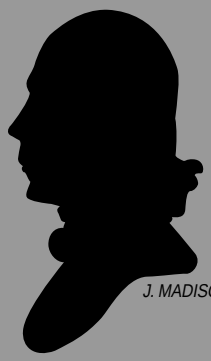

Class Action Watch

A Publication of the Federalist Society's Litigation Practice Group and Its Class Actions Subcommittee

In This Issue

Volume 1 Number 3
Fall 1999

In the last two issues of Class Action Watch, we dedicated the Analysis Section to a presentation of data we collected in surveying a sampling of major American companies on their class action litigation over the past ten years. In this issue, we present the remaining data, which covers a fairly diverse range of subjects. Before discussing this data, though, a brief review of the survey project, methodology employed, and earlier findings is in order. To read about the survey and these earlier reported findings in their entirety, we invite you to visit the Federalist Society's web page at www.fed-soc.org.

ABOUT THE CLASS ACTION SURVEY

In December 1998 the Federalist Society mailed a survey to 100 Fortune 500 companies with nationwide commercial interests. The companies represented every conceivable industry.

The Federalist Society survey asked about putative class actions that were pending in 1988, 1993, and 1998. The hope was that these chronological "snapshots" would provide some sense of the development of class action activity over the most recent ten-year period. The respondents were asked to provide information about federal actions as well as cases in all state courts.

For each of the three years, the survey asked companies to consider a wide variety of subjects, including but not limited to the number of class actions, the type of predominant issue, the size of the class, the incidence and magnitude of settlement demands, and the ultimate disposition.

We had no idea whether or not class action litigation was perceived as a "problem" by the companies we surveyed (indeed, a number of the respondent companies had no class actions to report). Moreover, the surveys were submitted anonymously, and we therefore do not know which companies responded.

Thirty-two companies responded by submitting surveys. Given the size of these companies and the logistical difficulties associated with responding to such a survey (it was 15 pages), we were quite satisfied to have secured such business participation in this kind of a project.

The pool of respondents reflects a diverse collection of class action experiences. It is clear, for example, that the companies that responded were not simply those especially concerned with or affected by class action litigation. A number of the respondents had no or very little litigation pending during the years in question, while others posted more significant numbers. The median and mean numbers of class actions reflect that distribution.

It is crucial to note that this survey effort was not intended to be a complete scientific sample or analysis of class action activity. The data was intended to increase our understanding in this area, but it by no means complete our understanding.

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From The Editors

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Dear Reader:

I am pleased to present the latest issue of Class Action Watch. There have been a number of legislative and litigation developments since last issue of Class Action Watch. On the legislative front, Congress enacted the Y2K liability reform act, which includes limitations on class actions brought to address Y2K claims. More recently, in late September, the U.S. House of Representatives passed its version of the class action reform bill, which would make it much easier to litigate nationwide class actions in federal court. On the litigation front, it seems that scarcely a week goes by without news of some massive class action settlement or judgment — be it Fen-Phen, replacement parts, or most recently, laptop computers. With all this class action activity, it seemed appropriate to publish another issue of the Class Action Watch.

The response to the Class Action Watch remains overwhelmingly positive. The serious debates concerning the future of class actions on Capitol Hill and elsewhere demand accurate information. We remain committed to providing objective information concerning the changing nature of class action litigation. We certainly can use your help in this endeavor. The goal of the Class Action Watch is to provide a clearinghouse for accurate, objective information about class actions. We welcome your participation and encourage readers to share information and experiences.

This issue features results from two of our survey efforts. The "Analysis" section reports the final results of our surveys of corporate experience with class actions. The survey results continue to show interesting trends. For example, participating corporations reported that state-court class actions were concentrated in a handful of States and also reported a growing number of very large class actions, those with over a million class members. The Analysis section also reports on the preliminary results of our latest survey effort — a survey of outside class action attorneys. Although responses are still rolling in, and any final conclusions will need to await future issues of the Watch, we have shared the results of some of the early returns — consider this the equivalent of exit poll data. Finally, this issue concludes with a lengthy "Recent Developments" section, which reflects the number of important class action settlements and developments that have occurred since our last issue.

