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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES  
CENTRAL CIVIL WEST**

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**IN RE: TV WRITERS CASES**

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**THIS DOCUMENT RELATES TO:**

- Case No. 268 836 – Alch, et al. v. Time Warner Entertainment Company, L.P., et al.;
- Case No. 268 837 – Neal, et al. v. Viacom Inc. and United Paramount Network;
- Case No. 268 838 – Young, et al. v. DreamWorks SKG TV LLC;
- Case No. 268 839 – Bast, et al. v. Fox Broadcasting Company, et al.;
- Case No. 268 840 – Levy, et al. v. The Gersh Agency, Inc.;
- Case No. 268 841 – Edwards, et al. v. The Carsey-Werner Co., et al.;
- Case No. 268 842 – Wynn, et al. v. National Broadcasting Company, Inc., et al.;
- Case No. 268 843 – Brooks, et al. v. William Morris Agency, Inc.;
- Case No. 268 844 – Brett, et al. v. Walt Disney Company, et al.;
- Case No. 268 845 – Distefano, et al. v. Columbia TriStar Television, Inc.;
- Case No. 268 847 – Eisenson, et al. v. Lucy Stille & Associates, Inc.,  
d/b/a Paradigm Talent & Literary Agency, et al.;
- Case No. 268 848 – Lang, et al. v. Shapiro-Lichtman, Inc., d/b/a Shapiro Lichtman-Stein;
- Case No. 268 849 – Neal, et al. v. The Endeavor Agency, Inc.;
- Case No. 268 877 – Kinghorn, et al. v. Universal Studios, Inc., et al.;
- Case No. 268 878 – Moriarty, et al. v. Viacom Inc., Paramount Studios, Inc., et al.;
- Case No. 268 880 – Yanok, et al. v. Agency for the Performing Arts, Inc.;
- Case No. 268 881 – Schwartz, et al. v. United Talent Agency, Inc.;
- Case No. 268 882 – Shayne, et al. v. Viacom Inc. and CBS Broadcasting Inc., and
- Case No. 268 883 – Kalish, et al. v. Viacom Inc., Spelling Entertainment Inc., et al.

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**EXHIBIT A  
TO DECLARATION OF PAUL SPRENGER IN SUPPORT OF MOTION FOR  
(1) PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENTS;  
(2) ENTRY OF ADMINISTRATIVE ORDER NOS. 1-4;  
AND (3) ENTRY OF PRELIMINARY APPROVAL ORDER**

**Qualifications and Experience of Lead Counsel, Paul Sprenger**

Lead Class Counsel Paul Sprenger has for decades been named to the *National Law Journal's* list of the “Best Litigators in Employment Law” and The Washingtonian’s list of “Washington’s 50 Best Lawyers”. Since its inception in 1987, he has been voted into Naifeh and Smith’s Best Lawyers in America in Minnesota and Washington, DC. He has also been a

1 *Minnesota Journal of Law & Politics, Washingtonian Magazine, and/or Washington Post* “Super  
2 Lawyer” annually for the past 25 years.

3 In 2006, he was honored by the National Partnership for Women and Families with its  
4 Trail Blazer award for his career long accomplishments for women in the workplace and,  
5 together with his law partner and spouse, named Washingtonian of the Year in 2007.

6 Sprenger filed his first class action in 1968, the year the class action rule was effective in  
7 Minnesota courts, as plaintiff’s counsel for a deceased building contractor’s estate. Soon after,  
8 he was retained to represent the Attorneys General of Minnesota and Wisconsin and other  
9 corporate and business entities in commercial class actions. He initiated his first employment  
10 discrimination class action in 1972, representing the National Organization for Women (NOW)  
11 against the 3M Company in a series of class cases which established current methods of  
12 statistical proof of disparate impact based on electronic records.

13 Complex class actions and multi-party litigation have been Mr. Sprenger’s specialty. He  
14 has served as plaintiffs’ lead counsel or liaison counsel in several federal multi-district  
15 proceedings involving collectively more than 250 class actions: In Re: Ford Motor Company  
16 Employment Practices Litigation, MDL 1044 (Lead Counsel/All Cases)(E.D. Mich. 1995); In  
17 Re: Burlington Northern Employment Practices Litigation, MDL 374 (Lead Counsel/All Cases)  
18 (N.D. Ill. 1980); In Re: Coordinated Pretrial Proceedings in Antibiotic Antitrust Actions, MDL  
19 10 (Liaison Counsel/All Cases: Lead Counsel, German Governmental Entities and Health  
20 Insurance classes, 1975–1981, Lord, J./ E.D.Pa., Weiner, J); In Re: Sugar Antitrust Litigation,  
21 MDL 201, MDL 201A (Lead Counsel States of Minnesota and Wisconsin governmental entities  
22 classes, 1975-1980) (N.D. Cal. Boldt, Sr. J. by assignment) (E.D. Pa. Cahn, J.). He has also  
23 served as lead counsel in numerous employment cases other than the Writers age discrimination  
24 cases that established landmark precedents in employment class actions, including:

