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BY ELECTRONIC DELIVERY

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Aaron Tidman—Recommendation for Best LGBT Lawyers Under 40

Dear John:

I understand that the LGBT Bar Association is considering naming Aaron Tidman, with whom I worked closely when he was associated with Debevoise, as one of the top LGBT lawyers under 40. I am writing to provide my strong endorsement of Aaron's candidacy and to describe some of the work he and I did together.

Aaron was a key member of two teams that yielded wins for our clients. In one matter, we obtained dismissal of all securities class action claims against a large Russian mining and minerals concern the securities of which are traded on the New York Stock Exchange. *See Board of Trustees of the City of Ft. Lauderdale Gen. Emp. Retirement Sys. v. Mechel OAO*, No. 09 Civ. 3617 (RJS), 2011 WL 3502016 (S.D.N.Y. Aug. 9, 2011), *aff'd sub nom. Frederick v. Mechel OAO*, No. 11-3666-cv, 2012 WL 1193724 (2d Cir. Apr. 11, 2012). In the other, we represented a former outside director of India-based Satyam Computer Services Ltd. Despite the CEO of that company having confessed to orchestrating one of the largest accounting frauds in history, we—in conjunction with counsel representing other former directors, won dismissal of all securities class action claims against our client. *See in re Satyam Computer Servs. Ltd. Sec. Litig.*, No. 09 MD 2027 (BSJ), 2013 WL 28053 (S.D.N.Y. Jan. 2, 2013).

One feature both cases shared in common was that our clients were not terribly familiar with United States litigation generally or Rule 10b-5 securities litigation specifically. Aaron assisted in the preparation of detailed explanatory memoranda in the *Mechel* case and both written and oral explanations in the *Satyam* case. Our client in *Satyam* came to know Aaron well through meetings and telephone calls and mentioned to me frequently his happiness with Aaron's work on the case.

Aaron is a strong researcher and equally strong writer. In the *Mechel* case, we had to explain difficult concepts of Russian antitrust law to a New York federal judge, and to explain that actions taken against the company by Russian authorities should not translate into a U.S. securities fraud violation. Aaron played a leading role in drafting the argument section of our highly persuasive brief on these points. In *Satyam*, Aaron both had to negotiate with counsel for co-defendants—some of whom were situated differently enough as to want to stress different arguments than those we thought most helpful—and to draft arguments for our client’s separate brief that would not undermine the arguments of our co-defendants. Aaron substantially drafted both our opening and reply briefs, and I was extremely pleased with Aaron’s draftsmanship.

During Aaron’s time at Debevoise, he also was an exceptional “firm citizen.” I serve on our firm’s Hiring Committee, and in that capacity I am at least somewhat familiar with the concerns LGBT recruits have about choosing a firm that strongly values diversity. We have a number of LGBT partners, but it is our LGBT associates from whom our recruits most want to hear about what justifies our reputation for respect and collegiality. Aaron consistently was one of our most important resources in this regard.

I was very sorry to see Aaron move on to his current position at Mintz Levin. During our work together, he already was developing into one of our most talented securities litigation associates—talents I understand he has continued to build upon at your firm. If his growth at Mintz has remained on the same trajectory he demonstrated at Debevoise, Aaron undoubtedly deserves the LGBT Bar Association’s consideration as a top young LGBT attorney.

Please do not hesitate to contact me if I can provide more information supporting Aaron’s candidacy for this recognition.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeff", followed by a long, sweeping horizontal line that extends to the right.

Jeffrey S. Jacobson