



who failed to survive the Holocaust, seek the immediate recovery of all identifiable "looted assets," appropriate compensatory and punitive damages, and an order requiring defendant banks to disgorge all profits earned by knowingly participating in the consummation of Nazi Regime's crimes directed against members of the plaintiff-class.

### DEFINITIONS

2. "Nazi Regime" is defined as the National Socialist government of Germany from 1933 through 1945, as more specifically defined in "the Accused Organizations and Individuals" in The Nurnberg Trial, 6 F.R.D. 69 (1946), and persons, organizations or entities which acted in furtherance of the interests of, on behalf of, or under the authority of, that government (including persons, organizations and/or entities of the European Axis countries).

3. "Crimes against humanity" is defined as murder, extermination, enslavement, deportation, and other inhumane acts committed against any civilian population, or persecutions on political, racial or religious grounds, including conspiracy to commit the above acts, and complicity in the commission of such acts, whether or not in violation of the domestic law of the country where perpetrated.

4. "Crimes against peace" is defined as planning, preparing, initiating or waging a war of aggression, or a war in violation of international treaties, agreements or assurances, or participation in a common plan or conspiracy for the accomplishment of any of the foregoing.

5. "Genocide" is defined as undertaking actions, including killing, causing serious bodily injury or permanently impairing mental faculties, subjecting a group to conditions of life intended to cause physical destruction of the group, including conspiracy to

commit the above acts, and complicity in the commission of such acts, whether in time of peace or in time of war, with the specific intent to destroy, in whole or in substantial part, a national, ethnic, racial, or religious group.

6. "War crimes" is defined as violations of the laws or customs of war, including murder, ill-treatment or deportation to slave labor or for any other purpose of civilian population of or in occupied territory, murder or ill-treatment of prisoners of war, killing of hostages, plunder of public or private property, wanton destruction of cities, towns or villages, or devastation not justified by military necessity, including conspiracy to commit the above acts, and complicity in the commission of such acts.

7. "Looted assets" is defined as any and all personal, commercial, real, and/or intangible property, including cash, securities, gold, jewelry, businesses, art masterpieces, equipment and intellectual property, that was illegally taken from the ownership or control of an individual, organization or entity, by means including, but not limited to, theft, forced transfer and exploitation, during the period of 1933 through 1946 by any person, organization or entity acting on behalf of, or in furtherance of the acts of, the Nazi Regime, its officials or related entities, in connection with crimes against humanity, war crimes, crimes against peace, genocide, or any other violations of fundamental human rights.

8. "Cloaked assets" is defined as any and all capital and/or assets owned by, controlled by, or held for the benefit of, any German corporation doing business from 1933-46 and the identity of which was disguised in the bank of any neutral country, which capital or assets include the profits of entities which were engaged in the use of forced or slave labor during this period.

9. "Slave labor" is defined as work done by an individual at the sole discretion and will of another person or entity and for which no, or insubstantial, compensation is paid, often under circumstances that include confinement.

### JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction based on the following:

(a) The named plaintiffs are citizens of the United States, and/or citizens of the state in which they reside, each of whom asserts a claim against one or more of the defendants under federal common law as it incorporates customary international law, as well as New York and Swiss law. Accordingly, subject matter jurisdiction over the claims of the named plaintiffs is conferred on this Court by 28 U.S.C. 1331; 28 U.S.C. 1332; 28 U.S.C. 1367; and principles of ancillary jurisdiction. Venue is appropriate under 28 U.S.C. 1391(a) (3).

(b) The putative "looted assets/slave labor" plaintiff class contains persons who are citizens of the United States; permanent residents of the United States; and citizens of foreign states. Each putative class member asserts claims against one or more of the defendant banks under customary international law. Accordingly, subject matter jurisdiction over the claims of putative class members is conferred on this Court by 28 U.S.C. 1331, and 28 U.S.C. 1367, including principles of ancillary jurisdiction recognized in Supreme Tribe of Ben Hur v. Cauble, 255 U.S. 256 (1921).

