

CONFIRMATION  
COPY

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OF ORIGINAL FILED  
Los Angeles Superior Court

APR 23 2004

John A. Clarke, Executive Officer/Clerk  
By C. Quintana, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

11 BARBRA STREISAND,

12 Plaintiff,

13 vs.

14 KENNETH ADELMAN, an individual;  
15 PICTOPIA.COM, a California corporation;  
LAYER42.NET, a California corporation; and  
16 DOE 1 through DOE 20, inclusive,

17 Defendants.

) Case No. SC077257

) **REPLY IN SUPPORT OF MOTION FOR**  
) **ATTORNEY'S FEES; SUPPLEMENTAL**  
) **DECLARATIONS OF RICHARD**  
) **KENDALL AND CHRISTOPHER**  
) **NEWMAN IN SUPPORT THEREOF**

) Complaint filed: May 20, 2003

) Date: April 30, 2004  
) Time: 8:30 a.m.  
) Dept: H  
) Judge: Hon. Allan J. Goodman

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1 **INTRODUCTION**

2 Having filed a meritless multiple-count lawsuit demanding ten million dollars, Barbra  
3 Streisand now complains that defendants Ken Adelman and Pictopia.com spent 2% of that sum in  
4 attorneys' fees to obtain a dismissal. Given the threat, the amount incurred was reasonable. By  
5 bringing a successful anti-SLAPP motion, Defendants avoided the cost of trial and secured their  
6 right to continue providing information to the public about the California coastline without facing  
7 the dilemma Streisand had sought to impose: either acquiesce in censorship by private parties  
8 who use the coastline but wish to avoid public scrutiny, or face the risk of massive liability.

9 For the motion to succeed, Defendants had to show that Streisand had no reasonable  
10 probability of success on her five causes of action. Defendants had to develop the law and the  
11 facts necessary to demonstrate conclusively that there was *no* question worthy of a jury's  
12 consideration on *any* of the causes of action. The legal issues, such as the scope of the right to  
13 privacy under the California Constitution, required careful research and analysis before such a  
14 demonstration could be made. Ms. Streisand's celebrity and the abundance of information about  
15 her made finding the relevant facts a time consuming enterprise. Meanwhile, this lawsuit  
16 threatened to hobble the California Coastal Records Project by opening the floodgates to claims  
17 from any coastal tenant who objected to having his or her home photographed.

18 Streisand's primary contention is that because she was billed \$45,954 for her counsel's  
19 work on this motion, the \$204,069.50 billed by Irell "for handling the same work" is facially  
20 unreasonable. She is wrong; it was not "the same work." Plaintiff's \$45,954 figure represents  
21 "work performed in connection with the Defendants' anti-SLAPP motion." Opp. at 1. By the time  
22 Defendants filed their anti-SLAPP motion, Plaintiff's counsel had already filed her Complaint and  
23 Motion for Preliminary Injunction, and therefore had already completed their research into the  
24 merits of her causes of action. Plaintiff does not disclose how much she was billed for this work.  
25 Yet in order to support their anti-SLAPP motion, Defendants had to perform their own research  
26 into these substantive issues so as to demonstrate the lack of any probability that Streisand would  
27 succeed on them.

1           Moreover, the very reason the anti-SLAPP statute exists is that it is far easier to level  
2 speech-chilling charges of wrongdoing than it is to defend against them, just as it is easier to make  
3 an assertion than to prove a negative. If it generally cost SLAPP plaintiffs as much to bring such  
4 suits as it costs defendants to respond to them effectively, there would be far less need for the anti-  
5 SLAPP statute and its fee-shifting provisions in the first place.<sup>1</sup> To hold that a plaintiff's costs  
6 determine the parameters for "reasonable" defense expenditures would severely undermine the  
7 deterrent effect the statute is intended to have.

