



New York University
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School of Law

40 Washington Square South, Room 307
New York, New York 10012-1099
Telephone: (212) 998-6172
Fax: (212) 995-4341
Email: burt.neuborne@nyu.edu

Burt Neuborne
Inez Milholland Professor of Civil Liberties
Legal Director, Brennan Center for Justice

March 10, 2008

Hon. Edward R. Korman
United States District Judge
for the Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 1201

Re: In re Holocaust Victim Assets Litigation
96 CV 4849 – Neuborne Supplemental Fee Application:
October 1, 2005-March 10, 2008

Dear Judge Korman:

I enclose a supplemental fee application covering the period from October 1, 2005-March 10, 2008. The application conforms to the criteria approved by Magistrate Judge Orenstein and Judge Block in connection with the litigation over my initial request for fees. Please note that the bulk of the fees were incurred in 2006 in connection with: (a) an inspection, at the Court's request, of the CRT program in Zurich; and (b) opposition to petitions for certiorari filed by Mr. Dubbin and Mr. Swift attacking the settlement in the Supreme Court.

Sincerely yours,

Burt Neuborne

cc: all settlement counsel
Samuel Dubbin, Esq.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IN RE HOLOCAUST VICTIM ASSETS
LITIGATION

Case Nos. 96-CV-4949 (ERK) JO)

Fee application of Burt Neuborne

Consolidated with:

Case Nos. 99-CV-5161
97-CV-0461

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SUPPLEMENTAL FEE APPLICATION OF BURT NEUBORNE
OCTOBER 1, 2005-MARCH 10, 2008

In accordance with the criteria set forth in the Report and Recommendation of Magistrate Judge James Orenstein, dated March 15, 2007, which was accepted and approved by Judge Frederic Block on December 17, 2007, the undersigned hereby requests a supplemental award of attorneys' fees in the amount of \$83,925.00 for 186.5 hours of service, @ \$450 per hour, rendered to the plaintiff-classes as Lead Settlement Counsel from October 1, 2005-March 1, 2008. This application is supported by a Declaration of Burt Neuborne, dated March 10, 2008, which includes, as Exhibit A, a chronological listing of time charges for specified tasks reflecting the undersigned's contemporaneous time records. A copy of this application and the supporting declaration has been posted on the web site maintained by the settlement class, and has been mailed to all interested counsel.

Dated: March 10, 2008

Respectfully submitted,


Burt Neuborne

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
IN RE HOLOCAUST VICTIM ASSETS
LITIGATION

Case No. 96-CV-4949 (ERK) JO)

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DECLARATION OF BURT NEUBORNE
IN SUPPORT OF SUPPLEMENTAL FEE
APPLICATION FOR PERIOD FROM
OCTOBER 1, 2005-MARCH 10, 2008

Burt Neuborne, an attorney duly admitted to practice before the courts of the State of New York, hereby declares under penalty of perjury:

1. On March 15, 2007, Magistrate Judge James Orenstein issued a Report and Recommendation in connection with my application for fees as Lead Settlement Counsel from January 1999-September 30, 2005. On December 17, 2005, Judge Frederic Block issued an Amended Memorandum and Order approving Magistrate Orenstein's Report and Recommendation (hereafter "the Report and Recommendation"). On December 18, 2007, the Court entered judgment in accordance with the December 17, 2007 Amendment memorandum and order. On February 20, 2008, after the expiration of the appeal period, the District Court issued an order directing the signatories of the settlement fund to transfer the fee award to counsel. The funds were transferred the following day.

2. The Report and Recommendation, which awarded hourly fees @\$450 per hour, directed that supplemental fee applications for services rendered after September 30, 2005, be filed promptly upon the resolution of the initial fee application, and at quarterly intervals thereafter. In accordance with Magistrate Judge Orenstein's suggestion, an

application covering the period from October 1, 2005-March 10, 2008 is being filed on March 10, 2008. Future fee applications, if any, will be filed on a quarterly basis.

3. This declaration, dated March 10, 2008, is filed in support of an application for attorneys' fees in connection with 186.5 hours, @\$450 per hour, totaling \$83,925.00, for the period from October 1, 2005-March 10, 2008. The supplemental fee application conforms in all respects to the criteria set forth in Magistrate Judge Orenstein's Report and Recommendation.

4. The detailed time charges, set forth as Exhibit A, reflect contemporaneous time records detailing the activity and the amount of time expended.

