



# DON'T MESS WITH TEXAS

**How Susman Godfrey Became America's Leading Trial Firm**

By Katrina Dewey

FROM LEFT TO RIGHT: PARTNERS GEOFFREY HARRISON, VINEET BHATIA, SHAWN RAYMOND, ERICA HARRIS, NEAL MANNE, LEXIE WHITE AND MAX TRIBBLE.

## **Judge Lee Rosenthal's Houston courtroom was packed earlier this year, largely with troops of drab-suited**

bureaucratic lawyers defending Harris County's practice of jailing thousands of low-risk folks arrested for minor charges like unpaid tolls - and then holding them for months by setting bail amounts they could not possibly pay.

Across the aisle, Alexandra "Lexie" White, a Susman Godfrey partner, was one of four pro bono lawyers challenging the constitutionality of this bail system. Representing those who had been arrested, she showed a video of a probable-cause hearing at which a

homeless man charged with sleeping under a bridge had his bail set at \$5,000.

She quietly rose to examine the county's expert witness who supported the practice.

So, sir, she asked, is it true that you see the cash bail system as a "budgeting tool for the poor," helping a person by keeping her cash resources out of reach?

This was not White's first rodeo.

White grew up in courtrooms in Baton Rouge. She remembers sitting in front of counsel table, in a chair to the side, watching her father preside over a civil court dispute in which a lady was suing her landlord for emotional distress because a cleaning crew had forgotten a boa constrictor in her apartment while she was away.

Though White's family has roots in the law, her upbringing was "a lot of love" but not a lot of money. She used her talent as a competitive swimmer to win a scholarship to college and then returned to Baton Rouge where she set new marks in almost every class she took at Louisiana State University Law School. She graduated first in her 2004 class, clerked for the 9th Circuit, and then joined Susman Godfrey.

Within months of joining, she went to trial - her second - with the one and only Steve Susman, with whom she collaborated to prepare every witness and craft every argument. When the judge asked Susman on the first day of trial if he was ready to give the opening statement, Susman rose, smiled, and drawled, "Your Honor, Ms. White will be delivering the opening." After taking a deep breath, she did.

"We like to take risks," says Neal Manne, Susman Godfrey's Houston-based managing partner.

That attitude has made Susman Godfrey the nation's most elite litigation firm. Pick your metric - money, U.S. Supreme Court clerks, bet-the-company cases, percentage of partners in trial annually - the firm runs circles around everyone else. In fact, with 93 percent of its attorneys having held federal clerkships (that's 96 of 103 lawyers and all of its partner-track associates) it beats by a handy margin even the justices of the U.S. Supreme Court's own mark of 66 percent.

In 2016 alone, Susman Godfrey won more than \$1 billion in verdicts and settlements for its clients. And it posted a remarkable "in-trial" rate of 44 percent, meaning a staggering 44 percent of its partners and associates were in trial in 2016. Compare that with your average litigation firm.

To explain Susman Godfrey to Big Law is a little bit like trying to explain Lyle Lovett to fans of the Beastie Boys. You have to be able to hear what you're listening to and understand where it comes from in order to understand why Susman Godfrey is unique, special and without peer as an American law firm that excels in courtroom battle.

You also have to know about a little boy named Louis, and why partners wander over to baseball fields for no particular reason. You need to understand a brotherhood that includes sisters and how loyalty and fun can create more profitability than any fancy-ass, hourly-billing law firm consultant could ever conjure. Read on and you will.

The firm plays off the board, as it has since maverick Steve Susman opened his doors in 1980.

Watching Steve Susman in trial - such as when he represented Frank McCourt in his divorce - you know you are in the presence of greatness. He is of an era that produced two or three enduring legends, among the best ever at their craft. That's indisputable. Where Susman

stands alone is in founding a firm that has become much better than its original footprint.

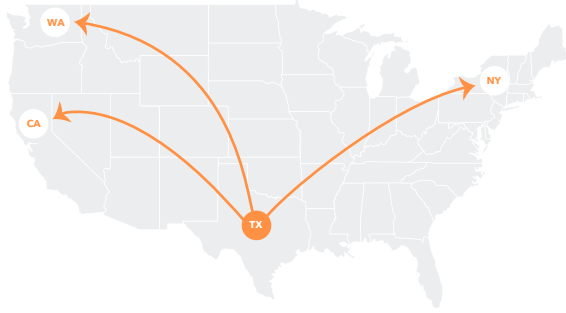
He started out clerking for U.S. Supreme Court Justice Hugo Black and teaching at University of Texas Law School before helming an antitrust case for purchasers of corrugated boxes. He won \$550 million and understood that his success should come from his results rather than his effort. There's a sturdy Chevy truck in that recipe: federal clerkship, Texas and bet on yourself, even if there are today Rauschenbergs hanging on the wall.

