the Action.

 The work performed by my firm for the benefit of the class in the Action, included:
 - Review, revisions, proofing and filing of Lead Plaintiff papers, Amended Complaint, oppositions to motions to dismiss, supplemental Complaint, opposition to E+Y's Judgment On Dismissal, deficiency letter re: Defendants' Answer, motions to compel discovery, other discovery-related motions filed under seal, motion for leave to amend complaint, and motion for preliminary approval of settlement.
 - Preparation of Declarations regarding lead plaintiff motion, memo regarding motion to supplement complaint, research memo on disclosure of CW identities, non-party subpoenas, and courtesy copies for Court.
 - Preparation efforts and participation with Kessler Topaz in oral arguments and Court
 appearances re: leadership, motions to dismiss, Rule 26(f) conference, status
 conference, and telephonic conference regarding preliminary approval of settlement.

- Assist in Initial Disclosures and class certification discovery, service of non-party subpoenas and follow-up on documents, review of non-party documents, and strategy and procedure disc.'s with Kessler Topaz re: discovery disputes, pleadings, class certification, and settlement.
- Review Court filings by parties, discovery notices, Court decisions, search protocols and procedures, subpoena duces tecum, and preliminary approval papers.
- 3. The schedule attached hereto as Exhibit 1 is a lodestar summary indicating the amount of time spent by each attorney and professional support personnel of my firm who was involved in litigating this Action, and the lodestar calculation of the value of that time based upon my firm's current billing rates for complex litigation matters. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.
- 4. The hourly rates for the attorneys and professional support staff in my firm set forth in Exhibit 1 have been accepted in other complex securities and/or shareholder litigation in this District and elsewhere.
- 5. The total number of hours expended on this Action by my firm from its inception through May 15, 2014 is 388.2 hours. The total lodestar for that work is \$191,617.75, consisting of \$174,842.75 for attorneys' time and \$16,775.00 for professional support staff time.
- 6. My firm's lodestar figures are based upon the firm's established billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

- 7. As detailed in the schedule attached hereto as Exhibit 2, my firm has incurred a total of \$2,068.00 in unreimbursed expenses in connection with the prosecution and settlement of this Action.
- 8. The expenses incurred in this Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials, and are an accurate record of the expenses incurred.
- 9. With respect to the standing of my firm, attached hereto as Exhibit 3 is a brief biography of my firm and the attorneys in my firm who were principally involved in this Action.

I declare, under penalty of perjury, that the foregoing facts are true and correct. Executed on May 22,2014.

Curtis V. Trinko

In re Weatherford International Securities Litigation 11 Civ. 1646 (LAK) (JCF)

LAW OFFICES OF CURTIS V. TRINKO, LLP

TIME REPORT

Inception through May 15, 2014

NAME	HOURS	HOURLY RATE	LODESTAR
Partners		A ALLE AND A STATE OF THE ALL A	
Curtis V. Trinko	140.90	\$760.00	\$107,084.00
Associates			
Jennifer E. Traystman	67.50	\$450.00	\$30,375.00
C. William Margrage	91.55	\$325.00	\$29,753.75
Eileen M. Ryan	27.25	\$280.00	\$7,630.00
Paralegals		100	
Lora del Pino	61.00	\$275.00	\$16,775.00
TOTAL LODESTAR:	388.20	A A A A A A A A A A A A A A A A A A A	\$191,617.75

In re Weatherford International Securities Litigation 11 Civ. 1646 (LAK) (JCF)

LAW OFFICES OF CURTIS V. TRINKO, LLP

EXPENSE REPORT

CATEGORY	AMOUNT
Court Fees	\$800.00
On-Line Legal Research*	\$83.76
Postage & Express Mail, Messenger	\$421.31
Internal Reproduction Costs	\$600.51
Travel (Meals, Hotel, Transportation)	\$155.57
Working Meals	\$6.85
TOTAL EXPENSES:	\$2,068.00

^{*} The charges reflected for on-line research are for out-of-pocket payments to the vendors for research done in connection with this litigation. Online research is billed to each case based on actual time usage at a set charge by the vendor. There are no administrative charges included in these figures.

In re Weatherford International Securities Litigation 11 Civ. 1646 (LAK) (JCF)

LAW OFFICES OF CURTIS V. TRINKO, LLP

FIRM BIOGRAPHY

The LAW OFFICES OF CURTIS V. TRINKO, LLP is an AV-rated law firm which specializes in complex commercial litigation, and particularly, litigation involving violations of federal and state securities and corporate laws, as well as claims involving officers' and directors' liability, corporate governance practices and procedures, and claims of excessive executive and advisory compensation. The firm has directly participated in the recovery of substantial settlements on behalf of defrauded shareholders injured by illegal corporate activities, or shareholders denied the appropriate valuation for their equity ownership in the wake of successful and/or attempted corporate buy-outs, takeovers and other transactions involving corporate restructurings, asset sales and/or mergers and acquisitions. Moreover, the firm's efforts have assisted in restoring many millions of dollars to corporate treasuries depleted by the illegal practices and/or breaches of fiduciary duties by their corporate officers and directors. The firm has also represented both individual and corporate defendants in numerous securities class actions, investor claim-related litigation, shareholder derivative litigation, and other commercial litigation.

