

EXHIBIT B

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22 Plaintiffs' Interim Class Counsel

23 **UNITED STATES DISTRICT COURT**
24 **CENTRAL DISTRICT OF CALIFORNIA**
25 **WESTERN DIVISION**

26 IN RE KOREAN AIR LINES CO., LTD.
27 ANTITRUST LITIGATION

MDL No. 07-01891

Master File No. CV 07-05107 SJO
(AGRx)

28 This Document Relates To:
ALL ACTIONS

**DECLARATION MARC M.
SELTZER IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND REIMBURSEMENT OF
EXPENSES**

Date: December 2, 2013
Time: 10:00 a.m.
Place: Courtroom No. 1
Judge: Hon. S. James Otero

DECLARATION MARC M. SELTZER IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

1 I, Marc M. Seltzer, declare as follows:

2 1. I am a partner in the law firm of Susman Godfrey L.L.P. I submit this
3 declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees and
4 Reimbursement of Expenses in connection with services rendered in this case.

5 2. The Court appointed me as Interim Class Counsel for the Class ("Co-Lead
6 Class Counsel"). As Co-Lead Class Counsel, I have personally supervised and
7 directed every aspect of the prosecution and resolution of this litigation on behalf
8 of the Class.

9 3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating
10 the amount of time spent by the partners, attorneys and professional support staff
11 of my firm who were involved in this litigation under my direction, and the
12 lodestar calculation based on my firm's current billing rates. For personnel who
13 are no longer employed by my firm, the lodestar calculation is based upon the
14 billing rates for such personnel in their final year of employment at the firm. The
15 schedule was prepared from contemporaneous time records regularly prepared and
16 maintained by my firm, which are available at the request of the Court. Time
17 expended in preparing this application for fees and reimbursement of expenses has
18 not been included in this request.

19 4. The hourly rates for the partners, attorneys and professional support staff
20 in my firm reflected in Exhibit 1 are the same as the regular current rates charged
21 for their services in non-contingent matters.

22 5. The total number of hours expended on this litigation by my firm is
23 5,105.95 . The lodestar for my firm is \$2,763,507.00.

24 6. My firm's lodestar figures are based upon the firm's billing rates, which
25 rates do not include charges for expense items. Expense items are billed separately
26 and such charges are not duplicated in my firm's billing rates.
27
28

EXHIBIT 1

Name	Title	Hours Worked	Billing Rate	Lodestar
Marc M. Seltzer	Partner	1,466.1	\$925.00	\$1,356,142.50
Barry C. Barnett	Partner	36.6	\$875.00	\$32,025.00
David H. Orozco	Partner	1,070.15	\$500.00	\$535,075.00
Steven G. Sklaver	Partner	8.0	\$600.00	\$4,800.00
Amy T. Brantly	Of Counsel	14.75	\$500.00	\$7,375.00
Daniel J. Walker	Associate	2,053.6	\$350.00	\$718,760.00
Ryan C. Kirkpatrick	Associate	0.3	\$425.00	\$127.50
Mark L. Anderson	Paralegal	0.5	\$270.00	\$135.00
John F. Dolan	Paralegal	2.8	\$280.00	\$784.00
Bradley C. Crawford	Paralegal	266.25	\$220.00	\$58,575.00
Alisha Chandler	Paralegal	36	\$270.00	\$9,720.00
Frank Arevalo	Paralegal	28.3	\$200.00	\$5,660.00
Dennis Sobczak	Paralegal	122.6	\$280.00	\$34,328.00
TOTAL		5105.95		\$2,763,507.00

