

#### When The Stakes Are High

Johnny Johnson Lightfoot Franklin & White (Birmingham, AL)

205.581.0716 | jjohnson@lightfootlaw.com http://www.lightfootlaw.com/alabama-lawyer/john-m-johnson

#### I. Introduction.

In today's legal environment any accident which could potentially cause toxic exposure to a large group of people can result in litigation costing millions of dollars, even more significant damage to company image, and costly diversion of valuable personnel and assets. It has never been more important to develop reliable methods for evaluating cases early not just with respect to liability exposure, but also considering regulatory implications and public relations issues.

Evaluating and then managing a complex case is never an easy process. In the sections below I have provided

some guidelines in three phases to evaluate and manage a mass tort case: 1) Early Case Assessment; 2) Assembling a team to manage the litigation; and 3) Budgeting. In the last section I have provided some citations to published resources that can help in evaluating cases.

#### II. Perform a Systematic Early Case Assessment.

Many factors influence an evaluation of a case's value. I have included the checklist I use to evaluate cases.

(Continued on next page)

#### **Early Case Assessment Form**

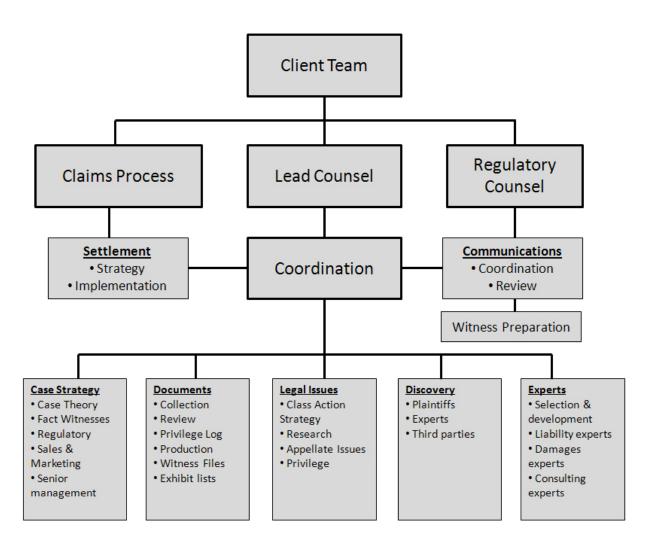
Case N	lame:
Matter	Number:
Date:	
Α.	Parties
B.	Related litigation
C.	Factual Background
D.	Allegations
E.	Defenses
F.	Damages Claimed
G.	Venue Profile
Н.	Judge Profile
l.	Opposing Counsel Profile
J.	Key Client Witnesses
K.	Key Third Party Witnesses
L.	Key Documents
M.	Key Dates
N.	Plaintiffs' Trial Themes
Ο.	Defense Trial Themes
P.	Case Strengths
Q.	Case Weaknesses
R.	Liability Evaluation
S.	Client Issues Related to Litigation
T.	Settlement Value
U.	Strategy

V.

Budget

### III. Assemble the Right Team to Manage the Litigation.

I have included below a diagram that illustrates the type of coordination that can be necessary to manage complex litigation efficiently.



### IV. Understand the Rules For Reporting Loss Contingencies.

Public companies have to be concerned with properly reporting loss contingencies. The accounting standard governing disclosure of loss contingencies is Financial Accounting Standards Board Accounting Standards Codification 450-20 (ASC 450). This has been the subject of considerble controversy in recent years. Under those standards when a loss is deemed to

be both "probable and estimable", the company must record an accrual for the loss and disclose it. There was an effort in 2010 to amend these requirements to require reporting of possible losses unless they were remote. This effort was defeated but further refinement of the requirement is likely.

I have included below a very useful chart that shows when loss contingencies should be disclosed under the current rules.

		1	sonably Estimate tential Loss
		Reasonable Estimate	No Reasonable Estimate
	Probable (Likely to occur)	Accrue.  Disclose as necessary to avoid misleading financial statements.	No accrual.  Disclose contingency and state that a reasonable estimate of possible loss or range of loss cannot be made.
Likelihood That a Loss Will be	Reasonably Possible	No accrual.  Disclose contingency and estimate of possible loss or range of loss.	No accrual.  Disclose contingency and state that a reasonable estimate of possible loss or range of loss cannot be made.
Realized	Remote (Likelihood is slight)	No accrual. No disclosure (limited exceptions, e.g., guarantees)	No accrual.  No disclosure (limited exceptions, e.g., guarantees)

## VI. Published References That Can Provide Guidance For Evaluating Cases.

There have been surprisingly few articles published providing guidance on how to predict case value. However, some are available. As early as 1966 Amjur Trials published some very detailed articles on case evaluation and settlement strategy. These articles were updated in May of 2012 and contain useful outlines and research material. The guidance article for plaintiffs can be found at 4 Am. Jur. Trials 289, and the article for defendants is at 4 A. Jur. Trials 379. A more recent article specifically addressing case evaluation can be found at 53 Am. Jur. Trials 1. In addition to listing factors similar to the ones I outlined above, this article cites some of the databases that are available for comparison in valuing cases.

Thomson Reuters collects and publishes jury verdict information organized from 21 states. These

publications are available at the Westlaw store at Westlaw.com. In addition, standard legal research tools can be used to find verdicts and settlements from other states that can be used as guidelines. Westlaw Next (www.next.westlaw.com) can be used to search jury verdicts and published settlements.

#### VII. You Need to Develop a Budget to Predict and Track Costs.

There is no good software on the market to budget legal costs. Many companies have developed templates using Microsoft Excel. Budgets done on that software are relatively easy to develop but can be cumbersome to adjust. We use a program called Microsoft Project. It is more cumbersome to develop a budget using Project but it provides more visibility of predicted work and is easier to adjust and track once it has been developed.

An example budget is attached.

