

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LENNOX EMMANUEL,
Plaintiff,

**DECLARATION OF ATTORNEY
FRED LICHTMACHER IN SUPPORT
OF PLAINTIFF'S APPLICATION
FOR ATTORNEY'S FEES
CIVIL ACTION NO.: 05 cv 8854 (MGC)**

-against-

PORT AUTHORITY OF NEW YORK AND NEW JERSEY,
PORT AUTHORITY POLICE DEPARTMENT, PORT
AUTHORITY POLICE OFFICERS M. RANDAZZO AND
K. BABISCKO, PORT AUTHORITY POLICE
SERGEANT ENG and UNIDENTIFIED PORT
AUTHORITY POLICE OFFICERS AND EMPLOYEES,

Defendants.

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FRED LICHTMACHER, ESQ., pursuant to 28 U.S.C. §1746, declares under
penalty of perjury as follows:

FRED LICHTMACHER, ESQ., being duly sworn, deposes and says.

1 I am an attorney duly admitted to practice law before the courts of the State of New York
as well as in the Southern, Eastern and Northern district federal courts. I am the attorney for the
plaintiff in the above-entitled matter, and I am familiar with the facts and circumstances
hereinafter contained within, the source of my knowledge being the contents of my file, having
filed this case, conducted discovery and tried this matter to a verdict.

2 This attorney did not charge the plaintiff anything for representing him, nor did I pass
along any of the expenses.

3 No hourly fee was negotiated with my client, who clearly is a mature gentleman of
modest means.

4 Slip 627 which is contested by the defendants is this attorney's effort to locate the witnesses the defendants so adamantly hid throughout this litigation, sometimes contrary to the Court's explicit Orders.

5 This attorney wrote dozens of letters to every address for every individual with the same name as the eight witnesses whose locations defendants kept secret.

6 This attorney generated no excessive hours for this matter and needed every moment I spent on it to present the case I envisioned and prevailed by presenting.

Dated: New York, New York
September 16, 2007

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