IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCAH MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
and on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,
MEADOWBROOK CORPORATION, a dissolved
West Virginia Corporation, MATTHIESSEN & HEGELER ZINC
COMPANY, INC., a dissolved Illinois corporation formerly
doing business in West Virginia, and
T.L. DIAMOND & COMPANY, INC., a New York corporation doing
business in West Virginia.

Defendants.

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PETITION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES

Petitioners, Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor; Cochran, Cherry, Givens, Smith, Lane & Taylor; The Law Office of Gary Rich; West & Jones; Kennedy and Madonna; and Hill, Peterson, Carper, Bee & Deitzler, seek the award of attorneys' fees and litigation expenses from the settlement fund created on behalf of the class. This request for fees and expenses is based upon over seven years of effort that required thousands of hours of attorney time and millions of dollars in litigation expenses.

The parties have reached a settlement that will provide the class with relief in a relatively quick manner. As a result of this settlement, programs will be established by a claims

administrator that will implement a community remediation program and a 30 year-long extensive medical monitoring program.

If the parties had not reached this settlement, the Plaintiffs faced many more years of litigation with an uncertain outcome. Moreover, if the Plaintiffs were successful at trial, years of appeals were a certainty. If an appellate court adopted DuPont's trial plan requiring individual trials for every single class member, this litigation had the potential to be the longest (and perhaps the most expensive) in the history of American jurisprudence. In light of the risks, the parties reached a tentative settlement that is now pending approval by the Court.

The settlement fund is comprised of (1) a $70,000,000.00 cash payment and (2) a 30-year medical monitoring program without any monetary cap but with an estimated value by the Petitioners to be between $65,000,000.00 and $90,000,000.00,[1] placing the total value of the recovery made on behalf of the class at $135 million to $160 million. Petitioners are asking for (1) fees in the amount $30,000,000.00, (2) current litigation expenses in the amount of $10,242,865.23, and (3) $150,000.00 in anticipated future litigation expenses with any unused portion reimbursed to the class. The fee requested constitutes 19% to 22% of the total value of the settlement.[2] The fees and costs requested are reasonable in light of the factors considered by courts in similar cases.[3] Petitioners have itemized their litigation expenses in Exhibit A to this

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[1] The original medical monitoring plan was valued at almost $130,000,000.00 and had 40 year duration with routine CT scans. The medical monitoring program agreed to in the settlement has a 30 year duration with CT scans available as diagnostically necessary. The costs of the CT scans from the original program represented approximately 50% of the overall cost. While the reduction in the CT scans will reduce the value of the program, other aspects will be more costly For example, because the population has aged since the entry of the original order, more people will be immediately eligible for more advanced screening such as urinary tract testing.

[2] This Court had previously determined that a contingency fee of 33.3% was reasonable, a determination which was not challenged on appeal.

[3] In *Kay Company, et al. v. Equitable Production Co.*, Judge Goodwin found that a 20% fee was reasonable in a case that lasted four years but was "less complex than other class actions." *Kay Company*, 2010 WL 4501572 at *6 (S.D. W. Va. Nov. 5, 2010). Judge Goodwin stated, "...in this case, the discovery was relatively straightforward-the

Memorandum and detailed their time in Exhibit B. Petitioners will provide testimony supporting their expenses and time at the December 30, 2010, hearing.

This petition is submitted on behalf of the law firms of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor; Cochran, Cherry, Givens, Smith, Lane & Taylor; The Law Office of Gary Rich; West & Jones; Kennedy and Madonna; and Hill, Peterson, Carper, Bee & Deitzler. The grounds for this petition are set forth in this document and in affidavits and other supporting documentation that will be submitted at or before the December 30, 2010, hearing.

A. The Spelter litigation has been a highly complex project.

This case was filed on June 15, 2004, on behalf of current property owners and former and current residents who lived near Defendant E. I. DuPont de Nemours and Company's (DuPont) former zinc smelter in Harrison County, West Virginia. The case was removed to federal court and thereafter remanded back to state court. The second amended complaint alleged negligence and recklessness, negligence per se, public and private nuisance, trespass, strict liability and unjust enrichment and demanded damages including remediation, medical monitoring and punitive damages.