8           Finally, Streisand's counsel and Irell & Manella have different views as to the meaning of  
9 "reasonable" legal efforts and the role of expertise in undertaking them. Streisand's counsel  
10 apparently believes that "reasonableness" is measured by the minimum effort required to generate  
11 a passable document and that "expertise" is the ability to generate such documents as "efficiently"  
12 as possible. Opp. at 9-10. Irell & Manella disagrees with this, as well as the assertion that legal  
13 research and analysis are "of no value" unless ultimately presented in some court filing. Opp. at  
14 11. Rather, legal expertise lies in the ability to identify solutions and assess which arguments  
15 should be presented to the Court and which should not. Such judgment must be informed by  
16 thorough examination of all avenues of research reasonably likely to bear fruit. Finding solutions  
17 to legal problems that other lawyers often miss is something that our clients find worth the time  
18 and cost, and is an eminently reasonable approach to providing true efficiency in the long run.

19           It is therefore spurious to measure the reasonableness of legal efforts simply by dividing  
20 the amount of time or money spent by the number of pages filed. Opp. at 3. To determine  
21 whether the time Irell spent was reasonable, this Court must take into account quality as well as  
22 quantity and must keep in mind the big picture. It is reasonable to invest \$200,000 in order to nip  
23 a claim for ten million in the bud, protect one's First Amendment rights, and guard the public's  
24 right of access to information of vital social importance. This Court's own painstaking efforts in  
25 hearing four days of argument and drafting a 46-page opinion attest to the fact that there was good

26  
27 <sup>1</sup> See Kathryn W. Tate, *California's Anti-SLAPP Legislation: A Summary of and*  
28 *Commentary On Its Operation and Scope*, 33 Loy. L.A. L.Rev. 801, 803-05 (1999-2000) (while  
SLAPPers often expect to lose and are willing to write off litigation expenses as the cost of doing  
business, the enormous damages amounts they claim, coupled with the specter of staggering  
defense costs, serve to intimidate defendants).

1 reason for Irell & Manella to spend as much time as it did on the motion. Having forced  
2 Defendants to bring an anti-SLAPP motion, Streisand cannot be heard now to complain that they  
3 did a better job on it than she is willing to pay for.

4 **ARGUMENT**

5 **I. All Fees Necessitated By The Motion To Strike Are Recoverable**

6 Streisand claims that she is not required to pay all of the fees requested because there is no  
7 recovery for fees on matters that are applicable to "both the anti-SLAPP motion *and* other aspects  
8 of the litigation." Opp. at 5:16-17 (emphasis in original). Beginning with the unsupported  
9 assertion that the purpose of an attorney's fees award under section 425.16(c) is to compensate  
10 defendants for "the *additional* cost of litigating the anti-SLAPP motion," Opp. at 5:19-20  
11 (emphasis added),<sup>2</sup> she concludes that "[i]nsofar, as research would necessarily have to be  
12 performed were the anti-SLAPP motion never filed, Defendants should not be able to recover  
13 those fees." Opp. at 5:20-21. Apparently Plaintiff means by this that the only research efforts  
14 reimbursable under Section 425.16(c) are those focused on the procedural application of the  
15 statute itself, and not on the substantive arguments defendants must win in order to prevail. There  
16 is no basis in law or common sense for this assertion.

17 Streisand attempts to rely on *Lafayette Morehouse Inc. v. Chronicle Publishing Co.*, 39  
18 Cal. App. 4th 1379 (1995), for this argument. The lawsuit in *Lafayette*, however, contained seven  
19 causes of action, only one of which, libel, was subject to the anti-SLAPP motion. *See Lafayette*  
20 *Morehouse Inc. v. Chronicle Publishing Co.*, 37 Cal. App. 4th 855, 861 (1995). Therefore, the  
21 appellate court held that a trial court had erred by awarding fees and costs "for the entire case and  
22 not just the motion to strike." 39 Cal. App. 4th at 1384. That is not the case here, where the *all* of  
23 the causes of action were subject to, and ultimately stricken as a result of, the anti-SLAPP motion.