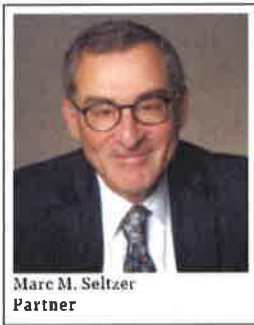
EXHIBIT 2

Description	Amount
Deposition Expenses	\$15,669.97
Expert Fees	\$387,243.47
Messenger/Delivery Services	\$3,733.62
Telephone and Calling Card Expenses	\$5,182.21
Hotel & Travel Expenses	\$9,951.58
Litigation Fund	\$195,000.00
Miscellaneous Client Charges	\$1,071.23
Outside Photocopy Services	\$181.25
Online Research Services	\$411.44
Reproduction Charges	\$2,484.30
In-House Postage Charges	\$290.35
Research Charge	\$34,090.14
Reproduction Charges	\$9,190.50
Secretarial Overtime	\$2,242.90
Fax Charges	\$1.98
Long Distance expense incurred	\$865.27
Translation Expenses	\$2,765.00
TOTAL INCURRED EXPENSES	\$670,375.21
Reimbursement from Asiana Settlement	\$566,691.07
TOTAL UNREIMBURSED EXPENSES	\$103,684.14

EXHIBIT 3

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SUSMAN GODFREY L.L.P.



Marc M. Seltzer

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Overview

Marc Seltzer has practiced law for forty years, litigating complex business law cases in state and federal courts throughout the United States. He was a principal in the law firm of Corinblit & Seltzer, a Professional Corporation, before joining Susman Godfrey. Marc Seltzer's relationship with the lawyers of Susman Godfrey began in the late 1970's, when he worked with Steve Susman on the *Corrugated Container* antitrust case. In the ensuing years, Mr. Seltzer joined forces with Susman Godfrey on a number of other cases. In February 1998, Marc Seltzer became a partner of the firm, and opened the firm's Los Angeles office. Since then, the firm's Los Angeles office has become one of the leading litigation boutiques in California.

Marc Seltzer's involvement in nationally prominent litigation began in the mid-1970's, when he was tapped by Jack Corinblit to work on the massive *Equity Funding* securities litigation. That case consisted of more than 100 consolidated class and private action cases, and was settled in 1976 for over \$60 million, then the largest recovery ever achieved in a securities fraud class action. See *In re Equity Funding Corp. of America Securities Litigation*, 438 F. Supp. 1303 (C.D. Cal. 1977). Later, in the 1980's, Mr. Seltzer was appointed by the Los Angeles federal court to serve as sole lead counsel to represent the plaintiff class in the *ZZZZ Best* securities fraud case. The *ZZZZ Best* fraud was described by the United States Attorney for the Central District of California as "the most massive and elaborate securities fraud perpetrated on the West Coast in over a decade," harking back to the *Equity Funding* case. The case was settled for more than \$40 million and resulted in several important published decisions sustaining plaintiffs' claims. See *In re ZZZZ Best Securities Litigation*, 864 F. Supp. 960 (C.D. Cal. 1994). Since joining the firm, Mr. Seltzer has continued to work on complex litigation. Marc Seltzer was, together with Steve Susman, a member of the Susman Godfrey trial team representing approximately 90 financial institutions in a negligent misrepresentation case against one of the "Big Four" accounting firms. That case settled just prior to the commencement of trial. Marc Seltzer also teamed with Steve Susman in prosecuting the *In re Vitamin Antitrust Litigation*, which was settled pursuant to agreements that made more than \$1.05 billion available to the class.

Mr. Seltzer has also been appointed to serve as lead counsel for plaintiffs in

numerous securities, antitrust and other class and non-class action cases. Among those cases is the *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, in which Marc Seltzer was appointed by the Court to serve as one of the co-lead counsel for the economic loss class action plaintiffs. He has also represented defendants in antitrust, securities, copyright, trademark, trade secret, unfair competition and other complex litigation.