### THE PARTIES

#### Plaintiffs

11. Plaintiff Elizabeth Trilling-Grotch is a United States Citizen and a resident of El Cerrito, California. Elizabeth Trilling-Grotch was born to Jewish parents in Bialystok,

Poland, on May 6, 1938, and is presently 58 years old. Mrs. Trilling-Grotch is the only surviving heir of her father Roman Trilling and mother Rose Trilling. To the best of her knowledge, her father was arrested in 1939, detained in a Russian "Gulag" and died. Her mother was confined to the Jewish "ghetto" in Warsaw, Poland, and later died in a concentration camp. Elizabeth was smuggled out of Warsaw by Jania Zilow, a Polish Christian nanny to the Trilling family.

12. Prior to World War II, Roman Trilling, his brother Max, and father Oswald, owned and operated a large textile mill named Oswald Trilling and Son in Bialystok, Poland. Upon information and belief, all of the family's possessions were looted by the Nazi Regime.

13. According to Ms. Zilow's account as relayed to Max Trilling (Roman's brother) and Ida Tumarkin (Rose's sister) and then to Elizabeth, Rose Trilling was forced to live in the Jewish ghetto in Warsaw with Elizabeth beginning in approximately 1940. In the ghetto Rose Trilling was required to do slave labor in a factory manufacturing raincoats. While detained in the ghetto Rose Trilling attempted to escape by providing the factory superintendent with a "note" to withdraw 3,000 gold Francs from a Swiss bank account. The superintendent reported Rose Trilling to the Nazi Regime authorities, after which time she was transported to a concentration camp where she perished.

14. Plaintiff Lillie Ryba (nee Lefkovits) was born in Kosice, Czechoslovakia in 1924. Her father, Samuel Lefkovits, was a teacher and her mother owned a restaurant. In 1944, Ryba and her family were ordered by the occupying Nazi Regime to turn over their valuables, which they did, and to move into a Jewish ghetto. Soon thereafter, Ryba and her family were deported in cattle cars to the Auschwitz concentration camp. At Auschwitz, Ryba was selected to perform field work.

15. Ryba was transferred to a work camp called Usfeld, near Breslau, Germany. From the camp, she and other inmates were marched to a German factory where they produced munitions, supervised by Nazi Regime soldiers. Her health deteriorated significantly during her enslavement.

16. In 1945, Ryba was liberated by the Allied forces. She is now a citizen of the United States and a resident of Brooklyn, New York.

17. Lillie Ryba is a member of a congregation affiliated with the World Council of Orthodox Jewish Communities, Inc.

18. Plaintiff Jacob Friedman is a United States citizen and a resident of Brooklyn, New York. Jacob Friedman was born to Jewish parents January 7, 1921, and is presently 76 years old. He was born in Chust, Czechoslovakia, and grew up in Satu Mare, Romania. Jacob Friedman is the only surviving heir of his father, Marton Friedman, and his mother, Margita Friedman, who were gassed to death in Auschwitz in the spring of 1944.

19. In 1939, Jacob Friedman moved to Budapest and returned to visit his parents in 1940 or 1941, when he was beaten by "police officers." In the spring of 1944, Jacob Friedman's parents, along with the other residents of Satu Mare, were placed in a Jewish "ghetto" by officers of the Nazi Regime and their home and possessions were looted. Soon thereafter, Jacob Friedman's parents, along with the other residents of Satu Mare, were placed on railroad "cattle" cars, taken to Auschwitz and gassed to death.

#### The Putative Plaintiffs' Class

20. The putative plaintiff class (the "looted assets/slave labor" class) consists of targets of Nazi persecution whose property was subject to systematic looting by the Nazi Regime. Pursuant to a policy of utilizing looted property to finance the Nazi Regime war

effort, Nazis accumulated looted assets and periodically transferred the looted assets to defendant banks in return for foreign currency designed to purchase war material. Putative looted assets class members seek return of the looted assets, where possible; compensation for the value of looted assets; appropriate damages, compensatory and punitive, caused by defendants' knowing participation in Nazi war crimes, crimes against peace, and crimes against humanity; and an order directing defendant banks to disgorge all profits earned by knowingly trafficking in looted assets. Class members also seek appropriate compensatory and punitive relief, including disgorgement of all profits, for damages caused by defendant bank's trafficking in the products and profits of Nazi slave labor with knowledge that they were consummating the commission of acts in violation of customary international law.