In addition, the firm has pursued litigation on behalf of defrauded consumers, for violations of the federal antitrust laws and various consumer protection laws, on behalf of pension plan participants, for violations of ERISA, on behalf of mass tort victims, to remedy

human rights violations, as well as on behalf of Holocaust victims, those afflicted with Gulf War Syndrome, and those harmed by the Bhopal Gas Disaster.

CURTIS V. TRINKO

For the past twenty-four years, Mr. Trinko, the principal of the firm, has personally been actively involved in class action and derivative securities, as well as consumer, mass-tort, environmental, and antitrust litigation in many Federal District Courts and State Courts throughout the United States. In fact, Mr. Trinko has had significant involvement in approximately 370 such complex litigations. Moreover, he has also been extensively engaged in general commercial litigation in both Federal and State Courts for the past thirty-four years.

Curtis V. Trinko graduated from New York University School of Law in 1974, where he was both a Root-Tilden Scholar and a Research Fellow at the Center for International Studies. He received his B.A. Degree with Honors from the University of Wisconsin-Madison in 1971. From 1974-1975, he clerked with the Hon. Thomas R. McMillen, a United States District Judge, then sitting in the Northern District of Illinois. In 1975, he was admitted to the Bar of the State of New York, to the Bars of the U.S. District Courts for the Southern and Eastern Districts of New York, and to the Bar of the U.S. Court of Appeals for the Second Circuit. Since then, Mr. Trinko has also been admitted to the Bars of the U.S. Courts of Appeals for the Ninth Circuit and Eleventh Circuit, the Bars of the U.S. District Court for the Northern District of California and Colorado, as well as the Bar of the United States Supreme Court. Prior to establishing his own law practice, he was a member of Rouhana & Trinko, A Professional Corporation. Prior thereto, Mr. Trinko was affiliated with the law firm now known as Abbey Gardy, LLP, and he

had been a litigation associate at Milbank, Tweed, Hadley & McCloy and Golenbock and Barell in New York City.

KINNY W. CHAN

Kinny W. Chan, previously associated with the firm, graduated from Brooklyn Law School in 2005. Mr. Chan received his B.A. degree from the University of Florida in 2001. In 2006, he was admitted to the Bar of the State of New York, as well as the Bar of the U.S. District Courts for the Southern District of New York. In 2010, Mr. Chan became a Manager at an Electronic Discovery Firm.

JENNIFER E. TRAYSTMAN

Jennifer E. Traystman, an associate with the firm, graduated from New York University School of Law in 2005. Ms. Traystman received her B.A. degree from the State University at Binghamton in 2001. She is a member of the Bar of the State of New York, as well as the Bar of the U.S. District Courts for the Southern District of New York. Ms. Traystman is involved in complex civil litigation on securities fraud class actions on behalf of shareholders and investors, as well as consumer claims, corporate commercial litigation, and contract disputes. Prior to her association with the firm, Ms. Traystman had been a securities litigation associate at Cadwalader, Wickersham & Taft, LLP.

C. WILLIAM MARGRABE

C. William Margrabe, an associate of the firm, graduated from the University of Michigan Law School in 2011. He received his B.A. degree from Princeton University in 2003. Mr. Margrabe is a member of the Bar of the State of New York, and the Bars of the U.S. District Courts for the Southern and Eastern Districts of New York. Mr. Margrabe is involved in

complex litigation regarding securities fraud actions on behalf of shareholders and investors and contract litigation.

EILEEN M. RYAN

Eileen M. Ryan, an associate of the firm, graduated from St. John's University, School of Law in 2010. She received her B.A. degree from St. Joseph's College in 2006. Ms. Ryan is a member of the Bar of the State of New York. She is involved in securities fraud litigation, commercial litigation, and anti-trust litigation.

KAREN A. CULLINANE

Karen A. Cullinane, an associate of the firm, graduated from the University of Michigan Law School in 2011. She received her B.A. degree from Wellesley College in 2005. She is a member of the Bar of the State of New York. Ms. Cullinane is involved in complex civil litigation, contract litigation, and other business litigation.