5. The tasks described in Exhibit A include a trip to Zurich at the Court's request in January, 2006 to review the operations of the CRT, and successful opposition to three petitions for certiorari in the United States Supreme Court challenging the structure of the settlement and the allocation of funds to members of the Looted Assets class. Opposition to the petitions for certiorari was particularly complex because the initial petition, which was vigorously pursued through the filing of a response to the brief in opposition, was supported by a cross-petition filed by a class counsel, requiring the preparation and filing of several additional responsive documents in the Supreme Court.

6. Copies of this application have been forwarded to all interested counsel, including counsel who appeared in connection with the initial fee application

Dated: March 10, 2008
New York, New York



Burt Neuborne

EXHIBIT A

Time Charges: October 1, 2005-March 10, 2008

Swiss Bank Litigation

2005:

Oct 7.....conf with Paul Berger re allocation of
residual funds.....1.5 hrs

Oct 21.....bkfst with Dov in NY re Swiss claims process
and estimate of residual funds.....1.5 hrs

Nov. 7.....tel conf with Zurich CRT staff (Mary/Dov) re
ins/claims program.....1.5 hrs

Nov. 10.....brief Swiss media re distribution progress.....1 hr

Dec 6.....conf. with Gideon Taylor re allocation of
residual funds.....1.5 hrs

Dec 13.....mtg with Swiss Re and Marc Cohen re
insurance claims program.....2 hrs

2006:

Jan 3.....rehearing denied - notify Court and counsel. . .5 hr

Jan 12.....mtg with Judge Korman re trip to Zurich.....2 hrs

Jan 15.....prep for Zurich trip/review CRT rules and
statements by past employees.....2.5 hrs

Jan 16-18.....visit claim facility in Zurich:

Jan 16.....fly to Zurich/review insurance claims/CRT
Evidence rules; productivity data; employee
cplts.....6 hrs

Jan 17.....interview staff; investigate cplts; perform
a CRT match to understand process.....8 hrs

Jan 18.....suggest modifications; determine need for
additional staff/additional data/coordinate

work with NY claims operation/address
Zurich staff/draft memo for Judge Korman
.....7 hrs

Jan 25.....brief NYLAG on claims program/respond
to cplts about slowness of process.....2 hrs

April 4.....review cert petition in 05-1275.....1 hr

April 5.....continue review of cert petition.....3.5 hrs

April 6.....review file to determine consistency
of petitioners' positions/ begin reading
cases cited in cert petition.....4 hrs

April 9.....complete reading cases in petition.....4.5 hrs

April 10.....outline op cert.....1 hr

April 17.....research re recent cy pres cases.....4.5

April 18.....conference with Hausfeld re cert/allocation.....2 hrs

April 19.....begin drafting op cert/review file for
inconsistencies/read recent law review
comment on class actions.....3.5

April 28.....re-read Amchem/shepardize and read recent
cases citing Amchem and Ortiz.....6 hrs

April 29.....begin drafting brief in opposition in 05-12758.5 hrs

April 30.....complete draft of op cert.....10 hrs

May 1.....edit op cert/confirm factual allegations.....6 hrs

May 2.....review/cite check/edit op cert.....5.5 hrs

May 3.....final edit op cert/proof fax from printer.....2 hrs

May 4.....review cross petition in 05-1416.....3 hrs

May 5.....series of phone conf's with class counsel
re cross petition/assure support.....5.5 hrs

May 6.....research re cross petition/relative rights

of Lead Settlement counsel and settlement counsel
when disagreement arises.....5.5 hrs

May 7.....research re cross petition/ripeness/standing of lawyer
w/o client.....6 hrs

May 8.....begin drafting response to cross petition.....4.5 hrs

May 9.....revise/complete draft response to cross petition.....6.5 hrs

May 10.....verify factual allegations re likelihood of residual
funds/edit response to cross pet.....3 hrs

May 11.....circulate draft response; series of phone conf's
with co-settlement counsel.....5 hrs

May 12.....edit/re-write response to cross petition in light of
comments by co-counsel.....6 hrs

May 15.....complete response to cross pet.....4.5 hrs

May 16.....edit/cite check response.....3.5 hrs

May 17..... proof fax from printer/file.....1 hrs

June 1.....review reply to op cert in 05-12754.5 hrs

June 3.....review cert papers in both 05-1275 and 05-1416.....4 hrs

June 4.....draft supplemental brief in opposition in 05-1275.....5 hrs

June 5.....edit/complete supp brief in opp.....6 hrs

June 6.....file supp brief in opp/proof fax from printer.....1 hr

June 9.....review supp reply in 05-1275.....3 hrs

June 12.....conf with Judge Korman on lack of need for additional
response.....1 hr

June 27.....mtg with Paul Berger/Judge Korman re allocation
of residual funds, if any.....2 hrs

Aug 30.....review invoices/Eisner/Special Masters.....1 hr

2007:

