

ORIGINAL

United States Courts
Southern District of Texas
FILED
AR NOV 28 2003
Michael N. Milby, Clerk

1 Lawrence W. Schonbrun, Esq. (CSB No. 054519)
2 Law Offices of Lawrence W. Schonbrun
3 86 Eucalyptus Road
4 Berkeley, CA 94705
5 Tel: (510) 547-8070

6 Attorney for Plaintiff Class
7 Member Brian Dabrowski

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF TEXAS
10 HOUSTON DIVISION

11	In re ENRON CORPORATION SECURITIES)	Class Action
12	LITIGATION)	
13) MDL No. 1446
14	<hr/>	
15	This Document Relates To:)	Civil No.: H-01-3624
16	MARK NEWBY, et al.,)	(Consolidated)
17	Plaintiffs,)	
18	vs.)	
19	ENRON CORP., et al.,)	
20	Defendants.)	
21	<hr/>	
22	THE REGENTS OF THE UNIVERSITY OF)	
23	CALIFORNIA, et al., individually)	
24	and on behalf of all others)	
25	similarly situated,)	
26	Plaintiffs,)	
27	vs.)	
28	KENNETH L. LAY, et al.,)	Date: December 11, 2003
	Defendants.)	Time: 2:00 p.m.
		Courtroom: Hon. Melinda Harmon

25 DECLARATION OF LAWRENCE W. SCHONBRUN IN SUPPORT OF
26 OPPOSITION TO LEAD COUNSEL'S APPLICATION FOR PARTIAL
27 REIMBURSEMENT OF EXPENSES AND REQUEST TO RESET THE PRESENTLY
28 SCHEDULED DECEMBER 11, 2003 HEARING ON SAID APPLICATION

1 I, Lawrence W. Schonbrun, declare:

2 1. I represent plaintiff class member/objector Brian
3 Dabrowski.

4 2. I have previously been admitted *pro hac vice* in this
5 Court with regard to the above-referenced matter.

6 3. I am a sole practitioner in private practice in
7 Berkeley, California.

8 4. I am competent to testify about the information set
9 forth herein, and, if called as a witness, would testify of my own
10 personal knowledge, unless otherwise indicated, to the facts set
11 forth herein.
12

13 5. I request the Court's consideration of the special
14 circumstances concerning the form of this objection. I received
15 class counsel's pleading on Friday, November 21, 2003. My
16 secretary Sandra Norris, who is my only secretary, is going to be
17 on vacation from Monday, November 24, 2003 through Friday,
18 November 28, 2003, for the Thanksgiving holiday.
19

20 6. This objection is being typed on Sunday, November 23,
21 2003, because my secretary has consented to come into the office
22 in order to get this pleading filed prior to commencing her
23 vacation. I apologize to the Court for its brevity; however, I
24 believe it spells out the nature of my objection to the form of
25 the expense declaration which class counsel has filed in the
26 instant case.
27
28

1 7. Having reviewed the Milberg Weiss declaration, I would
2 ask this Court to require that the Milberg Weiss law firm be
3 ordered to provide backup data in the form of bills, receipts,
4 cancelled checks, and invoices for the following categories of
5 reimbursement:
6

7 a. Experts'/Consultants'	
8 Investigators' Fees:	\$1,696,097.74
9 Financial Consultants:	808,573.57
10 Investigator and Witness Expenses:	731,308.04
11 Computerized Legal Research:	354,534.90
12 Meals, Hotels and Transportation:	866,156.76
13 Photocopy Expenses	1,489,483.53
14	

15 8. I would like to appear at the hearing on class counsel's
16 expense reimbursement application. I will be out of the country
17 on December 11, 2003, as a result of a long-planned vacation. I
18 will be returning to the United States on Sunday, December 14,
19 2003. If it is possible, I would request that the hearing be
20 rescheduled for a date that is mutually convenient to all
21 participants on either December 16, 17, 18, 19, or 22. If that is
22 not possible, and the Court permits a telephonic appearance, then
23 I would request the opportunity to appear by telephone on December
24 11, 2003.
25

26 9. I believe that the attached memorandum of points and
27 authorities explains why I believe that class counsel's \$4.8
28

1 million expense reimbursement should not be approved based upon
2 the evidentiary record to date.

3 I declare under penalty of perjury that the foregoing is true
4 and correct.
5

6 Executed at Berkeley, California, on the 23rd day of
7 November, 2003.

8
9 Lawrence W. Schonbrun
10 Lawrence W. Schonbrun, Declarant
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28