Education

University of California at Berkeley (B.A., 1969)
UCLA School of Law (J.D., 1972)

Honors and Distinctions

- ^ Recipient, 2012 Jewish Federation of Los Angeles' Bruce I. Hochman-Maimonides Torch of Justice Award
- ^ Recipient, 2004 American ORT Jurisprudence Award
- ^ Named a "Super Lawyer" by Southern California Law & Politics magazine (2004-2012)
- ^ Named one of Law Dragon's 500 Leading Plaintiff's Lawyers (2007)
- ^ Named one of Law Dragon's 100 Lawyers You Need To Know in Securities Litigation (2008)

Books and Articles

- ^ Co-author, California Federal Civil Rules (LexisNexis 2013);
- ^ Co-author, California State Antitrust and Unfair Competition Law (Matthew Bender & Co., 2009), published by the Antitrust and Unfair Competition Law Section, State Bar of California
- ^ "Choosing Between Class and Derivative Actions," published in Second Annual Institute, Class and Derivative Litigation in the 1990's — The New Frontier (Prentice Hall Law & Bus. 1991); and the same topic for subsequent Annual Institutes
- ^ "Measures of Damages in Private Actions for Violations of the Federal Securities Laws: The Basic Rules and Selected Problems," published in Securities Litigation 1990 (PLI 1990)
- ^ "Shareholders' Derivative Suits in Contests for Corporate Control," published in Securities Litigation 1986: Prosecution and Defense Strategies (PLI 1986)

Professional Associations and Memberships

- ^ Past Vice-Chair of the Executive Committee, Antitrust and Unfair Competition Law Section, State Bar of California
- ^ Past President and current member of the Board of Directors of the Ninth Judicial Circuit Historical Society
- ^ Past President and current member of the Board of Directors of the Legal Aid Foundation of Los Angeles

- ^ Member, Executive Committee of the Litigation Section of the Los Angeles County Bar Association
- ^ Member, Board of Governors of the Association of Business Trial Lawyers
- ^ Member of the Board of Directors of the National Equal Justice Library
- ^ Member of the Board of Directors, American Friends of Hebrew University, Western Region
- ^ Member of the Board of Trustees of the Lawyers Committee for Civil Rights Under Law
- ^ Member of the Board of Directors of the Friends of the Los Angeles County Law Library
- ^ Member of the Advisory Board of the American Antitrust Institute
- ^ American Bar Association (and its Business Law, Antitrust Law, Torts and Insurance Law, and Litigation Sections)
- ^ Life Member of the American Law Institute
- ^ Life Fellow of the American Bar Foundation
- ^ American Association for Justice
- ^ Consumer Attorneys of California
- ^ Selden Society

Notable Representation

- ^ *McGuire v. Dendreon Corp.*, consolidated securities fraud class action cases filed in Seattle federal court in which Marc Seltzer was appointed to serve as lead counsel for the class. The case was settled for \$16.5 million in cash.
- ^ *Clark v. AdvanceMe, Inc.*, a class action brought in Los Angeles federal court challenging financial arrangements with retail merchants under California's laws against usury. Marc Seltzer served as lead counsel for the class. The case was settled for approximately \$23.4 million in cash and other economic consideration.
- ^ *In re Korean Air Lines Co., Ltd.* Antitrust Litigation, consisting of more than eighty consolidated antitrust class action cases pending in the Los Angeles federal court. Marc Seltzer was appointed by the Court to serve as one of three co-lead counsel for the class. The case was partially settled as to one defendant for \$21 million in cash and travel vouchers. The litigation is proceeding against the remaining defendant.
- ^ *CLRB Hanson Industries, LLC v. Google, Inc.*, a class action for alleged false advertising which was settled for \$20 million. Mr. Seltzer successfully argued the appeal from the judgment approving the settlement before the Ninth Circuit. *See*, 465 Fed. Appx. 617 (9th Cir. 2012)
- ^ *In Re Universal Service Fund Telephone Billing Practices Litigation*, an antitrust and breach of contract class action involving more than fifty consolidated cases in which Marc Seltzer, together with Barry Barnett and

David Orozco, served as co-lead trial counsel for plaintiffs. The case was settled as to one defendant for benefits to the class totaling \$25 million, and tried to a verdict as to the remaining defendant. The jury found in favor of defendant on the antitrust claim and returned a \$16 million verdict in favor of plaintiffs on the breach of contract claim which was affirmed by the Tenth Circuit. The trial court issued numerous published decisions in this matter. *See, e.g., In Re Universal Service Fund Telephone Billing Practices Litigation*, 300 F. Supp.2d 1107(D. Kan. 2003).

