

EXHIBIT

“T”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

**Declaration of Irving
Cohen**

-against-

THE CITY OF NEW YORK et al,

10 CV 6005 (RWS)

Defendant.

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Irving Cohen, 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 the principal attorney of the Law Office of Irving Cohen, Attorney-at-Law. I submit this Declaration in support of the attorneys' fee application submitted in the above captioned matter by plaintiffs' counsel, Gerald M. Cohen and Joshua P. Fitch, the partners at Cohen & Fitch LLP, attorneys whom I have known for over one year.

2. I received my law degree from New York University School of Law in 1967 I received an L.L.M from the same law school in 1977. I am a member in good standing of the New York State bar and am admitted to practice in the Second Circuit, the Southern and Eastern Districts of New York, and the Supreme Court of the United States.

3. I started the practice of law in 1969 with a small firm and within a few years, became a partner. In 1981, I began practicing in my own firm specializing in criminal and civil litigation.

4. For about eight years, I taught law at John Jay College, part of the City University.

5. For at least the last twenty years, I have taught law students as part of the NITA program at Cardozo Law School.

6. In my practice, I regularly litigate criminal and civil cases in both federal and state court. I am a member of the Criminal Justice Act ("CJA") panel for the Southern District of New York.

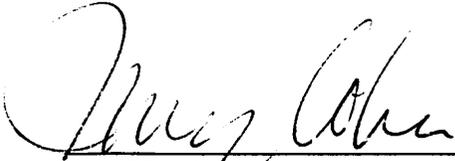
7. Additionally, I regularly litigate federal civil rights actions brought pursuant to 42 U.S.C. § 1983 in federal court. In April last year, I tried a civil rights case in the Southern District of New York which resulted in a hung jury. In the middle of a retrial of that case in January of this year, the case was settled.

8. I have consulted on several matters with both of the partners of Cohen & Fitch LLP on several occasions and have referred civil rights cases to them.

9. I have been impressed by how both Gerald M. Cohen and Joshua P. Fitch conducted themselves. They are well prepared, knowledgeable and a credit to federal civil rights practice. They have always presented themselves with utmost professionalism and have proved to be skilled litigators.

10. Accordingly, based upon my forty-five (45) years of experience as a lawyer practicing in Federal Courts throughout New York, I support both Gerald M. Cohen's and Joshua P. Fitch's requested hourly rates of \$500 as reasonable, and in line with the prevailing rates for an attorney of their caliber, experience and reputation in the Southern District of New York.

DATED: New York, New York
November 16, 2015



IRVING COHEN