

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

IN RE MUTUAL FUNDS ) MDL-1586  
INVESTMENT LITIGATION )  
 )  
Invesco Sub-Track ) Case No. 04-md-15864  
 )

**AFFIDAVIT OF SAMUEL K. ROSEN  
IN SUPPORT OF JOINT PETITION FOR ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES FILED ON BEHALF OF  
HARWOOD FEFFER LLP**

STATE OF NEW YORK )  
 ) ss.:  
COUNTY OF NEW YORK )

Samuel K. Rosen, being first duly sworn, deposes and says:

1. I am a member of the law firm of Harwood Feffer LLP. I submit this affidavit in support of my firm's application for an award of attorneys' fees in connection with services rendered in this case, as well as the reimbursement of expenses incurred by my firm in connection with this litigation.

2. My firm acted as Lead Counsel in the ERISA class action. The tasks undertaken by my firm can be summarized as follows:

- a. review of background material in connection with the market-timing and related issues as it related to the ERISA plan involved in the mutual funds in this sub-track;
- b. co-ordination and organization of counsel in other aspects of this sub-track, including dealing with matters before the Judicial Panel on Multi-District Litigation.
- c. review of documents produced by defendants in response to ERISA-required production demands;
- d. preparation and filing of amended consolidated complaint;

- e. response to motion to dismiss, including research, analysis of facts and law, leading to oral argument;
- f. appeal of District Court decision dismissing Invesco action;
- g. subsequent submissions to Fourth Circuit after Supreme Court decision in *LaRue v. DeWolfe Boberg & Assoc., Inc.*;
- h. discussions with damage expert concerning ERISA-related damages;
- i. settlement discussions with defendants' counsel; and
- j. preparation for and attendance at preliminary settlement hearing.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and professional support staff of my firm who were involved in this litigation, and the lodestar calculation based on my firm's current billing rates.<sup>1</sup> 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 partners, attorneys and professional support staff in my firm included in Exhibit 1 are the same as the regular current rates charged for their services in non-contingent matters and/or which have been accepted and approved in other securities or shareholder litigation.

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<sup>1</sup> This application does not include time for anyone who spent fewer than 5 hours on this litigation.

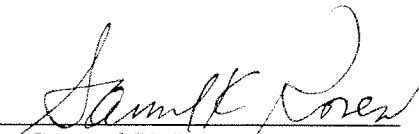
5. The total number of hours expended on this litigation by my firm is 193.65 hours. The total lodestar for my firm is \$114,671.50, consisting of \$108,008 for attorneys' time and \$6,663.50 for professional support staff time.

6. My firm's lodestar figures are based upon the firm's 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.

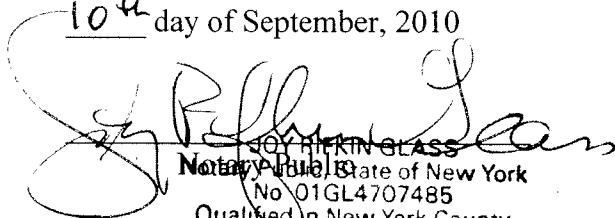
7. As detailed in Exhibit 2, my firm has incurred a total of \$9,703.03 in unreimbursed expenses in connection with the prosecution of this litigation.

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 represent an accurate recordation of the expenses incurred.

9. With respect to the standing of counsel in this case, attached hereto as Exhibit 3 is a brief biography of my firm and attorneys in my firm who were principally involved in this litigation.

  
\_\_\_\_\_  
Samuel K. Rosen

Sworn to before me this  
10<sup>th</sup> day of September, 2010

  
JOY HINKIN GLASS  
Notary Public, State of New York  
No. 01GL4707485  
Qualified in New York County  
Commission Expires July 31, 2013

**EXHIBIT 1**

***In re Mutual Funds Investment Litigation – Invesco Sub-Track, 1:04-MD-15864***

**HARWOOD FEFFER LLP**

**TIME REPORT — Inception through August 31, 2010**

Name	Total Hrs.	Hourly Rate	Total Lodestar
<b>PARTNERS:</b>			
Robert I. Harwood	48.85	\$700	\$ 34,195.00
Samuel K. Rosen	98.60	\$600	\$ 59,158.00
Matthew M. Houston	17.90	\$600	\$ 10,740.00
<b>ATTORNEYS:</b>			
Peter W. Overs	4.50	\$450	\$ 3,915.00
<b>PROFESSIONAL SUPPORT STAFF:</b>			
Glenn C. Mariano	6.50	\$275	\$ 1,787.50
Taras Sawchuk	8.20	\$180	\$ 1,476.00
Virgilio Soler	13.60	\$250	\$ 3,400.00
<b>TOTAL LODESTAR</b>	193.65		\$114,671.50

