UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ENRON CORPORATION SECURITIES LITIGATION	§	Civil Action No. H-01-3624
	§	**(Consolidated)**
	§	
	§	CLASS ACTION
This Document Relates To:	§	
	§	
MARK NEWBY, et al., Individually and On Behalf of All Others Similarly Situated,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	
	§	
ENRON CORP., et al.,	§	
	§	
Defendants.	§	
	§	
THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, et al., Individually and On Behalf of All Others Similarly Situated,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	
	§	
KENNETH L. LAY, et al.,	§	
	§	
Defendants.	§	

LEAD COUNSEL'S RESPONSE TO AMICUS CURIAE BRIEF OF THE TEXAS ATTORNEY GENERAL REGARDING REQUEST FOR ATTORNEY FEES (DOCKET NO. 5930)

Lead Counsel gratefully acknowledges the Texas Attorney General's prior support of plaintiffs' claims through *amicus curiae* briefs in this case, the Fifth Circuit and the Supreme Court. Lead Counsel must note, however, that while the Texas Attorney General relies on the Class Action Fairness Act ("CAFA") as a basis for his authority to comment on the attorney fee request, CAFA does not appear to apply to this case.[1] Nonetheless, Lead Counsel addresses the issues raised by the Texas Attorney General, which as he notes are nothing other than a reiteration of objections previously raised by others.

The Attorney General states that he has reviewed the presentation filed March 5, 2008 (Docket No. 5927), Lead Counsel's Memorandum of Law in Support of Fee Award and Reimbursement of Plaintiffs' Expenses (Docket No. 5816) ("Fee Brief") and several objections. *See* Amicus Curiae Brief of the Texas Attorney General Regarding Lead Plaintiff's Request for Attorneys' Fees (Docket No. 5930) ("AG Mem.") at 3. Apparently, the Attorney General has not reviewed the Declaration of Christopher M. Patti (Docket No. 5796) ("Patti Declaration"), the Declaration of James Holst in Support of Lead Counsel's Motion for An Award of Attorney Fees (Docket No. 5824) ("Holst Declaration"), the Declaration of Helen J. Hodges in Support of Lead Counsel's Motion for An Award of Attorney Fees (Docket No. 5818) ("Hodges Decl." or "Hodges Declaration"), the Supplemental Declaration of Helen J. Hodges in Support of Lead Counsel's Motion for An Award of Attorney Fees (Docket No. 5909) ("Hodges Supp. Decl." or "Hodges Supplemental Declaration"), the Expert Report of Professor Charles Silver Concerning the Reasonableness of Class Counsel's Request for An Award of Attorneys' Fees (Docket No. 5822)

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[1] CAFA applies only to cases filed after February 18, 2005; this case was filed in October 2001. Moreover, even if it were applicable to this case in general, CAFA primarily addresses the subject of attorney fees in the context of "coupon settlements." *See* 28 U.S.C. §§1711-15. Here, the settlements have already been approved and they are totally cash, not coupons.

("Silver Report"), the Supplemental Report of Professor Charles Silver Concerning the Reasonableness of Class Counsel's Request for An Award of Attorneys' Fees (Docket No. 5906) ("Silver Supp. Report"), the Declaration of John C. Coffee, Jr. (Docket No. 5821) ("Coffee Decl."), the Declaration of H. Lee Sarokin in Support of Lead Counsel's Motion for An Award of Attorney Fees (Docket No. 5819) ("Sarokin Decl."), the Declaration of Professor Lucian A. Bebchuk (Docket No. 5820), Lead Counsel's Reply in Support of Motion for Award of Attorney Fees and Reimbursement of Plaintiffs' Expenses (Docket No. 5807) ("Fee Reply Brief") or the Corrected Declaration of Kenneth M. Moscaret Esq. (Docket No. 5911) ("Moscaret Declaration"). Suffice it to say, the Attorney General has not reviewed, or at least does not acknowledge, the wealth of support before the Court for the requested fee award. In addition, the Attorney General appears not to understand that the multiple settlements achieved in this case have already been approved by the Court. *See* AG Mem. at 3 referring to "the unprecedented amount of the settlement ***proposed***."