21. Each member of the plaintiff class suffered financial injury as a direct result of the common plan between representatives of the Nazi Regime, defendant SBA and defendant banks, to knowingly establish and maintain a mechanism and instrumentality to dispose, conceal or deposit assets wrongfully looted from the victims of the Holocaust and the fruits of trafficking in slave labor of the victims of the Holocaust.

### The Defendants

22. Defendants Credit Suisse, Union Bank of Switzerland, and Swiss Bank Corporation are the three largest private banks in Switzerland. Upon information and belief, through merger, acquisition, transfer, or succession, the defendant banks represent at least 75% of the private banking institutions operating in Switzerland from 1933-45. Each defendant bank carries on extensive business operations in the United States, and the State of New York.

23. Defendant Bank For International Settlements ("BIS") is a bank incorporated under the laws of Switzerland with its principal place of business in Basel, Switzerland. BIS has served as an international clearinghouse for reparation payments growing out of World War II.

24. Upon information and belief, as detailed in U.S. Efforts to Recover and Restore Gold and Other Assets Stolen or Hidden by Germany During World War II (1997), a copy of which has been lodged with the Court, Nazi Germany maintained a policy of looting the assets of targets of persecution, collecting the looted assets in central depositories, and transferring the looted assets to defendant banks and their predecessors in return for foreign currency needed to purchase war material. Upon information and belief, defendant banks and their predecessors accepted looted assets with knowledge that the assets had been obtained pursuant to widespread and systematic violation of customary international law, and with full knowledge that the payments for the looted assets would be used to purchase war material for the Nazis. Upon information and belief, defendant banks earned substantial profits from trafficking in looted assets, both in the form of direct commissions, and by reselling the looted assets at a higher price. In addition, defendant banks acted as the knowing principal financial conduit for goods produced by Nazi slave labor throughout Europe. Upon information and belief, defendant banks trafficked in the products and profits of Nazi slave labor with knowledge that the goods or the profits therefrom were produced under conditions that violated customary international law. Upon information and belief, defendant banks earned substantial profits from knowingly trafficking in the products of Nazi slave labor. Defendant banks also knowingly disposed of and concealed looted assets and



slave labor profits deposited in or processed through their banks and earned substantial profits thereon.

25. Defendants Union Bank of Switzerland, Credit Suisse and Swiss Bank Corporation are the leading banks in Switzerland. Upon information and belief, they are successors in interest to at least seventy-five (75%) of the banks that existed during the War.

26. Swiss Bankers Association ("SBA") is the trade association of the Swiss banks and currently has 405 member banks. The SBA serves two primary functions: (1) a traditional trade association; and (2) a "self-regulatory" organization. In its capacity as a trade association, the SBA functions as the domestic and international spokesperson for its members. It also establishes rules and mandates policies to be followed by its member banks. In its capacity as a "self-regulatory" organization, the SBA cooperates closely with the Swiss Federal Banking Commission and the Swiss National Bank in implementing specific policies and procedures for its members to follow. The SBA engaged in the misconduct alleged herein, and continues to engage in such misconduct, individually, and as part of a common scheme among all of the defendants and other co-conspirators, including a substantial number of the SBA's members.

27. Various other persons and entities, the exact identities of which are presently unknown, have participated as co-conspirators with the defendants in the violations alleged herein and have performed acts and made statements in furtherance thereof.

28. As a result of defendants' actions and statements in furtherance of their attempts to conceal the nature and extent of the looted and cloaked assets of which they have possession or in which they transacted, defendants have fraudulently concealed their activities such that plaintiffs' claims could not be ascertained until recently.

