

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**SUPPLEMENTAL DECLARATION OF JOSEPH D. JEAN IN SUPPORT OF
DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER PURSUANT TO 11 U.S.C.
§ 327(e) OF BANKRUPTCY CODE AND FED. R. BANKR. P. 2014 AND 2016
AUTHORIZING EMPLOYMENT AND RETENTION OF PILLSBURY WINTHROP
SHAW PITTMAN LLP AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR
AND DEBTOR IN POSSESSION *NUNC PRO TUNC* TO THE PETITION DATE**

I, Joseph D. Jean, being duly sworn, hereby state as follows:

1. I am a partner at the firm of Pillsbury Winthrop Shaw Pittman LLP ("Pillsbury" or the "Firm"), a global law firm with its principal offices at 31 West 52nd Street, New York, NY 10019. I am admitted in, practicing in, and a member in good standing of, the bar of the State of New York and the bar of the United States District Court for the Southern District of New York.

2. I submit this supplemental declaration (the "Supplemental Declaration") in connection with the application (the "Application") of the Madison Square Boys & Girls Club, Inc. as debtor and debtor in possession (the "Debtor") to retain and employ Pillsbury as special insurance counsel, *nunc pro tunc* to the Petition Date.

3. Unless otherwise stated in the Supplemental Declaration, I have personal knowledge of the facts set forth herein and, if called as a witness, I would testify thereto. Certain of the disclosures set forth herein relate to matters not within my personal knowledge but rather within the knowledge of other attorneys and employees at Pillsbury and are based on information provided to me by them.

Supplemental Disclosures Regarding Professional Compensation and Services

4. Pillsbury has represented the Debtor since March 2019. Pillsbury was originally engaged by Debtor in March 2019 for corporate governance advice which is the subject of that certain engagement letter dated as of March 27, 2019 (the “March 2019 Engagement Letter”). The March 2019 Engagement Letter states that the retention was at Pillsbury’s standard billing rates.

5. In July, 2019, Pillsbury was retained by Debtor to represent it in a specific insurance matter. For this engagement, Pillsbury and Debtor executed a second engagement letter on a fixed fee arrangement “related exclusively to tendering pending and future Child Victims Act (“CVA”) claims to the Company’s *current liability insurance carriers One Beacon subsidiary Atlantic Specialty Insurance Company, Great American Insurance Company, and Philadelphia Indemnity Company (the “Current Insurers”)* who issued *Management Liability policies and excess Management Liability policies.*” (emphasis added). This fixed fee arrangement was related exclusively for the filing of an action against the three Management Liability insurance carriers through Summary Judgment Motions. See Engagement Letter dated as of July 24, 2019 (the “July 2019 Engagement Letter”).

6. The July 2019 Engagement Letter fixed fee arrangement was for the narrow and limited representation of the Debtor against three liability insurance carriers who issued Management Liability policies and excess Management Liability Policies to Debtor. Section 1 “Scope of Engagement and Fees” specifically stated that “This engagement and associated Fixed Fee is exclusively related to this litigation against the Current Insurers through the Summary Judgment stage of such litigation. *Any subsequent representation to this or other matters shall continue to be governed by our original engagement letter dated March 27, 2019.*” (emphasis added).

7. In September 2020, after the Summary Judgment Motions had been filed (and the parties awaited rulings from the court), Pillsbury and Debtor agreed to a subsequent narrow engagement at a blended billing rate for a new narrow scope of insurance advice which predominately included paralegal work and non-partner attorney work reviewing correspondences, handling defense-related expenditures, reviewing a narrow set of insurance policies, and tendering the defense and indemnification of new CVA claims to Debtor's insurers based on insurance policies known (or secondary evidence of such policies) from the 1970s to 1990 which to that date had been uncovered by the Insurance Archeology Group ("IAG"), an insurance archeologist company retained by the Debtor to perform an exhaustive review of available information regarding potentially available insurance policies. Neither litigation against insurance companies nor the currently expected extensive work required due to the significant increase of CVA claims and number of insurance policies was contemplated by the September 2020 engagement. The parties agreed on a blended rate alternative fee arrangement of \$750/hour for all attorneys working on this limited scope of work, instead of instituting Pillsbury's standard rates for these tasks as set forth in the March 2019 Engagement Letter and July 2019 Engagement Letter. On or about January 1, 2022, this alternative fee arrangement was adjusted to a blended rate of \$900/hour to reflect economic and other conditions. The narrow scope of work remained the same and was still being handled largely by a paralegal and a non-partner.