This Court certified the class and appointed petitioners as class counsel. The case was intensively litigated for six years. Hundreds of thousands of pages of documents were produced by Defendants and reviewed by Petitioners. Third party subpoenas were served on multiple entities, resulting in the review of several thousand additional documents. Dozens of fact witnesses were deposed. Dozens of expert witnesses were disclosed and deposed, both before and after class certification. Each of the ten named Plaintiffs gave two depositions. Discovery took place in more than a dozen states across the country.

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parties had only one discovery dispute-and motion practice was not extensive." *Id.* The complexity of and breadth of discovery in this action stand in marked contrast to that in *Kay*.

The parties briefed and argued numerous contested motions, including the motion for class certification and a half a dozen motions to compel. Numerous hearings took place, including a three-day class certification hearing wherein expert and fact testimony and evidence were presented by both Plaintiffs and Defendants, with many of the same aspects of a trial including exhibit lists, witness lists, and per-hearing motions. In addition to the Court's monthly status conference hearings, the parties filed numerous discovery based motions requiring a dozen hearings before the discovery commissioner. DuPont also appealed two trial-level orders to the Appeals Court of the State of West Virginia. While both writs were ultimately denied, both writs also required extensive pleadings by the Petitioners.

The protracted litigation culminated in a five-week jury trial. Trial preparation of a case of this magnitude required thousands of attorney hours. During the trial, class counsel prepared and presented four opening and four closing arguments; prepared and presented live fact and expert testimony; prepared and presented videotaped fact testimony; responded to nearly daily motions offered by the defendant DuPont; offered evidence in the form of documents, graphics, animations, and video presentations. Furthermore, Petitioners prepared cross-examinations for each of the 70+ individual fact witnesses identified by DuPont as well as each of the twelve expert witnesses disclosed by DuPont.

After the judgment was entered, Petitioners responded to numerous post-trial motions filed by DuPont. The Petitioners' post-trial work culminated in defending DuPont's omnibus appeal challenging the jury verdicts in their entirety. Petitioners defense of DuPont's appeal required extensive briefing on multiple issues, including issues of first impression, and oral argument before the West Virginia Court of Appeals.

If this case were to be successfully retried by the Plaintiffs, DuPont has stated its intent to challenge the judgment through the state appellate and federal appellate courts, which would add years to this litigation and potentially deprive the class of any remedy.

B. Petitioners are entitled to an award of attorneys' fees and expenses under the common fund doctrine.

Petitioners ask this Court to award its fees and expenses from the common fund created on behalf of the class. Specifically, Petitioners request fees in the amount of $30,000,000.00 and expenses in the amount of $10,242,865.23. With a settlement ranging in value between $135 million and $160 million, the fee amount would constitute approximately 19% to 22% of the value of total reward attained, which is substantially less than the percentage fee previously approved and much less than those awarded in similar cases. These amounts are reasonable in light of the factors considered by courts in similar cases.

C. Basing an award of attorneys' fees on the amount of the common fund is the accepted practice in this type of litigation.

An attorney is the equitable owner of a fund brought into court through his or her services, to the extent of the reasonable value of such services, and the court may award the attorney reasonable compensation to be paid out of it. *Weigand v. Alliance Supply Co.*, 44 W.Va. 133, 28 S.E. 803 (1897) [Syll. Pt. 8]. This is especially true in the "common fund" cases "where the plaintiff, suing on behalf of himself and others of the same class, discovers or creates a fund which inures to the benefit of all." *Roach v. Wallins Creek Collieries Co.*, 111 W.Va. 1, 160 S.E. 860 (1931) [Syll. Pt. 2]. Among these situations are class actions. "[C]lass actions are a flexible vehicle for correcting wrongs committed by large-scale enterprise upon individual consumers, and a court has wide discretion to award attorneys' fees and costs." *McFoy v. Amerigas, Inc.*,

170 W.Va. 526, 533, 295 S.E.2d 116, 24 (1982). Environmental class actions, in particular, fit into this category by virtue of the significant public benefit they create. *See e.g., Batchelder v. Kerr-McGee Corp.*, 246 F. Supp. 2d 525 (N.D. Miss. 2003) (awarding attorneys' fees in the amount of 33% of the fund recovered in class action seeking damages for groundwater contamination); *In re Combustion, Inc.*, 968 F. Supp. 1116 (W.D. La. 1997) (awarding attorneys' fees in the amount of 36% of the fund recovered in class action seeking damages for pollution from hazardous waste).