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25  
26 <sup>2</sup> If bringing an anti-SLAPP motion were an effort that had to be made *in addition* to  
27 defending the SLAPP suit, doing so would multiply rather than mitigate the burden on SLAPP  
28 defendants. The whole point of the anti-SLAPP mechanism is to protect defendants from  
suffering the cost of defending a SLAPP suit, by providing them with an *alternative* to doing so—  
that of having it stricken as meritless early on, and being reimbursed for the cost of doing so. *See*  
*Tate, supra* n.1, at 802-06.

1 A more apposite case is *Metabolife International, Inc. v. Wornick*, 213 F. Supp. 2d 1220,  
2 1223-24 (S.D. Cal. 2002), in which the court granted defendant's application for \$319,687.99 in  
3 attorney fees and costs under section 425.16(c), while discussing and distinguishing *Lafayette*.  
4 The court noted that in contrast to *Lafayette*, "here, the entire lawsuit is subject to the anti-SLAPP  
5 motion because all causes of action against [the defendant] related to free speech and all of the  
6 activity by [the defendant's] attorneys occurred in the context of, and were inextricably intertwined  
7 with, the anti-SLAPP motion." *See also Tuchscher Development Enterprises, Inc. v. San Diego*  
8 *Unified School Dist.*, 106 Cal. App. 4th 1219, 1230-31, 1248-49 (2003) (affirming award under  
9 section 425.16(c) including fees incurred in opposing plaintiff's discovery requests and  
10 reconsideration motion, as the court found them sufficiently connected to the motion to strike).

11 Defendants have not sought to obtain all the fees and costs associated with defending this  
12 suit. Rather, they have redacted out approximately \$80,000 in expenditures for work related  
13 solely to defending the motion for preliminary injunction, settlement talks, or other advice. Apart  
14 from these matters, all work was in support of the anti-SLAPP motion.

15 **II. Irell & Manella's Rates Are Reasonable**

16 Streisand argues that Irell & Manella's rates are too high because they are higher than the  
17 average fee charged by a sample of 164 Southern California firms. This is a comparison of apples  
18 and oranges. At most, 46 of the 164 surveyed firms are from Los Angeles "and related areas."  
19 Roberts Decl., ¶ 4. At most, 27 of them approach Irell in size. *Id.* More importantly, there is no  
20 evidence supporting Streisand's assertion that these firms have "similar experience and similar  
21 expertise in this type of litigation." *See Opp.* at 8:7-8; Roberts Decl. ¶ 6. There is evidence,  
22 however, that Irell & Manella's fees are comparable to those of firms with comparable reputations  
23 in the Los Angeles area. *See Edelman Decl.*, ¶¶ 5-7.

24 Legal services are not a fungible commodity, and there are good reasons why clients are  
25 willing to pay higher than average fees for Irell's services. *See Newman Decl.*, Ex. A at 2  
26 (describing, among other awards received by Irell attorneys, the Litigator of the Year award  
27 presented to Richard Kendall by the Century City Bar Association ). Irell & Manella's attorneys  
28 and other team members, including the summer associates that it recruits exclusively from the top

1 law schools in the country, have above-average credentials.<sup>3</sup> It is entirely reasonable that a person  
2 faced with a lawsuit seeking ten million dollars and an injunction quashing his free speech would  
3 hire the best counsel he can find.

4 **III. Defendants Thoroughly Documented The Time Spent On The Motion**

5 Streisand complains that "non-descript or ambiguous expenses make it impossible to  
6 determine whether the time spent on those activities is reasonable," but continue to fail to identify  
7 any specific entry that is ambiguous. Opp. at 7:13-14. Most of the descriptions on Irell &  
8 Manella's billing report expressly reference the anti-SLAPP motion. See Kendall Decl., Ex. A.  
9 No more specificity is needed to support a fee award. See, e.g., *Sheffer v. Experian Information*  
10 *Solutions, Inc.*, 290 F. Supp. 2d 538, 549 (E.D. Pa. 2003) (entry stating that hours were spent  
11 "researching the fee petition" sufficiently specific to allow court to determine that hours were  
12 reasonable for work performed).