## CLASS ALLEGATIONS

29. Fed. R. Civ. P. 23(a)(1). Each of the proposed classes is so numerous that individual joinder of all its members is impracticable under the standards of Fed. R. Civ. P. 23(a)(1). As the factual allegations demonstrate, thousands of persons are members of each class. While the exact number and identities of the class members are unknown at this time, such information can be ascertained through appropriate investigation and discovery.

30. Fed. R. Civ. P. 23(a)(2) and 23(b)(3). There are questions of law and fact that are common with respect to each class, which predominate over any individual issues which may exist as to each class. Common questions of fact and law include the following:

a. Did the defendant banks knowingly or otherwise carry out banking transactions involving Nazi Regime looted assets?

b. Did the defendant banks knowingly or otherwise carry out banking transactions involving Nazi Regime cloaked assets?

c. Did the defendant banks knowingly or otherwise carry out banking transactions that involved capital or assets which included, in whole or in part, profits from Nazi Regime entities who employed slave labor?

d. Were the defendant banks knowingly complicit in the Nazi Regime's activities in furtherance of their illegal war effort and in their commission of violations of international law by the liquidation, depositing, and/or laundering of, looted assets or cloaked assets?

e. Did the defendant banks combine with each other in the Nazi Regime's illegal war effort and in their commission of violations of international law by the depositing, liquidating and/or laundering of looted assets or cloaked assets?

f. Did the defendant banks violate applicable standards of banking conduct?

member. Furthermore, for many, if not most, class members, a class action is the only feasible mechanism that allows them an opportunity for legal redress and justice.

34. This action is also certifiable under the provisions of Fed. R. Civ. P. 23(b)(1) and/or 23(b)(2) because:

a. Inconsistent or varying adjudications with respect to individual members of each class would establish incompatible standards of conduct for the defendants toward that class.

b. Adjudications of individual class members' claims with respect to the defendants would, as a practical matter, be dispositive of the interests of other members not party to the adjudications, and could substantially impair or impede the ability of other class members to protect their interests.

c. With respect to each class, the defendants have acted and refused to act on grounds generally applicable to that class, thereby making equitable relief with respect to that class as a whole appropriate.

#### **THE FACTS UNDERLYING BOTH INDIVIDUAL AND CLASS CLAIMS**

35. As Europe became engulfed in war, the Holocaust began. Nazi Germany engaged in atrocious war crimes, crimes against peace, and crimes against humanity, including the systematic looting of the property of targets of persecution, both as a prelude to their shipment to extermination camps and in the ghoulish aftermath of their mass murder.

36. As the Nazis occupied territory across Europe, they systematically plundered gold, foreign exchange, assets, securities, jewelry, and art treasures. Part of this loot went back to Germany to accounts in the Reichsbank. Much of the looted gold and foreign

exchange made its way to secret accounts in Switzerland. The Swiss Bank Secrecy Act of 1934, designed to protect accounts, was instead used to protect looted assets in accounts of such war criminals as Hitler, Goering, Goebbels, Ribbentrop, and Himmler. It was recognized that "[t]he traditional stock in trade of Swiss Bankers, Notaries, Realtors, Insurance Companies, Attorneys, . . . [was] the concealment of assets." Upon information and belief, approximately 95% of all assets liquidated for the benefit of the Nazi Regime, including looted and cloaked assets, were handled by the Swiss banks.

37. In order to transform looted property into negotiable assets usable for the German war effort, it was necessary to find an international receiver of stolen property willing to fence the looted assets by laundering them into currency that could be used to purchase war material. Defendant banks and their predecessors knowingly assumed that role.

38. The very Swiss banks, including the three defendant banks and their predecessor entities, that had attracted substantial deposits from targets of Nazi persecution by promising them bank secrecy and loyalty, willingly cooperated with the Nazis by knowingly receiving property looted from targets of persecution and laundering it into foreign currency or accepting it for deposit to the credit of the looters.