Others quickly signed on. Rather than joining the big Texas firms, Lee Godfrey, Parker Folse, Mark Wawro, and a rustle of other smart graduates of, primarily, the University of Texas School of Law, bought into the Susman vision in the early days. It was big and bold, like Susman, and leavened by the elegant Godfrey. The contingent fee work had swagger, but necessitated the firm taking some small, not necessarily good cases to keep the lights on and everyone occupied. The vision was awesome, but the business model was a work in progress.

Enter Neal Manne. From the year the firm opened, Susman had his eye on the fellow Texan. Typical Susman, he would not let go. Manne had grown up in blue-collar Baytown and set things on fire in Austin during law school. Manne was graduating in 1980, and Susman called and asked him to come interview. Manne was flattered but told Susman no. "I'm not going to practice in Houston. You're busy and I'm busy. I don't want to waste your time or mine." Not even remotely deterred, Susman responded, "Fine. But at a certain point you'll change your mind, and call me, and we'll talk about it."

Manne clerked for 9th Circuit Judge William Norris, then moved to D.C. where he worked at a Big Law firm before eventually becoming Chief Counsel to the U.S. Senate Judiciary Subcommittees on Juvenile Justice and on Constitutional Law. He then became Chief of Staff to Senator Arlen Specter. "During my six years in D.C.," Manne recalls, "I would periodically get a random phone call from Steve Susman, who I still had never laid eyes on, and he would bark into the phone, 'Manne, are you ready to get a real fucking job yet?'"

In 1988, Manne said yes, joining Folse, his best friend from law school, in Houston. Manne brought not only political dexterity but a polish and sophistication that would amplify the firm's corporate base, creating tremendous ballast for its expanding caseload of contingency work. He has an extraordinarily broad litigation portfolio, including Chevron, for whom he is helping lead the defense in the climate change litigation. For more than a decade he has been one of Wal-Mart's go-to litigators, having tried major cases for it across the country and in Puerto Rico. His partners elected him a managing partner in 2011 and have re-elected him ever since.



**Susman Godfrey has exported its trial expertise from deep in the heart of Texas to offices in California, Washington and New York.**

Somehow, the added responsibilities of managing the firm have not cut into his career-long devotion to pro bono and public interest cases. In the last three years alone, Manne has defeated an effort by the State of Texas to block Syrian refugees from resettling in the state, successfully represented an exonerated Death Row inmate in having his prosecutor disbarred for life, and led the bail reform case against Harris County - resulting in the release of thousands of low-risk defendants and the overturning of the unconstitutional system.

Max Tribble, another young lawyer, also joined Susman in 1988 after graduating from Harvard Law School. The die was cast for the next era of winning at the firm, pairing Susman's own penchant for swinging for the fences with a turbo-charged group of risk takers who loved calculated risk and brought a set of skills and swagger that are unsurpassed.

Tribble, Geoffrey Harrison, and Vineet Bhatia are the dream team for whom any major firm would trade its current 50-year-old partner ranks. And with good reason; they are the bank. Over two decades of practicing together, they have formed an enduring friendship. Their families all have second homes in Telluride because they like to hang out together. They are unique as individuals and a powder keg as trial lawyers.

Tribble is the most senior of the three, and combines a technical mind with a special appreciation for risk taking. He grew up on the East Side of Houston, the only child of a couple who ran a chain of bowling alleys. He learned to count cash at the age of four, rolled a million quarters from the pinball machines, and learned to ride a bike in the bowling alley. His interest in business and entrepreneurship came honestly and led him to study business at Harvard and then go to law school. As he was graduating in 1988, he heard about a unique young firm in his hometown that liked to take risks.

"Susman Godfrey was revolutionary," he says, recalling the norm for most serious firms was lockstep compensation for partners. "We've always valued business genera-

tion, performance and results. We structured everything about the firm based on winning for clients."

Tribble has handled hundreds of disputes, many of them involving patents and intellectual property, and is also handling the world's largest trust dispute, representing a grandson of the late J. Howard Marshall.

