

# EXHIBIT

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

PLAINTIFF,

**DECLARATION OF  
JONATHAN S. ABADY**

-against-

**10-CV-6005 (RWS)**

CITY OF NEW YORK, ET AL,

DEFENDANT.  
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JONATHAN S. ABADY, an attorney admitted to practice in the State of New York, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

1. I am a partner at Emery Celli Brinckerhoff & Abady LLP. I submit this Declaration in support of the attorneys' fee application submitted in the above-captioned matter by plaintiff's counsel, Jon L. Norinsberg, an attorney whom I have known for several years.

2. I graduated from New York University School of Law in 1990. I am admitted to practice before the Supreme Court of the United States; the United States Court of Appeals, Second Circuit; as well as the Southern, Eastern and Northern Districts of New York.

3. I successfully litigated and argued Gasperini v. The Center for Humanities, 518 U.S. 415 (1996) in the United States Supreme Court, a seminal case in Seventh Amendment jurisprudence, now featured in law school case books throughout the country.

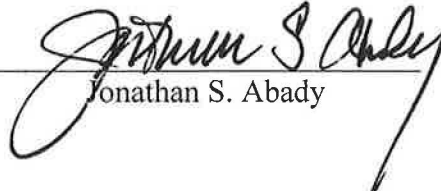
4. In 2008, I was named in The Best Lawyers in America as one of New York's top attorneys in the area of civil rights law. See [www.bestlawyers.com](http://www.bestlawyers.com).

5. In the area of civil rights, I have represented numerous plaintiffs in wrongful death actions, police misconduct cases, First Amendment litigation, and voting rights cases. In 2000, I was a member of the team of lawyers who litigated voting irregularities in Florida in the Bush-Gore Presidential election.

6. Mr. Norinsberg and I worked together for several years on a case entitled Jovanovic v. The City of New York, 04-CV-8437 (PAC). During that time, Mr. Norinsberg proved to be an extremely conscientious and highly-skilled litigator, and always demonstrated the highest degree of professionalism. Accordingly, I fully support Mr. Norinsberg's requested hourly rate of \$600.00 as entirely reasonable, and in line with the prevailing rates for an attorney of his caliber, experience and reputation in the Southern District of New York.

7. Based upon my years of experience as a lawyer practicing in this field in federal courts across the country and at every level, and based upon my observations and interactions with Mr. Norinsberg over the years, I fully support Mr. Norinsberg's hourly rate of \$600.00 for his work in this matter. I think it is more than reasonable and in line with the prevailing market rates for an attorney of his caliber, experience and reputation in the Southern District of New York.

DATED: New York, New York  
December 8, 2015

  
Jonathan S. Abady