- ^a *Masimo v. Tyco Healthcare L.P.*, an antitrust case in which Marc Seltzer, together with Steve Susman, Vineet Bhatia and Stephen Morrissey, served as co-trial counsel for the plaintiff. The case was tried to a verdict resulting in an award in favor of our client. A new trial was granted as to damages. On retrial, the Court awarded approximately \$45 million in damages (after trebling). The Ninth Circuit affirmed the liability verdict and damages award.
- ^a *White v. NCAA*, an antitrust class action brought in Los Angeles federal court challenging limitations on financial assistance provided by colleges and universities to student athletes. Marc Seltzer served as co-lead counsel for the plaintiff class. The case was settled for benefits for the class totaling approximately \$220 million.
- ^a *In re Structured Settlement Litigation*, consolidated class actions brought in the Los Angeles Superior Court in which Marc Seltzer served as one of the lead counsel for the plaintiffs. The plaintiffs were parties to structured settlements who were victimized by the alleged fraudulent conversion of U.S. Treasury bonds backing their settlements. After three years of hotly contested litigation, the case was settled for approximately \$135 million.
- ^a *Livid Holdings, Ltd. v. Salomon Smith Barney, Inc.*, a securities fraud case brought on behalf of an investor in a start up company. Marc Seltzer was retained to represent the plaintiff on appeal following the dismissal of the action by the trial court, and was successful in overturning the dismissal of the case. *See Livid Holdings Ltd. v. Salomon Smith Barney, Inc.*, 416 F.3d 940 (9th Cir. 2005). The case was subsequently settled.
- ^a *In Motorcar Parts & Accessories Securities Litigation*, fourteen consolidated securities fraud class actions in which Marc Seltzer was appointed by the Los Angeles federal court to serve as lead counsel for the class. The case was settled for \$7.5 million in cash. *See Z-Seven Fund, Inc. v. Motorcar Parts & Accessories*, 231 F.3d 1215 (9th Cir. 2000).
- ^a *In re IDB Communications Group, Inc. Securities Litigation*, in which Marc Seltzer served as one of four co-lead counsel appointed by the Los Angeles federal court to represent the plaintiff class in more than twenty consolidated securities fraud class action cases. The case was settled for \$75 million in cash.
- ^a *In re Taxable Municipal Bond Securities Litigation*, in which four lawyers, including Marc Seltzer, served on Plaintiffs' Executive Committee, and together with plaintiffs' lead counsel, supervised and managed every aspect of the litigation. This litigation was a consolidated multi-district proceeding brought on behalf of defrauded purchasers of taxable

municipal bonds. The case resulted in numerous reported decisions on important recurring issues arising under the federal securities laws. *See, e.g., In re Taxable Municipal Bond Litigation*, [1993 Transfer Binder] Fed. Sec. L. Rep. (CCH) 97,742 (E.D. La. 1993). After several years of intense litigation, the case was settled for approximately \$110 million in cash.

