

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

_____))
))
AMERICAN BROADCASTING COMPANIES, INC.,)
THE ASSOCIATED PRESS, CABLE NEWS NETWORK)
LP, LLLP, CBS BROADCASTING INC., FOX NEWS)
NETWORK, L.L.C. and NBC UNIVERSAL, INC.,)
))
Plaintiffs,)
))
- against -)
))
JENNIFER BRUNNER, in her official capacity as)
the SECRETARY OF STATE OF OHIO,)
))
Defendant.)
_____)

Cause No.: 1:04-CV-750
District Judge Michael H. Watson

**AFFIDAVIT OF MARIA BOBORIS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF
ATTORNEYS' FEES PURSUANT
TO 42 U.S.C. § 1988**

STATE OF NEW YORK)
:)
COUNTY OF NEW YORK)

ss.:

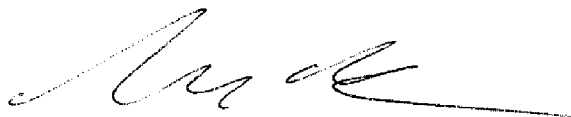
MARIA BOBORIS, being duly sworn, hereby deposes and says:

1. I am a graduate of St. John's University School of Law and a law clerk (bar admission pending) at the firm of Cahill Gordon & Reindel LLP, 80 Pine Street, New York, NY 10005. Cahill Gordon, along with Frost Brown Todd LLC, has represented plaintiffs American Broadcasting Companies, Inc. ("ABC"), The Associated Press ("AP"), Cable News Network LP, LLLP ("CNN"), CBS Broadcasting Inc. ("CBS"), Fox News Network, L.L.C. ("Fox News")

NBC Universal, Inc. ("NBC") (collectively "Plaintiffs") in this action. I submit this affidavit in support of Plaintiffs' motion for an award of attorneys' fees and expenses pursuant to 42 U.S.C. § 1988 (2000) ("section 1988").

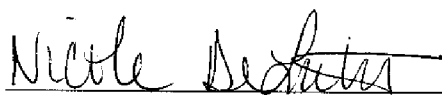
2. In connection with a litigation matter that Cahill Gordon is handling before the Supreme Court of the State of New York, I was recently asked to research attorneys' hourly rates at New York law firms comparable in reputation and experience to Cahill Gordon for the period February 1, 2005 through September 30, 2006. Attached hereto as Exhibit A is a chart detailing attorneys' hourly rates at such New York firms over that period. The chart demonstrates that the rates sought by Cahill Gordon in this litigation are in line with its peers.

3. The data presented in the attached chart was gathered from fee applications approved by the United States Bankruptcy Court for the Southern District of New York, the United States Bankruptcy Court for the Middle District of Pennsylvania and the United States Bankruptcy Court for the District of Delaware.



Maria Boboris

Sworn to before me this
23rd day of August, 2007.



Notary Public

NICOLE DELUTRI
Notary Public, State of New York
No. 01DE6160981
Qualified in Richmond County
Commission Expires Feb. 12, 2011

EXHIBIT A

Comparison of Billing Rates 2005-2006

	Cahill & Gordon & Reindel LLP	Fried, Frank, Harris, Shriver & Jacobson LLP ¹	Kaye Scholer LLP ²	Willkie Farr & Gallagher LLP ³	Weil, Gotshal & Manges LLP ⁴	Shearman & Sterling LLP ⁵	Davis Polk & Wardwell ⁶	Fried, Frank, Harris, Shriver & Jacobson LLP ⁷	Weil, Gotshal & Manges LLP ⁸
Partners	\$668	\$620 - 745	\$665 - 750	\$595 - 825	\$775 - 810	\$675 - 795	\$620 - 865	\$650 - 995	\$775 - 810
7th-Year Associate	\$568			\$540					
6th-Year Associate		\$475		\$510			\$520		
5th-Year Associate	\$488	\$450	\$475	\$480			\$490	\$445	\$440
4th-Year Associate	\$428						\$460		
3rd-Year Associate	\$404			\$415 - 430	\$440		\$420		\$375
2nd-Year Associate	\$360	\$350		\$375		\$305 - 330	\$355	\$420	
1st-Year Associate	\$332		\$350	\$310	\$375	\$211.50 - 385		\$420	

¹ Fee Application covering March 1, 2005 through March 31, 2005. *New World Pasta.*

² Fee Application covering February 1, 2005 through February 28, 2005. *USG Corporation.*

³ Fee Application covering October 1, 2004 through February 28, 2005. *Loral Space & Communications, Ltd. et al.*

⁴ Fee Application covering September 1, 2005 through September 30, 2005. *USG Corporation.*

⁵ Fee Application covering October 8, 2005 through January 31, 2006. *In re Delphi Corporation.*

⁶ Fee Application covering June 1, 2006 through September 30, 2006. *Delta Airlines.*

⁷ Fee Application covering July 1, 2006 through September 30, 2006. *Catpina Corporation.*

⁸ Fee Application covering September 1, 2005 through September 30, 2005. *USG Corporation.*