Where a common fund has been generated on behalf of a class through a settlement or judgment, class counsel's fees are paid from the common fund. Typically, the percentage method is used to determine the allocation of attorneys' fees from the common fund. *Manual for Complex Litigation* § 14.121 (4th ed. 2004) ("the vast majority of courts of appeals...permit or direct district courts to use the percentage-fee method in common fund case"). Determination of the percentage designated as attorneys' fees is within the sound discretion of the court. In making the determination, the court should be primarily guided by the reasonableness of the fee award. *Fischel v. Equitable Life Assurance Soc'y*, 307 F.3d 997, 1007 (9th Cir. 2002).[4]

D. The factors typically applied to determine reasonableness of fees support Petitioners' request for an award of 19% to 22% ($30,000,000.00).[5]

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[4] *Smith v. Krispy Kreme Doughnut Corporation*, 2007 WL 119157 (M.D.N.C. 2007)("On the question of attorneys fees, the Court finds that in a common fund case such as this, a reasonable fee is normally a percentage of the Class recovery."); *DeLoach v. Phillip Morris Cos.*, No. 00-1235, 2003 WL 23094907, at *3 (M.D.N.C. 2003) (citing with approval *In re Compact Disc Minimum Advertised Price Antitrust Litig.*, 216 F.R.D. 197, 215 (D. Me. 2003); *In re Microstrategy, Inc. Sec. Litig.*, 172 F.Supp.2d 778, 787 (E.D. Va. 2001); *In re Vitamins Antitrust Litig.*, MDL No 1285, 2001 WL 34312839 at *3 (D.D.C. July 16, 2001).

[5] This Court has previously approved a comparable request for attorneys' fees and costs. Specifically the Court determined that "after applying the factors outlined by the Court in Aetna, it is clear that the fees sought are reasonable." February 25, 2008, Order Approving Attorneys' Fees and Costs citing *Aetna Casualty & Surety Co. v. Pitrolo*, 176 W. Va. 190, 342 S.E.2d 156 (1986) ("The West Virginia Supreme Court of Appeals, consistent with the majority of jurisdictions, had laid out the factors to be considered when evaluating the reasonableness of attorneys' fees.")

Courts have applied a number of factors in determining the reasonableness of fees:[6] (1) time and labor expended; (2) the complexity and duration of the litigation; (3) the size of the fund created and the number of persons benefited; (4) skill required to properly perform the legal services; (5) experience, reputation, and ability of the attorneys; (6) the likelihood of recovery; and (7) fee awards in similar cases.

Few, if any, cases have required the sheer amount of resources as those allocated by the Petitioners in prosecuting this case. The combined amount of hours devoted to this case by the Petitioners is approximately 57,000 hours representing the work of more than 16 attorneys. In addition to the labor, Petitioners have incurred almost $10,242,865.23 in litigation expenses. Moreover, the Petitioners anticipate that even more time will be required during the implementation of the settlement.

The record shows that this case was extraordinarily complex, requiring seven years of intense litigation. Legal issues that arise in class certification are some of the most confounding issues in the practice of law, and this case was no exception to that rule. This case was vigorously defended by a team of exceptional defense firms with national reputations built by successfully defending environmental and class action cases. Petitioners briefed numerous legal and factual issues. In response to repeated assertions of privilege and other discovery matters, Petitioners were involved in twelve hearings before the discovery commissioner. As a result of one of the discovery rulings, DuPont filed a petition for writ of prohibition, which was successfully opposed by Petitioners. This case also required Petitioners to understand complex