- ^ *Cowles v. Gannett Outdoor Co., Inc.*, of Southern California, coordinated class actions brought in Los Angeles federal court for an alleged conspiracy to suppress competition for leases for billboards sites in Southern California in violation of § 1 of the Sherman Act. Marc Seltzer served as co-lead counsel for the class. The case was settled for \$6.5 million in cash.
- ^ *Slaven v. B. P. America, Inc.*, a class action brought in Los Angeles federal court on behalf of fishermen and business owners for economic losses suffered as a result of the spill of more than 200,000 gallons of crude oil from a tanker off the coast of Huntington Beach, California that befouled coastal waters and nearby beaches. The case was brought under the Trans-Alaska Pipeline Authorization Act, admiralty law and the law of California, and resulted in several published decisions in the district court and the Ninth Circuit. *See, e.g., Slaven v. B. P. America, Inc.*, 973 F.2d 1468 (9th Cir. 1992). Marc Seltzer served as co-lead counsel for the class. The case was ultimately settled for \$4 million in cash, plus court-approved attorneys' fees and costs.
- ^ *In re Carnation Company Securities Litigation*, consolidated class actions for violation of the federal securities laws brought in Los Angeles federal court. The plaintiffs alleged that false denials were made relating to the potential takeover of Carnation Company by Nestle, S.A., before the merger of the two firms was announced. Marc Seltzer served as co-lead counsel for the class. The case was settled for \$13 million in cash.
- ^ *In re International Technology Securities Litigation*, consolidated securities class actions filed in Los Angeles federal court. The plaintiffs alleged that the Company's financial statements were materially misleading for failing to earlier write off or set up appropriate accounting reserves relating to the Company's off-site waste disposal operations. Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled for \$12 million in cash and newly-issued securities.
- ^ *Guenther v. Cooper Life Sciences, Inc.*, a combined stockholders class and derivative action brought in San Francisco federal court for alleged false and misleading statements regarding the Company's products and prospects. Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled for \$9.85 million in cash and non-cash economic benefits valued at \$8.3 million.
- ^ *Heckmann v. Ahmanson*, consolidated class and derivative actions arising out of the alleged "greenmailing" of the Walt Disney Co. by Saul Steinberg and a group of his companies. Marc Seltzer was one of the lead counsel for the class of investors. The case was settled after three weeks of trial for approximately \$60 million. *See Heckmann v. Ahmanson*, [1989 Transfer Binder] Fed. Sec. L. Rep. ¶ 94, 447 (Cal. Sup. Ct. April 12, 1989) (order denying summary judgment).

- ^ *Financial Federation, Inc. v. Ashkenazy*, in which Marc Seltzer and his co-trial counsel successfully defended at trial an anti-takeover case brought in Los Angeles federal court under the federal securities laws and the RICO statute by a financial institution against persons who allegedly sought to take control of the institution. See *Financial Federation, Inc. v. Ashkenazy*, [1984 Transfer Binder] Fed. Sec. L. Rep. (CCH) 91,489 (C.D. Cal. 1983).
- ^ *Green v. Occidental Petroleum Corp.*, in which Marc Seltzer, together with co-counsel, represented plaintiffs in consolidated securities fraud class action cases that established important precedent in the Ninth Circuit regarding the certification of plaintiff classes and the computation of damages in securities fraud cases. See *Green v. Occidental Petroleum Corp.*, 541 F.2d 1335 (9th Cir. 1976). The case was settled for \$12 million in cash.
- ^ *Wool v. Tandem Computers, Inc.*, a securities fraud class action in which Marc Seltzer played a leading role. One of the notable achievements in this case was a victory for the plaintiffs in the Ninth Circuit which established important precedent concerning the measure of damages recoverable in federal securities fraud class action cases, the standard for "controlling person" liability under the federal securities laws and the requirements for pleading fraud with the particularity specified under Rule 9(b), Fed.R. Civ. P. See *Wool v. Tandem Computers, Inc.*, 818 F.2d 1433 (9th Cir. 1987). Following the issuance of the Ninth Circuit's opinion, the case was settled for \$16.5 million in cash.
- ^ *Plaine v. McCabe*, a securities class action, in which Marc Seltzer argued before the Ninth Circuit, obtaining a substantial victory for plaintiffs, establishing significant precedent in the Ninth Circuit regarding the standards for liability for violations of tender offer disclosure rules under the federal securities laws. See *Plaine v. McCabe*, 797 F.2d 713 (9th Cir. 1986).
- ^ *Biben v. Card*, consolidated securities fraud class actions where Marc Seltzer served as co-lead counsel for plaintiffs. The plaintiffs achieved substantial pretrial victories, including establishing the validity of their claims under the federal securities laws against the director, accountant and attorney defendants in that case. See *Biben v. Card*, [1984-1985 Transfer Binder] Fed. Sec. L. Rep. (CCH) 92,010 (W.D. Mo. 1985), on denial of motion for reconsideration, [1984-1985 Transfer Binder] Fed. Sec. L. Rep. (CCH) 92,083 (W.D. Mo. 1985). The case settled for approximately \$12 million in cash.
- ^ *Sanwa Bank California v. Facciani*, where Marc Seltzer was co-lead counsel for a plaintiff class in which settlements totaling approximately \$26 million in cash were obtained on behalf of defrauded investors who were victimized by an alleged Ponzi scheme.
- ^ *In re California Indirect-Purchaser Infant Formula Antitrust Class Action Litigation*, comprised of several consolidated consumer class actions brought for the alleged price-fixing of infant formula products. Marc Seltzer was appointed by the court to serve as one of two co-lead counsel for plaintiffs and the class. The case was settled for approximately \$20