Task Name	Work	Duration	Start	Finish	Costs - Fees	Costs - Expenses	Costs - Total Resource Names	
Case Wanagement	4,334 hrs	859 days	Tue 9/1/09	Fri 12/14/12	Fri 12/14/12 \$1,757,437.92	\$412,500.00	\$2,169,937.92	
L100 Case Development	2,204 hrs	424 days	Tue 9/1/09	Fri 4/15/11	\$844,487.03	\$293,500.00	\$1,137,987.03	
L110 Fact Investigation	710 hrs	420 days	Tue 9/1/09	Mon 4/11/11	\$305,581.29	\$22,500.00	\$328,081.29	
Preliminary Plant Tour	20 hrs	30 days	Tue 9/15/09	Mon 10/26/09	\$8,380.52	\$500.00	\$8,880.52 John M. Johnson[3%], Brooke Malcolme[3%], Lee Hollis[3%]	ne[3%], Lee Hollis[3%]
Preliminary Factual Investigation	150 hrs	200 days	Tue 9/15/09	Mon 6/21/10	\$62,695.95	\$2,000.00	\$64,695.95 John M. Johnson[3%], Brooke Malcolme[3%], Lee Hollis[3%]	me[3%],Lee Hollis[3%]
Investigate Plant Processes	60 hrs	200 days	Tue 9/15/09	Mon 6/21/10	\$26,327.42	\$0.00	\$26,327.42 John M. Johnson, Brooke Malcolme[0%], Lee Hollis[4%]	%], Lee Hollis[4%]
Interview Former Employee Witnesses	120 hrs	410 days	Tue 9/15/09	Mon 4/11/11	\$52,676.10	\$6,000.00	\$58,676.10 John M. Johnson, Brooke Malcolme[0%], Lee Hollis[4%]	%], Lee Hollis[4%]
Investigate Environmental Compliance History	60 hrs	200 days	Tue 9/15/09	Mon 6/21/10	\$26,315.71	\$4,000.00	\$30,315.71 John M. Johnson[80%], Brooke Malcolme[0%], Lee Hollis[4%]	olme[0%], Lee Hollis[4%]
General Fact Investigation	300 hrs	420 days	Tue 9/1/09	Mon 4/11/11	\$129,185.59	\$10,000.00	\$139,185.59 John M. Johnson, Brooke Malcolme[1%], Lee Hollis[8%]	%], Lee Hollis[8%]
L120 Analysis/Strategy	80 hrs	180 days	Tue 9/1/09	Mon 5/10/10	\$37,700.74	\$2,000.00	\$39,700.74	
Perform Early Case Assessment	20 hrs	30 days	Mon 12/7/09	Fri 1/15/10	\$10,900.00	\$0.00	\$10,900.00 John M. Johnson[8%]	
Perform Risk Analysis	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson	
Retain Experts	60 hrs	180 days	Tue 9/1/09	Mon 5/10/10	\$26,800.74	\$2,000.00	\$28,800.74 John M. Johnson[0%], Lee Hollis[4%]	
L130 Experts/Consultants	440 hrs	311 days	Mon 2/1/10	Mon 4/11/11	\$157,949.82	\$200,000.00	\$357,949.82	
Air Dispersion Expert	40 hrs	136 days	Mon 10/4/10	Mon 4/11/11	\$10,649.19	\$20,000.00	\$30,649.19 John M. Johnson[0%], Brooke Malcolme[4%], Lee Hollis[0%]	me[4%], Lee Hollis[0%]
Toxicologist	80 hrs	136 days	Mon 10/4/10	Mon 4/11/11	\$21,330.99	\$20,000.00	\$41,330.99 John M. Johnson[0%], Brooke Malcolme[7%], Lee Hollis[0%]	me[7%],Lee Hollis[0%]
Real Estate Expert	60 hrs	225 days	Tue 6/1/10	Mon 4/11/11	\$28,666.39	\$10,000.00	\$38,666.39 Lee Hollis[2%], John M. Johnson[1%]	
Landfill Management Expert	80 hrs	311 days	Mon 2/1/10	Mon 4/11/11	\$21,339.13	\$40,000.00	\$61,339.13 John M. Johnson[0%], Brooke Malcolme[3%]	me[3%]
Surface & Groundwater Expert	60 hrs	311 days	Mon 2/1/10	Mon 4/11/11	\$16,004.35	\$60,000.00	\$76,004.35 John M. Johnson[0%], Brooke Malcolme[2%], Lee Hollis[0%;	me[2%],Lee Hollis[0%]
Other Experts	120 hrs	311 days	Mon 2/1/10	Mon 4/11/11	\$59,959.77	\$50,000.00	\$109,959.77 John M. Johnson[3%], Lee Hollis[2%]	
L140 Documents/File Management	420 hrs	410 days	Tue 9/15/09	Mon 4/11/11	\$87,217.88	\$38,000.00	\$125,217.88	
Preliminary Document Collection	60 hrs	180 days	Tue 9/15/09	Mon 5/24/10	\$9,900.00	\$10,000.00	\$19,900.00 Robin Morris[4%]	
Manage Plant Documents	120 hrs	410 days	Tue 9/15/09	Mon 4/11/11	\$26,067.52	\$4,000.00	\$30,067.52 Robin Morris[2%], Brooke Malcolme[2%]	[%]
Gather ADEM Documents	40 hrs	180 days	Tue 9/15/09	Mon 5/24/10	\$8,274.42	\$4,000.00	\$12,274.42 Robin Morris[2%], Brooke Malcolme[1%]	%]
Gather Plaintiff Documents	200 hrs	311 days	Tue 9/15/09	Tue 11/23/10	\$42,975.94	\$20,000.00	\$62,975.94 Robin Morris[4%], Brooke Malcolme[4%]	[%]
L150 Budgeting	6 hrs	40 days	Tue 9/1/09	Mon 10/26/09	\$3,270.00	\$0.00	\$3,270.00	
Prepare Budget	6 hrs	30 days	Tue 9/15/09	Mon 10/26/09	\$3,270.00	\$0.00	\$3,270.00 John M. Johnson[3%]	
Analyze Performance vs. Budget	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00	
L160 Settlement/ADR	48 hrs	120 days	Mon 11/1/10	Fri 4/15/11	\$20,186.67	\$14,000.00	\$34,186.67	
Settlement Conferences	24 hrs	120 days	Mon 11/1/10	Fri 4/15/11	\$10,093.33	\$2,000.00	\$12,093.33 John M. Johnson[1%], Brooke Malcolme[1%]	ne[1%]
Mediation	24 hrs	120 days	Mon 11/1/10	Fri 4/15/11	\$10,093.33	\$12,000.00	\$22,093.33 John M. Johnson[1%], Brooke Malcolme[1%]	me[1%]
L190 Other Assesment/Administrative	500 hrs	410 days	Tue 9/1/09	Mon 3/28/11	\$232,580.65	\$17,000.00	\$249,580.65	
General	200 hrs	410 days	Tue 9/1/09	Mon 3/28/11	\$99,080,65	\$12,000.00	\$111,080.65 John M. Johnson[3%], Lee Hollis[3%]	
Local Counsel Fees	300 hrs	410 days	Tue 9/1/09	Mon 3/28/11	\$133,500.00	\$5,000.00	\$138,500.00 Lee Hollis[9%]	
L200 Pretrial Procedures	400 hrs	420 days	Tue 9/1/09	Mon 4/11/11	\$195,000.00	\$9,000.00	\$204,000.00	
L210 Pleadings	100 hrs	420 days	Tue 9/1/09	Mon 4/11/11	\$48,750.00	\$0.00	\$48,750.00 John M. Johnson[1%], Madeline Haikala[1%]	ala[1%]
L220 Injunctions/Provisional Remedies	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00	
L230 Court Conferences	80 hrs	300 days	Tue 2/16/10	Mon 4/11/11	\$39,000.00	\$4,000.00	\$43,000.00 John M. Johnson[2%], Madeline Haikala[2%]	ala[2%]
L240 Dispositve Motions	140 hrs	246 days	Mon 5/3/10	Mon 4/11/11	\$68,250.00	\$3,000.00	\$71,250.00	
Frye Motions	60 hrs	135 days	Tue 10/5/10	Mon 4/11/11	\$29,250.00	\$1,500.00	\$30,750.00 John M. Johnson[3%], Madeline Haikala[3%]	ala[3%]
Summary Judgment Motions	80 hrs	246 days	Mon 5/3/10	Mon 4/11/11	\$39,000.00	\$1,500.00	\$40,500.00 John M. Johnson[2%], Madeline Haikala[2%]	ala[2%]
L250 Other Motions	80 hrs	300 days	Tue 2/2/10	Mon 3/28/11	\$39,000.00	\$2,000.00	\$41,000.00 John M. Johnson[2%], Madeline Haikala[2%]	ala[2%]
L260 Class Certification & Notice	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00	
L300 Discovery	1,730 hrs	859 days	Tue 9/1/09	Fri 12/14/12	\$717,950.89	\$110,000.00	\$827,950.89	
L310 Written Discovery	40 hrs	200 days	Mon 10/5/09	Fri 7/9/10	\$19,500.00	\$2,000.00	\$21,500.00 John M. Johnson[1%], Madeline Haikala[1%]	ala[1%]
L320 Document Production	360 hrs	420 days	Tue 9/1/09	Mon 4/11/11	\$150,845.09	\$5,000.00	\$155,845.09	
Analyze Plaintiff Documents	180 hrs	266 days	Mon 4/5/10	Mon 4/11/11	\$75,400.26	\$2,500.00	\$77,900.26 John M. Johnson[3%], Brooke Malcolme[3%], Lee Hollis[3%]	me[3%],Lee Hollis[3%]
Analyze Defense Documents	180 hrs	410 days	Tue 9/1/09	Mon 3/28/11	\$75,444.83	\$2,500.00	\$77,944.83 John M. Johnson[2%], Brooke Malcolme[2%], Lee Hollis[2%]	me[2%],Lee Hollis[2%]
L330 Depositions	950 hrs	750 days	Mon 2/1/10	Fri 12/14/12	\$389,706.59	\$84,500.00	\$474,206.59	