PAST AND PRESENT LITIGATION

This firm has actively litigated, and has been approved as class or derivative counsel in the prosecution of various securities class action suits or derivative actions, such as: Solash v. Lionel Corp, 89 Civ. 7760 (S.D.N.Y.) (recovery of \$1.4 million); In Re Amdahl Securities

Litigation, Master File No. C-92-20609-JW (EAI) (N.D. Cal.) (recovery of \$13 million); Landes

v. Goodfriend, 3-93-CV-698 (E.D.TN) (recovery of \$3.2 million); In Re RasterOps Corporation

Securities Litigation, C.A. No. C-92-20349-RM W (EAI) (N.D. Cal. 1992) (recovery of \$6.5 million); MacDavid v. Figgie, 93 CV-001798, 94-L-08) (Ct. of Common Pleas Lake County of Ohio) (Mitrovich, J.) (recovery of \$3.3 million on behalf of Company, the release of

Employment Agreement rights as to base pay, bonuses, incentive pay, consulting fees, restricted stock and deferred compensation by various individual defendants, the creation of Committee to review Board's performance and structure to ensure a majority of independent directors, and the reduction of the Board's operating expenses by a minimum of \$200,000); In Re Nord Resources Corporation Securities Litigation, Case No. C-3-90-380 (S.D. Ohio) (recovery of \$4.75 million); Telerate, Inc. Shareholder Litigation, Civ. 1115 (Del. Ch. 1989) (benefit of \$95 million); Korf v. The Cooper Companies, Inc., Civ. Action No. 89 Civ. 5892 (MGC) (S.D.N.Y.) (recovery of \$1.7 million); In Re National Health Laboratories, Securities Litigation, Master File No. Civ. No. 92-1949-H (CM); (SD. CA) (recovery of \$64 million); In Re T² Medical, Inc. Shareholder Litigation, Master File No. 1:94-CV-744-RLV (N.D. Ga.) (recovery of \$7 million); Fort Howard Shareholder Litigation, No. 999 (Del. Ch.) (recovery of \$13.4 million); LILCO Shareholder Litigation, No. 84-0588 (E.D.N.Y.), (recovery of \$50 million); Horstmann v. Bailey, Nos. 84-4903, 84-5001 (S.D.N.Y.) and Manning v. Cornelius, No. 88-7700 (E.D.Ky.), in which a class of limited partnership investors received approximately \$800,000 in settlement of an action under Section 10(b) and Rule 10b-5; Lionel Securities Litigation, No. 82 Civ. 1049 (JES) (S.D.N.Y.), (recovery of \$2.8 million); Petro-Lewis Securities Litigation, Civ. Action No. 84-C-326 (D. Col.), (recovery of \$137 million); Revco Shareholder Litigation, No. 106749 (Ohio Ct. C.P.) (plaintiffs' counsel credited with assisting in obtaining a price of \$38.50 in cash per share for the common stock of Revco, as compared to the initial proposal of \$36.00 per share); Owens Illinois Inc. Shareholder Litigation, No. 86-3955 (Ohio Ct. C.P.) (takeover offer of \$55 per share was increased to \$60 per share, and further increased to \$60.50 per share); Pandick Securities Litigation, No. 8736 (Del. Ch.) (shareholders were to receive \$25.50 per share in cash for

common stock, but as a direct result of the litigation instituted, received a special dividend of 11.25 cents per share, for an aggregate benefit to the shareholders of \$1,105,128); In re E.F.

Hutton Banking Practices Litigation, M.D.L. 649 (S.D.N.Y.) (recovery of \$2.5 million); Jackson v. Henley Manufacturing Corp, Consolidated Civil Action No. 10445 (Del. Ch.), (initial proposed tender offer price per share of common stock of \$80 per share was increased to \$90 per share, resulting in a benefit to the shareholders of approximately \$26 million); Grossman v.

Pillsbury Company, Consolidated Civil Action No. 1023 (Del Ch.), (poison pill struck down, allowing the Company to be acquired by Grand Metropolitan and a substantial premium over market value paid to Pillsbury's shareholders); Weintraub v. ITT, Master File No. 84-432 (D.Del.) (recovery of \$7.5 million); and Walt Disney Corp. Shareholder Derivative Action, (recovery of approximately \$45 million).

The firm has also acted as class or derivative counsel in obtaining substantial benefits for the public shareholders and/or companies in the following securities class actions:

In Re IDB Communications Group, Securities Litigation, CV-94-3618 (Ct.D.Ca) (recovery of \$75 million);

In Re First Executive Corporation Securities Litigation, CV-89-7135 DT (KX) (CC.D. Cal. 1994) (\$90 million recovery);

<u>In Re U.S. Bioscience Securities Litigation</u>, Civil Action No. 92-0678, (E.D. Pa.) (\$15.25 million settlement);

In Re Bristol-Myers Squibb Company Securities Litigation, Consolidated Civil Action No. 92 CIV 4007 (JES) (S.D.N.Y.) (\$19 million recovery);

In Re Diagnostek, Inc. Securities Litigation,
Master File No. CIV-92-1274 JB/WWD (D. New Max.) (\$16 million recovery);

In Re Foodmaker/Jack-In-The Box,

C93-517 WD (W.D. WA) (\$13 million recovery);