39. Upon information and belief, defendant banks were paid substantial commissions by the Nazis for knowingly laundering and depositing vast quantities of assets looted from targets of Nazi persecution with full knowledge that the assets had been acquired in violation of customary international law.

40. Nazi Germany attempted to shore up its war machine by the use of slave labor. Increasingly, goods produced by slave labor were sold by the Nazis to generate the

foreign exchange needed to finance the German war effort. Furthermore, the defendant banks provided a safe haven for the deposit or transfer of slave labor profits by Nazi Regime companies using slave labor.

41. The defendant banks and their predecessor entities, having knowingly laundered the looted assets of targets of persecution, then knowingly provided Nazi Germany with foreign currency in return for goods produced by Jewish slave labor and knowingly accepted the profits of slave labor as deposits to the accounts of the companies exploiting such labor.

42. Upon information and belief, defendant banks were paid enormous sums by the Nazis for their complicity in knowingly financing the importation into Switzerland of goods produced by slave labor and for knowingly accepting for deposit and concealing the illegal profits of such labor.

43. Defendant BIS operated as an international clearinghouse for foreign exchange transactions among certain countries, including Nazi Germany and Switzerland. With knowledge that much of Nazi Germany's foreign exchange was looted from the plaintiff class, BIS nonetheless assisted in foreign exchange transactions for Nazi Germany, including transactions for essential war materials. Defendant BIS still holds and retains millions of dollars of assets recaptured from Nazi Germany that derived from property looted from the plaintiff class.

#### CAUSES OF ACTION

44. Defendant banks, by trafficking in and hiding the assets looted from targets of Nazi persecution with knowledge that the assets had been obtained pursuant to systematic

persecution and murder, violated the laws of New York, Switzerland and customary international law enforceable in this Court as federal common law and the law of nations.

45. Defendant banks, by trafficking in goods produced by Nazi slave labor and exchanging and/or hiding the profits of slave labor with knowledge that the goods and profits had been produced under conditions that constituted violations of international law, violated the laws of New York, Switzerland and customary international law enforceable in this Court as federal common law and the law of nations.

WHEREFORE, plaintiffs pray that the Court:

1. Declare that defendant banks, by trafficking, disposing and concealing assets looted from targets of Nazi persecution with knowledge that the assets had been obtained pursuant to systematic persecution and murder, violated the laws of New York, Switzerland and customary international law enforceable in this Court as federal common law and the law of nations;
2. Declare that defendant banks, by trafficking in goods and profits produced by Nazi slave labor with knowledge that the goods and profits had been produced under conditions that constituted violations of international law, violated the laws of New York, Switzerland and customary international law enforceable in this Court as federal common law and the law of nations;
3. Direct defendant banks to make available forthwith all documents or other records needed to determine the identity of looted and slave labor assets received by them;
4. Direct defendant banks to return all identifiable property looted from plaintiffs and received by defendant banks;

g. Did the defendant banks knowingly or intentionally conceal their participation in transactions involving looted assets, cloaked assets, or assets of Nazi Regime entities who employed slave labor?

31. Fed. R. Civ. P. 23(a)(3). Plaintiffs' claims are typical of the claims of the members of each class. Plaintiffs and all members of the classes have been similarly affected by defendant Swiss banks' common course of conduct, and the members of each class have identical claims against the Swiss defendants.

32. Fed. R. Civ. P. 23(a)(4). The class representatives for each class will fairly and adequately protect the interests of the members of that class, and do not have interests which are antagonistic to the interests of other class members. The class representatives have retained attorneys experienced in the prosecution of complex litigation, and class action litigation.