8. The Debtor proposes to retain Pillsbury as special insurance counsel to render services to the Debtor with respect to its historical insurance coverage and insurance policies. The new engagement anticipates significant litigation against numerous insurers involving more than \$14 million primary/\$76 million excess in coverage and at least 27 primary/19 excess policies spanning more than two decades of policy periods. In particular, the Debtor anticipates that

Pillsbury will perform the following legal services (collectively, the “Special Insurance Counsel Matters”):

- (a) Analyzing, investigating, and assessing the Debtor’s rights under its newly discovered liability insurance policies;
- (b) Analyzing, reviewing and attempting to mediate and otherwise resolve with insurance proceeds the claims, demands, and/or lawsuits asserted against the Debtor;
- (c) Advising, negotiating and advocating on behalf of the Debtor with respect to its rights under Debtor’s insurance policies;
- (d) Advising the Debtor’s restructuring counsel and other professionals with respect to the foregoing matters as necessary to pursue the Debtor’s efforts in maximizing insurance recoveries for the liability claims being asserted against Debtor;
- (e) Noticing claims, keeping insurers informed, seeking defense costs from Debtor’s insurers and other insurance recovery related steps (e.g., seeking out and uncovering newly discovered insurance policies) and to preserve Debtor’s rights under Debtor’s primary and excess insurance policies; and
- (f) Litigating against any insurer that denies coverage or refuses to fully honor its coverage commitments to Debtor to fully and effectively resolve all covered or potentially covered CVA claims against Debtor and/or any other claims that may arise against Debtor.

9. The scope of work is now substantially different than pre-petition, and accordingly should be governed by Pillsbury’s standard rates as set forth in the March 2019 Engagement Letter and July 2019 Engagement Letter. There are now over 140 pending claims against the Debtor arising under the New York Child Victims Act. Pillsbury has now succeeded in securing many more primary and excess insurance policies under which coverage should be available. In recent weeks, new insurance evidence has suddenly surfaced from several of the Debtor’s insurers. The insurers are disputing coverage and/or the duty to defend which requires a close legal evaluation

and analysis of the CVA claims and the law, and which will also involve allocation between the various insurance companies and policy years. Pillsbury further anticipates that we will now likely have to engage in active litigation against and/or alternative dispute resolution with the insurers, which pre-petition was never contemplated nor part of the scope of work for the Debtor. This will now require significant partner level attorney involvement, as well as non-partner attorneys and paralegal assistance.

10. Subject to Court approval and in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, applicable U.S. Trustee guidelines, and the Local Rules of this Court, Pillsbury will bill at a 10% discount off its standard hourly rates which, after that discount will be: \$967.50 - \$1,413.00 for partners; \$657.00 - \$810.00 for associates; \$1,102.50 for counsel; and no more than \$400.00 for legal assistants/paralegals.

11. Pillsbury's discounted hourly rates are set at a level designed to compensate Pillsbury fairly for the work of its attorneys and legal assistants/paralegals. The rates and rate structure provided by Pillsbury are appropriate and reflect the complex and time sensitive nature of the matters Pillsbury will be handling.

12. These hourly rates are subject to periodic adjustments (typically on January 1 of each year) to reflect economic and other conditions. Pillsbury will provide notice of any rate increases to the Debtor, the United States Trustee for Region 2 (the "U.S. Trustee"), and the Official Committee of Unsecured Creditors.