We hope the material featured in this issue will prove helpful to litigators, judges and all those involved debates over the future of class actions. As we complete our inaugural volume of the Class Action Watch, we welcome feedback as to how we can improve the Class Action Watch to make it more valuable.

Paul Clement
Chairman, Class Actions Subcommittee

SOME EARLIER REPORTED RESULTS: A SUMMARY

For the respondents, class action litigation is on the rise. The number of pending putative class actions in state courts increased by 1,315 percent between 1988 and 1998, but by only 340 percent in federal courts for the same period.

Respondents reported that certified state class actions settled much more often than non-certified actions. And, with each passing year, the length of time between certification and settlement has narrowed substantially. The settlement rate was between 41 and 65 percent in state courts nationwide. The two previous issues of Class Action Watch set forth these findings as well as others in much greater detail.

ADDITIONAL FINDINGS

Among the respondents, a substantial proportion of class actions were filed in just a few states. In 1993, for example, 54 percent of the reported state court class actions appeared in just five jurisdictions: Alabama, California, Louisiana, Ohio, and Texas. That number jumped to 69 percent in 1998. As Figure One demonstrates, Texas, Louisiana, California, and Alabama were especially popular filing states. Indeed, filings went up in Alabama, California and Texas between 1993 and 1998. In 199_ , the Louisiana legislation enacted state class action reform. Filings did go down in Louisiana between 1993 and 1998, which raises the question whether intervening state reform had some impact.

The size of putative classes in state court increased among respondents between 1988 and 1993, as Figure Two suggests. In 1988, 86 percent of the reported class actions involved classes of fewer than 10,000 individuals and only seven percent of the classes involved 100,000 or more members. Those figures were quite different in 1998, with only 53 percent of the classes consisting of fewer than 10,000 members but 31 percent of the classes con-

Figure 1

Percentage of State Court Class Actions by Jurisdiction

	AL	CA	LA	OH	TX	All Other States
1993	5	8	21	5	14	46
1998	14	14	17	4	20	31

Putative Class Size (%)			
No. Class Members	**1988**	**1993**	**1998**
Less than 10,000	**86**	**62**	**53**
Greater than 10,000 but less than 100,000	**7**	**18**	**16**
100,000 to 1,000,000	**7**	**0**	**16**
Greater than 1,000,000	**0**	**18**	**15**

Figure 2

taining 100,000 or more members. Of special note, there were no 1-million members classes reported in 1988, but 18 percent of the classes involved 1 million or more members in 1993 and 15 percent involved 1 million or more members in 1998. These larger state class actions are a proxy (albeit, an admittedly inexact one) for nationwide class actions. Accordingly, these findings are consistent with the anecdotal evidence of a growing tendency for the filing of putative nationwide class actions in state courts.

Many have suggested that the litigation system is witnessing some changes in the kind of class actions being filed. In particular, the Rand Institute and others have reported that class actions involving consumer- or service-oriented claims are replacing traditional toxic tort or product defect claims. Data collected from respondents seems to corroborate this trend. Most notably, respondents reported an increase in class actions alleging fraudulent or wrongful sales practices and fraudulent or wrongful calculation of payments such as royalties or franchise fees. Increases here were significantly more pronounced than in any other area. There were only six such cases reported in 1988 and eight in 1993. But the number of cases jumped to 56 in 1998, and that spike was not attributable to a few outliers; the increases were fairly evenly distributed among all respondents.