**EXHIBIT 2**

*In re Mutual Funds Investment Litigation – Invesco Sub-Track, 1:04-MD-15864*

**HARWOOD FEFFER LLP**

**EXPENSE REPORT — Inception through August 31, 2010**

<b><u>Categories:</u></b>	<b><u>Amount</u></b>
Photocopies/Reproduction/Printing	\$ 1,446.42
Postage/Notice Costs	\$ 6.00
Telephone	\$ 5.00
Messengers/Express Services	
Filing/Witness Fees	\$ 497.50
Court Reporters/Transcript/Video	
Lexis/Westlaw/Legal Research	\$ 2,540.00
Experts/Consultants	\$ 4,400.11
Meals, Hotels & Transportation	\$ 752.00
Secretarial Overtime/Word Processing	\$ 56.00
Assessments	
Facsimile Charges	
<b>TOTAL EXPENSES:</b>	<hr/> \$9,703.03



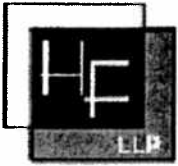
# HARWOOD FEFFER LLP

## FIRM DESCRIPTION

The law firm of Harwood Feffer LLP (“Harwood Feffer” or the “Firm”) specializes in complex, multi-party litigation with an emphasis on securities class actions, shareholder derivative and ERISA litigation. The Firm also handles more general complex commercial litigation involving allegations of breach of contract, breach of fiduciary duty, fraud, and negligence, as well as litigation involving consumer fraud, anti-competitive conduct, and other commercial claims. In addition, the Firm prosecutes actions on behalf of workers in actions stemming from violations of federal and state labor laws.

Harwood Feffer is dedicated to prosecuting socially useful actions in the most efficient manner and with the highest level of professional competence. The structure of the Firm allows us a far greater degree of independence, flexibility, and satisfaction than a large firm environment, without sacrificing the quality of representation necessary to successfully litigate complex actions throughout the country. The Firm maintains an excellent reputation among both the plaintiffs’ and defense bars. Our adversaries and co-counsel know that we take a case to trial, if necessary, to achieve a satisfactory result for our clients.

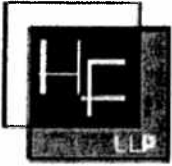
Harwood Feffer has been acknowledged by courts and by its peers to be one of the leaders in the plaintiffs’ shareholder advocacy bar. In this regard, we have developed new law in the areas of tender offers, fiduciary duty of corporate insiders to public shareholders in mergers and takeovers, and general principles of required disclosure to shareholders and institutional investors in public companies.



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As a result, the Firm has been designated as lead, co-lead or special counsel in numerous complex cases and other actions involving shareholder rights and corporate governance. In the vast majority of such actions, the Firm's skill and expertise has led to the recovery of substantial monetary and equitable benefits for investors, stockholders, corporations, and partnerships. By way of example, the following litigated actions, in which the Firm served in a leadership capacity, were all brought to highly successful conclusions: 1) In re First Capital Holdings Corporation Financial Products Securities Litigation, MDL 901 (C.D.Cal.) (restoration of over \$1 billion in insurance policies and benefits); 2) In re Royal Dutch/Shell Transport ERISA Litigation, (D.N.J.) (creation of settlement fund of \$90 million plus implementation of structural relief); 3) In re Prudential Bache Energy Income Partnerships Securities Litigation, MDL 880 (E.D.La.) (creation of settlement fund in excess of \$90 million); 4) In re JWP Inc. Securities Litigation, (S.D.N.Y.) (creation of settlement fund in excess of \$37 million); 5) Morse v. McWhorter, (M.D. Tenn.) (creation of a settlement fund of \$49.5 million on behalf of investors in Columbia/HCA Healthcare Corp.); 6) In re BankOne Securities Litigation, (N.D. Ill.) (creation of a \$45 million settlement fund); and 7) Sidney Morse, et al. v. Abbott Laboratories, et al., (N.D. Ill.) (creation of a \$14.1 million settlement fund following a jury verdict for plaintiffs).