The Attorney General asserts that the fee agreement negotiated by The Regents of the University of California ("The Regents") results in a "windfall" to attorneys and that the percentage requested, 9.52%, is not reasonable.[2] However, the Attorney General provides no support for that assertion.

Lead Counsel has demonstrated that the requested 9.52% fee is significantly less than awards made in other mega-fund cases. Even the average "mega-fund" fee award, 11.61%, is above the request here. The fee negotiated by the Lead Plaintiff is entitled to deference as this Court recognized in *Waste Management. In re Waste Management, Inc.*, No. H-99-2183, slip op. at 57

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[2] When the Attorney General engages outside counsel, he presumably wants to maximize the recovery and is willing to pay for excellent representation. In *In re Lease Oil Antitrust Litigation*, the State of Texas was represented by Susman Godfrey, who was awarded a 25% fee on a settlement of more than $185 million. *See In re Lease Oil Antitrust Litig.*, 186 F.R.D. 403, 408, 448 (S.D. Tex. 1999).

(S.D. Tex. May 10, 2002) (Compendium, Ex. B)[3] ("*Waste Management I*"). As Professor Coffee stated, "To reverse The Regents' well-considered position would undermine the role of the lead plaintiff as the party Congress intended to principally monitor class counsel – and would do so in the absence of any evidence that they were delinquent in performing their role." Coffee Decl., ¶51. Professor Silver added "Under the Private Securities Litigation Reform Act (PSLRA), a trial judge should overrule compensation terms negotiated by a lead plaintiff only when (1) the terms obviously exceeded the market rate ***when set*** and (2) the bargaining environment in which fees were set was marred by an identified defect." Silver Supp. Report at 3 (emphasis added). There is no logical reason to reduce the fee percentage agreed to in a mega-settlement.

And when the Attorney General claims the requested fee would result in a "windfall", he disregards the cases where similar and higher lodestar multipliers have been awarded in mega-fund cases. This Court awarded a lodestar multiplier of 5.296 in *Waste Management*. *Waste Management I*, No. 99-2183, slip op. at 64. In *Cardinal Health*, the court noted that the "outstanding" result supported the fee and awarded a 5.9 multiplier. Other courts concur.[4] Professor

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[3] All references to "Compendium, Ex. __" refer to Lead Counsel's Compendium of Exhibits in Support of Lead Counsel's Memorandum of Law in Support of Fee Award and Reimbursement of Plaintiffs' Expenses (Docket No. 5817).

[4] *See In re Visa Check/Mastermoney Antitrust Litig.*, 297 F. Supp. 2d 503, 524 (E.D.N.Y. 2003) (3.5 multiplier); *In re NASDAQ Market-Makers Antitrust Litig.*, 187 F.R.D. 465, 470 (S.D.N.Y. 1998) (awarding 14% of $4.027 billion fund, representing 3.97 multiplier); *In re Xcel Energy, Inc.*, 364 F. Supp. 2d 980, 998-99 (D. Minn. 2005) (awarding 25% of $80 million settlement fund, representing 4.7 multiplier); *In re Charter Commc'ns Inc.*, No. 4:02-CV-1186 CAS, 2005 U.S. Dist. LEXIS 14772, at *56 (E.D. Mo. June 30, 2005) (awarding 20% of $146 million settlement fund, representing 5.6 multiplier); *In re Aetna Inc. Sec. Litig.*, No. 1219, 2001 U.S. Dist. LEXIS 68, at *59 (E.D. Pa. Jan. 4, 2001) (awarding 30% of $82.5 million settlement fund, representing 3.6 multiplier); *In re Buspirone Antitrust Litig.*, No. 01-CV-7951 (JEK), slip op. at 5 (S.D.N.Y. Apr. 17, 2003) (awarding multiplier of 8.46) (Compendium, Ex. R); *Roberts v. Texaco, Inc.,* 979 F. Supp. 185, 198 (S.D.N.Y. 1997) (awarding multiplier of 5.5); *In re Rite Aid Corp. Sec. Litig.*, 269 F. Supp. 2d 603, 611 (E.D. Pa. 2003), *vacated, remanded*, 396 F.3d 294 (3d Cir. 2005), *cost/fees granted*, 362 F. Supp. 2d 587 (E.D. Pa. 2005) (on remand awarding fee equal to multiplier of 6.96); *Weiss v.*

Coffee stated "[T]here has still been general recognition that the lodestar multiplier should be higher in cases involving higher risk. As discussed earlier, this case faced extraordinary risk and, indeed, was ultimately decertified by the Fifth Circuit. Thus, whether or not a multiplier in the 5 to 6 range would be justified in most cases it is justified in this case . . . ." Coffee Decl., ¶35.