We asked respondents to provide data about whether any class actions had been filed during the pendency of an agency proceeding that involved substantially similar claims or requests for relief. Seven respondents reported that such class actions were filed, as demonstrated in Figure 3, with the exception of one of these respondents, each reported a significant increase. While no dual proceedings were reported for 1988, two were identified in 1993, and notably, 44 in 1998. For these respondents combined, about 20 percent of their total class action caseload involved such dual proceedings. While the reader can judge for himself whether this is a considerable

proportion of the respondents' caseload, one thing is certain—the frequency of dual proceedings is greater than in past years for the respondents at issue. Although the number of companies responding to this question is too small to support any firm conclusions, the anecdotal evidence from the survey suggests a growing number of dual proceedings

We sought to gauge the magnitude of class action claims in financial terms by seeking information about initial settlement demands by plaintiff classes in state courts. Responses to questions in this area were somewhat sparse, but those respondents who did report presented some interesting data. In 1988, eight respondents reported that they had cases involving initial settlement demands. All of those demands were less than $1 million. For those respondents, the landscape changed substantially by 1993. In 1993, the same eight respondents reported they had initial settlement demands. This time, though, only a quarter were under $1 million. Half of all the demands were greater than $10 million, and a quarter were between $1 million and $10 million. Finally, the respondents reported less drastic changes between 1993 and 1998. Eleven respondents reported in 1998, three of whom had not reported any data on initial settlement demands for previous years. For 1998, 37 percent of the demands were for more than $10 million, and 26 percent of the cases involved demands between $1 million and $10 million.

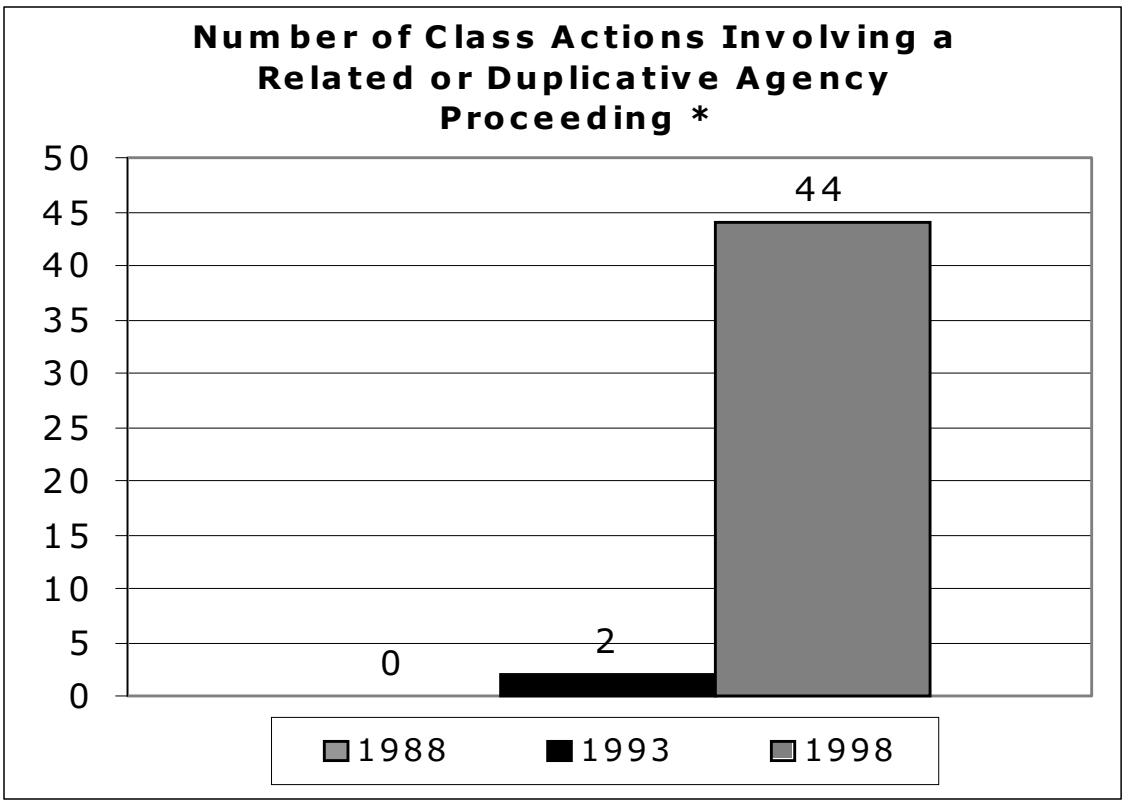

Figure 3

* The graph merely reflects anecdotal data as only seven companies responded to this question.