In Re Columbia Gas System, Inc. Securities Litigation, Cons. Civil Action No. 91-357-JLL (Dist. of Del.) (\$36.5 million recovery);

In Re Chambers Development,

CV 92-0679 (W.D. of Pa.) (\$95 million recovery);

In Re Prudential Limited Partnership Litigation,

(MDL Docket No. 1005) (\$110 million recovery);

In Re Tucson Electric Power Co. Securities Litigation,

Civ. 89-1274 (D. Ariz.) (\$30 million recovery);

In Re N.V. Philips Securities Litigation,

No. 90 Civ. 3044 (S.D.N.Y.) (\$9.25 million recovery);

In Re Consolidated Columbia Savings and Loan Actions,

Master File No. 89-6538 SVW (Ex) (C.D. Cal.) (\$79.5 million recovery);

Katz v. LIN Broadcasting Corp.,

90 Civ 7787 (KTD) (U.S.D.C., S.D.N.Y.) (\$9 million recovery);

In Re RJR Nabisco, Inc. Shareholder Litigation,

Civ. Action No. 10389 (Del. Ch.) (benefit of approximately \$55 million);

In Re Scott Paper Securities Litigation,

No. 90-6192 ((E.D. Pa.) (\$8 million recovery);

In Re Dime Savings Bank of New York,

No. 89-2189 (JM) (E.D.N.Y.) (\$6.8 million recovery);

Hillel v. Chase Manhattan Bank,

No. 90-6239 (S.D.N.Y.) (\$17.5 million recovery);

In Re General Development Corporation Securities Litigation,

No. 90-691-Civ.-Marcus (S.D. Fla.) (\$10 million recovery);

Rosengarten v. Irani, et al. and Occidental Petroleum Corp.,

Case No. BC 031286, Sup. Ct. Los Angeles County (creation of Investment Review Committee and Policy to review Company's capital commitment or guarantee which exceeds \$10 million in any activity other than that related to its primary business operations);

In Re Perseptive Biosystem, Inc. Securities Litigation,

C.A. No. 94-12575-PBS (Mass.) (recovery of \$8.25 million in cash, \$5 million in common stock and \$2 million in warrants);

In Re AM International, Inc. Securities Litigation,

M-21-31, MDL Docket No. 494 (S.D.N.Y.) (\$23 million recovery);

Consumer Power Co. Derivative Litigation,

Master File No. 84-Civ-3788 (E.D. Mich.) (\$33 million recovery);

Bansbach v. Zinn, et al.,

No. 97-2573 (Supreme Court, Ulster County)(__ recovery);

This firm presently serves or recently has served as class or derivative counsel in the following securities class actions:

In Re American Medical Holdings, Inc. Shareholder Litigation,

Cons. Civ. Action No. 13797 (Del. Ch.);

Stevens v. O'Brien Environmental Energy, Inc. et al.,

94-CV-4577 (ED Pa);

In Re John Alden Financial Corp. Securities Litigation,

95-830-Civ. Nesbitt (S.D. Fla.);

Steiner v. Montedison S.p.A. et al., 93 Civ. 3673 (ADS) (E.D.N.Y.);

Ellis et al. v. Leung et al., 94-CV-1763 (JG) (E.D.N.Y.);

Corigliano et al v. Arakis Energy Corp. et al., 1:95CV01661 (D. Columbia);

In Re Southwestern Life Corporation Securities Litigation, Master File No. 3-95 CV 05166 (N.D. of Texas, Dallas Div.);

In Re International Business Machines Corporation Securities Litigation, Master File No. 92-9076 (GLG)(S.D.N.Y.);

In Re Checkers Drive In Securities Litigation, 93-1749-CIV-T-17A, (Middle Dist. Fla.);

In Re Intelligent Electronics, Inc. Securities
Litigation; Master File No. 92-CV-1905 (ED Pa);

In Re Coastcast Corporation Securities Litigation, Master File No. CV-94-5712-RG (AJWX) (CD of Cal.);

In Re Media Vision Technology, Inc. Securities Litigation, C-94-1015-EFL, (ND Cal.);

In Re Kidder Peabody Litigation, 94 CIV. 3954 (S.D.N.Y.);

Myer Okun Defined Benefit Pension Plan and David Semel v. Jennifer Convertibles, CV-95 0080 (E.D.N.Y.);

In Re JWP, Inc. Securities Litigation, 92 Civ. 5815 (S.D.N.Y.);

In Re Medaphis Corporation Securities Litigation, 95 Civ. 1535 N.D. Ga. Atlanta Div.,

In Re Valence Technologies Securities Litigation, C-95-20459-JW (N.D. of Ca.);

Silverstein, et al. v. Turner Broadcasting Systems et al., No. E-41500 (Supr. Ct. of Ful.Co., Ga);