Supplemental Disclosures Regarding Connections with Parties In Interest

13. Since the filing of the Jean Declaration, Pillsbury has conducted a supplemental review of potential connections and relationships between Pillsbury and the potential parties in interest listed on **Schedule 1** hereto. Based on such review, except as set forth on **Schedule 2**

attached hereto, I do not believe there is any connection between Pillsbury and any party in interest listed on **Schedule 1**, including any connection with the U.S. Trustee or any person employed by the Office of the U.S. Trustee, other than Pillsbury's usual and customary interactions and connections with the U.S. Trustee and the persons employed by the Office of the U.S. Trustee which arise in the ordinary course of business.

14. The records upon which this investigation is based are maintained by Pillsbury in the ordinary course of business and are believed to be accurate. To the extent that I become aware hereafter that any such records or other information contained herein is not accurate or complete, I will promptly apprise the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
August 9, 2022

Respectfully submitted,

/s/ Joseph D. Jean

Joseph D. Jean
Pillsbury Winthrop Shaw Pittman LLP

Schedule 1

Amended Potential Parties in Interest

Amended Potential Parties in Interest

DEBTOR AND NON-DEBTOR AFFILIATES AND RELATED ENTITIES

MADISON SQUARE BOYS & GIRLS CLUB, INC.
MADISON SQUARE BOYS & GIRLS CLUB FOUNDATION, INC.
MSBGC-NYC SUPPORT CORPORATION

SOUTHERN DISTRICT OF NEW YORK BANKRUPTCY JUDGES

CHIEF JUDGE MARTIN GLENN
JUDGE LISA G. BECKERMAN
JUDGE SHELLEY C. CHAPMAN
JUDGE ROBERT D. DRAIN
JUDGE JAMES L. GARRITY, JR.
JUDGE DAVID S. JONES
JUDGE SEAN H. LANE
JUDGE CECELIA G. MORRIS
JUDGE MICHAEL E. WILES

STAFF FOR SOUTHERN DISTRICT OF NEW YORK BANKRUPTCY JUDGES

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ANDRES BARAJAS
ANNIE ZIESING
BRENDA ROBIE
BRIAN HARKINS
CHANTEL BARRETT
CHRISTIAN RIBEIRO
CHRISTINE AZZARO
DANIEL HARKINS
DEANNA ANDERSON
DOROTHY LI
FRANCES FREDERICKS
FRANCIS O'ROURKE
GREG WHITE
JACQUELINE DEPIEROLA
JACQUELINE TRAN
JAMIE EISEN
JENNA MACDONALD
LESLIE KAN
LESLIE WYBIRAL
LIZA EBANKS
LORRAINE ECHEVARRIA
LYNDA CALDERON
MEREDITH MITNICK
MICHAEL BLACKMON
MICHAEL CONTINO
MICHELLE SANAY

PATRICK CHEN
PUCCIA KARRA
ROBERT CARRASCO
TAYLOR JONES
TRACEY MERCADO
VANESSA ASHMEADE,
WILLIE RODRIGUEZ

STAFF FOR THE OFFICE OF THE UNITED STATES TRUSTEE FOR REGION 2

ALABA OGUNLEYE
ANDREA B. SCHWARTZ
ANDY VELEZ-RIVERA
ANNIE WELLS
BENJAMIN J. HIGGINS
BRIAN S. MASUMOTO
ERCILIA A. MENDOZA
GREG M. ZIPES
ILUSION RODRIGUEZ
JAMES GANNONE
LINDA A. RIFFKIN
MADELEINE VESCOVACCI
MARK BRUH
MARY V. MORONEY
NADKARNI JOSEPH
PAUL K. SCHWARTZBERG
RICHARD C. MORRISSEY
SHANNON SCOTT
SHARA CORNELL
SUSAN ARBEIT
SYLVESTER SHARP
TARA TIAN TIAN
VICTOR ABRIANO