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Task Name	Work	Duration	Start	Finish	Costs - Fees	Costs - Expenses	Costs - I otal Resource Names
Minor Plaintiff's	40 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$13,000.00	\$7,500.00	\$20,500,00
Plaintiff 1	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Plaintiff 2	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Plaintiff 3	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Plaintiff 4	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%)
Plaintiff 5	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Property Plaintiffs	40 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$13,000.00	\$7,500.00	\$20,500.00
Plaintiff 1	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Plaintiff 2	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%)
Plaintiff 3	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Plaintiff 4	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Plaintiff 5	8 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$2,600.00	\$1,500.00	\$4,100.00 John M. Johnson[0%], Brooke Malcolme[0%], Robin Morris[0%], Lee Hollis[0%]
Other Plaintiffs' Witnesses	80 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$33,600.00	\$9,000.00	\$42,600.00 John M. Johnson[2%], Brooke Malcolme[2%], Lee Hollis[2%]
State & Regulatory Witnesses	50 hrs	200 days	Mon 2/1/10	Fri 11/5/10	\$20,898.65	\$9,000.00	\$29,898.65 John M. Johnson[1%], Brooke Malcolme[1%], Lee Hollis[1%]
Plaintiffs' Treating Physicians - Group 1	120 hrs	200 days	Mon 5/3/10	Fri 2/4/11	\$50,200.00	\$10,000.00	\$60,200.00 John M. Johnson[3%], Brooke Malcolme[3%], Lee Hollis[3%]
Plaintiffs' Treating Physicians - Other Groups	400 hrs	400 days	Mon 6/6/11	Fri 12/14/12	\$167,333.33	\$20,000.00	\$187,333.33 John M. Johnson[4%], Brooke Malcolme[4%], Lee Hollis[4%]
Prepare & Defend Other Defendant Depositions	120 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$50,115.79	\$15,500.00	\$65,615.79
Co-Defendant 1	8 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$3,240.00	\$1,500.00	\$4,740.00 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[0%]
Co-Defendant 2	8 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$3,240.00	\$1,500.00	\$4,740.00 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[0%]
Co-Defendant 3	8 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$3,240.00	\$1,500.00	\$4,740.00 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[0%]
Co-Defendant 4	8 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$3,240.00	\$1,500.00	\$4,740.00 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[0%]
Co-Defendant 5	8 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$3,240.00	\$1,500.00	\$4,740.00 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[0%]
Co-Defendant 6	40 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$16,957.89	\$4,000.00	\$20,957.89 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[1%]
Co-Defendant 7	40 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$16,957.89	\$4,000.00	\$20,957.89 John M. Johnson[0%], Brooke Malcolme[0%], Lee Hollis[1%]
Miscellaneous Depositions	100 hrs	300 days	Mon 2/1/10	Fri 3/25/11	\$41,558.82	\$6,000.00	\$47,558.82 John M. Johnson[2%], Brooke Malcolme[2%], Lee Hollis[1%]
L340 Expert Discovery	200 hrs	290 days	Mon 9/6/10	Fri 10/14/11	\$83,499.21	\$15,000.00	\$98,499.21
Prepare For And Take Plaintiff's Experts	60 hrs	120 days	Tue 2/1/11	Mon 7/18/11	\$25,078.38	\$6,000.00	\$31,078.38 John M. Johnson[2%], Brooke Malcolme[2%], Lee Hollis[2%]
Prepare For And Defend Defense Experts	40 hrs	120 days	Mon 5/2/11	Fri 10/14/11	\$16,623.53	\$6,000.00	\$22,623.53 John M. Johnson[2%], Brooke Malcolme[2%], Lee Hollis[1%]
Misc. Expert Discovery	100 hrs	200 days	Mon 9/6/10	Fri 6/10/11	\$41,797.30	\$3,000.00	\$44,797.30 John M. Johnson[2%], Brooke Malcolme[2%], Lee Hollis[2%]
L350 Discovery Motions	60 hrs	410 days	Tue 9/15/09	Mon 4/11/11	\$24,800.00	\$500.00	\$25,300.00 John M. Johnson[1%], Madeline Haikala[1%], Brooke Malcolme[1%]
L390 Other Discovery	120 hrs	410 days	Tue 9/15/09	Mon 4/11/11	\$49,600.00	\$3,000.00	\$52,600.00 John M. Johnson[1%], Madeline Haikala[1%], Brooke Malcolme[1%]
L400 Preparation & Trial	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00
L410 Fact Witnesses	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Brooke Malcolme
L420 Experts	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Brooke Malcolme
L430 Written Motions & Submissions	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00
Motions in Limine	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Brooke Malcolme
Jury Instructions	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Brooke Malcolme
Trial Briefs	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Brooke Malcolme
Prepare Directed Verdict Motions	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala
L440 Preparation & Support	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00
Prepare Exhibits	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Robin Morris
Prepare Witness files	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Robin Morris
Mark Depositions	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Madeline Haikala, Robin Morris
L450 Trial & Hearing Attendance	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Brooke Malcolme, Madeline Haikala, Robin Morris, Don Stump
L460 Post-Trial Motions	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Brooke Malcolme, Madeline Haikala
L470 Enforcement	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson
L500 Appeal	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00
L510 Appellate Motions & Submissions	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Brooke Malcolme, Madeline Haikala
L520 Appellate Briefs	0 hrs	0 days	Tue 9/1/09	Tue 9/1/09	\$0.00	\$0.00	\$0.00 John M. Johnson, Brooke Malcolme, Madeline Haikala
530 Oral Argumont	2	O dayle	00/100	00/100	0000	000	CO OO John M Johnson