million.

- ✧ *Small v. Sunset Park*, where Marc Seltzer was lead counsel for a class of investors involving an alleged Ponzi scheme in which settlements totaling more than \$16.8 million were achieved, including \$12 million paid in settlement by a then "Big Five" accounting firm.
- ✧ *Schneider v. Traweek*, federal and state court securities class actions in which Marc Seltzer was lead counsel for the plaintiffs. Significant victories were obtained on plaintiffs' behalf in defeating motions to dismiss and in obtaining class certification. *See Schneider v. Traweek* [1990 Transfer Binder] Fed. Sec. L. Rep. (CCH) 95,419 and 95,505 (C.D. Cal. 1990). The case was settled for approximately \$14 million in cash.
- ✧ *Johnson v. Boston*, where Marc Seltzer was co-lead counsel for a nationwide class of investors victimized by an alleged Ponzi scheme. Approximately \$20 million in settlements were obtained for the defrauded investors.
- ✧ *Lilienthal v. Levi Strauss & Co.*, and individual minority shareholder's action for alleged breach of fiduciary duty by the majority owners, which resulted in a judgment after trial for the plaintiff providing for a recovery in excess of \$3 million. Marc Seltzer was co-trial counsel with Jack Corinblit.

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THE SUSMAN GODFREY DIFFERENCE

For more than thirty years, Susman Godfrey has focused its nationally recognized practice on just one thing: big - stakes commercial litigation. We are one of the nation's leading litigation boutique law firms with locations in **Houston, Dallas, Los Angeles, Seattle, and New York**. Each of the firm's **89 trial attorneys** specialize in complex commercial litigation.

How successfully does Susman Godfrey represent its clients?

When *The American Lawyer* held the first-ever "Litigation Boutique of the Year" competition, the firm was named one of the two top litigation boutiques in the nation.

"These firms manage to combine cutting-edge technologies, palpable tastes for risk, and an old-fashioned sense of partnership," said *The American Lawyer*. "The rewards are obvious: Their clients are stellar, and so are their profits."

In other words, Susman Godfrey represents its clients *very well*.

A record of winning

Susman Godfrey's very first case, the *Corrugated Container* antitrust trial, led to one of the highest antitrust jury verdicts ever obtained. Since that extraordinary start, the firm has remained devoted to helping businesses and individuals achieve similarly extraordinary results. Recent high-profile victories (click on the links below to see the particular facts and circumstances of these representations):

- Representation of the plaintiffs in a number of successful private antitrust actions against Microsoft Corporation, including litigation or private negotiations on behalf of **Gateway, Novell, Caldera, Be, Inc.**, Paltalk Holdings, and others.
- Representation of **MicroUnity Systems** in a variety of patent infringement litigation, which has led to confidential settlements with a variety of defendants, including Intel and Sony.
- Defeated claims for \$550 million in damages brought by Alcoa against our client, Luminant and convinced the jury to award Luminant \$10 million in counterclaim damages.
- Secured a \$225 million jury award for Dillard's, Inc. against I2 Technologies for fraud and breach of warranty.