GOVERNMENTAL/REGULATORY AGENCIES

DORMITORY AUTHORITY OF THE STATE OF NEW YORK
NEW YORK CITY DEPARTMENT OF YOUTH AND COMMUNITY DEVELOPMENT
NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION
NEW YORK STATE ALLIANCE FOR THE PREVENTION OF SEXUAL ABUSE
NEW YORK STATE CHILD AND ADULT CARE FOOD PROGRAM
NEW YORK STATE OFFICE OF ALCOHOLISM AND SUBSTANCE ABUSE SERVICES
NEW YORK STATE OFFICE OF CHILDREN AND FAMILY SERVICES
NEW YORK STATE OFFICE OF THE ATTORNEY GENERAL
OFFICE OF JUVENILE DELINQUENCY PROGRAM
UNITED STATES DEPARTMENT OF JUSTICE – OFFICE OF JUSTICE PROGRAMS

BANKRUPTCY AND CERTAIN ORDINARY COURSE PROFESSIONALS

EPIQ CORPORATE RESTRUCTURING

FINSBURY LLC

FRIEDMAN KAPLAN SEILER & ADELMAN LLP

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

PILLSBURY WINTHROP SHAW PITTMAN LLP

TENEO CAPITAL LLC

BANKS, INVESTMENT MANAGERS, AND SECURED LENDERS

BANK OF AMERICA

BROWN BROTHERS

CARVER BANK

CITI BANK

FIDELITY

JP MORGAN

JPMORGAN - CHILDS TRUST

LAMB FINANCIAL SERVICES

MERRILL LYNCH

NONPROFIT FINANCE FUND

PINNACLE SECURITIES

PNC BANK

RUANE CUNNIFF & GOLDFARB

RUANE CUNNIFF & GOLDFARB - SEQUOIA FUND

TRUFUND

VANGUARD

CURRENT & FORMER TRUSTEES, DIRECTORS, OFFICERS

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BARRY BREGMAN

BARRY RODRIGUES

BILL FEEHAN

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PETER SERPICO
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RICHARD PORTER
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ARGONAUT INSURANCE CO.
CHUBB GROUP
CHURCH MUTUAL INSURANCE CO.
EMPIRE BLUECROSS BLUESHIELD
FEDERAL INSURANCE COMPANY
HALLMARK SPECIALTY INSURANCE CO.
PHILADELPHIA INSURANCE COMPANY
RSUI LANDMARK AMERICAN INSURANCE CO.
STARSTONE NATIONAL INSURANCE CO.

LANDLORD

NATIONAL MULTIPLE SCHLEROSIS SOCIETY

LITIGATION PARTIES AND COUNTERPARTIES AND COUNSEL¹

A.B.
A.F.
A.G.
AARON HUMPHREY
ALFRED FALZON
AMONDO SAPIRO
ANDREW CAWLEY
ANTHONY VARUOLA
ANTOWNE FRAZIER
ARNOLD GLIM
ARTHUR TREMERE
AVAN LOGAN
B.D.

¹ The individual plaintiffs' names are consistent with the names or pseudonyms reflected in public filings. While Pillsbury reviewed the actual names of each individual plaintiffs for its conflicts process, for the purposes of their inclusion on this Schedule 1, only the plaintiffs' pseudonyms are used, where applicable, consistent with the Confidentiality Procedures approved under the *Order (I) Authorizing and Approving Special Noticing and Confidentiality Procedures, (II) Authorizing and Approving Procedures for Providing Notice of Commencement, and (III) Granting Related Relief* [Docket No. 32].

BRIAN TATE
C.C.
C.D.
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E.M. [70172/2021E]
E.M. [950681/2020]
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NEFTALI CEMENTENO
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PHILLIP HARRIS
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R.B.