## Annual Projected Cash Flow ABC Corporation Matter

Case Management	2007	2010	107	7107	202	B 100
L100 Case Development						
L110 Fact Investigation						
Preliminary Plant Tour	\$8,880.52					\$8,880.52
Preliminary Factual Investigation	\$25,231.42	\$39,464.53				\$64,695.95
Investigate Plant Processes	\$10,280.73	\$16,046.69				\$26,327.42
Interview Former Employee Witnesses	\$11,200.18	\$37,322.94	\$10,152.98			\$58,676.10
Investigate Environmental Compliance History	\$11,827.58	\$18,488.13				\$30,315.71
General Fact Investigation	\$29,270.88	\$86,408.85	\$23,505.85			\$139,185.58
L120 Analysis/Strategy						
Perform Early Case Assessment	\$6,903.33	\$3,996.67				\$10,900.00
Perform Risk Analysis						
Retain Experts	\$14,080.36	\$14,720.38				\$28,800.74
L130 Experts/Consultants						
Air Dispersion Expert		\$14,648.51	\$16,000.68			\$30,649.19
Toxicologist		\$19,753.78	\$21,577.21			\$41,330.99
Real Estate Expert		\$26,464.99	\$12,201.39			\$38,666.38
Landfill Management Expert		\$47,335.66	\$14,003.47			\$61,339.13
Surface & Groundwater Expert		\$58,652.87	\$17,351.47			\$76,004.34
Other Experts		\$84,856.41	\$25,103.36			\$109,959.77
L140 Documents/File Management						
Preliminary Document Collection	\$8,623.33	\$11,276.67				\$19,900.00
Manage Plant Documents	\$5,720.16	\$19,140.54	\$5,206.81			\$30,067.51
Gather ADEM Documents	\$5,318.91	\$6,955.50				\$12,274.41
Gather Plaintiff Documents	\$15,794.61	\$47,181.33				\$62,975.94
L150 Budgeting						
Prepare Budget	\$3,270.00					\$3,270.00
Analyze Performance vs. Budget						
L160 Settlement/ADR						
Settlement Conferences		\$4,535.00	\$7,558.33			\$12,093.33
Mediation		\$8,285.00	\$13,808.33			\$22,093.33
L190 Other Assesment/Administrative						
General	\$23,841.70	\$70,712.31	\$16,526.63			\$111,080.64
Local Counsel Fees	\$29,726.83	\$88,167.07	\$20,606.10			\$138,500.00
L200 Pretrial Procedures						
L210 Pleadings	\$10,214.29	\$30,294.64	\$8,241.07			\$48,750.00
L220 Injunctions/Provisional Remedies						
L230 Court Conferences		\$32,823.33	\$10,176.67			\$43,000.00
L240 Dispositve Motions						
Frye Motions		\$14,577.78	\$16,172.22			\$30,750.00