13 As for the handful of entries that do not expressly reference the anti-SLAPP motion, it is  
14 clear from the dates of the work, the identities of timekeepers, and/or the actual work product in  
15 question, that the time was spent on the anti-SLAPP motion.<sup>4</sup> Streisand misrepresents Ms. Seigle  
16 as having admitted that "ambiguities exist" as to the time reflected in these entries. Opp. at 7:6-7.  
17 She did nothing of the kind. Rather, she explained to Streisand's counsel that the inclusion of  
18 these entries was appropriate given the dates and context of the work performed and offered to  
19 investigate any particular entries identified by Streisand's counsel. Seigle Decl., Ex. C. at 1-2.  
20 Streisand's counsel failed to ever identify any particular entry.<sup>5</sup>

21 **IV. Irell & Manella's Staffing Of This Case Was Reasonable And Efficient**

22 Streisand argues that the amount of fees requested is excessive because Irell & Manella  
23 staffed too many people on the case and spent too much time on the case.

24 \_\_\_\_\_  
25 <sup>3</sup> The three summer associates who worked on this case had completed two years of study  
at the law schools of Harvard, Columbia, and UCLA respectively. Kendall Decl. ¶¶ 10, 14.

26 <sup>4</sup> Most such instances consist of various entries by Kelly Yang, which say "Researching"  
or "Writing Memo." See Kendall Decl., Ex. A at 1-2. However, the only research Ms. Yang did  
27 on this case was that described *infra* at 6-7. Supp. Kendall Decl., ¶ 4.

28 <sup>5</sup> In response to the objection raised in the Opposition at 14-15, the billing data with  
regard to drafting the fees motion were not available at the time the motion was filed, but have  
been submitted concurrently herewith. See Supp. Kendall Decl., ¶¶ 2-3 & Ex. A.

1 Contrary to the picture painted by Streisand, seventy-three percent of the time submitted in  
2 connection with this motion was billed by three attorneys: Richard Kendall, Laura Seigle, and  
3 Chris Newman. *See* Defendants' Motion, App. A. (381.1 of 519.35 hours). The other billers had  
4 discrete research assignments that did not require extensive supervision. One senior legal assistant  
5 and four research librarians – whose total hours came to less than \$5,000 – performed the bulk of  
6 the factual research, such as locating references to and photos of Streisand's residence in the  
7 media, discovering the existence of and obtaining documents related to the dispute in Malibu over  
8 Streisand's exploitation of ecologically sensitive coastal land, canvassing fan web sites and star  
9 maps for mention of Streisand's address, and determining whether Streisand's ownership of the  
10 residence in question was ascertainable from publicly available title documents. None of this  
11 work was duplicative, and none of the associates or partners on the case could have performed this  
12 type of research as inexpensively.

13 Similarly, the three summer associates who worked on the motion were each given discrete  
14 research assignments on topics that were reasonably judged to be of potential importance to the  
15 anti-SLAPP motion. Contrary to Plaintiff's assertions, this work was worthwhile. Kelly Yang's  
16 research memo on the anti-paparazzi claim required time and thought precisely because the statute  
17 has *not* been interpreted through caselaw. Ms. Yang was asked to analyze ways in which the  
18 applicability of this statute to the facts at hand might be ruled out as a matter of law—such as the  
19 question whether the California statute was applicable to activities undertaken from a helicopter  
20 flying outside the land perimeter of the state. Supp. Kendall Decl., ¶ 4. Ms. Yang ultimately  
21 determined that these were not viable arguments, and they were therefore not presented to the  
22 Court. This does not make her efforts wasteful or unreasonable.

23 Greg Fayer wrote two memos, one analyzing the burden of proof requirements under  
24 Section 425.16 and one analyzing the purposes recognized as underlying the legal right to  
25 privacy.<sup>6</sup> *Id.*, ¶ 5. Rebecca Dickinson researched the interplay between the common-law and  
26 California Constitutional rights to privacy, as well as the law on "newsworthiness." *Id.*, ¶ 6. Each

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28 <sup>6</sup> In entering his time, Mr. Fayer did not differentiate between research and drafting the  
results of this research, but contrary to Streisand's assertion, Opp. at 12:4-5, his work was indeed  
submitted to the partners on the case. Supp. Kendall Decl. ¶ 6.