33. Fed. R. Civ. P. 23(b)(3). A class action is superior to other available methods for the fair, efficient and just adjudication of this litigation. Individual joinder of all members of each class is impractical. Even if individual class members had the resources to pursue individual litigation, it would be unduly burdensome to the courts in which the individual litigation would proceed. Individual litigation magnifies the delay and expense to all parties in the court system of resolving the controversies engendered by defendant banks' common course of conduct. The class action device allows a single court to provide the benefits of unitary adjudication, judicial economy, and the fair and equitable handling of all plaintiffs' claims in a single forum. The conduct of this action as a class action conserves the resources of the parties and of the judicial system, and protects the rights of each class

5. Award plaintiffs the value of any identified property looted from plaintiffs and received by defendant banks;

6. Award plaintiffs compensatory and punitive damages arising out of the unlawful behavior of defendant banks in trafficking in disposing and concealing looted assets or the products or profits of slave labor with knowledge that the assets, products or profits were the fruits of Nazi violations of international law;

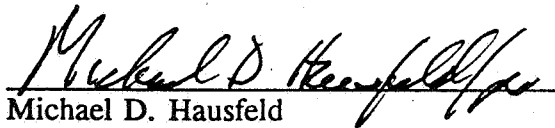
7. Order defendant banks to disgorge any profits earned by trafficking in disposing of or concealing looted assets or the products or profits of slave labor with knowledge that the assets, products or profits were the fruits of Nazi violations of international law; and



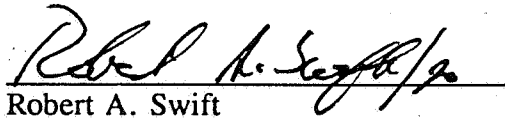
8. Award such other and further relief as shall seem just to the Court.

Dated: July 30, 1997

Respectfully submitted,



Michael D. Hausfeld  
Paul T. Gallagher  
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.  
1100 New York Avenue, NW  
Suite 500, West Tower  
Washington, DC 20005  
(202) 408-4600 phone  
202/ 408-4699 fax



Robert A. Swift  
Kohn, Swift & Graf, P.C.  
1101 Market Street  
Suite 2400  
Philadelphia, PA 19107  
(215) 238-1700 phone  
215/ 238-1968 fax

**CO-CHAIRPERSONS OF PLAINTIFFS' EXECUTIVE COMMITTEE**

Prof. Burt Neubourne  
NYU Law School  
40 Washington Square S.  
New York, NY 10012  
(212) 998-6172 phone  
212/ 995-4341 fax

**Special Counsel to Plaintiffs**

Melvyn I. Weiss  
Joseph Opper  
Daniel Dolcetti  
**Milberg Weiss Bershad  
Hynes & Lerach LLP**  
One Pennsylvania Plaza  
New York, NY 10119-0165  
(212) 594-5300 ph.  
212/ 868-1229 fax

Edward D. Fagan  
**Fagan & Associates**  
One World Trade Center  
Suite 8101  
New York, NY 10048  
(212) 293-1900 phone  
212/ 293-3800 fax

Arnold Levin  
**Levin, Fishbein, Sedran & Berman**  
320 Walnut Street  
Suite 600  
Philadelphia, PA 19106  
(215) 592-1500 ph.  
215/ 592-4663 fax

Robert L. Lieff  
**Lieff, Cabraser, Heimann &  
Bernstein, LLP**  
274 Battery Street  
30th floor  
San Francisco, CA 94111-3339  
(415) 956-1000 ph.  
415/ 956-1008 fax

Irwin Levin  
Richard Shevitz  
**Cohen & Malad, P.C.**  
136 N. Delaware St., Suite 300  
Indianapolis, IN 46206  
(317) 636-6481  
317/ 636-2593

Stephen A. Whinston  
Joel Sweet  
**Berger & Montague, P.C.**  
1622 Locust Street  
Philadelphia, PA 19103  
(215) 875-3000 phone

Mel Urbach  
One Parker Plaza, Suite 1500  
Fort Lee, NJ 07024  
(201) 461-2334 phone

Richard D. Emery  
**KOUNER KURTZ & OUTTEN**  
1740 Broadway, 25th Floor  
New York, NY 10019  
(212) 489-8230 phone  
212/ 489-8340 fax

**PLAINTIFFS' EXECUTIVE COMMITTEE**

**CERTIFICATE OF SERVICE**

I, Daniel J. Dolcetti, do hereby certify that on this 30th day of July, 1997, I caused two copies of the foregoing Amended Complaint to be served by hand upon:

Peter E. Calamari, Esq.  
HERTZOG, CALAMARI & GLEASON  
100 Park Avenue  
New York, New York 10017

A handwritten signature in black ink, appearing to read "Daniel J. Dolcetti", written over a horizontal line.