Analysis

FEDERALIST SOCIETY SURVEYS CLASS ACTION LAWYERS

This fall marks the first anniversary of the Federalist Society's Class Action Watch Project. Since its inception, we have had the opportunity to hear the opinions of many lawyers, corporate counsel, judges, and scholars respecting the state of class action litigation. Perhaps most notably, we have noticed that opinions in this area vary widely and that many people have strongly held views about the class action device. It is against this backdrop that the Federalist Society decided to undertake a "Class Actions Opinion Survey."

The survey, which is reprinted on page 7, asks the respondents to express their level of agreement or disagreement with a series of twelve statements. These statements deal with issues such as attorney fees, the impact of class certification, the incidence of state court class action filings, Rule 23 standards for certification, and the appropriate scope of settlement class actions.

The greatest challenge was to find an objective method of assembling a survey pool. Fortunately, the Martindale-Hubbell directory was enormously helpful in this regard. Among the various practice designations, lawyers may choose from "class actions" and "class action defense." We mailed a copy of the survey to anyone who used these designations to identify their practice areas. The survey reached 1,884 class action lawyers and 300 class action defense counsel.

Both categories of counsel received the same survey except in one respect. Lawyers who identified their practice as "class actions" received a survey reproduced on color paper, enabling us to differentiate defense counsel and thereby contrast their responses from a more general pool containing mostly plaintiff counsel.

The surveys were mailed less than a month ago, and we already have achieved a ten percent response rate in both categories. While it is premature to analyze the data fully, we have decided to disclose some preliminary results relating to state court class action litigation. This data is especially timely because of the debates currently taking place on Capitol Hill respecting legislation aimed at loosening the standards for removing state class actions to federal court.

Statement # 2 reads as follows: "As the federal courts of appeals have tightened the requirements for class certification, there is a greater incentive to file class actions in state court." For the most part, respondents are in agreement here, with 79 percent of defense counsel expressing agreement or strong agreement. About 61 percent of the broader category of class action lawyers expressed agreement or strong agreement.

Statement # 3 suggests that "State courts are appropriate forums for nationwide class actions." Here we begin to see some divergence between the two pools of respondents. While 74 percent of the defense counsel disagreed or strongly disagreed, about 52 percent of the class action lawyers agreed or strongly agreed with the statement.

Statement # 4 deals directly with the legislation pending in Congress: "It should be easier to remove nationwide class actions to federal court." About 63 percent of the class action defense counsel who responded thus far either agreed or strongly agreed with this statement. In fact, 46 percent of them strongly agreed. But among the more general category of class action lawyers, only 17 percent strongly agreed with the statement, and 45 percent either disagreed or strongly disagreed.

With the Supreme Court's recent decision on settlement classes, we also decided to provide a glimpse of the preliminary results relating to Statement # 12, which reads: "A settlement class action should be permitted even if the putative class could not be certified for litigation purposes under Rule 23." Here, reviews were quite mixed amongst defense counsel. An almost even amount agreed (44 percent) as disagreed (48 percent) with the statement. But among the general category of class action lawyers, the non-certifiable settlement class was much more favored, with 60 percent agreeing with the statement and only 28 percent disagreeing with it.

The figures discussed above are only the very early returns. Trends could shift as we receive more responses. A comprehensive analysis will appear in the next issue.

CLASS ACTIONS OPINION SURVEY

Please respond to the statements below by using the following scale:

1 – strongly disagree
2 – disagree
3 – no opinion
4 – agree
5 – strongly agree

1. Class actions result in a net savings of judicial resources.

2. As the federal courts of appeals have tightened the requirements for class certification, there is a greater incentive to file class actions in state court.

3. State courts are appropriate forums for nationwide class actions.

4. It should be easier to remove nationwide class actions to federal court.

5. It should be easier to appeal orders granting or denying class certification.

6. The incidence and magnitude of excessive class action attorney fee awards is exaggerated.

7. Certification of a nationwide class action all but guarantees that the case will settle.

8. A regulatory agency's ongoing examination of a defendant's conduct should counsel against certification of a class action.