The Firm has also been appointed Co-Lead Counsel in a Multidistrict Litigation against FedEx Ground Package System, Inc. currently pending in the Northern District of Indiana, Docket No. MD- 1700, involving actions prosecuting claims on behalf of over 40 separate state and federal classes from over 35 states. This litigation concerns FedEx Ground's practice of misclassifying its driver employees as independent contractors.



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Courts have often recognized the Firm's skill in class, derivative, and ERISA actions. For example, in In re Electro-Catheter Securities Litigation, Judge Nicholas Politan of the District of New Jersey stated:

[C]ounsel in this case are highly competent, very skilled in this very specialized area and were at all times during the course of the litigation that I participated in, which was perhaps the major part of the Court litigation here, always well prepared, well spoken, and knew their stuff and they are a credit to their profession. They are the top of the line.

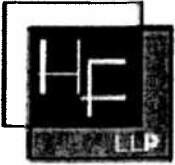
In J. Michael v. SFBC International, Inc., Judge Stanley R. Chesler of the District of New Jersey stated:

The Court . . . is delighted, quite frankly, to see the practicality of counsel on both sides in this matter and that, indeed, settlement in this case and at this early stage ends up with very substantial and practical benefits to all the parties in this case and ultimately to the corporation.

### THE ATTORNEYS OF THE FIRM

**Robert I. Harwood**, senior partner of the Firm, graduated from William and Mary Law School in 1971, and has specialized in securities law and securities litigation since beginning his career in 1972 at the Enforcement Division of the New York Stock Exchange. He has prosecuted numerous securities, class, derivative, and ERISA actions. He has served as Acting Village Justice in Dobbs Ferry, New York since 1999. He is a member of the Trial Lawyers' Section of the New York State Bar Association and has served as a guest lecturer at trial advocacy programs sponsored by the Practising Law Institute. In a statewide survey of his legal peers published by Super Lawyers Magazine, a special publication of THE NEW





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YORK TIMES MAGAZINE, Mr. Harwood has been consistently selected as a “New York Metro Super Lawyer” in 2006, 2007, 2008 and 2009. Super Lawyers are the top five percent of attorneys in New York, as chosen by their peers and through the independent research. He is also a Member of the Board of Directors of the MFY Legal Services Inc., which provides free legal representation in civil matters to the poor and the mentally ill in New York City.

Commenting on Mr. Harwood's abilities, in In re Royal Dutch/Shell Transport ERISA Litigation, (D.N.J.), Judge Bissell stated:

the Court knows the attorneys in the firms involved in this matter and they are highly experienced and highly skilled in matters of this kind. Moreover, in this case it showed. Those efforts were vigorous, imaginative and prompt in reaching the settlement of this matter with a minimal amount of discovery . . . . So both skill and efficiency were brought to the table here by counsel, no doubt about that.

Likewise, Judge Hurley stated in connection with In re Olsten Corporation Securities Litigation, 97 CV-5056 (E.D.N.Y. Aug. 31, 2001), wherein a settlement fund of \$24.1 million was created: “The quality of representation here I think has been excellent.” Mr. Harwood was lead attorney in Meritt v. Eckerd, 86 Civ. 1222 (E.D.N.Y. May 30, 1986), where then Chief Judge Weinstein observed that counsel conducted the litigation with “speed and skill” resulting in a settlement having a value “in the order of \$20 Million Dollars.” Mr. Harwood prosecuted the Hoeniger v. Aylsworth class action litigation in the United States District Court for the Western District of Texas (SA-86-CA-939), which resulted in a settlement fund of \$18 million and received favorable comment in the August 14, 1989 edition of The Wall Street Journal (“Prospector Fund Finds Golden Touch in Class Action Suit” p. 18, col. 1). Mr. Harwood served as co-lead counsel in In Re Interco Incorporated

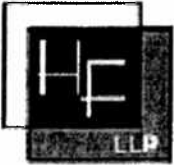


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Shareholders Litigation, Consolidated C.A. No. 10111 (Delaware Chancery Court) (May 25, 1990), resulting in a settlement of \$18.5 million, where V.C. Berger found, “This is a case that has an extensive record that establishes it was very hard fought. There were intense efforts made by plaintiffs’ attorneys and those efforts bore very significant fruit in the face of serious questions as to ultimate success on the merits.”