Among his strokes of genius was the realization, while representing Emerson Electric in the early 1990s, that Susman Godfrey could carve out a huge niche by adding its courtroom panache to the toolkit of patent litigation. "I felt our firm would have a real competitive advantage because, while very smart and knowledgeable about the technology, many patent lawyers at the time did not have our level of experience in front of juries and judges."

That approach has led him to slice a hefty swath through technology-driven litigation, both in joint ventures with patent firms and independently, winning more than \$1B in patent litigation. He's taken on Apple, Samsung, American Express, Google and Intel - the latter on behalf of MicroUnity for which he won \$300M in licensing fees. He represented Barcelona-based Fractus, S.A. against the entire cell phone industry to enforce Fractus' antenna patents. While the rest of the industry paid to license the patents before trial, defendant Samsung unwisely chose to fight. Tribble won \$38M against them. To date, Tribble has recovered over \$100 million in settlements and licenses for the company. In the next year, he has trials scheduled for House Canary against Title Source Inc., and the Marshall trust battle.

Geoffrey Harrison, possessed of a "dare me" personality and a business-driven mind, came to Susman Godfrey at the urging of the guy he calls "Big Daddy Susman." After studying business at Penn (where he was a champion debater), he went to University of Chicago Law School, where he was a moot court champion. A professor in the law and economics program and 7th Circuit Judge, Diane Wood, invited her fellow Texas alum Steve Susman to lecture, and he figured he'd seek out the best 1L while he was there. Courtesy of the law review managing editor, Susman reached out to Harrison and asked him to clerk with the firm the following summer.

The two are kindred spirits, and Harrison has reveled in the trials he's handled with Susman, Godfrey, Manne, and others since the day he joined in 1993 following a clerkship for the chief judge of the 11<sup>th</sup> circuit. He made partner in 1996, early and in record time.

Whereas Steve Susman gave Lexie White little notice that she would be delivering the opening statement, Lee Godfrey gave Harrison an entire lunchtime of notice that he'd be taking the next witness in one of his earliest trials. "Usually, people have plenty of notice. But sometimes opportunities present themselves. The question is: Are you the kind of person who will rise to

the occasion or shrink from it?" says Harrison. "Around here, we rise."

Northeast-born and Texas-raised, Harrison has compiled an astounding track record of wins mixing commercial litigation and public interest cases. He was named Houston's Hero in 2015 for his work upholding Houston's Equal Rights Ordinance in a lawsuit seeking its repeal.

He has won hundreds of millions of dollars in verdicts and settlements, netting \$50M for Apache Deepwater in an offshore well-abandonment case in the Gulf in 2015. Harrison and his team of Bill Merrill, Ashley McMillian and Abby Noebels took on Texas legend David Beck in the case. And true to the Susman Godfrey playbook, Harrison carefully cultivated meaningful roles for every member of the team, including its most junior member, Noebels, whose witnesses kept getting cut. The Sunday

of a lawyer when he enrolled at Columbia Law School in 1987. He was one of a couple Indian law students. A skilled debater, he won admiration at Wachtell early on but found himself drawn to the plaintiffs' side of cases. Although he and Wachtell typically represented defendants, he had a rare chance to work as plaintiff's counsel for Philip Morris when it sued ABC for reporting it had spiked its cigarettes with nicotine.

When Bhatia decided to move to Susman in 1995, his work for Philip Morris was an issue. Susman was considering representing the state of Texas as a plaintiff in the Tobacco Wars. Ultimately the firm solved the potential conflict by defending Philip Morris instead, marking one of its first major forays into big defense work - and locking up one of the nation's soon-to-be best trial lawyers. The relationship resulted

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before the last week of trial, Harrison was home when he received a revised witness list that showed Noebels' final witness was gone. He called her immediately.

"She had noticed and she didn't say but you could tell she was disappointed. So she was mighty pleased when I said, 'Why don't you take one of my witnesses?'" recalls Harrison. "That, I think, is a part of Steve Susman's continuing influence on how I, and I believe others, view our roles in the firm: to bring along the generation behind us as stand-up trial lawyers."

Harrison has three jury trials and two arbitrations set for 2018, with hundreds of millions of dollars in dispute. In a comment that would be startling elsewhere but underscores the ties at Susman Godfrey, one partner said of Harrison, "I'd take a bullet for him."

