

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to:*

*Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03 Civ. 6978*

**DECLARATION OF ELAINE M. RINALDI**

I, Elaine M. Rinaldi, Esquire, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Elaine M. Rinaldi and I have been a practicing attorney in the Commonwealth of Pennsylvania since 1982. Consistent with the Court's April 24, 2014 Order (ECF No. 2852), I make this Declaration in support of Plaintiffs' Counsel's Application for Attorneys' Fees and Expenses (ECF Nos. 2829-2831, 2841-2842), relative to the October 28, 2013 Memorandum Decision and Report and Recommendation of this Court awarding plaintiffs' attorneys' fees and costs as a result of defendants Al Haramain Islamic Foundation's and Wa'el Jelaidan's non-compliance with the Court's discovery orders (ECF No. 2789).

2. I am the Chair of Strategic Planning and Growth for Cozen O'Connor and a member of the firm's Management Committee, resident in the firm's Philadelphia headquarters. Prior to serving in this role, I focused my practice on handling complex litigation and subrogation matters in more than twenty jurisdictions across ten states.

3. As Chair of Strategic Planning and Growth for Cozen O'Connor, I am responsible for the implementation of the firm's strategic plan and continuing the firm's growth in key

markets nationally and internationally. I am also responsible for the firm's Lateral Integration Program and all partner acquisitions across Cozen O'Connor's global geographic footprint.

4. I have extensive experience screening and selecting lateral candidates in all markets in which our firm practices, including New York.

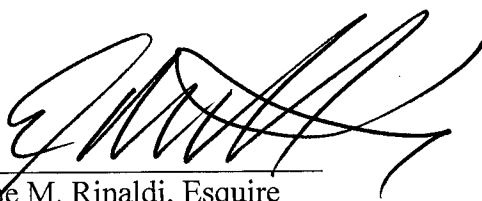
5. Based on these efforts, I am familiar with the billing rates charged by attorneys in this market with similar skill and expertise to the Cozen O'Connor attorneys representing plaintiffs in the above-captioned matter.

6. I am familiar with the hourly rates proposed by the attorneys representing plaintiffs in this matter.

7. The hourly rates for the attorneys representing plaintiffs in this matter are consistent with the standard billing rates charged by attorneys with comparable experience and expertise in the New York area, particularly for cases of similar complexity and scale.

8. I certify that all of the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on May 15, 2014.

  
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Elaine M. Rinaldi, Esquire