Daniel J. Dolcetti (DD 7871)

Mark Sarna, Esq.  
15 Engle Street, Suite 100  
Englewood, NJ 07631  
(201) 816-1200 phone  
201/ 816-9815 fax

J. Christopher Jensen  
**Cowan Lebowitz & Latman, P.C.**  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 790-9200 phone  
212/ 790-9300

Dan L. Johnston  
26 Broadway, 21st floor  
New York, NY 10004  
(212) 292-0095 phone  
212/292-0097

William Marks  
**The Marks Law Firm**  
1001 Pennsylvania Ave., NW  
6th floor  
Washington, DC 20004  
(202) 624-7207 phone  
202/ 624-7222 fax

Michael Witt  
**Witti Neumann & Partners**  
Poseartstr. 9, D-81079, Monchen  
Bogenhausen, Germany  
49/89/6 88 55 90  
49/89/6 88 5372 fax

Prof. Richard Weisberg  
**Benjamin Cardozo School of Law**  
55 Fifth Avenue  
New York, NY 10003  
(212) 790-0299 phone  
212/ 790-0205 fax

Richard Appleby  
**Law Offices of Richard Appleby**  
39 Broadway  
New York, NY 10006  
(212) 344-1800  
212/ 809-6174 fax

Harley S. Tropin  
**Kozyak, Tropin & Throckmorton**  
201 S. Biscayne Blvd.  
Miami, FL 33101  
(305) 372-1800

Sam Heins  
Kent Williams  
**Heins, Mills & Olson, P.L.C.**  
700 Northstar East  
608 Second Avenue South  
Minneapolis, MN 55402  
(612) 338-4605 ph.  
612/ 338-4692 fax

Gordon Ball  
**Law Offices of Gordon Ball**  
750 Nations Bank Center  
550 Main Avenue  
Knoxville, TN 37902  
(615) 525-7028 ph.  
615/ 525-4679 fax

Don Barrett  
Pat Barrett, Jr.  
**Barrett Law Offices**  
404 Court Square North  
P.O. Drawer 987  
Lexington, MS 39095  
(601) 834-2376 ph.  
601/ 834-2628 fax

Steven A. Martino  
**Jackson, Taylor & Martino**  
Southtrust Bank Building  
61 St. Joseph Street  
Mobile, AL 36602  
(334) 433-3131 ph.  
334/ 433-4207 fax

Patrick W. Pendley  
**Law Offices of Patrick Pendley**  
58005 Meriam Street  
Plaquemine, LA 70764  
(504) 687-6396 ph.  
504/ 687-6398 fax

Marc E. Kasowitz  
Daniel R. Benson  
**Kasowitz, Benson, Torres &  
Friedman LLP**  
1301 Ave. of the Americas, 36th Floor  
New York, NY 10019  
(212) 506-1700 ph.  
212/ 506-1800 fax

Marvin Blount, Jr.  
**Law Offices of Marvin Blount**  
400 West First Street  
Greenville, NC 27835-0058  
(919) 752-6000 ph.  
919/ 752-2174 fax

Ira Neil Richards  
**Trujillo Rodriguez & Richards, L.L.C.**  
The Penthouse  
226 West Rittenhouse Square  
Philadelphia, PA 19103  
(215) 731-9004  
215/ 731-9044 fax

Martin Mendelsohn  
**Verner, Liipert, Bernhard, McPherson  
and Hand**  
901 15th Street, NW  
Washington, DC 20005  
(202) 371-6000 ph.  
202/ 371-6279 fax

David Shapiro  
222 Grays Inn Road  
London, England WCI 8HB  
011-44-171-837-2222 ph.  
011-44-171-533-2000 fax