1 of these issues was disputed in this case and discussed by the Court in its decision.<sup>7</sup> Using the  
2 results of their research, Chris Newman spent the bulk of his time reading, analyzing, and  
3 reconciling the relevant sources in order to generate a first draft of the motion, performing  
4 additional research as needed in the process of formulating appropriate arguments. *Id.*, ¶ 7.

5 In short, reducing the cost of this anti-SLAPP motion would have required a reduction in  
6 the degrees of thorough research and careful thought that went into presenting it.

7 **V. The Requested Amount Of Fees Is Neither Excessive Nor Unprecedented**

8 Streisand asserts that "No Court Has *Ever* Granted An Award that is Remotely Similar to  
9 the Amount Requested by Defendants." *Opp.* at 12 (emphasis in original). The assertion is false.  
10 As cited in Defendants' motion, the court in *Metabolife Int'l Inc. v. Wornick*, 213 F. Supp. 2d  
11 1220, 1228 (S.D. Cal. 2002), awarded a total of \$318,687.99 under § 425.16(c), including  
12 appellate fees. The court in *Church of Scientology v. Wollersheim*, 42 Cal. App. 4th 628, 658-60  
13 (1996), awarded of \$130,506.71 under § 425.16(c) at rates that reflected market value more than  
14 seven years ago.

15 Instead of acknowledging these cases, Streisand lists a selection of cases in which lower  
16 sums were awarded. *Opp.* at 13-14. Streisand does not explain the context of these cases—  
17 whether the attorneys in those cases were from firms comparable to Irell & Manella, whether the  
18 issues were as complex as those presented here, whether the Court held several days of hearing  
19 and wrote a lengthy decision as here. The one case Streisand discusses at length is inapposite. In  
20 *Dove Audio, Inc. v. Rosenfeld, Meyer & Susman*, 47 Cal. App. 4th 777 (1996), the anti-SLAPP  
21 motion turned entirely on one straightforward issue: applicability of the absolute privilege of Civil  
22 Code section 47(b). *See id.* at 784-85. Once this was held to apply, any probability of success  
23 was conclusively foreclosed. *See id.* This explains the much smaller investment of fees needed to  
24 bring that motion, an investment which appears comparatively even smaller because it reflects the  
25 billing rates prevailing seven years ago.

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<sup>7</sup> See Statement of Decision filed Dec. 31, 2003, at 9, 13-25, 29-30, 40-42.



1 CONCLUSION

2 There is an affrescoed chamber in Rome called the Sala dei Cento Giorni. It is so named  
3 because Vasari boasted to Michelangelo that he and two students had finished the whole room in  
4 one hundred days. Michelangelo's famous response was: "It looks like it." Like Vasari, Plaintiff's  
5 counsel apparently believe that expertise is demonstrated by economy without reference to quality.  
6 Plaintiff's position suggests that the skill behind the Sistine Chapel should be judged, not by the  
7 difficulty of the work or the quality of the final result, but by the shocking absurdity of taking *four*  
8 *whole years* to plan and execute a *single room*, when clearly the paint could be spread on the walls  
9 in a matter of days. To do something well means spending more effort than the bare minimum  
10 needed to get the walls covered. This is true not only of the grand work of great artists, but also of  
11 the daily grind of advocacy in our nation's courts. It is especially true in lawsuits that address  
12 important issues. The California Coastal Records Project is a public service having immense  
13 value to government, academia, and the citizenry at large, and protecting it from Streisand's  
14 attempt at censorship was worth the utmost of effort. For these reasons, and all those stated  
15 earlier, Defendants respectfully request that this Court grant them full reimbursement of the  
16 \$204,069.50 incurred in bringing the motion to strike, and the additional \$15,000 incurred in  
17 bringing the present motion.