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[6] *Richardson v. Kentucky Nat. Ins. Co.*, 216 W.Va. 464, 607 S.E.2d 793 (2004); *Barber v. Kimbrell's Inc.*, 577 F.2d 216, 226, n. 28 (4th Cir. 1978); *In re Royal Ahold N.V. Securities & Erisa Litigation*, 461 F.Supp.2d 383 (D. Md. 2006); *In re Cendant Corp. Litig.*, 264 F.3d 201, 255-256 (3rd Cir. 2001), cert denied by *Mark v. California Public Employees' Retirement Sys.* 535 U.S. 929, 122 S.Ct. 1300, 152 L. Ed. 212 (2002); *Central States Southeast and Southwest Areas Health and Welfare Fund v. Merck-Medico Managed Care, L.L.C.*, 2007 WL 3033489 at *16 (2nd Cir. 2007).

scientific and engineering issues concerning chemistry, toxicology, statistics, meteorology, medicine and remediation.

The seven-year duration of this litigation is considered long by almost any measure. Also, the duration is, in the case, indicative of the complexity of the case. Not only does this case have a long history, but, without a settlement, would have a lengthy and uncertain future.

Because of Petitioners' efforts in obtaining this settlement, a $70,000,000.00 cash payment will be generated for the class to be used as set forth in the Memorandum of Understanding. Additionally, more than 8,000 people are entitled to a medical monitoring program without any monetary caps. The medical monitoring is expected to utilize faculty from the West Virginia University as well as employ local health care providers. As a result of the cash settlement and medical monitoring program, a reasonable estimate of the total monetary benefit to the class is $135 million to $160 million. While this settlement represents a compromise from the original verdict amounts, it does remove the uncertainty of a retrial, which had the potential to eliminate any relief for the class, and the years of appeals that would follow.

Very few plaintiffs' firms have the legal and financial resources to take on this type of litigation. Petitioners included attorneys who were skilled trial lawyers with expertise in complex litigation, in particular environmental litigation. Petitioners undertook this litigation on a contingency fee arrangement, which had the significant risk of not only nonpayment of fees, but unrecoverable litigation expenses as well. Numerous uncertainties raised the risk for Petitioners. To name a few: was DuPont legally responsible for the conduct of Graselli; what effect did DuPont's agreement with T. L. Diamond have on DuPont's liability for T.L. Diamond; what evidence existed that supported DuPont's affirmative defense on the statute of limitations; and

were there other sources of contamination. Any of these issues could have substantially affected the chances of a favorable outcome for the Plaintiffs.

The 19% to 22% requested by petitioners is consistent with fees awarded in other class action cases. A survey of recent fee awards in class action cases is presented below.

- 25.5% in *Leach v. E. I. DuPont de Nemours and Company*, Civil Action No.:01-C-608 (Circuit Court of Wood County, W. Va. 2005)
- 33% in *Bynum v. District of Columbia*, 412 F. Supp. 2d 73 (D.D.C. 2006).
- 30% in *Brody v. Hellman*, 167 P.3d 192 (Colo. App. 2007).
- 29% in *In re Educ. Testing Services Praxis Principles of Learning & Teaching, Grades 7-12 Litig.*, 447 F. Supp. 2d 612 (E.D. La. 2006).
- 22.5% in *In re Warafarin Sodium Antitrust Litig.*, 212 F.R.D. 231, 262 (D. Del. 2002).
- 33% in *Godshall v. Franklin Mint Co.*, 2004 W.L. 2745890 (E.D. Pa. 2004).
- 33% in *In re FAO Inc. Sec. Litig.*, 2005 WL 3801469 (E.D. Pa. 2005).
- 30% in *Central States Southeast and Southwest Areas Health and Welfare Fund v. Merck-Medico Managed Care, L.L.C.*, 2007 WL 3033489 at *16 (2nd Cir. 2007)
- 33% in *Hainey, et al. v. Parrott, et al.*, 2007 WL 2752375 (S.D. Ohio 2007).