9. The existing Rule 23 factors provide a sufficient basis for screening out cases that are not appropriate for class treatment.

10. Cases seeking medical monitoring are particularly strong candidates for class action treatment.

11. It is appropriate for state courts or legislatures to modify the elements of a cause of action to make it easier to seek class action treatment.

12. A settlement class action should be permitted even if the putative class could not be certified for litigation purposes under Rule 23.

Recent Developments

- It was the best of times and then the worst of times for the tobacco industry in their ongoing effort to fight against the massive "statewide" class action certified by the Florida courts. In July, the jury in phase one of the proceedings found against the industry on issues related to liability. However, the industry scored an apparent victory on September 3, 1999, when the state intermediate appellate court ruled that punitive damages as well as compensatory damages would have to be determined on a plaintiff-by-plaintiff basis. The victory was short-lived. Later in September, the appellate court vacated its earlier opinion and set oral argument for October 21st. Within hours of the argument, the court issued an opinion reversing its earlier judgment and allowing the trial court to initiate proceedings which would result in a lump sum punitive damage award that would cover the entire class. The industry is currently seeking discretionary review of the adverse ruling.

- Massive settlement agreed to in Fen-Phen litigation. American Home Products agreed to a massive class action settlement in the litigation arising out the diet drug combination Fen-Phen. The $3.75 billion settlement includes $2.3 billion to cover Fen-Phen users suffering current injuries, $1 billion to provide for medical monitoring of Fen-Phen users who have not yet manifested any injury, and a reported $429 million for lawyers for the class. While juries have awarded individual plaintiffs verdicts as high as $23 million, the settlement would cap an individual's compensation at $1.5 million. This disparity creates the prospect of class members exercising their right to opt out of the settlement, and if class members opt out in large numbers, that action could threaten the settlement agreement.

- Two huge class action awards against State Farm. A nationwide class action certified against State Farm Insurance Company resulted in two massive awards against the insurer. First, the jury in the case awarded the class $456 million in compensatory damages for breach of contract claims. Then, the judge awarded $730 million in damages, including $600 million in punitive damages, against the company for consumer fraud claims. These class actions in the Illinois state courts covered plaintiffs in 48 States. The main allegation against State Farm was that its use of generic replacement parts, as opposed to original manufacturer replacement parts, constituted breach of contract and consumer fraud. State Farm argued that its policies complied with the specific disclosure requirements imposed by the state legislatures in all the States in which the company does business.

- House approves Class Action Reform Bill. On September 23, 1999, the U.S. House of Representatives approved the class action reform bill. The House approved the measure by a vote of 222 to 207, along largely partisan lines. A handful of Republicans, such as Representatives Doolittle and Chenoweth and Graham, voted against the measure on federalism grounds. The main provision in the reform bill would relax the requirement of complete diversity for class actions involving more than 100 class members, more than $1 million, and parties from multiple States. Federal courts would have jurisdiction over such suits as long as the constitutional requirement of minimal diversity is satisfied. Action now moves to the Senate, where similar legislation has been introduced by Senators Grassley and Kohl.

- States and municipalities turn attention to lead paint industry. Fresh from their successful settlements with the tobacco industry, States and municipalities are suing manufacturers of lead paint. Most recently, the State of Rhode Island became the first State to sue the industry when it announced its suit on October 12, 1999. Defendants in the Rhode Island suit include Atlantic Richfield, DuPont Co., and Sherwin-Williams. The Rhode Island suit follows

on the heels of a number of suits filed by municipalities, including a class action suit filed by the City of Philadelphia on behalf of all cities in the United States with populations over 100,000 persons. The Philadelphia action seeks damages for: inspecting HUD and privately owned housing; removing lead paint from public and private residential properties built or painted prior to 1950; testing individuals to detect elevated lead blood levels; treating city residents for exposure to lead paint; and educating the public about the hazards of lead paint. The City of New York, apparently unwilling to delegate its litigation authority to the City of Brotherly Love, filed its own suit seeking over $50 million in damages.