The Attorney General asserts that the percentage awarded here should be lower because the fee percentage agreed to and awarded in *WorldCom* was lower and that case was of similar magnitude. However, as Lead Counsel has previously pointed out, the similarity of *WorldCom* to *Enron* ends at the size of the recovery. In *WorldCom*, only one bank, Citigroup, faced §10(b) liability. The vast bulk of the claims and the settlement funds were for violation of §11, which does not require plaintiff to prove scienter or reliance and places the burden of rebutting loss causation on the defendant. There was far more risk and necessarily more creative lawyering here, where the potential §10(b) liability far exceeded the §11 liability, as compared to *WorldCom*. Approximately 80% of the funds recovered in *WorldCom* were distributed to debt claimants with Securities Act claims (Coffee Decl., ¶29) and, as Professor Coffee notes:

> [I]t is far more difficult to recover funds on behalf of the shareholders of a bankrupt corporation where there has been no recent public offering that triggers the more favorable liability provisions of the Securities Action of 1933.

Id. Professor Coffee also notes that "the fraud in *WorldCom* was simple and egregious" ("WorldCom's management capitalized line costs, which were essentially a rental expense that created no asset that WorldCom retained. From an accounting perspective, this was indefensible, and the accounting irregularities in *WorldCom*, if detected, should have been obvious to a student in Accounting 101. In contrast, the fraud in *Enron* involved the murkiest depths of contemporary

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Mercedes-Benz of N. Am., 899 F. Supp. 1297, 1304 (D.N.J. 1995) (awarding fee equal to multiplier of 9.3); *In re RJR Nabisco Inc. Sec. Litig.*, No. 88 Civ. 7905, 1992 U.S. Dist. LEXIS 12702 (S.D.N.Y. Aug. 24, 1992) (awarding fee equal to multiplier of 6.0).

accounting theory.") and much less complex than *Enron* ("Comparing the two cases in terms of their accounting complexity is much like comparing a high school physics experiment with true rocket science.").[5] Coffee Decl., ¶30.

While the Attorney General urges analysis of the *Johnson* factors, he refers only to the March 5, 2008 filing by Lead Counsel, and ignores the evidence and analysis set forth at pages 62-75 of the Fee Brief and the many declarations filed January 4, 2008. The reasonableness of the requested fee is well supported by analysis of the abundant evidence regarding each of the *Johnson* factors. By claiming that a "mechanical" application of the *Johnson* factors is not appropriate, he seems to suggest that the evidence that is before the Court and supports the award should just be disregarded. He next rejects the lodestar cross-check stating "Lodestars should not be used to justify otherwise excessive compensation," and thereby concedes that the lodestar multiplier ***is*** reasonable here. AG Mem. at 5. In sum, he urges that the fee request be reduced for no valid reason. Any way you slice it – the percentage is less than 10%; the *Johnson* factors support the reasonableness of the request; the lodestar multiplier is within the range of reasonableness – and there is no windfall to the lawyers by awarding the fee that the Lead Plaintiff negotiated.

Finally, the Attorney General notes that others have claimed that the lodestar is inflated by including non-attorney hours, contract attorney hours and time spent on "unsuccessful" claims. He suggests that a special master could review the accuracy of the data underlying the lodestar calculation. This suggestion ignores the Hodges Declaration, which the Attorney General has apparently not reviewed, and which describes in detail the work (in over 150 pages) including the tremendous number of briefs written, documents reviewed, depositions taken or defended,

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[5] In no way should this analysis be read as a denigration of the work done in *WorldCom*. The point is that the two cases were very different and not really comparable.

settlements negotiated and documented and the monumental investigation, as well as the time and attention given to preparing the plan of allocation. The Lead Plaintiff oversaw and directed every step. *See* Patti and Holst Declarations. This Court has read all those briefs and conducted every hearing to date; it knows well the work that was done.