18 Dated: April 23, 2004

IRELL & MANELLA LLP  
Richard B. Kendall  
Laura A. Seigle  
Christopher M. Newman

21  
22  
23 By: 

Richard B. Kendall  
Attorneys for Defendants  
Kenneth Adelman and Pictopia.com



1 a matter of law, such as the question whether the California statute was applicable to activities  
2 undertaken from a helicopter flying outside the land perimeter of the state. Ms. Yang prepared a  
3 memo on these theories, which concluded that they were not viable defenses. As this was the only  
4 work Ms. Yang performed in connection with this case, there is no uncertainty as to the fact that  
5 her time entries were related to the motion to strike.

6 6. Although his time entries did not differentiate between research and writing, Greg  
7 Fayer wrote two memos that were circulated to the team working on this case. One analyzed the  
8 burden of proof requirements under Section 425.16. The other examined key judicial and  
9 academic expositions of the rationales underlying the legal right to privacy, and considered their  
10 implications in the context of this case.

11 7. Rebecca Dickinson collected and summarized cases shedding light on the interplay  
12 between the common-law and California Constitutional rights to privacy, as well as cases  
13 addressing the "newsworthiness" for First Amendment purposes of personal information about  
14 persons in the public eye.

15 8. Chris Newman performed the task of creating a first draft of the anti-SLAPP  
16 motion, which included review of the factual and legal research performed by others, additional  
17 research based on his own ideas regarding how best to argue the case, and distillation of all this  
18 material into a manageable and coherent argument. His draft then became the basis for further  
19 review and revision by Laura Seigle and myself.

20 Executed on April 23, 2004, at Los Angeles, California.

21 I declare under penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct.

23  
24   
25 \_\_\_\_\_  
26 Richard Kendall  
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# **EXHIBIT "A"**

**Client Detailed Time And Expense Report**  
 by Client ID/Matter No

Time Date Range: 2/20/2004 to 3/4/2004 Disb Date Range: 2/20/2004 to 3/4/2004

Client: 158166 Adelman, Kenneth A. Bill Atty: KNDL Kendall, Richard B. Client Last Payment: 4/5/2004  
 Matter: 0002 Streisand Resp Atty: KNDL Kendall, Richard B. Matter Last Billed: 4/5/2004

**Detailed Fees Section for Matter: Streisand**

Atty	Date	Status	Description	Bill Hrs	Bill Rate	Bill Amt
CNEW	2/20/2004	B	Preparation of declarations for fee motion.	4.75	395.00	1,876.25
SCHG	2/20/2004	B	Edit Atty Fee motion.	0.75	295.00	221.25
SGLE	2/20/2004	B	Tc with Newman re declarations; cf with Newman re same.	0.25	520.00	130.00
SGLE	2/22/2004	B	Review and revise fees motion; review supporting declarations; e-mail re same.	1.00	520.00	520.00
CNEW	2/23/2004	B	Preparation of declarations for fee motion.	2.75	395.00	1,086.25
SGLE	2/23/2004	B	E-mails re motion and declarations.	0.25	520.00	130.00
SCHG	2/25/2004	B	Check case for atty fees motion (shifting of burden of proof in federal case law versus California case law).	1.00	295.00	295.00
SGLE	2/25/2004	B	Revise fees motion.	4.00	520.00	2,080.00
SCHG	2/26/2004	B	Review edited attys fee motion.	0.50	295.00	147.50
SGLE	2/26/2004	B	Revise motion; review court file re work performed on anti-SLAPP motion; e-mails to Chung re questions on motion.	4.00	520.00	2,080.00
SCHG	2/27/2004	B	Edit Attys Fee motion.	2.75	295.00	811.25
SGLE	3/1/2004	P	Review and revise Edelman declaration; review motion to tax costs.	0.50	520.00	260.00
SGLE	3/1/2004	P	Revise fees motion.	0.25	520.00	130.00
CNEW	3/2/2004	P	Fees motion.	2.25	395.00	888.75
SGLE	3/2/2004	P	E-mails and tcs re finalizing motion and declarations for filing.	0.25	520.00	130.00
CNEW	3/3/2004	P	Final revisions of fees motion and declarations, preparation for filing.	4.25	395.00	1,678.75
SCHG	3/3/2004	P	Get hearing date for atty's fee motion.	0.25	295.00	73.75
SGLE	3/3/2004	P	Revise fees motion and declaration; TC Newman re changes to motion; emails re hearing date.	6.50	520.00	3,380.00