Bhatia is the only lawyer to have lateralled between the nation's two most exclusive law firms - moving from Wachtell to Susman in 1995. Born in Lucknow, India, to a family of doctors, he had no perspective on the job

in Bhatia serving as one of the lead lawyers defending Philip Morris, and also provided Susman Godfrey with its earliest experience using large fixed fees in defense cases rather than hourly billing - a practice that is now a mainstay of the firm.

Bhatia has gone on to play a key role in building up the firm's defense practice for clients including Genworth Financial, Equitas, Lyondell, and Kellogg Brown Root, while winning over \$1B in verdicts and settlements for clients including Lyondell and Masimo. He's currently preparing for trial in Northern California in early 2018 on behalf of a hosting provider that claims Machine Zone - maker of Game of War and Mobile Strike - defrauded his client.

"What I would say about our firm is that our work in plaintiff's cases teaches us to be lean and to focus on the issues that really matter. That translates into how successfully we handle defense cases," says Bhatia, who brought experience and Fortune 500 clients from Wachtell.

His first big contingency win was for Lyondell, where he won a \$22M award at age 37. With a 30 percent contingent fee, for roughly \$300,000 in lawyer time he obtained a fee of more than \$6M for the firm. Under the firm's compensation system, Bhatia was paid the lion's share of that fee, and he was off and running.

The trio of Tribble, Harrison, and Bhatia, anchored by Manne, catalyzed Susman's risk taking into a durable machine that now has more than 30 partners who generate multimillion-dollar fees year in and year out. As Lee Godfrey retired and Steve Susman reached his mid-70s, Susman Godfrey has transcended the persistent question of firms founded by legendary lawyers: Does anything come next?

For the Susman Godfrey of 2017, the answer is a resounding yes from a firm well stocked with big rainmakers in four nationwide offices who handle a diversified mix of cases for plaintiffs and defendants, most of it on various non-hourly arrangements. Even most of its defense work, for mega-clients like General Electric, Chevron and Wal-Mart, is done on monthly fixed-fee arrangements rather than by the hour. Each partner can determine her or his portfolio of risk, allowing room for partners who are less risk tolerant while letting those who go big put all their chips on the table.

It also built out from its Texas base, spurred in part by the tort reform that swept through Texas in the 1990s. One of its earliest stars, Parker Folse (a clerk to then-U.S. Supreme Court Justice William Rehnquist), moved to Seattle to open the firm's first non-Texas office in 1995. The firm opened in Los Angeles in 1998 under class-action powerhouse Marc Seltzer, and in 2006, the firm opened in New York, where it has flourished under Bill Carmody and collected Supreme Court clerks as if it were a hobby.

The firm has evolved, but what has not changed at all is the raw desire to win. To win to make money. To win to help your client. To win to be the best. To win because it's so fun to celebrate.

To win.

Winning Susman Godfrey style is bigger, badder, and more fun than at any other firm. It's celebrated in grand style in far-flung places by entire trial teams after a trial victory or big settlement. It's celebrated with an annual good-natured, unofficial competition among the Tribble-Harrison-Bhatia-Robert Rivera crew, with Bacchanalias at Carbone and other outrageously amazing restaurants and resorts. It's the lifeblood of the firm. In most cases, the partner who brings in the win gets a huge cut of the payout. And, unlike other major law firms, there are neither 100 partners upstream stepping on the haul nor the sense that such windfalls will never happen again.

There may be no better illustration of the larger-than-life nature of law practice at Susman Godfrey than Bill



**Los Angeles partner Kalpana Srinivasan**

Carmody, whose own story as an audacious outsider rivals that of his firm. The former Tulsa bartender and Merchant Mariner became Susman Godfrey's least likely partner - no clerkship - through big trial wins, risk-taking, and wooing of Steve Susman. After practicing for years in Dallas, including at his own firm, Carmody agreed to move to Susman's fledgling New York office in 2007. What started as a couple cubbyholes somewhere on Park Avenue is today the swankiest office on 6th Avenue, from which Carmody, Jacob Buchdahl, and a host of other stars represent GE, Dan Loeb and, most recently, lead Uber in its battles with Waymo.

"When I got off the plane at LaGuardia, I only had one good friend in New York: Daniel Boulud. Daniel is one of the best chefs in the world, but he wasn't going to give us any legal work. So the truth is, I didn't have many wild dreams at that point," says Carmody. "Susman Godfrey lawyers had handled cases across America - including NYC - but we had no beachhead here. For the first bunch of years, Steve, Jacob Buchdahl, and I were completely occupied with the challenge of the moment, which was getting to the point where we had our legs underneath us - the challenge of letting the best legal market in the country know that the best trial firm was in town and open for business."