R.C.
R.F.
R.F. II
R.M.
R.S.
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RAMOS REYES
RANDALL JAMES
RENZO BUSETTI
RICHARD VESPI
ROBERT LIGUORI
ROBERT O'LEARY
ROBERT RAMIREZ
ROBERT SERRINGER
ROBERTO GONZALEZ
ROGER WELCH
RONALD PROKOPIAK
S.R. [950449/2020]
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ROBERT TOFANI
TERRENCE BROWNE
TERRENCE LOGAN
THE ESTATE OF EMMANUEL WILLIAM SORGE
THOMAS LOGERFO
THOMAS M. LUKAS
TYRONE LOGAN
VITO PESCE
WILLIAM MCFIELD
WILLIAM SORGE
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ANDREOZZI & ASSOCIATES, P.C.
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CUTI HECKER WANG LLP
DUNDON ADVISERS LLC
GRANT & EISENHOFER, P.A.
HACH ROSE SCHIRIPPA & CHEVERIE, LLP
HARNICK AND HARNICK, P.C.
HERMAN LAW FIRM
JEFF ANDERSON & ASSOCIATES, P.A.

LEVY KONIGSBERG LLP
LOWEY DANNENBERG, P.C.
MARCOWITZ LAW FIRM
MERSON LAW, PLLC
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PFAU COCHRAN VERTETIS AMALA PLLC
RAPHAELSON & LEVINE LAW FIRM, P.C.
ROCKEFELLER UNIVERSITY
ROPES & GRAY LLP
SEEGER WEISS LLP
SILVER & KELMACHER, LLP
SLATER SLATER SCHULMAN LLP
THE MARSH LAW FIRM, PLLC
THE SIMPSON TUEGEL FIRM
WEITZ & LUXENBERG
WILLIAMS CEDER LLC

**SIGNIFICANT VENDORS, UTILITIES, CONTRACT COUNTERPARTIES, AND UCC
LIEN COUNTERPARTIES**

42ND STREET LESSEE LLC
501 AUCTION LLC
ABRAR QAIUM
ADP, INC.
ADT SECURITY SERVICES
ADVANCE CLADDING CONSTRUCTION COMPANY
AFA PROTECTIVE SYSTEMS, INC.
AFLAC NEW YORK
AIA, ALERA GROUP
ALDA BUILDING COMPANY LLC
ALEX DONNER ENTERTAINMENT, CORP.
ALL AMERICAN SCHOOL BUS CORP.
ALLIED ASBESTOS SERVICE LLC
ALLSTATE LIFE INSURANCE COMPANY
ALLSTATE SERVICES GROUP LLC
AMAZON CAPITAL SERVICES
AMERICAN EXPRESS
AMERIFLEX
ANTHEM LIFE & DISABILITY INSURANCE CO.
APPRAISERS AND PLANNERS INC.
ARAMARK
AUTHNET GATEWAY
AV DESIGN INTEGRATION
BABY DUNK
BALLARD SPAHR LLP
BASE TECHNOLOGIES, INC.
BCM ONE