# Quarterly Projected Cash Flow ABC Corporation Matter

Investigation		Qtr 1, 2010	Qtr 2, 2010	Otr 3, 2010	Otr 4, 2010	Otr 1, 2011	Qtr 2, 2011   Qtr 3, 2011	11.07	Total
the members of the state of the	Case Management								
Processes   Sea 417 94   ST 62.07 6   ST 6	L100 Case Development								
Frocesses   Start 174   St 18,76182   Start 174   St 18,76182   Start 174   St 18,76182   Start 174   St 18,76182   St 17,184   St 1,628,17   St 1,638,17	L110 Fact Investigation								
Processes   Proc	Preliminary Plant Tour								
Processes   \$8417.94   \$7,629.75   \$1,908.59   \$9,437.96   \$9,437.96   \$9,151.98   \$9,151.99   \$9,15	Preliminary Factual Investigation	\$20,702.70	\$18,761.82						\$39,464.52
Employee Witnesses   \$9,151.99   \$9,299.99   \$9,437.99   \$9,151.99   \$9,101.99	Investigate Plant Processes	\$8,417.94	\$7,628.75						\$16,046.69
romental Compilance History S9 588 69 887/8944 521,805.51 \$21,805.51 \$21,180.	Interview Former Employee Witnesses	\$9,151.98	\$9,294.98	\$9,437.98	\$9,437.98	\$9,151.98	\$1,001.00		\$47,475.90
restigation         \$21,188.38         \$21,519.44         \$21,850.51         \$21,188.38           ase Assessment         \$3,906.67         \$4,480.11         \$1,646.51         \$21,183.36           ase Assessment         \$1,040.26         \$4,480.11         \$1,646.51         \$14,423.15           actual         \$10,240.26         \$4,480.11         \$11,342.14         \$11,442.14         \$10,588.44           Apert         \$840.97         \$12,820.06         \$13,017.31         \$10,449.88         \$10,449.88           Apert         \$840.97         \$12,820.06         \$13,017.31         \$10,443.14         \$10,493.84           Apert         \$840.97         \$12,820.06         \$13,017.31         \$10,432.16         \$10,449.88           Apert         \$840.97         \$12,820.06         \$13,017.31         \$10,432.16         \$10,449.88           Abrangement         \$10,508.64         \$15,885.15         \$10,432.16         \$10,432.16         \$10,432.16           Accuments         \$10,508.64         \$15,885.15         \$10,401.41         \$10,401.41         \$10,401.41         \$10,701.41           Accuments         \$1,409.17         \$1,400.14         \$1,400.14         \$1,400.14         \$1,400.14         \$1,400.14         \$1,400.14           Accument	Investigate Environmental Compliance History	\$9,698.69	\$8,789.44						\$18,488.13
gy         see Assessment         \$5.996.67         Reseasament         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.67         \$5.996.64         \$5.996.64         \$5.996.64         \$5.996.64         \$5.996.64         \$5.996.64         \$5.996.64         \$5.996.67 <td>General Fact Investigation</td> <td>\$21,188.38</td> <td>\$21,519.44</td> <td>\$21,850.51</td> <td>\$21,850.51</td> <td>\$21,188.38</td> <td>\$2,317.48</td> <td></td> <td>\$109,914.70</td>	General Fact Investigation	\$21,188.38	\$21,519.44	\$21,850.51	\$21,850.51	\$21,188.38	\$2,317.48		\$109,914.70
ase Assessment         \$5,996.67         Bet Assessment         \$5,996.67           lalysis         \$10,240.26         \$4,490.11         \$14,648.51         \$14,423.15           spert         \$10,240.26         \$13,780.74         \$14,648.51         \$14,423.15           ert         \$10,240.26         \$12,820.08         \$13,017.31         \$11,342.14         \$11,342.14           ert         \$10,506.64         \$12,820.08         \$13,017.31         \$10,998.44         \$10,998.44           ert         whangement         \$10,506.64         \$15,806.15         \$16,129.54         \$15,60.37           whangement         \$10,75.56         \$4,201.11         \$16,129.54         \$15,60.77           counnents         \$1,503.47         \$12,366.07         \$15,603.47           counnents         \$1,209.66         \$12,168.17         \$13,364.67         \$15,600.77           counnents         \$1,209.66         \$11,162.17         \$13,364.67         \$1,693.47         \$1,693.47           counnents         \$1,209.66         \$11,162.17         \$13,364.67         \$1,693.47         \$1,693.47         \$1,693.47           counnents         \$1,209.66         \$11,162.17         \$1,309.46         \$1,693.47         \$1,783.47         \$1,783.47         \$1,783.47 <td>L120 Analysis/Strategy</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	L120 Analysis/Strategy								
Stringle	Perform Early Case Assessment	\$3,996.67							\$3,996.67
S10,240.26   S4,480.11   S14,646.51   S14,423.15   S16,508.64   S16,203.44   S22,335.51   S16,129.54   S16,608.77   S16,209.64   S16,209.64   S16,129.54   S16,129.54   S16,609.77   S16,	Perform Risk Analysis								
tents    State	Retain Experts	\$10,240.26	\$4,480.11						\$14,720.37
xpert         \$14,648.51         \$14,423.15           ent         \$37,80.71         \$11,342.14         \$14,423.15           ent         \$10,508.64         \$12,820.08         \$13,017.31         \$10,438.84           ment Expert         \$10,508.64         \$15,885.15         \$16,129.54         \$16,129.54         \$16,129.84           Management         \$15,203.44         \$22,981.94         \$22,335.51         \$22,335.51         \$22,628.38           Management         \$1,605.86         \$4,201.11         \$4,840.14         \$4,840.14         \$4,893.47           ocuments         \$4,893.47         \$4,766.80         \$4,840.14         \$4,840.14         \$4,893.47           ocuments         \$4,334.24         \$22,335.51         \$7,694.81         \$4,893.47           Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81           Acences         \$12,359.62         \$13,162.17         \$13,364.67         \$7,694.81           Acences         \$12,359.62         \$13,362.17         \$1,783.11           Acences         \$12,359.62         \$1,783.12         \$1,783.11           Acences         \$1,7339.42         \$1,510.35         \$1,881.27         \$1,881.27           Aces         \$21,693.73	L130 Experts/Consultants								
ert  Technology  T	Air Dispersion Expert				\$14,648.51	\$14,423.15	\$1,577.53		\$30,649.19