Since then, owing to its people, the New York office has found nothing but success, says Carmody. Of the 24 lawyers in the New York office, six have clerked for the Supreme Court, and a seventh is on his way to clerk for Justice Elena Kagan.

"All of our New York lawyers are of the highest caliber, and are all incredible people too. And their efforts on behalf of our clients are unsurpassed. When the pressure is on, it's 24/7, where all of us are making personal sacrifices for the good of our clients. When you add the



**Seattle partner Parker Folse**

fact that we genuinely like and respect each other, too, you couldn't ask for more," says Carmody. And, to bring things full circle, the firm's epic holiday party for the legal community each December is catered by Carmody's old pal, chef Daniel Boulud.

The gatekeeper for entry into the nation's most elite lawyer club is Erica Harris, a longtime Houston partner. She only interviewed with Susman Godfrey at the urging of her UT classmate, Steve Susman's son Harry, and she has watched as the firm has become a ridiculously impossible place to get a job.

"Harry came up to me one day when I was in my suit and said, 'My dad's got this firm and they don't have enough women signed up to interview. Would you do me a favor and just take a half an hour? You could fit it in here.'"

From the start, in a sea of firms that all seemed alike, Susman Godfrey struck her as different. She flew to Houston and had dinner with Neal and Nancy Manne. Neal is a fairly persuasive lawyer, of course, but absolutely no one can resist Nancy. Because she liked the couple and wanted to build a friendship, Erica decided to accept a summer job. After graduating second in her class from Texas in 1996, she clerked for Judge Rosenthal and then completed a fellowship at University of Virginia Law School, thinking it would bolster what she thought would become a career in legal academia. Instead, she was drawn back to law practice, and in 1998 joined Susman Godfrey.

Joining Susman Godfrey meant she was making \$10,000 less than her other options. "That was a big deal to my household, which was a 'what do we have in the refrigerator' home. My parents didn't understand," she says. Her first week, she got on two trial teams and argued a motion with Rivera. And she never looked back. She's invalidated trademarks, won hundreds of millions

for clients, and has been called "the best damn lawyer in Houston." She epitomizes the firm's philosophy of allowing each lawyer to calibrate her own risk as a trial lawyer, while at the same time overseeing recruiting, including the 13 lucky lawyers who joined this year. While they are all standouts (and federal clerks), she noted one lawyer's answer when she asked: Why him?

"I have grit," he said. He liked sitting down and staying with a problem until it was figured out. That was the right answer.

If you want to talk grit, you need look no further than Los Angeles standout Kalpana Srinivasan, a 2004 Stanford Law School graduate who started her professional life as a policy reporter with the AP in Washington, D.C. She clerked for 9th Circuit Judge Raymond Fisher, then chose Susman Godfrey because she wanted a firm where she could have more impact early on. Her fellow clerks went to big firms and dug into discovery; Srinivasan flew to Minnesota.

As she tells it, Manne called her shortly after she joined the firm, looking for help in a statewide class action he was defending for Wal-Mart. His strategy involved finding some good store-level witnesses from Northern Minnesota.

Says Srinivasan, "I was sort of stunned that, sight unseen, the managing partner of the firm was like, 'Go find and pick out the trial witnesses for my case.' I said, 'Okay, here I go.'"

In her large, rented SUV, she spent weeks traversing the frozen tundra from Shakopee to White Bear Lake to Owatonna, eating pie late at night with Wal-Mart employees. But here's what sets Susman Godfrey apart: when the case was tried the next year, Srinivasan presented the witnesses at trial.

That latitude, as well as the people, was what attracted her to Susman Godfrey. Before she joined, she flew to Houston to meet the partners and was struck by their caliber as lawyers and more. "They excel in so many different things. They're incredible lawyers. They're also great skiers. Some of them are first-class runners. And I realized this group just has a passion for so many things," she says.

Law, of course, among them. To keep such a talented and driven group of people focused and incentivized, money matters. The firm pays top dollar of \$300,000 or more for Supreme Court clerks. Under the firm's system, partner compensation has nothing to do with seniority; there are no points or shares. On January 1 of each year, every partner starts out even, and compensation for that year depends solely on the partner's performance - and results - for the year. No one keeps track of vacation time, and each partner decides for herself how much to work and on which cases. Part-

ners can earn seven figures without bringing in any business at all but, since the firm has few long-term clients, there is a very strong incentive for rainmaking. In this meritocracy, where each year stands alone, it's not uncommon for a very young partner to be among the most highly paid. And that says a lot at a firm where, because of its extraordinary business model, there have been many years where a partner made \$5 million, \$10 million, or even substantially more.