Based on his review of the Hodges Declaration, (Ret.) Judge Sarokin stated that he was surprised the lodestar was not higher. Sarokin Decl., ¶33. Indeed, the Hodges Supplemental Declaration explains that Lead Counsel outsourced – that is, paid for and expensed – most of the substantial time spent to code (not review and analyze) millions of pages of documents and prepare the majority of the deposition binders. Hodges Supp. Decl., ¶6. Thus, that time did not add to the lodestar. The Hodges Supplemental Declaration also explains that Lead Counsel directly hired ten young attorneys – the "contract" attorneys – during the intensive document review and fact deposition period and before expert reports and depositions. Hodges Supp. Decl., ¶7. They were supervised by Coughlin Stoia Geller Rudman & Robbins LLP partner Paul Howes and performed the same tasks that firm associates with their level of experience did. *Id*. In addition, they were paid salaries commensurate with their experience. The only difference between them and regular associates with the firm was that they were hired for a limited time specifically to prepare the Enron case for trial. *Id*. The Hodges Supplemental Declaration also explains that the other contract attorneys were senior lawyers who each made a vital contribution to the successful prosecution of the case. Hodges Supp. Decl., ¶¶8-11. The Hodges Supplemental Declaration also describes the work of non-attorney professionals such as in-house forensic accountants and economic analysts and their contribution to the successful result achieved. Hodges Supp. Decl., ¶¶12-15.

Lead Counsel provided additional support for the hours included in the lodestar in the Fee Reply Brief and in the Moscaret Declaration. In sum, contract attorney time is appropriately included in lodestar. *In re Tyco Int'l, Ltd. Multidistrict Litig.*, No. 02-md-1335-PB, slip op. at 59

(D.N.H. Dec. 19, 2007) (Compendium, Ex. P). *See* Fee Reply Brief at 25-30.[6] Paralegal and other professionals' time is also appropriately included. *See Sandoval v. Apfel*, 86 F. Supp. 2d 601, 609-11 (N.D. Tex. 2000).

Lead Counsel has provided more than ample support for the requested fee in the declarations and briefs previously filed. The Attorney General's comments regarding the fee request, like the objectors' he repeats, should be rejected.

DATED: March 10, 2008

Respectfully Submitted,

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PATRICK J. COUGHLIN
HELEN J. HODGES
BYRON S. GEORGIOU
G. PAUL HOWES
SPENCER A. BURKHOLZ
JAMES I. JACONETTE
ANNE L. BOX
JAMES R. HAIL
JOHN A. LOWTHER
ALEXANDRA S. BERNAY
MATTHEW I. ALPERT
JENNIFER L. GMITRO

/s/ Roger B. Greenberg *signed by permission
HELEN J. HODGES

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058

[6] Even if Lead Counsel had paid them hourly – and it did not – it still could have properly billed them at current associate rates under *Tyco* which states: "It is therefore appropriate to bill a contract attorney's time at market rates and count these time charges toward the lodestar." No. 02-md-1335-PB, slip op. at 59.

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
REGINA M. AMES
9601 Wilshire Blvd., Suite 510
Los Angeles, CA 90210
Telephone: 310/859-3100
310/278-2148 (fax)

Lead Counsel for Plaintiffs

SCHWARTZ, JUNELL, GREENBERG
& OATHOUT, LLP
ROGER B. GREENBERG
State Bar No. 08390000
Federal I.D. No. 3932

/s/ Roger B. Greenberg
ROGER B. GREENBERG

Two Houston Center
909 Fannin, Suite 2700
Houston, TX 77010
Telephone: 713/752-0017

THE BILEK LAW FIRM
THOMAS E. BILEK
Federal Bar No. 9338
State Bar No. 02313525
808 Travis, Suite 802
Houston, TX 77002
Telephone: 713/227-7720

Attorneys in Charge

WOLF POPPER LLP
ROBERT C. FINKEL
845 Third Avenue
New York, NY 10022
Telephone: 212/759-4600

SHAPIRO HABER & URMY LLP
THOMAS G. SHAPIRO
MATTHEW L. TUCCILLO
53 State Street
Boston, MA 02109
Telephone: 617/439-3939

Attorneys for Nathaniel Pulsifer

E. LAWRENCE VINCENT
3020 Legacy Drive, #100-324
Plano, TX 75023
Telephone: 214/680-1668
972/491-2417 (fax)

Attorneys for the Archdiocese of Milwaukee Supporting Fund, Inc.