BEL-AQUA POOL SUPPLY INC.
BETHANY HDFC
BKD, LLP
BLACKBAUD
BOYS & GIRLS CLUB OF HARLEM
BOYS & GIRLS CLUBS OF AMERICA
BROADWAY UNLOCKED
BRONX AQUATICS & SAFETY INC.
BSN SPORTS INC
CABLEVISION
CARDWORKS ACQUIRING
CHARTER COMMUNICATIONS
CHURCH MUTUAL
CITY OF FINANCE COMMISSIONER
CLASSY, INC.
CON EDISON
CONNEY SAFETY
CREATIVE ART WORKS
CROWN AWARDS
CROWN CASTLE FIBER LLC
CROWN JANITORIAL
CROWN TROPHY, INC.
CT CORPORATION
CYA, INC
DAWELL CONSULTING LLC
DE LAGE LANDEN FINANCIAL SERVICES, INC.
DELL BUSINESS CREDIT
DELOITTE CONSULTING LLP
DINOSAUR RESTAURANTS LLC
DRAIN KLEEN SEWER SERVICES INC.
EDELMAN SULTAN KNOX WOOD ARCHITECTS LLP
EFFICIENT COMBUSTION & COOLING CORP.
EL RAVEN PRODUCTIONS
EMPIRE FIRE SYSTEMS LLC
ENGIE
EXTRA SPACE STORAGE
FEDERAL EXPRESS CORP.
FIRST ADVANTAGE BACKGROUND SERVICES CORP.
FIRSTMARK SERVICES
FLYER MIKE DESIGNS, LLC
FOUR SEASONS PROMOS, LLC
FRANKIE'S CARNIVAL TIME, INC.
FUZE, INC.
GEM MECHANICAL LLC
GIVESMART US, INC.
GO CHARITY

GOTHAM ARCHITECTURAL GLASS & SIGN
GRACI PAVING ASSOCIATES INC.
GROWTH AND DEVELOPMENT SERVICES, INC.
HANZEL LI
HELIUM PLUS EAST INC.
HILLMANN CONSULTING, LLC
HSO PRODUCTIONS INC.
HYDRO LANE, INC.
IF IT'S WATER, INC.
INDEPENDENT ELEVATOR INSPECTIONS, INC
INLAND PRINTING COMPANY
INSURANCE ARCHAEOLOGY GROUP
INTEGRATED AQUATICS ENGINEERING
J & L SERVICE NYC INC.
JMV CONSULTING ENGINEERING, P.C.
JOHN TODD
JUNK PROS
KAUFMAN IRON WORKS
KIDS IN SEATS INC.
KIPS BAY BOYS & GIRLS CLUB
KNIGHT MARKETING CORP.
KONE INC.
KVL AUDIO VISUAL SERVICES, INC
LAMB INSURANCE SERVICES
LAWLESS & MANGIONE
LAWYERS ALLIANCE FOR NEW YORK
LEADER ELECTRIC COMPANY
LEAF COMMERCIAL CAPITAL
LIBERTY COCA-COLA BEVERAGES LLC
LIBERTY INDUSTRIAL GAS & WELDING
LIBERTY SCIENCE CENTER
LIGHTHOUSE DOCUMENT TECHNOLOGIES, INC.
LOM PROPERTY CONSULTING LLC
MAGIC MECHANICAL
MAMA FOUNDATION FOR THE ARTS, INC.
METROPOLIS GROUP INC.
METROPOLITAN LIFE
METROTECH SYSTEMS
MILLIMAN
MUTUAL SECURITY SERVICES, INC.
NARDELLO & CO LLC
NATIONAL FIRE EXTINGUISHER CO.
NATIONAL GRID
NATIONAL MULTIPLE SCLEROSIS SOCIETY
NEW YORK BUSINESS SYSTEMS
NEW YORK CITY WATER BOARD

NEW YORK DEPARTMENT OF LAW
NEW YORK STATE ALLIANCE
NFOCUS SOLUTIONS
NOBLE ELEVATOR COMPANY INC.
NONPROFIT SOLUTIONS NETWORK CORP.
NOTES FOR NOTES
NOVAK FRANCELLA LLC
NUVISION SOLUTIONS LLC
NY STATE ALLIANCE
NYC FIRE DEPARTMENT
NYC WATER BOARD
NYS DEPT. OF ENVIRONMENTAL CONSERVATION
ORKIN INC.
ORKIN PEST CONTROL
OUTREACH DEVELOPMENT CORP.
PADUANO & WEINTRAUB LLP
PITNEY BOWES GLOBAL FINANCIAL
PITNEY BOWES PURCHASE POWER
PLYWOOD PICTURES LLC
POL. WIRE TECH INC.
POLAR AIR CONDITIONING INC.
QUILL CORPORATION
REGINA CATERERS INC.
ROBINSON'S INDUSTRIAL GAS AND EQUIPMENT CORP.
ROTO ROOTER PLUMBING SERVICES
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SBW, INC.
SEAN KERSHAW
SEND IN THE CLOWNS ENTERTAINMENT
SERVICE MECHANICAL INC.
SHELTERPOINT LIFE INSURANCE CO.
SIGMA
SLEEPY HOLLOW COUNTRY CLUB
SOLVE IT SIMPLE LLC
STAPLES
STAPLES ADVANTAGE
STAR GROUP PRODUCTIONS
SUNESYS ENTERPRISE LLC
SWOOP
SYSCO METRO NEW YORK LLC
THE COTOCON GROUP
THE METRO GROUP, INC.
TIME WARNER CABLE
TOTAL AQUARIUMS INC.