Mr. Harwood served as lead counsel in Morse v. McWhorter, (Columbia/HCA Healthcare Securities Litigation) (M.D. Tenn.), in which a settlement fund of \$49.5 million was created for the benefit of the Class, as well as In re Bank One Securities Litigation, (N.D. Ill.), which resulted in the creation of a \$45 million settlement fund. Mr. Harwood also served as co-lead counsel in In re Safety-Kleen Corp. Stockholders Litigation, (D.S.C.), which resulted in a settlement fund of \$44.5 million; In re Laidlaw Stockholders Litigation, (D.S.C.), which resulted in a settlement fund of \$24 million; In re AIG ERISA Litigation, (S.D.N.Y.), which resulted in a settlement fund of \$24.2 million; In re JWP Inc. Securities Litigation, (S.D.N.Y.), which resulted in a \$37 million settlement fund; In re Oxford Health Plans, Inc. Derivative Litigation, (S.D.N.Y.), which resulted in a settlement benefit of \$13.7 million and corporate therapeutics; and In re UNUMProvident Corp. Securities Litigation, (D. Me.), which resulted in the creation of settlement fund of \$45 million.

**Joel C. Feffer**, one of the senior members of the firm, was the partner supervising the litigation of In re Home Shopping Network, Inc., Derivative Litigation, (S.D. Fla.), which created a settlement benefit in excess of \$20 million, and Edge Partners, L.P. v. Dockser, et al., (D. Md.), which created a settlement benefit in excess of \$11 million. In addition, Mr. Feffer was in charge of Dornberger v. Metropolitan Life Insurance Company in the Southern District of



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New York, which created a settlement benefit of more than \$20 million; the successful prosecution of the Regeneron Pharmaceuticals, Inc. Securities Litigation in the Southern District of New York, which created a settlement fund in excess of \$4 million; and Croyden Assoc. v. Tesoro Petroleum Corp., et al., (Del. Ch.), which created a settlement benefit of \$19.2 million on behalf of holders of preferred stock of Tesoro Petroleum Corp.; and In re Alliance Pharmaceutical Corp. Securities Litigation, (S.D.N.Y.), which on the eve of trial created a settlement of \$4.75 million.

Mr. Feffer graduated from Georgetown University Law Center in 1967 and specialized in corporate law and securities litigation. Mr. Feffer is a member of both the New York State and American Bar Associations.

**Daniella Quitt**, a member of the Firm, graduated from Fordham University School of Law in 1988, is a member of the Bar of the State of New York, and is also admitted to the United States District Courts for the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second, Fifth and Ninth Circuits.

Ms. Quitt has played a significant role in numerous actions in which Harwood Feffer served as lead or co-lead counsel, wherein substantial benefits were conferred upon plaintiff shareholders, such as In re Safety-Kleen Corp. Stockholders Litigation, (D.S.C.) (settlement fund of \$44.5 million); In re Laidlaw Stockholders Litigation, (D.S.C.) (settlement fund of \$24 million); In re UNUMProvident Corp. Securities Litigation, (D. Me.) (settlement fund of \$45 million); In re Harnischfeger Industries (E.D. Wisc.) (settlement fund of \$10.1 million); In re Oxford Health Plans, Inc. Derivative Litigation, (S.D.N.Y.) (settlement benefit of \$13.7 million and corporate therapeutics); In re JWP Inc. Securities Litigation, (S.D.N.Y.) (settlement fund of \$37 million); In re Home Shopping



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Network, Inc., Derivative Litigation, (S.D. Fla.) (settlement benefit in excess of \$20 million); In re Rexel Shareholder Litigation, (Sup. Ct. N.Y. County) (settlement benefit in excess of \$38 million); and Croyden Assoc. v. Tesoro Petroleum Corp., et al., (Del. Ch.) (settlement benefit of \$19.2 million).

In connection with the settlement of Alessi v. Beracha, (Del. Ch.), a class action brought on behalf of the former minority shareholders of Earthgrains, Chancellor Chandler commented: "I give credit where credit is due, Ms. Quitt. You did a good job and got a good result, and you should be proud of it."