CUNEO GILBERT & LaDUCA, L.L.P.
JONATHAN W. CUNEO
MICHAEL G. LENETT
507 C Street, N.E.
Washington, DC 20002
Telephone: 202/789-3960
202/789-1813 (fax)

Washington Counsel

CICCARELLO DEL GIUDICE & LAFON
MICHAEL J. DEL GIUDICE
1219 Virginia Street, East, Suite 100
Charleston, WV 25301
Telephone: 304/343-4440
304/343-4464 (fax)

Attorneys for Employer-Teamsters Local Nos. 175 & 505 Pension Trust Fund

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing LEAD COUNSEL'S RESPONSE TO AMICUS CURIAE BRIEF OF THE TEXAS ATTORNEY GENERAL REGARDING REQUEST FOR ATTORNEY FEES (DOCKET NO. 5930) document has been served by sending a copy via electronic mail to serve@ESL3624.com on March 10, 2008.

I also certify that a copy of the above-mentioned document has been served via U.S. MAIL on the parties listed on the attached "Additional Service List" on this 10th day of March, 2008.

Deborah S. Granger

DEBORAH S. GRANGER

ADDITIONAL SERVICE LIST	
Stuart Yoes THE YOES LAW FIRM, LLP 3535 Calder Avenue, Suite 235 Beaumont, TX 77726-7584 409/833-2352 409/838-5577 (fax)	Frank H. Tomlinson PRITCHARD, McCALL & JONES, LLC 505 N. 20th Street, Suite 800 Birmingham, AL 35203 205/328-9190 205/458-0035 (fax)
Edward W. Cochran 20030 Marchmont Rd. Shaker Heights, OH 44122 216/751-5546 216/751-6630 (fax)	N. Albert Bacharach Jr. 115 N.E. Sixth Avenue Gainesville, FL 32601-6592 352/378-9859 352/338-1858 (fax)
Paul S. Rothstein 626 N.E. First Street Gainesville, FL 32601 352/376-7650 352/374-7133 (fax)	Maureen McGuirl FENSTERSTOCK & PARTNERS LLP 30 Wall Street, 9th Floor New York, NY 10005 212/785-4100 212/785-4040 (fax)
Lawrence W. Schonbrun LAW OFFICES OF LAWRENCE W. SCHONBRUN 86 Eucalyptus Road Berkeley, CA 94705 510/547-8070	Richard C. Bauerle 30 Greenbriar Ottumwa, IA 52501
Arnold Gregg 4445 Forest Glen Road Anaheim Hills, CA 92807	Steven F. Helfand HELFAND LAW OFFICES 582 Market Street, Suite 1400A San Francisco, CA 94104 415/397-0007 415/397-0009 (fax)
Mr. Stanley Majors 9332 S. 85th East Avenue Tulsa, OK 74133-5547	Stephen Neuwirth QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP 51 Madison Avenue, 22nd Floor New York, NY 10010

ADDITIONAL SERVICE LIST	
John J. Pentz CLASS ACTION FAIRNESS GROUP 2 Clock Tower Place, Suite 260G Maynard, MA 01754 987/461-1548 707/276-2925 (fax)	J. Scott Kessinger 7304 Michigan Ave. St. Louis, MO 63111 314/369-5115 314/754-8370 (fax)
Jonathan E. Fortman 910 S. Florissant Road St. Louis, MO 63135 314/522-2312 314/524-1519 (fax)	Edward F. Siegel 27600 Chagrin Blvd. #340 Cleveland, OH 44122 216/831-3424 216/831-6584 (fax)
SPRINGFIELD LAW OFFICE OF: JOHN COREY QUA 36 Newmoon Terr, N. Springfield, MI 49015-1328 269/963-4413	Ernst-Georg Baltzer 115 Cherry Tree Lane Campbell River, BC V9W 8E9 Canada E-mail: pacificgeorge@aol.com
Jeannette Dreisbach 1122 Tamarisk Road Palm Springs, CA 92262 760/408-9678	J. Jones P.O. Box 53289 Portland, OR 98264 (zip code on objection partially illegible)
Joseph W. Cotchett Steven N. Williams Aron K. Liang COTCHETT, PITRE & MCCARTHY San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010 650/697-6000 650/607-0577	Tom Alan Cunningham CUNNINGHAM DARLOW LLP 909 Fannin, Suite 3700 Houston, TX 77010
Martin D. Chitwood CHITWOOD HARLEY HARNES LLP 1230 Peachtree Street, Suite 2300 Atlanta, GA 30309	Roger F. Claxton Robert J. Hill CLAXTON & HILL, PLLC 10000 N. Central Expressway, #725 Dallas, TX 75231 214/969-9029 214/953-0583 (fax)