- Emerging Joint Employer Liability. There is a new flow of class action litigation involving temporary employees, who claim that the corporations, which hire them through a temporary employment agency, are actually their joint employer and owe them for past pension and other benefits. *Herman v. Time Warner, Inc.*, 56 F.Supp.2d 411 (S.D.N.Y. 1999)(denying defendents' motion to dismiss complaint, which alleges temporary employees were misclassified and owed benefits); *Vizcaino v. Microsoft Corp.*, 120 F.3d 1006 (9th Cir. 1997) (en banc), cert. denied; 118 S Ct. 899 (1998) (adopting an IRS audit, which concluded that Microsoft improperly classified workers as independent contractors and temporary workers).
- Amount in Controversy. The *Meritcare* case provides additional insight into the issue of using attorney fees to reach the amount in controversy requirement. The Third Circuit ruled that each plaintiff in a diversity-based class action must satisfy the amount-in-controversy requirement separately. *Meritcare Inc. v. St. Paul Mercury Insurance Co.*, 166 F.3d 214 (3d Cir. 1999). *The New Jersey Law Journal* reports that Meritcare will "likely have ramifications on class action practice involving state law claims. The result will likely be an increase in the number of these claims filed in New Jersey state courts rather than federal courts." *James J. Ferrelli, Meritcare, Inc. v. St. Paul Mercury Insurance Co.*: A Swan Song for Diversity-based Class Actions?, *The New Jersey Law Journal*, April 19, 1999, at S5.
- Old class actions and the new economy. As the Y2K Act's class action provisions evidence, high technology companies have been immune from the changes in class action litigation that have occurred over the past several years. The latest evidence is the reported settlement of a class action brought against Toshiba for alleged defects in its laptop computers. According to the *Wall Street Journal*, Toshiba reached a settlement in a class action filed, which had a nominal value of $2.1 billion and included a $147.5 million payment to class counsel. The alleged defect at the heart of the case was the possibility that the laptops could lose or spoil data when saved to a floppy disk.
- Congress addresses class actions in Y2K Act. Congress also addressed the issue of class actions in the Y2K Act, passed and signed into law on July 20, 1999. The Act's class action provisions, which apply only to claims based on alleged Y2K failures, make two important changes in the law. First, the Act adds a new requirement for certification of a class action for Y2K claims. In addition to all other requirements of applicable state or federal law, the party seeking class certification must also show that the defects "as alleged would be a material defect for the majority of the members of the class. Second, the act includes language similar to that in the Class Action Reform Bill, which expands federal jurisdiction over Y2K class actions. However, there are some important differences from the House-approved version of the broader class action bill. For example, while the House bill would grant federal court jurisdiction as long as the total amount in

Recent Developments

controversy exceeds $1 million, the Y2K Act uses a $10 million amount in controversy as the trigger for federal jurisdiction.

- Y2K Bug Litigation. "Businesses have already filed several suits against software manufacturers for their alleged refusal to offer free upgrades. For example, customers filed at least six class-action suits in 1998 against Medical Manager Corp., a software manufacturer that markets a program used by more than 25,000 health care practitioners in the United States. . . . Medical Manager settled most of these cases in December 1998, agreeing to provide free upgrades and remiburse those who had already paid." Lance Caughfield, *Who's Picking Up the Tab? Policyholders Try to Bill Insurers for Y2K Remediation Costs*, *Texas Lawyer*, September 20, 1999, at 23. "The most interesting development in the area of cost recovery lies in the suits recently brought against insurers for the cost of remediation. On June 18, 1999, GTE sued five of its insurers to cover its remediation costs, which according to Securities and Exchange Commission filings amount to almost $400 million. Since that time, Xerox and Unisys have sued their insurers in similar actions. The total recovery sought so far appraoches $1billion." *Id.*

- Putative Class Registration on the Internet. *The New York Law Journal* reports that the Internet is increasingly being use as a tool in signing up potential class action clients. *Web Watch: Class Action Updates on the Web, New York Law Journal*, September 13, 1999, at S17, col. 1. "One well-known Washington D.C. plaintiffs firm, Cohen, Milstein, Hausfeld & Toll—known these days for its Holocaust-related class actions and its work on the Texaco and other civil rights and employment cases—has set up a very effective thought not terribly aesthetic page at www.cmht.com/cwhome2.htm. Clearly designed to be read by clients and potential clients, it fills readers in on a dizzying array of cases, from fake stucco to shoe price fixing to the Exxon Valdez." *Id*.