Prior to joining Harwood Feffer in May 1991, Ms. Quitt represented both plaintiffs and defendants in complex commercial litigation. Since her affiliation with Harwood Feffer, Ms. Quitt has focused her practice on shareholder rights but continues to handle general commercial and consumer litigation.

**Matthew M. Houston**, a member of the Firm, graduated from Boston University School of Law in 1988. Mr. Houston is a member of the Bar of the State of New York and the Commonwealth of Massachusetts. Mr. Houston is also admitted to the United States District Courts for the Southern and Eastern Districts of New York and the District of Massachusetts. Since his affiliation with Harwood Feffer in 1992, Mr. Houston has concentrated his practice exclusively in the field of shareholder rights and ERISA class actions.

Mr. Houston has played a principal role in numerous class actions wherein substantial benefits were conferred upon plaintiffs: Pace American Shareholder Litigation, 94-92 TUC-RMB (securities fraud class action settlement resulting in a recovery of \$3.75 million); In re Bay Financial Securities Litigation, Master File No. 89-2377-DPW, (J. Woodlock) (D. Mass.) (settlement of action based upon federal securities law claims resulting in class recovery in excess of \$3.9 million); Crandon Capital Partners v. Sanford M. Kimmel, C.A. No. 14998 (J. Chandler) (Del. Ch. 1996)



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(settlement of an action on behalf of shareholders of Transnational Reinsurance Co. whereby acquiring company provided an additional \$10.4 million in merger); Goldsmith v. Technology Solutions Company, 92 C 4374 (J. Manning) (N.D. Ill. 1992) (recovery of \$4.6 million as a result of action alleging false and misleading statements regarding revenue recognition).

**Samuel K. Rosen**, a member of the Firm, graduated Princeton University in 1965 and cum laude from Harvard Law School in 1968. Mr. Rosen has had extensive experience in securities class action litigation, as well as complex corporate and commercial litigation. Mr. Rosen has also represented public and private companies in matters of general corporate concern.

In 1979, Mr. Rosen argued in the United States Supreme Court, and won, the landmark case, Park Lane Hosiery Co., Inc. v. Shore, 439 U.S. 322 (1979). Mr. Rosen played a key role in the successful prosecution of Morse v. McWhorter, (M.D. Tenn.) (creation of a settlement fund of \$49.5 million on behalf of investors in Columbia/HCA Healthcare Corp.) and In re Olsten Corporation Securities Litigation, (E.D.N.Y.) (creation of a settlement fund of \$24.1 million).

**James G. Flynn**, a member of the Firm, graduated cum laude from Fordham College in 1980 and cum laude from St. John's School of Law in 1988. Mr. Flynn is a member of the Bar of the State of New York and is also admitted to the United States District Courts for the Southern and Eastern Districts of New York and to the United States Court of Appeals for the Second and the Fifth Circuits.

Mr. Flynn has played a principal role in numerous class, derivative, and consumer actions wherein substantial benefits were conferred upon investors and consumers, such as In re Executive Telecard, Ltd. Securities Litigation, 94 Civ. 7846 (CLB) (S.D.N.Y.) (settlement benefit in cash and options of over \$4 million in



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Federal securities action); In re Verizon Three Way Calling Litigation, No. 603484-01 (Sup. Ct. N.Y. County) (class action settlement providing full refund of improper three way calling charges of up to \$2 million collected); In re Graham-Field Health Products, Inc. Securities Litigation, No. 98-CV-1923 (DRH) (E.D.N.Y.) (\$5,650,000 settlement of Federal securities class action); and Geer v. Cox, et al., Case No. 01-2583-JAR (D. Kan.) (derivative settlement of \$2.5 million in class and derivative action).

Prior to joining Harwood Feffer, Mr. Flynn represented both plaintiffs and defendants in commercial and securities litigations and in class actions. Since his affiliation with Harwood Feffer in 1994, Mr. Flynn has focused his practice in the field of shareholder and consumer rights but continues to handle general and complex commercial litigation as well.