ADDITIONAL SERVICE LIST	
Loren Kieve QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP 50 California Street, 22nd Floor San Francisco, CA 94111 415/875-6600 415/875-6700	Darrell Palmer LAW OFFICES OF DARRELL PALMER 603 North Highway 101, Suite A Solana Beach, CA 92075 858/792-5600 866/583-8115 (fax)
Mark I. Machiz COHEN, MILSTEIN, HAUSFELD & TOLL, P.L.L.C. One South Broad Street, Suite 1850 Philadelphia, PA 19107 215/825-4010 215/825-4001 (fax)	Avi S. Garbow Whitney R. Case COHEN, MILSTEIN, HAUSFELD & TOLL, P.L.L.C. 1100 New York Avenue, NW, Suite 500, West Tower Washington, DC 20005 202/408-4600 202/408-4699 (fax)
Austin M. O'Toole Attorney & Counselor At Law 509 Nineteenth Street Galveston, TX 77550 409/763-3130 409/763-3111 (fax)	Georgia Matula 9823 Sagedowne Ln. Houston, TX 77089
Nasser Pebdani 5714 Bermuda Dunes Houston, TX 77069	Wiley M. Cauthen P.O. Box 3084 Winter Garden, FL 34778
Jean E. Clark 591 Calibre Crest Parkway #103 Altamonte Springs, FL 32794	Janice K. Farmer 937 Carlson Drive Orlando, FL 32804
Josh G. Mayes 4919 Fern Cove Drive Baytown, TX 77521	Mike L. Smith 1306 Emily Morgan Circle Richmond, TX 77469
Joyce Barrett 11510 Pinole Ln. Ct. Houston, TX 77066	Mary Lynne Dix 5402 Blossom Houston, TX 77007
Frank R. Diemont 10827 Britoak Lane Houston, TX 77079	Rinetia G. Turner 7826 Heron Lakes Drive Houston, TX 77064

ADDITIONAL SERVICE LIST	
Carmen Alliece Morris 4602 Atascocita Trail Humble, TX 77346-4400	Richard C. Barrett 4515 Crichton Lane Orlando, FL 32806
John McGunn 1315 S. 3rd St. #301 Louisville, KY 40208-2326 502/500-6078	Michael John Reiter 3725 E. Denton Avenue, Apt. 127 St. Francis, WI 53235
Charles B. Bowman 2422 Deep Lake Drive Kingwood, TX 77345	Christine A. Smith 16611 Shimmering Lake Drive Cypress, TX 77433
Diane L. Watts 25016 Highway 525 Greenbank, WA 98253	Lewis M. May 5715 Will Clayton Pkwy #2513 Humble, TX 77338
Emil B. Thomas Claine C. Thomas 7435 Kobersky Lane La Grange, TX 78945	Laura L. Giambrone 2212 Cortlandt St. Houston, TX 77008
James Sutton P.O. Box 914 Silver Springs, FL 34489	Kathy Washington 1663 Meadow Green Dr. Missouri City, TX 77489
Betty Studzinski 23707 Hopewell Drive Katy, TX 77493	Linda Ward 5107 Nassau Road Houston, TX 77021
Sharon Farrell 1318 Sand Pines Katy, TX 77494	Helen Taylor 2123 Redcoat Dr. Missouri City, TX 77489
Deborah Korkmas 6450 Olympia Dr. Houston, TX 77057	Ramona Betancourt 13611 Pallwood Cypress, TX 77429