25 In Re: Burlington Northern Employment Practices Litigation, MDL 810 F.2d 601  
26 (7th Cir. 1987), 679 F.2d 762 (8th Cir. 1982) (largest race class action settlement on  
27 record at time);  
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National Organization for Women (NOW), et al. v. Minnesota Mining and Manufacturing Company, 73 F.R.D. 467 (D. Minn. 1977) (includes nine related gender class actions) (established principle that company-wide computer readable data were discoverable regardless of limited scope of plaintiffs' claims or availability of hardcopy data);

Rajender, et al. v. University of Minnesota, 546 F. Supp. 158 (D. Minn. 1982) (first class of female academic employees; established disparate impact in hiring female academic employees in phase I liability trial of 11 weeks resulting in 15 year Consent Decree eventually adopted as university's permanent academic search and hiring procedure; set standards for award of fees and costs in employment class actions);

Holden, et al. v. Burlington Northern, Inc. et al., 665 F. Supp. 1398 (D. Minn. 1987) (gender discrimination; set standards for court review of classwide Consent Decree in view of objections from two of 13 class representatives following five months of trial);

Franklin, et al. v. Metropolitan Waste Control Commission, C.A. No. 3-88-784 (D.Minn. 1987) (Consent Decree including provisions for classwide racial harassment prevention);

Miller, et al. v. The Meredith Relocation Corp. et al., Civ. 89-745-B (S.D. Iowa, 1990) (federal government employee class; approved standing for government employees under RICO to sue relocation company hired by government);

Ulvin, et al. v. Northwestern National Life Insurance Company, C.A. No. 3-88-730 (D. Minn.) and Steinbeck, et al. v. Northwestern National Life Insurance Company, 728 F. Supp. 1389 (D. Minn. 1990) (age class actions; first age class notice in District; age plaintiff can try defamation, slander and libel claims to jury with ADEA motivation for discriminatory discharge);

Mabone, et al. v. Pillsbury Co., C.A. No. 4-89-386 (D. Minn., Consent Decree, October 11, 1990) (largest race class settlement in Minnesota at the time);

Aburime, et al. v. Northwest Airlines, Inc., et al., C.A. No. 3-89-402 (D. Minn.) (largest race class settlement in Minnesota involving re-write of human resources policies

1 at Northwest and mini-trials on damages for 1,200 claimants, which the WALL STREET  
2 JOURNAL described as “one of the most comprehensive [settlements] ever crafted in a  
3 race discrimination case.” *Race Discrimination Suit Against Northwest Airlines is*  
4 *Settled*, WALL STREET J. (Aug. 19, 1991));

5 Severtson, et al. v. Phillips Beverage Co., 141 F.R.D. 274 (D. Minn. 1992); 137  
6 F.R.D. 264 (D. Minn. 1991) (age class; court established standards for notice to class in  
7 age discrimination cases);

8 In Re: Pepco Employment Litigation, C.A. No. 86-0603 (D.D.C., Consent  
9 Decree, March 22, 1993) (race and gender classes; \$38.4 million was then largest  
10 settlement of any kind in D.C. Circuit history; court established principle in D.C. Circuit  
11 that there is no “self critical” privilege in employment cases; court established standards  
12 for use of statistical evidence in hiring class claims);

13 Hyman, et al. v. First Union and First American Bank, C.A. No. 94-1043 (D.D.C.  
14 1997) (age class action litigation against take-over bank and bank taken over; settlement  
15 amount was then the largest age settlement in nation and remains the largest settlement of  
16 private age discrimination lawsuit);

17 Burns, et al. v. Control Data Corporation, C.A. No. M.D. 4-96-41 (D. Minn.  
18 1997) (largest settlement of pattern and practice age case to reach trial in nation – second  
19 largest at time in nation);

20 In Re: Department of Labor/ETA Employment Practices Litigation, EEOC No.  
21 033-91-1185A, Tomas, A.J., (Consent Decree 1997) and related race class actions in  
22 Sealy, et al. v. Brock, Sec. Of Labor, Civ. 86-3028 (D.D.C. 1996);

23 In Re: Maytag Corporation/Dixie Narco Plant Closing Litigation (Jefferson  
24 County, West Virginia Circuit Court, 92-C-417) (displaced worker class; settled for \$18  
25 million in first successful plant closing case in nation, pursued on contract and tort  
26 theories); and

27 Jenson v. Eveleth Taconite Co., 130 F.3d 1287 (8th Cir. 1997) (five months of  
28 trial and several appeals in landmark 11 year litigation establishing the nation’s first

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sexual harassment class action and numerous other precedents, including the principle that defendant is liable for “litigation stress” brought on by trial and trial preparation in proving plaintiff’s psychological and emotional damages).

Over the past 30 years, Sprenger has spoken regularly at national, state and local continuing legal education courses across the country and authored articles concerning the trial of employment class actions and related topics.