

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE SEPTEMBER 11, 2001 LITIGATION

21 MC 97 (AKH)

-----X  
**NOTICE OF JOINDER**

**PLEASE TAKE NOTICE**, that Delta Air Lines, Inc., hereby joins the Motion to Dismiss filed on January 17, 2003 on behalf of defendants American Airlines, Inc., AMR Corporation, Continental Airlines, Inc., AirTran Airlines, Burns International Services corporation, Burns International Security Service Corporation, Globe Aviation Services Corporation, Globe Airport Security Services, Inc., Huntleigh USA Corporation and Pinkerton's Inc. (collectively, the "Aviation Defendants"), wherein the Aviation Defendants gave notice of their intent to move this Court before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the United States District courthouse located at 500 Pearl Street, New York, New York, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing those claims against the Aviation Defendants in the five (5) Master Complaints and their corresponding individual complaints which allege wrongful death, personal

injury or property damage relating to the September 11, 2001 terrorist attacks and sustained other than on the aircraft seized by the terrorists (the "Ground Damage Claims").

Dated: February 6, 2003  
Garden City, NY

**GALLAGHER GOSSEEN  
FALLER & CROWLEY**

By: 

**MICHAEL J. CROWLEY**

A Member of the Firm  
Attorneys for Defendant  
**DELTA AIR LINES, INC.**  
Office and P.O. Address  
1010 Franklin Avenue, Suite 400  
Garden City, NY 11530-2927  
(516) 742-2500  
Atty. I.D. # MC/2821

**To:**

Marc Moller, Esq.  
KREINDLER & KREINDLER  
100 Park Avenue  
New York, NY 10017  
(212) 687-8181  
Plaintiffs' Liaison Counsel

Desmond T. Barry, Esq.  
CONDON & FORSYTH LLP  
685 Third Avenue  
New York, NY 10017  
(212) 894-6770  
Defenses Liaison Counsel

Condon & Forsyth  
685 Third Avenue, 14<sup>th</sup> Floor  
New York, NY 10017  
Attorneys for American Airlines

**To:**

Debevoise & Plimpton  
919 Third Avenue  
New York, NY 10022-3904  
Attorneys for American Airlines

Mayer, Brown, Rowe & Maw  
190 South LaSalle Street  
Chicago, Illinois 60603-3441  
Attorneys for United Airlines, Inc.

Quirk & Bakalor, P.C.  
845 Third Avenue, 15<sup>th</sup> Floor  
New York, NY 10022  
Attorneys for United Airlines, Inc.

Biedermann, Hoenic, Massamillo & Ruff  
A Professional Corporation  
90 Park Avenue  
New York, NY 10016  
Attorneys for Air Canada

Campbell, Campbell, Edwards & Conroy  
A Professional Corporation  
One Constitution Plaza, Third Floor  
Boston, Massachusetts 02129  
Attorneys for US Airways

St. John & Wayne, L.L.C.  
Two Penn Plaza East  
Newark, New Jersey 07105-2249  
Attorneys for Continental Airlines

Law Office of Robert S. Murphy  
96 Willis Avenue  
Mineola, NY 11501  
Attorneys for TEM Enterprises/Casino Express

Satterlee Stephens Burke & Burke  
230 Park Avenue  
New York, New York 10169-0079  
Attorneys for AirTran Airlines

**To:**

**Connell Foley, LLP**  
85 Livingston Avenue  
Roseland, New Jersey 07068  
Attorneys for Colgan Air, Inc.

**Simpson Thacher & Bartlett**  
425 Lexington Avenue  
New York, New York 10017-3954  
Attorneys for Argenbright Security, Inc.

**Mendes & Mount, LLP**  
750 Seventh Avenue  
New York, New York 10019-6829  
Attorneys for Huntleigh USA Corp.

**Susman Godfrey L.L.P.**  
Suite 5100  
1000 Louisiana Street  
Houston, Texas 77022-5096  
Attorneys fro Huntleigh USA Corp.

**Jones Hirsch Connors & Bull P.C.**  
1 Dag Hammarskjold Plaza  
New York, New York 10017  
Attorneys for Globe Aviation Services, Inc.

**Kelly, Libby & Hoopes, P.C.**  
175 Federal Street  
Boston, Massachusetts 02110  
Attorneys for Globe Aviation Services, Inc.

**Lord, Bissell & Brook**  
Suites 2600-3600  
Harris Bank Building  
115 South LaSalle Street  
Chicago, Illinois 60603  
Attorneys for Globe Aviation Services, Inc.

**Hunton & Williams**  
200 Park Avenue  
New York, New York 10166-0136  
Attorneys for Burns International Services Corp.

**To:**

Davis Polk & Wardwell  
450 Lexington Avenue  
New York, New York 10017  
Attorneys for Securicor PLC

Cleary, Gottlieb, Steen & Hamilton  
One Liberty Plaza  
New York, New York 10006  
Attorneys for Securitas AB

Chadbourne & Parke LLP  
30 Rockefeller Plaza  
New York, New York 10112  
Attorneys for Pinkerton's Inc.

McLaughlin & Stern LLP  
260 Madison Avenue - 18<sup>th</sup> Floor  
New York, New York 10016  
(212) 448-1100  
Attorneys for ICTS International

Perkins Coie LLP  
1201 Third Avenue, Suite 4800  
Seattle, Washington 98101-3099  
Attorneys for The Boeing Company

Reboul, MacMurray, Hewitt & Maynard  
45 Rockefeller Plaza  
New York, New York 10111  
Attorneys for The Boeing Company

O'Melveny & Myers LLP  
400 South Hope Street  
Los Angeles, California 90071  
Attorneys for Massachusetts Port Authority

O'Melveny & Myers LLP  
Citigroup Center  
153 East 53<sup>rd</sup> Street  
New York, NY 10022-4611  
Attorneys for Massachusetts Port Authority

**To:**

Goodwin Procter LLP  
Exchange Place  
Boston Massachusetts 02109-2881

Dombroff & Gilmore  
1025 Thomas Jefferson Street, NW - Suite 300  
Washington, DC 20007  
Attorneys for Metropolitan Washington Airport Authority  
and The City of Portland, Maine

Dombroff & Gilmore  
40 Broad Street - Suite 2000  
New York, New York 10004  
Attorneys for Metropolitan Washington Airport Authority  
and The City of Portland, Maine

Keith Harris, Esq.  
Port Authority of New York and New Jersey  
225 Park Avenue South - 13<sup>th</sup> Floor  
New York, NY 10003  
Attorneys for Port Authority of New York and New Jersey

Flemming, Zulack & Williamson, LLP  
One Liberty Plaza  
New York, New York 10006-1404  
Attorneys for Port Authority  
and World Trade Center Properties LLC