In Re Woolworth Securities Class Action Litigation, Master File No. 94 Civ. 2217 (S.D.N.Y.); Calhoun, et al. v. Work Recovery, Inc. et al., 95-561-TUC-ACM (D. of Az.);

In Re Roberds Securities Litigation, Case No. C-3-94-86 (SD Ohio);

Joseph v. Computer Concepts Corp., 95CV3304 (E.D.N.Y.);

In Re American Pacific Securities Litigation, CV-S-93-00576-PMP- (LRL) (Nevada);

In Re Leslie Fay Securities Litigation, No. 92-CIV-8036 (WCC) (S.D.N.Y.);

In Re Tiphook Securities Litigation, Master File No. 93-CV-4449 (New Jersey);

In Re Liuski International Inc. Securities Litigation, 94 Civ 1045 (E.D.N.Y.);

In Re ACLN, Ltd. Securities Litigation
Initial Filing 12/27/2001 (S.D. New York) (Hon. Richard Conway Casey);

In Re Advanced Lighting Technologies Securities Litigation Initial Filing 04/09/1999 (N.D. Ohio) (Hon. Donald C. Nugent);

<u>In Re AnnTaylor Stores Corporation Securities Litigation</u> Initial Filing 04/24/1996 (S.D. New York) (Hon. Allen G. Schwartz);

In Re Andrx Corporation Securities Litigation Initial Filing 03/22/2002 (S.D. Florida);

In Re Ascend Communications, Inc. Securities Litigation
Initial Filing 12/02/1997 (C.D. California) (Hon. Mariana R. Pfaelzer);

In Re Aspen Technology, Inc. Securities Litigation
Initial Filing 10/05/1998 (D. Massachusetts) (Hon. Patti B. Saris);
In Re AT&T Corporation Securities Litigation
Initial Filing 10/27/2000 (D. New Jersey);

<u>In Re AT&T Wireless Group Securities Litigation</u> Initial Filing 12/06/2000 (S.D. New York) (Hon. Sidney H. Stein);

In Re BankAmerica Corporation Securities Litigation Initial Filing 10/15/1998 (E.D. New York) (Hon. Nina Gershon);

In Blech Securities Litigation H-94-3973 (S.D. New York)

<u>In Re BMJ Medical Management Securities Litigation</u> Initial Filing 02/02/1999 (S.D. Florida) (Hon. William J. Zloch)

In Re The Boeing Company Securities Litigation Initial Filing 10/31/1997 (W.D. Washington) (Hon. Thomas S. Zilly);

In Re Boston Chicken Securities Litigation Initial Filing 06/23/1997 (D. Colorado) (Hon. Patricia A. Coan);

In Re Bre-X Minerals Securities Litigation Initial Filing 04/28/1997 (W.D. Texas) (Hon. Edward C. Prado);

In Re Bristol-Myers Squibb Co. Securities Litigation Initial Filing 04/28/2000 (D. New Jersey) (Hon. Garrett E. Brown, Jr.);

In Re Bristol-Myers Squibb Company Securities Litigation Initial Filing 03/21/2002 (D. New Jersey) (Hon. Loretta A. Preska);

In Re Candie's Inc. Securities Litigation Initial Filing 05/17/1999 (S.D. New York) (Hon. Colleen McMahon);

In Re Cendant Corporation Securities Litigation Initial Filing 04/24/1998 (E.D. Pennsylvania);

<u>In Re CHS Electronics, Inc. Securities Litigation</u> Initial Filing 04/29/1999 (S.D. Florida) (Hon. Alan S. Gold);

In Re Cisco Systems, Inc. Securities Litigation Initial Filing 04/20/2001 (N.D. California) (BZ);

In Re Compaq Computer Corp. Securities Litigation Initial Filing 03/12/1999 (S.D. Texas);

In Re Comparator Systems Corp. Securities Litigation No. 763689 (Superior Court of California) (Hon. John C. Woolley)

In Re ComTech Communications Securities Litigation CV-1208 (ADS) (S.D. New York);

In Re Crown America REIT Securities Litigation Civ. No. 95-202-J (E.D. Pennsylvania) (Hon. D. Brooks Smith)

In Re DaimlerChrysler AG Securities Litigation

Initial Filing 11/28/2000 (D. Delaware);

<u>In Re Emulex Corporation Securities Litigation</u> Initial Filing 02/20/2001 (C.D. California);

<u>In Re Enron Corp. Securities Litigation</u> Initial Filing 10/22/2001 (S.D. Texas) (Hon. Melinda Harmo);

In Re ESC Medical Systems Ltd. Securities Litigation
Initial Filing 10/23/1998 (S.D. New York) (Hon. Michael B. Mukasey);

In Re Exodus Communications, Inc. Securities Litigation Initial Filing 07/16/2001 (N.D. California);

In Re FirstPlus Financial Group, Inc. Securities Litigation Initial Filing 11/06/1998 (N.D. Texas);