erft         \$3,780.71         \$11,342.14         \$11,342.14         \$10,998.44           ment Expert         \$8,480.97         \$12,820.08         \$13,017.31         \$12,622.84           ndwater Expert         \$10,508.64         \$16,885.15         \$16,129.54         \$16,640.77           Management         \$10,508.64         \$22,981.94         \$23,355.51         \$22,628.38           Management ocuments         \$4,693.47         \$4,766.80         \$4,840.14         \$4,840.14         \$4,693.47           ocuments         \$4,693.47         \$4,766.80         \$4,840.14         \$4,840.14         \$4,693.47           ocuments         \$4,693.47         \$4,766.80         \$4,840.14         \$4,803.47         \$4,693.47           ocuments         \$1,236.08         \$13,162.17         \$13,364.67         \$7,694.81         \$4,693.47           Documents         \$1,239.08         \$13,162.17         \$13,364.67         \$7,694.81         \$16,394.81           Rence vs. Budget         \$1,339.42         \$17,610.35         \$17,881.27         \$16,526.63           Res         \$21,619.51         \$21,610.51         \$21,610.71         \$17,831.17           Res         \$1,517.83         \$1,517.78         \$14,517.78           Res         \$1,517.78 <td>Toxicologist</td> <td></td> <td></td> <td></td> <td>\$19,753.78</td> <td>\$19,449.88</td> <td>\$2,127.33</td> <td></td> <td>\$41,330.99</td>	Toxicologist				\$19,753.78	\$19,449.88	\$2,127.33		\$41,330.99
ment Expert         \$81,480.97         \$12,820.08         \$13,017.31         \$12,622.84           Indwater Expert         \$10,508.64         \$15,885.15         \$16,129.54         \$16,407.77           Indwater Expert         \$10,508.64         \$15,885.15         \$16,129.54         \$16,407.7           Index Expert         \$15,203.44         \$22,981.94         \$23,335.51         \$22,623.86           Index Expert         \$7,075.66         \$4,201.11         \$4,840.14         \$4,840.14         \$4,693.47           Index ocuments         \$4,364.24         \$2,591.27         \$4,840.14         \$4,893.47         \$4,693.47           Index ocuments         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$7,693.47           Index ovs. Budget         \$1,3364.67         \$1,3364.67         \$7,694.81         \$1,783.11           Index ovs. Budget         \$1,7339.42         \$17,610.35         \$17,881.27         \$1,783.11           Index ovs. Budget         \$1,7339.42         \$1,7610.35         \$1,781.27         \$1,783.12           Res         \$21,619.51         \$21,957.32         \$22,295.12         \$22,295.12           Index ovs. Budget         \$1,7339.42         \$1,7610.35         \$1,781.27         \$1,783.12           Res <td>Real Estate Expert</td> <td></td> <td>\$3,780.71</td> <td>\$11,342.14</td> <td>\$11,342.14</td> <td>\$10,998.44</td> <td>\$1,202.95</td> <td></td> <td>\$38,666.38</td>	Real Estate Expert		\$3,780.71	\$11,342.14	\$11,342.14	\$10,998.44	\$1,202.95		\$38,666.38
rodwater Expert         \$10,508.64         \$15,685.15         \$16,129.54         \$15,203.41         \$15,203.44         \$22,981.94         \$23,335.51         \$22,628.38           Management to Management collection         \$7,075.56         \$4,201.11         \$4,840.14         \$4,840.14         \$4,693.47           counments         \$4,693.47         \$2,501.77         \$13,364.67         \$7,694.81         \$4,693.47           counments         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$4,693.47           counments         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$1,783.17           nance vs. Budget         \$12,959.68         \$13,162.17         \$13,364.67         \$1,783.12         \$1,783.11           acec         \$17,339.42         \$17,610.35         \$17,881.27         \$1,783.12         \$16,526.63           ees         \$21,619.51         \$21,957.32         \$22,295.12         \$22,295.12         \$20,606.10           visional Remedies         \$4,586.67         \$9,460.00         \$9,460.00         \$9,477.78           ces         \$9,316.67         \$9,460.00         \$9,173.33	Landfill Management Expert	\$8,480.97	\$12,820.08	\$13,017.31	\$13,017.31	\$12,622.84	\$1,380.62		\$61,339.13
Management         \$12,203.44         \$22,981.94         \$23,335.51         \$22,628.38           ument Collection         \$7,075.56         \$4,201.11         \$4,840.14         \$4,840.14         \$24,693.47           ocuments         \$4,643.44         \$4,840.14         \$4,840.14         \$4,693.47         \$4,693.47           Documents         \$4,643.24         \$2,591.27         \$12,694.81         \$4,693.47         \$4,693.47           Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$4,693.47           Indice vs. Budget         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$1,77,783.11           References         \$12,959.68         \$13,162.17         \$13,364.67         \$1,783.00         \$1,77,83.11           References         \$17,334.2         \$17,610.35         \$17,881.27         \$16,526.63         \$16,526.63           Rees         \$21,619.51         \$21,957.32         \$22,295.12         \$20,606.10         \$1,428.57           visional Remedies         \$4,586.67         \$9,316.77         \$1,4577.78         \$14,577.78	Surface & Groundwater Expert	\$10,508.64	\$15,885.15	\$16,129.54	\$16,129.54	\$15,640.77	\$1,710.71		\$76,004.35
Management         \$7,075.56         \$4,201.11         \$1,040.14         \$4,693.47           ocuments         \$4,693.47         \$1,364.24         \$2,591.27         \$1,364.67         \$4,693.47           ocuments         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$4,693.47           Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$1,693.47           Inance vs. Budget         \$1,626.68         \$13,162.17         \$13,364.67         \$6,493.78         \$1,693.78           Renoces         \$1,733.42         \$17,610.35         \$17,881.27         \$11,783.11         \$1,783.11           Ind/Administrative         \$17,339.42         \$17,610.35         \$17,881.27         \$16,526.63           ees         \$21,619.51         \$22,295.12         \$22,295.12         \$20,606.10           visional Remedies         \$4,586.67         \$9,460.00         \$9,460.00         \$9,460.00           ees         \$9,316.77         \$1,4577.78         \$14,577.78	Other Experts	\$15,203.44	\$22,981.94	\$23,335.51	\$23,335.51	\$22,628.38	\$2,474.98		\$109,959.76
ument Collection         \$7,075.56         \$4,201.11         \$6,840.14         \$4,840.14         \$6,893.47           ocuments         \$4,863.47         \$4,840.14         \$4,840.14         \$4,693.47           ocuments         \$4,842.4         \$2,591.27         \$13,364.67         \$7,694.81         \$6,493.47           Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$6,449.78           Perences         \$17,339.42         \$13,162.17         \$13,364.67         \$6,449.78         \$6,449.78           Perences         \$17,339.42         \$17,610.35         \$17,881.27         \$16,526.63         \$16,526.63           Pees         \$21,619.51         \$21,957.32         \$22,295.12         \$20,606.10         \$1,54,587.78           Pees         \$4,586.67         \$9,316.7         \$1,457.78         \$14,577.78         \$14,577.78	L140 Documents/File Management								