- Louisiana leading reform. *The National Law Journal* reports that "class action law has swung in favor of the defense in every forum." Michael D. Goldhaber, *Class Action Blues, New Orleans Style: Louisiana Perfects the Class Action; It May Also Be the First to Destroy It*, *The National Law Journal*, June 28, 1999, at C1, col. 1. Further, "[i]f Louisiana was at the forefront of the class action trend, it has also been at the leading edge of the backlash. . . . The state Supreme Court, in *Ford v. Murphy Oil* (1997), drew the line on the concept , refusing to recognize a class when the action arose from multiple sources and multiple events. The Legislature abolished punitive damages in most cases in 1996, and in mid-1997, it began requiring separate trials to establish damages for the individual members of a class." *Id.*

- Tobacco Litigation. *Laborers' and Operating Engineers' Utility Agreement Health & Welfare Trust Fund for Arizona, et al. v. Philip Morris, Inc., et al.*, 42 F.Supp. 2d 943 (D.Ariz.1999). In this Preliminary Order, the District Court discusses the trend, whereby pension funds are seeking to recover health care costs from tobacco companies. The Court granted defendants' motion to dismiss the complaint, finding that "the essential concept underlying all of the issues is proximate cause." *Id.* at 946. The Court found "no direct relationship between the alleged misconduct and the injury suffered." *Id*. at 947.

- Media Companies' Billing Practices Challenged. *Hill, et al. v. Galaxy Telecom, L.P., et al.*, 184 F.R.D. 82(N.D. Miss. 1999). On January 12, 1999, the District Court for the Northern District of Mississippi certified a class of cable television subscribers who claim that the cable company's five dollar late fee does not reasonably reflect the company's cost in processing late payments, but rather is arbitrary and simply serves as a penalty.

1999 National Lawyers Convention
The Ethics of Class Action Litigation
Practice Group Session

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FEDERALIST SOCIETY AND ITS
PROFESSIONAL RESPONSIBILITY & LITIGATION
PRACTICE GROUPS

Prominent class action plaintiffs lawyer William Lerach once said, "I have the greatest practice of law in the world. I have no clients." For some, this statement pinpoints the ethical problems associated with much class action litigation. Others suggest that ethical concerns are a red herring—the court, defense counsel, and class counsel ensure that class members are treated fairly. This panel will consider the ethics of class action litigation and proposed reforms. Should the standard for class representation be tightened? Can class representatives and class counsel fairly represent the interests of would-be class members? How should courts and defense counsel assure that a proposed settlement is fair? Should class members be more aggressive in objecting to settlements in which class counsel receive a disproportionately large fee? Are federal courts better than state courts at policing class actions? If so, should diversity requirements be loosened?

PANELISTS:

Mr. Paul Bland, Counsel, *Trial Lawyers for Public Justice*
Professor Lester Brickman, *Cardozo School of Law*
Ms. Elizabeth Cabraser, *Lieff, Cabraser, Heimann & Bernstein*
Ms. Marsha Rabiteau, *Senior Counsel, Dow Chemical Company*
Mr. Lawrence Schonbrun, *California Attorney*

MODERATOR:

Judge Jerry Smith, *U.S. Court of Appeals, 5th Circuit*

To see a transcript of proceedings, visit our webpage at www.fed-soc.org.

Upcoming Events

- December 1, 1999 National Press Club Washington, D.C. — *Medical Monitoring: Gateway to Unlimited Liability or Just Reimbursement?*
- December 7, 1999 U.S. Chamber of Commerce Washington, D.C. — *Regulation Through Litigation*
- January 27, 1999 Silicon Valley Lawyers Chapter — Joseph Grundfest, "Second Annual Latest Trends and Emerging Issues in Securities Class Action Litigation."

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