In Re Fore Systems, Inc. Securities Litigation Initial Filing 07/29/1997 (W.D. Pennsylvania);

In Re Foxmeyer Health Corporation Securities Litigation
Initial Filing 08/12/1996 (N.D. Texas) (Hon. Sam A Lindsay);

In Re Ford Motor Company Securities Litigation
Initial Filing 01/29/2002 (S.D. New York) (Hon. Milton Pollack);

In Re FPA Medical Management, Inc. Securities Litigation Initial Filing 05/15/1998 (C.D. California);

In Re General Instruments Corp. Securities Litigation 01-3051 (E.D. Pennsylvania) (Hon. Harry D. Leinenveber) In Re Global Crossings, Ltd. Securities Litigation Initial Filing 02/14/2002 (C.D. California);

In Re Globalstar Telecommuncations Ltd. Securities Litigation Initial Filing 03/06/2001 (S.D. New York);

In Re Globix Corporation Securities Litigation Initial Filing 01/04/2002 (S.D. New York);

In Re GTE Corp. Takeover Litigation
Initial Filing 06/01/2000 (S.D. New York) (Hon. Deborah A. Batts);

In Re GT Interactive Software Securities Litigation
Initial Filing 01/07/1998 (S.D. New York) (Hon. Loretta A. Preska);

In Re Happiness Express, Inc. Securities Litigation

Initial Filing 05/22/1996 (E.D. New York);

In Re Homestead Holding Corp. Securities Litigation 4671-S-1991 (Court of Common Pleas, Dauphin County)

In Re Informix Corporation Securities Litigation
Initial Filing 04/11/1997 (N.D. California) (Hon. Wayne D. Brazil);

In Re Insurance Management Solutions Group, Inc. Securities Litigation Initial Filing 10/07/2000 (M.D. Florida);

In Re Intel Corporation Securities Litigation Initial Filing 10/09/2001 (N.D. California);

In Re Iomega Corporation Securities Litigation Initial Filing 02/09/1998 (D. Utah) (Hon. David Sam);

In Re IPO Allocation Securities Litigation
21 MC 92 (SAS) (S.D. New York) (Hon. Shira A. Scheindlin)

<u>In Re Iridium World Communications, Ltd. Securities Litigation</u> Initial Filing 04/22/1999 (D. District Columbia) (Hon. Thomas P. Jackson);

In Re J.P. Morgan Chase & Co., Inc. Securities Litigation Initial Filing 02/15/2002 (S.D. New York);

In Re Kinder Morgan, Inc. Securities Litigation Initial Filing 06/28/2000 (D. Colorado);

In Re Knight Trading Group, Inc. Securities Litigation Initial Filing 11/08/2000 (D. New Jersey);

In Re Legato Systems, Inc. Securities Litigation
Initial Filing 12/02/2000 (N.D. California) (Hon. Jeremy Fogel);

In Re Lernout & Hauspie Speech Products N.V. Securities Litigation Initial Filing 08/11/2000 (E.D. Pennsylvania);

In Re L.F. Rothschild Holding Corp. Debenture Litigation 90-CV-0708 (MJL) (S.D. New York);

In Re Lucent Technologies, Inc. Securities Litigation Initial Filing 12/28/2000 (D. New Jersey);

In Re McKesson HBOC, Inc. Securities Litigation Initial Filing 04/28/1999 (N.D. California) (Hon. James Larson);

In Re Medi-Hut Co., Inc. Securities Litigation Initial Filing 02/28/2002 (D. New Jersey);

In Re Metromedia Fiber Network Securities Litigation Initial Filing 08/21/2001 (S.D. New York);

In Re National Auto Finance Securities Litigation
Initial Filing 10/29/1998 (S.D. Florida) (Hon. Daniel T. K. Hurley);

In Re Network Plus Corp. Securities Litigation Initial Filing 07/03/2001 (S.D. New York);

In Re New Era of Networks, Inc. Securities Litigation Initial Filing 01/04/2001 (D. Colorado);

In Re NorthPoint Communications Group, Inc. Securities Litigation Initial Filing 10/31/2001 (S.D. New York) (Hon. Shira A. Scheindlin);

In Re NVIDIA Corporation Securities Litigation Initial Filing 02/19/2002 (N.D. California);

In Re Oracle Corporation Securities Litigation
Initial Filing 03/13/2001 (N.D. California) (MEJ);
In Re Oxford Health Plans, Inc. Securities Litigation
Initial Filing 11/04/1997 (D. Connecticut) (Hon.Dominic J. Squatrito);

In Re Pacific Gateway Exchange Securities Litigation
Initial Filing 04/07/2000 (N.D. California) (Hon. William H. Alsup);

In Re Paradyne Networks, Inc. Securities Litigation Initial Filing 11/30/2001 (S.D. New York) (Hon. Shira A. Scheindlin);