ocuments         \$4,693.47         \$4,766.80         \$4,840.14         \$4,840.14         \$4,693.47           Ocuments         \$4,364.24         \$2,591.27         \$13,364.67         \$7,694.81         \$2,693.47           Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$8,693.47           Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         \$8,693.47           Pance vs. Budget         \$2,233.64         \$13,162.17         \$13,62.13         \$8,493.78         \$8,449.78           Perences         \$17,339.42         \$17,610.35         \$17,881.27         \$16,526.63         \$16,526.63           Pees         \$21,619.51         \$27,957.12         \$20,606.10         \$20,606.10         \$20,606.10           Pees         \$1,428.57         \$1,600.71         \$1,600.71         \$1,600.71         \$1,428.57           Pees         \$4,586.67         \$9,460.00         \$9,460.00         \$9,173.33         \$1,733.33           Pees         \$1,733.94         \$1,733.94         \$1,733.94         \$1,733.34         \$1,733.34	Preliminary Document Collection	\$7,075.56	\$4,201.11						\$11,276.67
ocuments         \$4,364.24         \$2,591.27         \$13,364.67         \$7,694.81         \$7,696.71         \$7,696.71         \$7,696.71         \$7,428.57 <t< td=""><td>Manage Plant Documents</td><td>\$4,693.47</td><td>\$4,766.80</td><td>\$4,840.14</td><td>\$4,840.14</td><td>\$4,693.47</td><td>\$513.35</td><td></td><td>\$24,347.37</td></t<>	Manage Plant Documents	\$4,693.47	\$4,766.80	\$4,840.14	\$4,840.14	\$4,693.47	\$513.35		\$24,347.37
Documents         \$12,959.68         \$13,162.17         \$13,364.67         \$7,694.81         PRIOR METALITY           Pance vs. Budget         References         \$4,535.00         \$6,449.78         \$6,449.78           Perences         \$17,339.42         \$17,610.35         \$17,881.27         \$17,881.27         \$16,526.63           Pees         \$21,619.51         \$21,957.32         \$22,295.12         \$20,606.10         \$20,606.10           Perences         \$1,428.57         \$1,660.71         \$1,428.57         \$1,428.57         \$1,433.33           Pees         \$4,586.67         \$9,460.00         \$9,460.00         \$9,473.33         \$1,437.78           Pees         \$1,660.77         \$1,660.77         \$1,457.778         \$1,457.778	Gather ADEM Documents	\$4,364.24	\$2,591.27						\$6,955.51
rence vs. Budget  rences  renc	Gather Plaintiff Documents	\$12,959.68	\$13,162.17	\$13,364.67	\$7,694.81				\$47,181.33
Ferences St. 256.07 Se., 449.78 Ser., 449.77	L150 Budgeting								
Ference vs. Budget 8 445.35 on 86,449.78 Ferences 84,535.00 86,449.78 Ferences 817,339.42 817,610.35 817,881.27 816,526.63 Fees \$21,619.51 \$21,619.51 \$22,295.12 \$22,295.12 \$20,606.10 Fees \$17,48.57 \$17,48.57 \$17,428.57 Fees \$4,586.67 \$9,316.67 \$9,460.00 \$9,460.00 \$9,477.78 \$14,577.78 \$14,577.78	Prepare Budget								
Ferences Set, 449.78 Ferences Set, 449.78 Ferences Set, 449.78 For an Introduction of the construction of	Analyze Performance vs. Budget								
erences         \$4,535.00         \$6,449.78           ntVAdministrative         \$17,339.42         \$17,610.35         \$17,881.27         \$17,881.27         \$16,526.63           ees         \$21,619.51         \$21,957.32         \$22,295.12         \$22,295.12         \$20,606.10           visional Remedies         \$7,428.57         \$7,544.64         \$7,660.71         \$7,428.57         \$7,428.57           ces         \$4,586.67         \$9,316.67         \$9,460.00         \$9,460.00         \$9,173.33           ons         \$1,4577.78         \$1,4577.78         \$1,4577.78	L160 Settlement/ADR								
res \$1,783.11	Settlement Conferences				\$4,535.00	\$6,449.78	\$1,108.56		\$12,093.34
nnt/Administrative         \$17,339,42         \$17,610,35         \$17,881,27         \$16,526.63           ees         \$21,957,32         \$22,295,12         \$22,295,12         \$20,606,10           visional Remedies         \$7,428.57         \$7,544.64         \$7,660,71         \$7,660,71         \$7,428.57           ces         \$4,586.67         \$9,316.67         \$9,460.00         \$9,460.00         \$9,173.33           ons         \$1,4577.78         \$1,4577.78         \$1,4577.78         \$1,4577.78	Mediation				\$8,285.00	\$11,783.11	\$2,025.22		\$22,093.33
ces         \$17,339,42         \$17,610,35         \$17,881,27         \$16,526,63           ces         \$21,619,51         \$21,957,32         \$22,295,12         \$20,606.10           visional Remedies         \$7,428,57         \$7,544,64         \$7,660,71         \$7,428,57           oes         \$4,586,67         \$9,316,67         \$9,460,00         \$9,460,00         \$9,173,33           ons         \$1,4577,78         \$14,577,78         \$14,577,78         \$14,577,78	L190 Other Assesment/Administrative								
ces         \$21,619.51         \$21,957.32         \$22,295.12         \$22,295.12         \$20,606.10           wisional Remedies         \$7,428.57         \$7,544.64         \$7,660.71         \$7,428.57         \$7,428.57           ces         \$4,586.67         \$9,316.67         \$9,460.00         \$9,460.00         \$9,173.33           ons         \$1,586.67         \$1,586.67         \$1,577.78         \$1,577.78	General	\$17,339.42	\$17,610.35	\$17,881.27	\$17,881.27	\$16,526.63			\$87,238.94
visional Remedies     \$7,428.57     \$7,544.64     \$7,660.71     \$7,428.57       ces     \$4,586.67     \$9,316.67     \$9,460.00     \$9,460.00       ons     \$14,577.78     \$14,577.78	Local Counsel Fees	\$21,619.51	\$21,957.32	\$22,295.12	\$22,295.12	\$20,606.10			\$108,773.17
\$7,428.57 \$7,544.64 \$7,660.71 \$7,660.71 \$7,428.57 \$7,428	L200 Pretrial Procedures								
\$4,586.67 \$9,316.67 \$9,460.00 \$9,460.00 \$9,173.33 \$1,4577.78 \$14,577.78	L210 Pleadings	\$7,428.57	\$7,544.64	\$7,660.71	12'099'2\$	\$7,428.57	\$812.50		\$38,535.71
\$4,586.67 \$9,316.67 \$9,460.00 \$9,460.00 \$9,173.33 \$14,577.78 \$14,577.78	L220 Injunctions/Provisional Remedies								
\$14,577.78	L230 Court Conferences	\$4,586.67	\$9,316.67	\$9,460.00	\$9,460.00	\$9,173.33	\$1,003.33		\$43,000.00
\$14,577.78 \$14,577.78	L240 Dispositve Motions								
	Frye Motions				\$14,577.78	\$14,577.78	\$1,594.44		\$30,750.00

