

I, KEITH F. PARK, declare as follows:

1. I am an attorney duly licensed by the State of California and am admitted to the Bar of this Court *pro hac vice*. I am a member of the firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, counsel to the Lead Plaintiff, The Regents of the University of California. I make this Declaration in support of the Supplemental Submission regarding Lead Counsel's interim expense reimbursement request.

2. On March 8 and 9, 2002, there was a two day meeting of representatives of the Enron Lead Plaintiff, several Milberg Weiss lawyers and staff and outside expert consultants held at the Ritz Carlton in Laguna Niguel, California. More than 35 individuals attended this meeting. The meeting was called to allow the lawyers, staff personnel and experts who were going to be working on the case to meet early on with representatives of the Lead Plaintiff's legal staff and to discuss the key issues presented by the case and allow for planning the prosecution of the case and provide those present with uniform instructions as to the strategies, procedures, policies, etc. that would be followed in the prosecution of the case. Another focus of this meeting was the preparation of the Consolidated Complaint. The \$25,584.33 represents a portion of the charges for the rooms for the 35 plus people, as well as phone and fax charges, conference rooms for meetings and meals and other services.

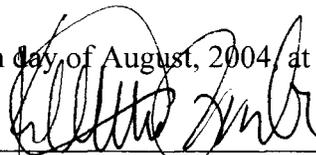
3. The hotel charges for Darnell Donahue (\$1,315.87), Rick Nelson (\$899.46), and Christine Sanders (\$1,451.88), were incurred in New York City for the period November 29, 2001 to December 2, 2001 (Darnell Donahue and Christine Sanders) and November 29, 2001 to December 1, 2001 (Rick Nelson). These were all multiple-night stays and were for the purpose of meeting with representatives of our client, Amalgamated Bank, to collect and verify the Bank's transactional data in Enron securities. What the computer printout provided to the Court shows is the lump sum total hotel charges (including room rate, taxes, faxes, phone, and meals at the hotel) for multiple days. I

have reviewed the available backup to the computer printout and advise the Court that the basic room rate per night for this hotel was \$359.00 per person. In addition, our records show that these three individuals traveled to New York and back via coach class. With respect to charges for other hotel services such as long distance telephone, fax and other charges, it is my experience that hotels charge for these services at very high rates and a hardworking, "captive" guest can make necessary charges that equal or even exceed the basic room charge.

4. In the course of responding to the defendants' 43 motions to dismiss, we brought a few lawyers from our New York office to work with us in San Diego in drafting oppositions. Elizabeth Berney was one of these lawyers. A review of the relevant records shows that Ms. Berney stayed in San Diego from approximately May 10 through May 16, 2002. On May 22, 2003 my partner, Paul Howes, who has a major role working with our class representative/clients and developing witness testimony, flew to Lubbock, Texas to prepare one of the class representatives for his deposition. At the same time, Mr. Howes was able to interview two other potential witnesses. He returned to San Diego on May 23, 2003. I have been advised by Mr. Howes that it was difficult to schedule a time when the two witnesses and client would all be available and that was the reason for the quick turnaround time for this trip.

5. On the few occasions when a private jet service was used to travel, there were multiple persons on board. The amount for which we sought reimbursement was not the total cost of the charter; rather, we sought reimbursement for the equivalent first class rate for each person on the plane.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 13th day of August, 2004, at San Diego, California.



KEITH F. PARK

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DECLARATION OF KEITH F. PARK IN SUPPORT OF SUPPLEMENTAL SUBMISSION REGARDING LEAD COUNSEL'S INTERIM EXPENSE REIMBURSEMENT REQUEST document has been served by sending a copy via electronic mail to serve@ESL3624.com on this 16th day of August, 2004.

I further certify that a copy of the foregoing document has been served via overnight mail on the following parties, who do not accept service by electronic mail on this 16th day of August, 2004..

Carolyn S. Schwartz
United States Trustee, Region 2
33 Whitehall Street, 21st Floor
New York, NY 10004


DEBORAH S. GRANGER