Fees Total

15,918.75



# **EXHIBIT "A"**

# IRELL & MANELLA LLP



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Practice Areas

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## 41 Irell Attorneys, In 16 Practice Areas, Named Super Lawyers In *Los Angeles Magazine* Survey

Forty-one Irell & Manella attorneys were named as Southern California "Super Lawyers" in a 2004 survey by *Los Angeles Magazine*. This recognition was given to I&M attorneys in sixteen different practice areas:

- appellate
- entertainment
- bankruptcy
- business
- business litigation
- corporate finance
- entertainment litigation
- environment and land use
- estate planning
- intellectual property
- intellectual property litigation
- labor and employment
- real estate
- securities litigation
- tax
- white collar criminal defense

Our Morgan Chu was the top vote getter in Southern California in this survey of 65,000 Los Angeles and Orange County lawyers.

Our Roy Geiger was named one of the top fifty lawyers in Orange County.

Our James Adler and Paul Frimmer were named as two of the top one hundred lawyers in Los Angeles County.

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**I&M Attorneys Lead Professional And Charitable Organizations**



Six Irell & Manella attorneys were recently named as president (or chair) of professional or community organizations in which they are involved.

- Henry Shields was reelected as President of the American Cinematheque, the largest non-profit exhibitor of films in the world. American Cinematheque operates the Egyptian Theatre in Hollywood and will soon open the Aero Theatre in Santa Monica.
- Meredith Jackson was elected President of the Financial Lawyers Conference. The Financial Lawyers Conference is a non-profit organization comprised of Southern California Attorneys involved in legal issues relating to finance, banking and commercial law and bankruptcy.
- Steve Marenberg was named President-elect of the Alliance for Children's Rights. The Alliance for Children's Rights is Los Angeles County's only legal services, information clearinghouse and social services referral organization devoted solely to helping children living in poverty and foster care.
- Morgan Chu was named Chair of the USC Intellectual Property Institute. The Institute, holding its first conference on May 25, 2004 in Beverly Hills, California, will focus on key legal and business issues in patent, trademark, copyright and related fields.
- Andra Greene was named President-elect of the Federal Bar Association of Orange County. The Federal Bar Association is the premier professional association for judges and lawyers involved in federal practice before the U.S. District Courts.
- Brian Hennigan was named President-elect of the Federal Bar Association, Los Angeles County. The Federal Bar Association is the premier professional association for judges and lawyers involved in federal practice before the U.S. District Courts.

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### **Morgan Chu Named #1 Lawyer In Southern California**

[Click to read article](#)

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### **Richard Kendall Honored As Litigator Of The Year**

The Century City Bar Association named Richard Kendall Litigator of the Year at its annual dinner meeting on March 30, 2004. Mr. Kendall was recognized for his many accomplishments as a litigator and was given the award by the Honorable Pamela Rymer, a judge on the United States Court of Appeal for the Ninth Circuit. Among Mr. Kendall's many accomplishments as a lawyer are his victories in the United States Supreme Court in a case for

Citibank and in the Delaware Supreme Court in a case for Viacom and CBS. Mr. Kendall specializes in entertainment, media, banking and international litigation.

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### **Christine Byrd Elected to American College of Trial Lawyers**

Litigation Partner Christine Byrd was recently elected to the American College of Trial Lawyers, considered to be the premier professional organization for trial lawyers in North America. Membership in the American College of Trial Lawyers is by invitation only, and is extended after investigation only to experienced trial lawyers "who have demonstrated exceptional skill as advocates and whose professional careers have been marked by the highest standards of ethical conduct, professionalism and civility."

In addition to being an accomplished trial lawyer, Ms. Byrd frequently serves as an arbitrator, and serves on the Board of Directors of the American Arbitration Association, the Century City Bar Association, and the Ninth Judicial Circuit Historical Society.

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[Additional Headlines](#)