## About Johnny Johnson Partner | Lightfoot Franklin & White | Birmingham, AL

205.581.0716 | jjohnson@lightfootlaw.com http://www.lightfootlaw.com/alabama-lawyer/john-m-johnson

Mr. Johnson is a founding partner of Lightfoot, Franklin & White. He handles business litigation, intellectual property litigation, products liability litigation, and is widely recognized as one of the best and most experienced lawyers in the South handling environmental and toxic tort litigation. He advises clients on such matters as complex mass tort litigation, class actions, pesticide and chemical litigation and individual toxic tort claims in Alabama and throughout the Southeast. Through his mass tort practice, he became one of the pioneers in developing systems for the efficient management of complex litigation. He has lectured frequently on this subject. To see a sample of the system he helped develop for budgeting and tracking litigation costs, click on this link to view Lawsuits as Manageable Projects, Systems for Controlling Costs in Litigation, presented in August of 2003.

Mr. Johnson is the author of a book on toxic torts litigation and speaks frequently at industry and legal seminars regarding environmental issues. Mr. Johnson is a member of the American Bar Association and the Birmingham Bar Association, and has been a member of the Environmental Law Section of the Alabama State Bar since 1989. He is admitted in all Alabama Courts as well as the Fifth Circuit Court of Appeals, the Eleventh Circuit Court of Appeals, and the United States Supreme Court. The Best Lawyers of America publication has recognized Mr. Johnson for his work in commercial and environmental litigation since 2006 and for bet-the-company litigation since 2010. Mr. Johnson has been rated as AV Preeminent by Martindale-Hubbell for more than 20 years.

Mr. Johnson is the President of the Norma Livingston Ovarian Cancer Foundation. It raises funds to support ovarian cancer research and awareness of the risks, symptoms and treatments of the disease.

#### Education

- B.A., University of Virginia, 1979
- J.D., Vanderbilt University Law School, 1982