- Obtained a jury award of more than \$178 million in a breach of fiduciary duty case brought on behalf of minority shareholders of an NL Industries, Inc. subsidiary.
- Representation of Sky Technologies in patent infringement cases against i2 Technologies, IBM, Ariba, Oracle, and SAP that each have led to confidential settlements.
- Representation of the bankruptcy estate of **Enron Corp.** against ten banks and investment banks for aiding and abetting breach of fiduciary duty and fraud. Settlements to date have brought more than one billion dollars in value to the Enron estate.
- Successfully concluded the pro bono representation of **Texas Clean Air Cities Coalition** which included Dallas, Houston, Fort Worth, Waco, El Paso, Plano, Arlington, Irving, and 28 other local governments across Texas. The cities were concerned about the environmental threats resulting from the large amounts of nitrogen oxides, sulfur dioxide, particulate matter, mercury, and carbon dioxide to be emitted from the proposed plants. The coalition of Texas cities challenged permit applications by TXU Corporation to build eight coal-fired power units across Texas. Following the announcement of the proposed buyout of TXU by two private equity firms and citing a new environmental direction for the company, TXU announced that it would withdraw applications for all eight of the coal units that the coalition opposed.

These are only a few of our recent cases. Our practice area inserts provide a more complete description of Susman Godfrey's successes in a number of areas of commercial litigation, including **intellectual property**, **antitrust**, **accounting malpractice**, **energy and natural resources**, **securities litigation**, and **climate change litigation**.

The will to win

At Susman Godfrey, we want to win because we are stand-up trial attorneys, not discovery litigators. We approach each case as if it is headed for trial. Everything that we do is designed to prepare our attorneys to persuade a jury. When you are represented by Susman Godfrey, the opposing party will know that you are willing to take the case all the way to a verdict if necessary; this fact alone can make a good settlement possible.

The American Lawyer award confirmed Susman Godfrey's longstanding reputation as one of the premier firms of trial lawyers in the United States. We are often brought in on the eve of trial to "rescue" troubled cases or to take the reins when the case requires trial lawyers with a proven record of courtroom success.

We also want to win because we share the risk with our clients. We prefer to work on a contingency-fee basis so that our time and efforts pay off only when we win. Our interests are aligned with our clients—we want to achieve the best-possible outcome at the lowest possible cost.

Finally, we want to win because each of our attorneys shares a commitment to your success. Each attorney at the firm – associate as well as partner – examines every proposed contingent fee case and has an equal vote on whether or not to accept it. The resulting profit or loss affects the compensation of every attorney at the firm. This model has been a tremendous success for both our attorneys and our clients. In recent years, we have achieved the highest profit-per-partner results in the nation. Our associates have enjoyed performance bonuses equal to their annual salaries. When you win, our attorneys win.

Unique perspective

Susman Godfrey represents an equal number of plaintiffs and defendants. Ours is not a cookie-cutter practice turning out the same case from the same side of the bar time after time. We thrive on variety, flexibility, and creativity. Clients appreciate the insights that our broad experience brings. "I think that's how they keep their tools sharp," says one.

Many companies who have had to defend cases brought by Susman Godfrey on behalf of plaintiffs are so impressed with our work in the courtroom that they hire us themselves next time around – companies like El Paso Corporation, Georgia-Pacific Corporation, Mead Paper, and Nokia Corporation.