**Jeffrey M. Norton**, a member of the Firm, graduated with honors from Arizona State University in 1992 and cum laude from Pace University School of Law in 1997 where he received a Dean's Grant as well as a Public Interest Law Scholarship for his work with the Center for Constitutional Rights in New York City and Pace University's Social Justice Center. Mr. Norton concentrates his practice in the areas of shareholder rights, ERISA litigation, consumer fraud, products liability and civil rights. He has argued matters before numerous state and federal courts and played a key role in numerous actions where substantial benefits were conferred upon plaintiffs and class members, including In re Royal Dutch/Shell Transport ERISA Litigation, (D.N.J.) (\$90 million settlement); In re AIG ERISA Litig., 04-CV-9387 (S.D.N.Y.)(\$24.5 million settlement ); In re Conagra Foods, Inc. ERISA Litig., 8:05-CV-00348 (D. Neb.)(settlement valued over \$14 million); Salvato v. Zale Corp. et al., 3:06-CV-1124-D (N.D. Tx.) (settlement valued over \$7 million); and

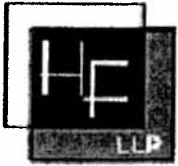


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Graden v. Conexant Systems, Inc., 2:05-CV-00695 (D.N.J.) (settlement valued at over \$12 million).

In the Conexant case, Mr. Norton argued and won an appeal before the U.S. Court of Appeals for the Third Circuit setting precedent that established statutory standing under ERISA for millions of otherwise disqualified former employees. See Graden v. Conexant Systems, Inc., 496 F.3d 496 (3d cir. 2007), cert. denied 128 S.Ct. 1473 (2008)). Mr. Norton subsequently argued and won a similar result before the Eleventh Circuit in Lanfear v. Home Depot, Inc., 536 F.3d 1217 (11th Cir. 2008). Mr. Norton was involved in the In re: New York ReNu with Moistureloc Product Liability Litigation, 766,000/2007 (NY Sup. Ct), and most recently was appointed to the Plaintiffs' Steering Committee in In re: Zicam Cold Remedy Marketing, Sales Practices And Products Liability Litigation, 2:09-md-02096 (FJM), pending in the U.S. District Court for the District of Arizona.

In addition to representing both plaintiffs and defendants in a wide range of commercial and civil litigation matters, Mr. Norton drafted the supplement to Paul D. Rheingold, MASS TORT LITIGATION (1996) and played a critical role in the seminal voting rights case of Goosby v. Town Board of the Town of Hempstead, 981 F. Supp. 751 (E.D.N.Y. 1997), aff, 180 F.3d 476 (2d. Cir. 1999), cert. denied, 528 U.S. 1138 (2000). Mr. Norton's efforts have been the subject of various television and newspapers pieces and he has been a panelist for CLE seminars, including ALL-ABA's Lender Misconduct in Consumer Foreclosures and Bankruptcy. Mr. Norton is admitted in the State Courts of New York and Connecticut as well as the United States District Courts for the Southern and Eastern Districts of New York, the Eastern District of Michigan, the Northern District of Ohio, the United States Courts of Appeals for the Second, Third, Fourth, and Eleventh Circuits, and the United States Supreme Court.



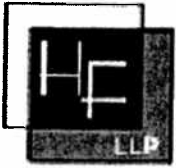
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**Peter W. Overs, Jr.**, Counsel to the Firm, was admitted to the New York Bar in 1994 and the U.S. District Court, Southern and Eastern Districts of New York in 1995. He is a graduate of St. Johns University (J.D., 1993) and New York University (B.A., *magna cum laude*, Departmental Honors in Philosophy, 1990). Mr. Overs authored "U.S. v. Fagg: Stretching the Bounds of Privacy," 66 St. Johns L. Rev. 1193 (1993). He is a member of the Association of the Bar, City of New York. Upon graduation from law school, Mr. Overs served as law clerk to the Honorable Paul J. Kelly, Jr., Circuit Judge, United States Court of Appeals for the Tenth Judicial Circuit. Prior to becoming an associate of the Firm, Mr. Overs represented both plaintiffs and defendants in antitrust and securities class actions, complex commercial litigation and federal appeals. Mr. Overs concentrates his practice on antitrust, labor law, consumer and ERISA class actions.

**Tanya Korkhov**, an associate of the Firm, was admitted to the bar in 2006. Ms. Korkhov graduated from New York University with a Bachelor of Arts in English and American Literature. She received her J.D. from the Benjamin N. Cardozo School of Law in 2005, where as a member of the Securities Arbitration Clinic, she represented clients in securities-related matters. Ms. Korkhov represented Cardozo on a four-member team in the 2005 and 2004 annual Willem C. Vis International Commercial Arbitration Moot Competition held in Vienna, Austria. Ms. Korkhov is admitted to the United States District Courts for the Southern and Eastern Districts of New York.