In Re Party City Securities Litigation
Initial Filing 03/22/1999 (D. New Jersey) (Hon. Alfred J. Lechner, Jr.);

In Re PeopleSoft Inc. Securities Litigation
Initial Filing 01/29/1999 (N.D. California) (Hon. Martin J. Jenkins);

In Re PHP Healthcare Corp. Securities Litigation
Initial Filing 03/09/1998 (C.D. California) (Hon. Andrew J. Wistrich);

In Re Phycor Inc. Securities Litigation
Initial Filing 10/06/1998 (M.D. Tennessee) (Hon. Joe B. Brown);

In Re Plains All American Pipeline Securities Litigation Initial Filing 11/29/1999 (S.D. Texas);

In Re PLC Systems, Inc. Securities Litigation

Initial Filing (D. Massachusetts) (Hon. Richard G. Stearns);

In Re Priceline.com Securities Litigation

Initial Filing 10/07/2000 (D. Connecticut);

In Re Providian Financial Corporation Securities Litigation

Initial Filing 10/25/2001 (N.D. California);

In Re PSINet, Inc. Securities Litigation

Initial Filing 12/28/2000 (E.D. Virginia);

In Re Rambus, Inc. Securities Litigation

Initial Filing 08/14/2001 (N.D. California);

In Re Razorfish, Inc. Securities Litigation

Initial Filing 12/15/2000 (S.D. New York);

In Re Reliance Group Holdings Inc. Securities Litigation

Initial Filing 06/23/2000 (S.D. New York);

In Re Rite Aid Corporation Securities Litigation

Initial Filing 03/15/1999 (E.D. Pennsylvania) (Hon. Stewart Dalzell);

In Re Rockefeller Center Properties, Inc. Securities Litigation

Initial Filing 11/15/1996 (D. Delaware) (Hon. Roderick R. McKelvie);

In Re S3 Incorporated Securities Litigation

Initial Filing 11/5/1997 (N.D. California) (Hon. Vaughn R. Walker);

In Re Safeguard Scientifics, Inc. Securities Litigation

Initial Filing 06/28/2001 (E.D. Pennsylvania);

In Re Schlotzsky's, Inc. Securities Litigation

Initial Filing 08/26/1998 (W.D. Texas) (Hon. James R. Nowlin);

In Re Scientific-Atlanta, Incorporated Securities Litigation

Initial Filing 07/24/2001 (N.D. Georgia);

In Re Sotheby's Holdings, Inc. Securities Litigation

Initial Filing 02/11/2000 (S.D. New York);

In Re SpecTran Corporation Securities Litigation

Initial Filing 10/02/1998 (D. Massachusetts);

In Re Sprint Corporation Securities Litigation

Initial Filing 06/25/2001 (D. Kansas);

In Re Sunterra Corporation Securities Litigation Initial Filing 01/23/2000 (M.D. Florida);

In Re Symbol Technologies, Inc. Securities Litigation Initial Filing 03/05/2002 (E.D. New York);

In Re Tee-Com Electronics, Inc. Securities Litigation 3:98-CV-00213 (AVC) (D. Connecticut);

<u>In Re 3Com Corporation Securities Litigation</u>
<u>Initial Filing 12/05/1997 (N.D. California) (Hon. James Ware);</u>

In Re Tel-Save Holdings Securities Litigation Initial Filing 07/01/1998 (E.D. Pennsylvania); In Re Triton Energy Limited Securities Litigation Initial Filing 07/22/1998 (E.D. Texas);

In Re Tyco International Ltd. Securities Litigation
Initial Filing 02/05/2002 (S.D. New York) (Hon. George B. Daniels);

In Re UniCapital Corporation Securities Litigation Initial Filing 06/08/2000 (S.D. Florida);

<u>In Re Unify Corporation Securities Litigation</u> Initial Filing 07/31/2000 (N.D. California);

In Re USEC, Inc. Securities Litigation
Initial Filing 11/07/2000 (W.D. Kentucky);

In Re Vencor, Inc. Securities Litigation Initial Filing 12/24/1997 (W.D. Kentucky);

In Re VISX, Inc. Securities Litigation
Initial Filing 02/25/2000 (N.D. California) (Hon. Maxine M. Chesney);

In Re Warnaco Group, Inc. Securities Litigation Initial Filing 08/23/2000 (S.D. New York);

<u>In Re Waste Management Inc. Securities Litigation</u> Initial Filing 11/03/1997 (N.D. Illinois) (Hon. Wayne R. Anderson);

In Re Windmere-Durable Holdings Inc. Securities Litigation Initial Filing 09/25/1998 (E.D. New York);

In Re WorldCom Inc. Securities Litigation Initial Filing 11/08/2000 (E.D. Pennsylvania);

In Re Worldwide Xceed Group, Inc. Securities Litigation Initial Filing 03/01/2001 (S.D. New York);

In Re Xerox Corporation Securities Litigation Initial Filing 12/23/1999 (D. Connecticut); and

<u>In Re XO Communications, Inc. Securities Litigation</u> Initial Filing 12/05/2001 (E.D. Virginia).