TOWER ELEVATOR CONSULTING & TESTING LLC
TOYOTA FINANCIAL SERVICES
TRANSPERFECT LEGAL SOLUTIONS
TREMONT ELECTRIC SUPPLY COMPANY
TRI WELD INDUSTRIES, INC.
TWI-LAQ INDUSTRIES, INC.
ULINE
UNITED STAFFING SOLUTIONS, INC.
UNITED WAY
VAL WIRING CORP.
VENABLE LLP
VERIZON WIRELESS
WEBSTER LOCK & HARDWARE CO.

Schedule 2

Amended Connections to Potential Parties in Interest

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is Client	Status
DORMITORY AUTHORITY OF THE STATE OF NEW YORK	Dormitory Authority of the State of New York	Unrelated and no billings for over 1 year.
BANK OF AMERICA	Bank of America; Bank of America N.A.; Bank of America N.A. Trustee's; Bank of America Securities, Inc.	Unrelated
CITI BANK	Citibank; Citibank, N.A.; Citibank as Trustee	Unrelated
FIDELITY	Fidelity National Information Services, Inc.	Unrelated
JP MORGAN	JP Morgan; JP Morgan Chase & Co.; JP Morgan Securities LLC	Unrelated
MERRILL LYNCH	Merrill Lynch; Bank of America Securities, Inc.	Unrelated
PNC BANK	PNC; The PNC Financial Services Group, Inc.;	Unrelated
DANIEL L. MOSLEY	Daniel L. Mosley	Unrelated
RICHARD EDDY	Richard Eddy	Unrelated
EMPIRE BLUE CROSS/BLUE SHIELD	Blue Shield of California; Blue Shield of Massachusetts, Inc.; Blue Shield of California Promise Health Plan; Blue Cross & Blue Shield of Rhode	Unrelated
ROCKEFELLER UNIVERSITY	Rockefeller Group, Inc.	Unrelated
ADP, INC.	Automatic Data Processing, Inc.	Unrelated
ADT SECURITY SERVICES	ADT Inc.	Unrelated
AMERICAN EXPRESS	American Express; American Express Bank, LTD; American Express Centurion Bank	Unrelated
CON EDISON	Consolidated Edison of New York	Unrelated
DELOITTE CONSULTING LLP	Deloitte Touche Tohmatsu LLC	Unrelated
DEPARTMENT OF LAW	State of New York, Department of Law	Unrelated
FEDERAL EXPRESS CORP.	FedEx Office and Print Services, Inc.; FedEx Supply Chain	Unrelated
KONE INC.	Kone Corporation	Unrelated

Name of Entity Searched	Name of Entity and/or Affiliate of Entity that is Client	Status
LIBERTY COCA-COLA BEVERAGES LLC	The Coca-Cola Company	Unrelated
LIGHTHOUSE DOCUMENT TECHNOLOGIES, INC.	Lighthouse Document Technologies, Inc.	Unrelated
SYSCO METRO NEW YORK LLC	Sysco Corporation	Unrelated