

# **EXHIBIT O**

## SUMMARY OF PLAINTIFF’S COUNSEL’S EXPERIENCE AND HOURLY RATES

<b>Attorney</b>	<b>Law School</b>	<b>Admission Year</b>	<b>Average Years of Experience<sup>1</sup> in Federal Civil Rights Litigation During Schoolcraft Case</b>	<b>Full or Part Time in Civil Rights Litigation (other practice areas)</b>	<b>Demanded Rate</b>	<b>Proposed Rate</b>
Jon Norinsberg	Georgetown University	1992	15 (from 1998)	Part (med mal and other tort)	\$600	\$400
Joshua Fitch	New England Law School	2005	5 (from 2008)	Part (criminal defense)	\$500	\$325
Gerald Cohen	Cardozo School of Law	2005	5 (from 2008)	Part (criminal defense)	\$500	\$325
Nat Smith	Brooklyn Law School	1988	18	Part (securities fraud, employment law, pensions)	\$575	\$450
John J. Meehan	New York Law School	2013	0-1	Part (med mal and other tort)	\$575	\$250

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<sup>1</sup> “It is well-established that ‘[e]ach attorney should receive fees based on the average of his or her level of experience over the course of the litigation, as opposed to their current level of experience.’” *Walker v. City of New York*, 2015 U.S. Dist. LEXIS 101253, \*17-18 (E.D.N.Y. July 27, 2015).

Howard Suckle	SUNY Buffalo	1987	No significant civil rights practice <sup>2</sup>	Commercial, tort, defamation, employment	\$575	\$300
John Lenoir <sup>3</sup>	Rutgers (Newark)	1980	No significant private civil rights practice until 2012	Unknown.	\$575	\$300
Richard A. Gilbert	Cardozo	1985	No significant federal court civil rights practice <sup>4</sup>	State court practice (including some police-related personal injury).	\$500	\$300
Peter J. Gleason	CUNY	2004	No significant federal court civil rights practice <sup>5</sup>	Police employment matters; torts	\$500	\$300
Harvey A. Levine	Brooklyn	1961	No significant federal court civil rights practice <sup>6</sup>	State court personal injury (including some	\$600	\$300

<sup>2</sup> Suckle is not named in Law Department automated records as appearing on any law enforcement civil rights matter initiated since 1996. He does appear in two discrimination cases, but his primary practice area appears to be torts. Suckle's PACER records show that *Schoolcraft* is the only apparent police-related litigation among the handful of federal cases listed for Suckle. See Ex. P, PACER Search Results for Smith Team.

<sup>3</sup> John Lenoir's PACER records show only nine cases in which he appeared in federal court. Only two appear on their face to be police civil rights matters; the other one is also with Nat Smith. See Ex. P. Law Department automated records do not show an appearance in any matter adverse to the City other than *Schoolcraft*, although he is known to have appeared in one other matter with Nat Smith. Dec. ¶ 31.

<sup>4</sup> Levine & Gilbert's website does not list civil rights as an area of specialty. See <http://lanman75.fatcow.com/levineandgilbert/1773.html> (accessed March 18, 2016). Richard A. Gilbert (of New York) shows only three federal court cases on PACER, one of which is *Schoolcraft*. Ex. R, PACER Search Results for Gleason Team.

<sup>5</sup> Gleason is listed as counsel on PACER in only five federal cases. See Ex. R. The Law Department's automated records show that he has appeared only in two Labor & Employment matters adverse to the City, and *Schoolcraft*. Dec. ¶ 31.

<sup>6</sup> According to PACER, Levine has appeared in only 10 federal court matters since 2000. See Ex. Q. Of those, four appear to involve a governmental entity. *Id.* Levine & Gilbert's website does not list civil rights as an area of specialty. See <http://lanman75.fatcow.com/levineandgilbert/1773.html> (accessed March 18, 2016).

				police-related personal injury)		
Paralegals					\$125	\$100
Law Student Magdalena Bauza					\$150	\$100