We know from experience what motivates both plaintiffs and defendants. This dual perspective informs not just our trial tactics, but also our approach to settlement negotiations and mediation presentations. We are successful in court because we understand our opponent's case as well as our own.

A lean and mean structure

At Susman Godfrey, our clients hire us to achieve the best possible result in the courtroom at the least possible cost. Because we learned to run our practice on a contingency-fee model where preparation of a case is at our expense, we have developed a very efficient approach to commercial litigation. We proved that big cases do not require big hours. And, because we staff and run all cases using the same model, clients who prefer to hire us by the hour also benefit from our approach.

There is no costly pyramid structure at Susman Godfrey. As a business, we are lean, mean and un-leveraged – with a one-to-one ratio between partners and associates. To counter the structural bloat of our opponents, who often have three associates for each partner, we rely on creativity and efficiency.

Susman Godfrey's experience has taught what is important at trial and what can be safely ignored. We limit document discovery and depositions to the essential. For most depositions and other case related events we send one attorney and one attorney alone to handle the matter. After three decades of trials, we know what we need – and what is just a waste of time and money.

Unparalleled talent

Susman Godfrey prides itself on a talent pool as deep as any firm in the country. Clerking for a judge in the federal court system is considered to be the best training for a young trial attorney, and 91% of our lawyers served in these highly sought-after clerkships after law school. Seven of our attorneys have clerked at the highest level – for Justices of the United States Supreme Court.

Our associates are not document-churning drones. Each associate at Susman Godfrey is expected to second-chair cases in the courtroom from the start. Because we are so confident in their abilities, we consider associates for partnership after seven years with the firm, unless they joined us following a federal judicial clerkship. In that case, we give credit for the clerkship, and the partnership track is generally six years. We pay them top salaries and bonuses, make them privy to the firm's financials, and let them vote – on an equal standing with partners – on virtually all firm decisions.

Each trial attorney at Susman Godfrey is invested in our unique model and stands ready to handle your big-stakes commercial litigation.

No Matter What the Case

Our firm is made up of the best and the brightest trial lawyers in the country. Quite simply, we can try any case, no matter what the subject matter. And our record proves it.

Patent law. Our lawyers are not "patent " lawyers . Yet Susman Godfrey is one of the nation's go-to firms for patent litigation. Indeed, as the amount in controversy soared in patent cases in the early 2000s, so has the number of patent cases tried and won by Susman Godfrey. Clients know that they need real trial lawyers to translate the patent talk into language that can be understood by a jury. And juries listen when Susman Godfrey lawyers talk. Our firm has won some of the largest jury verdicts in patent cases in the country.

Family law. Our lawyers are not "family " lawyers . Yet when the richest couples get in the nastiest divorce battles, they call the real trial lawyers for the ultimate show down. When the owner of the Dodgers risked losing his team to his wife in a bitter divorce battle, Frank McCourt called Susman Godfrey. When David Saperstein found himself in divorce proceedings with his wife in over their multi-million dollar estate, including their \$125 million "Fleur de Lys" mansion, he hired Susman Godfrey.

Tax law. Our lawyers are not "tax" lawyers. Yet, when an individual had a \$ 800 million tax dispute and needed a trial lawyer, he hired Terry Oxford of Susman Godfrey. Terry, with the assistance of tax counsel, tried the case for 5 weeks in federal court. The result: a decision that would return the taxpayer more than half the disputed amount.

Criminal law. Our lawyers are not " criminal " lawyers . Yet when evidence suggested a death row inmate was wrongly convicted, those trying to right the wrong called Susman Godfrey. When Barry Scheck and his Innocence Project wanted help reversing the wrongful conviction of George Rodriguez, they teamed up with Susman Godfrey. The conviction was reversed and Mr. Rodriguez freed, and Susman Godfrey continues the battle to obtain fair compensation for the 17 years he spent behind bars .

It does not matter what area of law your case is. If we haven't already been involved in path-breaking litigation there, we will master it. And you will have the best possible trial team on your side.

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