**Roy Shimon**, an associate of the Firm, was admitted to the Bar of the State of New York in 2007. Prior to becoming an associate of the Firm, Mr. Shimon served as judicial intern to New York Supreme Court Justice Ronald D. Hollie, and





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to New York State Supreme Court Justice/Associate Justice Appellate Term Jaime A. Rios.

Mr. Shimon graduated with honors from Franklin & Marshall College in 2003, where he was also inducted into the Pi Sigma Alpha and Alpha Kappa Delta National Honor Societies. He received his J.D. from St. John's University in 2006, where he served on the Board of the Moot Court Honor Society, and as Vice President of the Entertainment & Sports Law Society. Mr. Shimon is admitted to the United States District Courts for the Southern and Eastern Districts of New York.

**Professor Randolph M. McLaughlin**, a graduate of Columbia College and Harvard Law School, joined the Firm as *Of Counsel* in 2008. Professor McLaughlin is currently on the faculty at Pace University School of Law where he teaches courses focusing on civil rights law, litigation, labor law, voting rights, and civil procedure. Prior to joining Pace's law faculty in 1988, Professor McLaughlin was an attorney associated with Meyer, Suozzi, English & Klein, where he specialized in civil litigation and labor law. In 1978, he began his legal career at the Center for Constitutional Rights, a civil rights/civil liberties legal organization in New York City. For eight years he worked side by side with the renowned civil rights attorney William Kunstler. While there he was responsible for the management and coordination of important civil rights/civil liberties cases at the trial and appellate levels, and he pioneered the development of a legal strategy to redress incidents of racially-motivated violence. In 1982, he won an award of \$535,000 for five black women who had been attacked by members of the Chattanooga Ku Klux Klan.

On February 20, 1997, Professor McLaughlin won a landmark victory in a voting rights case against the Town of Hempstead, N.Y., entitled Goosby v. Town Board of the Town of Hempstead, 981 F. Supp. 751 (E.D.N.Y. 1997), *aff*, 180 F.3d



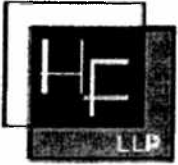
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476 (2d. Cir. 1999), cert. denied, 528 U.S. 1138 (2000). A federal judge ruled that the town-wide method of electing the Town Council was discriminatory and ordered that the system be dismantled.

In 1997, Professor McLaughlin agreed to represent the family of Charles Campbell who had been killed during a dispute over a parking space in Dobbs Ferry, N.Y. The shooter, an off-duty New York City police officer, was subsequently convicted of second-degree murder and sentenced to a prison term of twenty years to life. Professor McLaughlin filed suit against the shooter and his alleged accomplices. A federal jury awarded the plaintiff \$5 million dollars in compensatory damages.

In 2007, he intervened on behalf of an Hispanic political activist in a voting rights lawsuit brought by the United States Department of Justice against the Village of Port Chester. On January 17, 2008, the district court issued an opinion and found that the Village's at-large election system violated the Voting Rights Act of 1965.

**Professor Karen J. van Ingen**, a graduate of University of Rochester and Hofstra University School of Law, joined the Firm as Of Counsel in 2010. Professor van Ingen is currently on the faculty at Brooklyn Law School of Law where she directs the Investor Rights Clinic, teaches a seminar in arbitrating investor rights, and is a member of the steering committee of the Dennis J. Block Center for the Study of International Business Law. She has over 25 years of experience as a litigator, arbitrator and mediator, in commercial, international and large, complex case matters. She began as a litigator in federal and state courts and has both bench and jury trial experience with a focus in institutional and retail securities transactions, class actions, commercial contracts, and partnerships and joint ventures. She is a Special Master for the Appellate Division of the New York



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Supreme Court, and has been an arbitrator and mediator with both private institutions and through court sponsored programs. Her alternative dispute resolution experience has included serving on the Board of the Association for Conflict Resolution of Greater New York, serving as a Financial Industry Regulatory Authority mediator, serving as an American Arbitration Association National Faculty Member, and as a Member of the AAA/U.S.A.Track and Field Doping Grievance Panel. She has also been a member of the Arbitration Committee and the Alternative Dispute Resolution Committees at the New York City Bar.