Conclusion

As Judge Goodwin pointed out in his recent decision, two important issues are involved in awarding attorneys' fees in class action cases: the public perception regarding attorneys' fees and the incentive for attorneys to take on "class actions that vindicate the rights that might otherwise go unprotected." While in the abstract $30,000,000.00 may seem to be a large fee award, very few, if any firms, would undertake this litigation, spend millions on litigation expenses without any certainty for reimbursement, for this amount of fees. The substantial

compromise on attorneys' fees demonstrates the importance of providing a timely remedy to the class. If attorneys are to continue to undertake environmental litigation on behalf of citizens, plaintiff's attorneys must have the prospect of reasonable compensation. In light of the factors to determine reasonableness and of public policy considerations, the amount sought by the Petitioners is more than reasonable.

Petitioners respectfully request that this Court approve a fee of $30,000,000.00, constituting 19% to 22% of the total recovery made on behalf of the class.

Dated: November 30, 2010

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IN THE CIRCUIT COURT OF
HARRISON COUNTY, WEST VIRGINIA

LENORA PERRINE, CAROLYN HOLBERT,
WAUNONA MESSINGER CROUSER,
REBECCAH MORLOCK, ANTHONY BEEZEL,
MARY MONTGOMERY, MARY LUZADER,
TRUMAN R. DESIST, LARRY BEEZEL, and
JOSEPH BRADSHAW, individuals residing in West Virginia,
and on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Case No. 04-C-296-2
(Honorable Thomas A. Bedell)

E.I. DU PONT DE NEMOURS AND COMPANY,
a Delaware corporation doing business in West Virginia,
MEADOWBROOK CORPORATION, a dissolved
West Virginia Corporation, MATTHIESSEN & HEGELER ZINC
COMPANY, INC., a dissolved Illinois corporation formerly
doing business in West Virginia, and
T.L. DIAMOND & COMPANY, INC., a New York corporation doing
business in West Virginia.

Defendants.

_____/

CERTIFICATE OF SERVICE

I, Perry Jones, counsel for Plaintiffs, hereby certify that service of the Petition For Attorneys' Fees and Litigation Expenses has been made upon counsel of record via Federal Express for overnight delivery on this 30th day of November, 2010, addressed as follows:

David B. Thomas, Esq.
Allen, Guthrie & Thomas, PLLC
500 Lee Street East, Suite 800
Charleston, WV 25301
Counsel for Defendant E.I. Du Pont De Nemours and Company

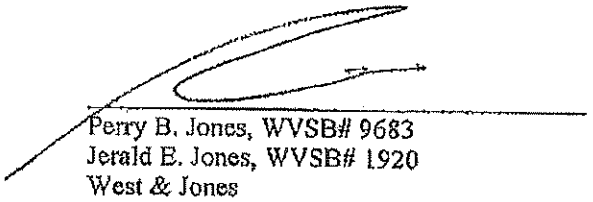

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EXHIBIT A

LITIGATION EXPENSES

Communication Costs Total		**$21,224.01**
CCGS	$541.53	
Levin Papantonio	$20,447.66	
Gary Rich	$0	
West & Jones	$65.26	
Kennedy & Madonna	$0	
Hill, Peterson	$169.56	
Outside Litigation Support Total		**$135,615.66**
CCGS	$90,414.60	
Levin Papantonio	$45,051.06	
Gary Rich	$0	
West & Jones	$150.00	
Kennedy & Madonna	$0	
Hill, Peterson	$0	
Copies Total		**$372,002.10**
CCGS	$130,038.96	
Levin Papantonio	$224,952.00	
Certified Copies	$607.50	
Printing	$4,575.00	
Gary Rich	$0	
West & Jones	$5,485.64	
Kennedy & Madonna	$129.00	
Hill, Peterson	$6,214.00	
Court Reporting Total		**$355,976.33**
CCGS	$253,630.46	
Levin Papantonio	$102,345.87	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	
Court Costs/Filing Fees Total		**$58,012.13**
CCGS	$47,417.05	
Levin Papantonio	$9,296.83	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$660.00	
Hill Peterson	$638.25	

