

CHAMBERS RULES FOR SEPTEMBER 11 CONSOLIDATED CASES

Counsel is referred to Judge Hellerstein's Individual Rules. Judge Hellerstein's Rules apply to the September 11 Consolidated Cases except to the extent altered or supplemented by the following rules.

1. Counsel Communication with the Court
 - A. Telephone Communication. Except for good cause, only Liaison Counsel may contact Chambers by telephone.
 - B. Facsimile Communication.
 - i. Written communications of six (6) pages or fewer may be faxed at any time without permission. No hard copy should be sent if a copy is sent by facsimile.
 - ii. Written communications of six (6) to twenty (20) pages may be faxed, without permission, only after hours: after 5:30 P.M through 8:30 A.M. the following morning. During office hours, between 8:30 A.M. and 5:30 P.M., permission to fax 6- to 20-page documents is necessary. No hard copy should be sent if a copy is sent by facsimile.
 - iii. Written communications of twenty-one (21) pages or more may only be faxed with permission. Permission is likely to be granted only in urgent circumstances. No hard copy should be sent if permission is given to fax the document.
 - C. Hand Deliveries. Permission for all hand deliveries to chambers remains necessary.
 - D. Courtesy Copies.
 - i. Courtesy copies of **all** documents filed with the Court should be forwarded in hard copy by mail to Chambers.
 - ii. A courtesy list of all newly-filed actions is requested, and should be sent by facsimile.
 - E. Docketing. Docket numbers must appear on all submissions to the Court. Thus far, two groups of September 11 cases have been consolidated. The first group deals with claims brought by passengers and ground victims of the September 11 attacks against airlines, security companies, airport operators, Boeing, the Port

Authority, and other defendants, and is consolidated under the master docket, In re September 11 Litigation, 21 MC 97 (AKH). The second group deals with claims brought by those who came to the scene following the attacks against defendants such as the City of New York and the Port Authority, and is consolidated under the master docket, In re World Trade Center Disaster Site Litigation, 21 MC 100 (AKH). If a filing relates to **all** of the cases within either group, the master caption should be used. If a filing relates to specific case(s), **only** the individual docket number(s) should appear.

2. Court Communication with Counsel

- A. Phone calls and facsimiles from the Court will be made to Liaison Counsel only, unless otherwise necessary.
- B. Certain orders and notices will be posted on the Southern District web site for the September 11 litigation - <<http://www.nysd.uscourts.gov/Sept11Litigation.htm>>.
- C. The Court has set up an email address to communicate to counsel in the September 11 litigation. Counsel should not, however, respond by email to the Court.

3. Liaison Counsel Contact Information

- A. In re September 11 Litigation, 21 MC 97 (AKH)
 - i. Plaintiff Liaison Counsel: Marc Moller, Kreindler & Kreindler, 100 Park Avenue, New York, NY 10017. Telephone: 212-687-8181. Fax: 212-972-9432.
 - ii. Defense Liaison Counsel: Desmond Barry, Condon & Forsyth, 685 Third Avenue, New York, NY 10017. Telephone: 212-490-9100. Fax: 212-370-4453.
- B. In re World Trade Center Disaster Site Litigation, 21 MC 100 (AKH)
 - i. Plaintiff Liaison Counsel: Michael Barasch, Barasch & McGarry, P.C., 11 Park Place, New York, NY 10007. Telephone: 212-385-8000. Fax: 212-385-7845.
 - ii. Defense Liaison Counsel: Gary Schaffer, Corporation Counsel of the City of New York, 100 Church Street, New York, NY 10007. Telephone: 212-788-0586. Fax: 212-788-0367.