ADDITIONAL SERVICE LIST	
Judy Northcutt 9603 Top Gallant Ct. Houston, TX 77065	Janice Moore 1338 Sherfield Ridge Drive Katy, TX 77450
Sandra G. Cherry Paul R. Cherry 18207 Hampton Oak Court Spring, TX 77379	Tracy Minter 403 Stockbridge Lane Dickinson, TX 77539
Gerald Thomas 3714 Hill Springs Drive Humble, TX 77345	Kelly Allen 20607 Chestnut Hills Drive Katy, TX 77450
Kelly Weaver P.O. Box 727 Beaver, OK 73932	James Sluaeder 46777 210st Brookings, SD 57006
Gloria Preisler 39120 8th Avenue North Branch, MN 55056	Rodney D. Williams 19231 Pasadena Circ.e Omaha, NE 68130-5012
Raymond Lingden 443 Maple Drive Foley, MN 56329	Richard L. Provost 2608 Milo Road Clyde, KS 66938
Richard M. Bellows 310 South 38th Lincoln, NE 68510	Eldon Hestermann 1808 South 202nd Eagle, NE 68347
Randy J. Lukken 13304 Hillsborough Dr. Omaha, NE 68164-6012	Randall E? (illegible) 643 6th St. Unadilla, NE 68454
Robert Sorensen 9101 O St. Lincoln, NE 68520	John E? (illegible) 1817 S. 214th St. Eagle, NE 68347
Robert L. Alston 814 Countryside Place Carlsbad, New Mexico 88220	Patrick L. Downey 6991 South Poplar Way Centennial, CO 80112
Rosemary Gracey 5120 Lakecrest Circle Papillion, NE 68133	Morris A. Brassfield 12622 Midland Creek Drive Tomball, TX 77377

ADDITIONAL SERVICE LIST	
Rodrick McGillivray 225 Gray Owl Pass Brookings, SD 57006	William C. Willman 1860 Chardonnay Place Tallahassee, FL 32317
Julie Smith 35 Indian Hills Rd. Council Bluffs, IA 51503	Josie N. Call 648 Caribou Circle Papillion, NE 68046
Daniel A. Grill Box 246 Sherburn, MN 56171	Lois E. Nelson 218 Kelser Street Welcome, MN 56181
Rodney L. Nelson 1003 Martin Road Welcome, MN 56181	Rusell Higgins 631 Summit Drive Fairmont, MN 56031
Steven R. Mitchell 5906 16th Street Terrace Great Bends, KS 67530	Sabas Cerecero, Jr. 915 Washington Concordia, KS 66901
John William Ryan 11500 S. 158 Bennet, NE 68317	Kiet Nguyen 7501 S. 41st St. Lincoln, NE 68516
M. Kramer 1000 N. 88th St. Lincoln, NE 68505	Harry Choffin 802 N. 12th Rd. Palmrya, NE 68418
Marlane Nollner 1110 Townsend St. Spearman, TX 79081	Larry Sheeley 46777 210 St. Brookings, SD 57006
James Schroeder 20387 Northgrove Loop Brookings, SD 57006	Raymond Lindgren 443 Maple Dr. Foley, MN 56629
Richard Provost 2608 Milo Rd. Clyde, KS 66938	Lizbeth I. Jensen 16212 Grover Street Omaha, NE 68130
Clarence & Janet Bouwens 318 Bryan Street Gretna, NE 68028	Donald Wilson 1004 S. Monroe Street Hugoton, KS 67951-2832

ADDITIONAL SERVICE LIST	
David C. Mattax, Chief Financial Litigation Division Office of the Attorney General of Texas P.O. Box 12548 Austin, TX 78711-2548	David J. Budig 934 Golfview Drive Platteville, WI 53818
Robert W. Besecker 252 White Street Benton, WI 53803	Nancy deBlonk 517 Henry Avenue Volga, SD 57071
Brian P. Corell 9639 Packer Court Lancaster, WI 53813	A. Hill 68 G-C Road Nashua, MT 59248
Leonard Klaas 6943 Pine Knob Road Lancaster, WI 53813	Samuel R. Magids 8313 Southwest Freeway, Suite 220 Houston, TX 77074
Kurt M. Ritter 20 Preston Drive Platteville, WI 53818	Donald J. Sappe 1540 Deborah Court Platteville, WI 53818
Thomas A. Young 950 Kelly Avenue Platteville, WI 53818	