This firm presently serves or recently has served as derivative counsel in the following corporate governance actions:

In Re BP Amoco Derivative Litigation 01-CH-011404 (Circuit Court of Cook County, Illinois);

<u>In Re Conseco, Inc. Derivative Litigation</u> 29D03-0006-CP-0393 (Superior Court, Hamilton County) (Hon. Steven R. Wation);

In Re Daimler-Chrysler AG Proxy Shareholder Litigation Initial Filing 11/28/2000 (D. Delaware);

In Re FPL Group, Inc. Derivative Litigation 02-20170-CIV-Gold (S.D. Florida) (Hon. Simonton);

In Re Imclone Systems, Inc. Derivative Litigation 02-601304 (Supreme Court, New York County);

In Re MeVC Draper Fisher Fund Derivative Litigation 02-CV-142 (D. Delaware); and

<u>In Re Walt Disney Co. Derivative Litigation</u> No. BC164078 (Superior Court, California).

This firm presently serves or recently has served as class counsel in the following Merger

& Acquisitions / corporate governance actions:

In Re Chock Full O'Nuts Corp. Shareholder Litigation No. 99-9108759 (Supreme Court, New York County);

In Re Dow Chemical / Union Carbide Merger Litigation 00 CIV. 3364 (DC) (S.D. New York) (Hon. Denny Chin);

In Re GTE Corp. Takeover Litigation

Initial Filing 06/01/2000 (S.D. New York) (Hon. Deborah A. Batts);

In Re Infinity Broadcasting Corp. Shareholder Litigation

No. 18219 NC (Delaware Chancery Court);

In Re JW Genesis Financial Corp. Takeover Litigation

CL-00-9682-AO (Circuit Court, 15th Judicial Circuit, Florida);

In Re NTN Communications, Inc. Shareholder Litigation

No. 785008 (Superior Court, California);

In Re Paxson Communications Corp. Shareholder Litigation

No. 17568-NC (Delaware Chancery Court);

In Re Plains All American Pipelines Shareholder Litigation

Initial Filing 11/29/1999 (S.D. Texas);

In Re Rave Medium Group, Inc. Shareholder Litigation

No. 18940 (Delaware Chancery Court);

In Re U.S. West Shareholder Litigation

No. 17230 (Delaware Chancery Court);

In Re Walt Disney Co. Shareholder Litigation

No. BC164078 (Superior Court, California); and

In Re Warner Lambert Co. Shareholder Litigation

No. 1750-NC (Delaware Chancery Court).

This firm presently serves or recently has served as class counsel in the following

consumer and product liability class actions:

In Re AOL Version 5.0 Software Product Liability Litigation

00-1341-MD-Gold (D. Florida);

In Re Fen-Phen / Redux Consumer Litigation

Civ. No. 1203 (E.D. Pennsylvania);

In Re Omnibus HMO Consumer Litigation

3:00CV2037 (SRV) (D. Connecticut);

In Re Providian Financial Corp. Credit Card Litigation

Judicial Council Coordination Proceeding No. 4085 (Superior Court, California); and

In Re Taco Bell Genetic Corn Consumer Litigation 00-CH-14114 (Circuit Court of Cook County, Illinois).

This firm presently serves or recently has served as class counsel in complex litigation relating to RICO or antitrust violations in the following cases:

In Re Colin Services Systems RICO Litigation 00-7571 (U.S. Court of Appeals, Second Circuit);

In Re High Fructose Corn Syrup Antitrust Litigation
MDL 1087 & Master file 95-1477 (D. Illinois) (Hon. Kauffman);

In Re IPO Fee Antitrust Litigation 01-9072 (S.D. New York) (Hon. Lawrence M. McKenny);

In Re Options Trading Antitrust Litigation
MDL 1283 & 99-CV-962 (S.D. New York) (Hon. Casey); and

<u>In Re American Express Merchants' Litigation,</u> Master file No. 03-CV-9592 (S.D. New York) (Hon. Daniels).

This firm presently serves or recently has served as class counsel in complex litigation relating to mass torts, toxic torts, environment contamination, human rights, and/or Holocaust victims claims in the following cases:

In Re MTBE Gas Additive Litigation 14065 / 001 (S.D. New York);

In Re Dow Chemical Company (Dursban) Litigation Initial Filing 05/21/01 (S.D. New York);

In Re Bhopal Gas Disaster Litigation 99 Civ. 11329 (S.D. New York);

In Re French Bank Holocaust Litigation 97-CV-7433 & 98-CV-7851 (E.D. New York) (Hon. Sterling Johnson); and

<u>In Re Gulf War Syndrome Litigation</u> 94-C-1392 (District Court, Brazoria County) (Hon. Hardin).