Experts Total		**$5,125,575.88**
CCGS	$2,934,710.92	
Levin Papantonio	$2,190,864.96	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	
Consulting Services Total		**$376,228.78**
CCGS	$12,743.07	
Levin Papantonio	$363,485.71	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	
Investigative Fees Total		**$313,418.84**
CCGS	$1,673.65	
Levin Papantonio	$311,745.19	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	
Miscellaneous Total		**$387,948.74**
CCGS	$245,173.72	
Levin Papantonio	$142,538.82	
Gary Rich	$0	
West & Jones	$107.20	
Kennedy & Madonna	$129.00	
Hill, Peterson	$0	
Photographs Total		**$10,184.43**
CCGS	$1,402.94	
Levin Papantonio	$905.41	
Video production	$7,876.08	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	

Postage Total		**$112,401.98**
CCGS	$30,019.17	
Levin Papantonio	$81,554.42	
Gary Rich	$0	
West & Jones	$566.66	
Kennedy & Madonna	$69.16	
Hill, Peterson	$192.57	
Publication Costs Total		**$98,014.05**
CCGS	$90,973.00	
Levin Papantonio	$4,883.26	
Gary Rich	$2,157.79	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	
Research		**$212,540.21**
GCGS	$91,540.21	
Levin Papantonio	$121,000.00	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill Peterson	$0	
Travel Total		**$1,228,011.95**
CCGS	$419,083.72	
Levin Papantonio	$769,403.92	
Gary Rich	$0	
West & Jones	$1,298.32	
Kennedy & Madonna	$28,334.56	
Hill, Peterson	$9,891.43	
Interest Total		**$1,435,710.14**
CCGS	$871,420.85	
Levin Papantonio	$564,289.29	
Gary Rich	$0	
West & Jones	$0	
Kennedy & Madonna	$0	
Hill, Peterson	$0	

TOTAL **$10,242,865.23**

EXHIBIT B

SPELTER CASE TIME

Hours

Cochran, Cherry, Givens, Smith Total		**11,499.52 Hours**
Attorneys		
J. Farrest Taylor	3,271.93	
Angela J. Mason	2,784.23	
J. Keith Givens	1,355.26	
Joseph D. Lane	1,195.28	
Jake A. Norton	428.90	
Karol L. Fleming	104.25	
McDavid Flowers	5.20	
Staff		
Christian Campbell	558.50	
Lara Eccles	340.50	
Shanna Conrad	283.70	
Judi Cassidy	279.57	
J. Heath Loftin	263.50	
Wesley Fain	150.60	
Alexis Armstrong	145.90	
Ashley Adderhold	117.20	
Haley Starling	75.50	
Cara Morales	60.25	
Connie Melton	51.00	
Jenny Stripling	22.00	
Tessie Steverson	6.25	
Hill, Peterson, Carper, Bee and Deitzler Total		**841 hours**
Attorney		
R. E. Hill	841	
Levin, Papantonio Law Firm Total		**39,320.08 hours**
Attorneys		
Robert Blanchard	250.00	
Steve Medina	6,690.30	
Ned McWilliams	7,420.50	
Mike Papantonio	2,563.80	
Mark Proctor	1,312.00	
Virginia Buchanan	3,728.00	
Amanda Slevinski	1,959.00	
Brian Barr	975.00	

Larry Morris	415.00	
Clay Mitchell	156.00	
Martin Levin	142.00	
Staff		
Nathan Bess	1,429.50	
Karla Shivers	5,114.00	
Rita Lee	1,628.00	
Miranda Phillips	525.00	
Robert Price	567.33	
Carol Moore	5,920.15	
Law Office of Gary W. Rich Total		**2,942.10 hours**
Attorney		
Gary Rich	1,993.00	
Staff		
Denna Pennington	28.5	
Clayton Patterson	12.4	
Other Staff	908.20	
West & Jones Law Firm Total		**1,252.40 hours**
Attorneys		
Jerald E .Jones	94.50	
Perry B. Jones	1,157.90	
Kennedy & Madonna Total		**1,238.20 hours**
Attorneys		
Kevin Madonna	1,028.10	
Robert Kennedy, Jr.	218.50	
Daniel Estrin	191.60	

Total hours: 57,093.30