The firm's monetary engine - and its democracy - is on full display every Wednesday at noon, Houston time. That's when all lawyers have a phone call about potential matters and decide which cases to accept. The bar is incredibly high, since the firm is deciding whether to invest its contingent time, and often its out-of-pocket cash. Despite the high stakes, the decisions are one person one vote; an associate who has been at the firm two weeks gets the same vote on these decisions as Susman or Manne - and is expected to take the responsibility seriously. Manne calls it "one of the ways we try to make our lawyers feel personally invested in the success of the firm, right from the start."

While he was elected to lead a firm that was already abundantly successful, the understated Manne never viewed staying the course as the goal. "Businesses are organic. Law firms have to grow or you can't keep attracting the very best people - who are the only people we want," he says. His two primary goals when he became a managing partner were to re-calibrate the already entrepreneurial compensation system to make it more transparent and objective, and to "make the firm look different" in terms of gender and ethnic diversity. The first was achieved quickly, and there has been steady progress toward the second.

The firm's mix of fee arrangements has moved steadily away from hourly work. More than 80 percent of the firm's revenues now derive from contingent, monthly-fixed or hybrid fees, with less than 20 percent coming from traditional hourly fees.

And then there's the personal. Manne and his wife Nancy are an emotional core of the firm, where family is a center rather than a burden. At Susman, family provides real values you go home to at night, values that resonate in who you are, as a person and a law firm partner.

Which brings us to King Louis. King Louis is not Steve Susman's password. He is, instead, a very real little boy who had a very, very rough first 82 days of life. He's three now and really likes when Dad reads him Goodnight Moon. He especially likes negotiating with Dad on an extension to each day's statute of limitations.

Dad is partner Shawn Raymond, who learned first-hand what the legal system looked like growing up. His

dad was an algae specialist in Hawaii. He moved the family to Colorado, where he tried to build an oyster farm. Huh? For Raymond, this meant that the first appellate decision he read was one deciding whether it was OK that the bank took away his family's livelihood and his Dad's dream. Raymond joined Teach for America for two years and lived in a rural town in the Mississippi Delta called Sunflower, where he was later inspired to create the Sunflower County Freedom Project to help kids who truly have nothing.

After winning moot court championships in his first two years at UT Law School, Raymond won a fellowship that allowed him to advocate for children in Mississippi. In 2000, Manne persuaded Raymond to join the firm. But first, Manne gave him a little negotiating tip: Raymond needed to ask Susman Godfrey to help Raymond buy a plot of land in Sunflower, Mississippi, so that his Sunflower County Freedom Project could take root and flourish. Like a signing bonus from the heart.

Raymond has grown into one of the firm's up and coming leaders. He's won big trial verdicts and won acclaim for his community service. And he and his wife Alicia have four sons. Some afternoons Bhatia will just stroll over to the baseball field to see how the Raymond boys are swinging that day.

That's how the Susman crew rolls. And it shows in every line of the words Raymond wrote to the firm as he visited the critically ill Louis over his first 82 days of life. Louis suffered an array of life-threatening illnesses, most pointedly a chronic inability to breathe on his own. Over the ensuing weeks, four people were allowed to be designated permanent visitors and, not surprisingly, Susman Godfrey was well represented. The visitors included Neal and Nancy Manne (limited to four permanent visitors, Raymond persuaded the hospital that Neal and Nancy were only one person, a tribute to his skills as an advocate but also an apt metaphor for the Mannes). The firm's attorneys would come by at all hours as Raymond spent his evenings with Louis, writing a string of email updates to the firm during his endless hours at the hospital.

On May 8, 2014, Raymond gave the toughest closing argument of his life. Drawing inspiration from John Belushi's "Nothing Is Over Until We Decide It Is" classic in *Animal House*, Raymond told Louis he had a tough day ahead. His 83rd on this planet, for those keeping score. "If you can't start breathing on your own tonight, these kind folks are going to perform a tracheotomy tomorrow morning."

That night, King Louis took over his own breathing. And the Susman Godfrey team cheered like it had won another billion dollars.