

Labor & Employment

# Anti-Union Videos: Can Employers Make Movies?

by Nancy L. Heilman

The Court of Appeals for the Third Circuit recently determined that an employer committed an unfair labor practice by soliciting employees to appear in an anti-union campaign video. In connection with the United Steelworker's 1994 campaign to organize the employer's salaried, non-exempt employees, the company began

employees to advise other managers or, alternatively, the video crew if they did not wish to appear in the videotape. Ultimately, the company filmed about 17 percent of the voting unit, while others requested to be excluded or avoided the filming.



Nancy L. Heilman

The district court identified the existence of a tension under the National Labor Relations Act between an employee's right not to be subject to unlawful polling and the employer's right to free speech and remanded the case to the National Labor Relations Board ("Board") to articulate a policy as to how employers may lawfully proceed. The Board concluded that the remand required it to answer whether and in what circumstances an employer may lawfully ask employees to participate in a campaign videotape, and whether, in the absence of advance notice of a choice to appear, the employer may lawfully include images of the employees in a videotape.

The Board was guided by cases in which the employer offered anti-union paraphernalia to employees, forcing them to make an observable choice for or against the union. The company contended that its actions did not constitute a poll because it was not purposefully seeking to

discern the views of employees. However, the question of whether such conduct is a poll turns on whether a reasonable employee would be impressed that the company was trying to discern union preference and not on the employer's subjective intent or whether such an impression actually was created. Here, the Board rejected the company's reliance on cases finding that casual questioning relating to campaign activities is not necessarily coercive and found that the employees unlawfully were forced to make an observable choice about their union sympathies.

The court of appeals approved the Board's five-factor test as effective to protect employees from direct solicitations by employers while allowing employers to create anti-

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production of a videotape for use in its campaign. Over a period of three days, the company's manager of communication services ("manager") approached employees and asked for their consent to be videotaped. Some employees were given advance written notice of the purpose of the videotape and their right to decline to participate. However, others received no notice until after they were taped, at which time they were required to submit a written request to delete their images from the videotape. After the first day of filming, the manager provided advance written notice for

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## Anti-Union Videos: Can Employers Make Movies?

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union campaign videos. Employers may lawfully solicit employees if they meet the following requirements:

- The solicitation is in the form of a general announcement which discloses that the purpose of the filming is to use the employee's picture in a campaign video and includes assurances that participation is voluntary, that nonparticipation will not result in reprisals, and that the participation will not result in rewards or benefits.
- Employees are not pressured into making the decision in the presence of a supervisor.
- There is no coercive conduct connected with the employer's announcement, such as threats of reprisal or grants or promises of benefits to employees who participate in the video.
- The employer has not created a coercive atmosphere by engaging in serious or pervasive unfair labor practices or other comparable coercive conduct.
- The employer does not exceed the legitimate purpose of soliciting consent by seeking information concerning union matters or otherwise interfering with the

statutory rights of employees.

Employers may stay within the bounds of the Board's requirements if they make a general announcement about the desire to videotape employees for use in a campaign video and film anyone who comes forward after the necessary assurances are made, avoiding any pressure on the employee to make a decision in the presence of a supervisor.

✉ For more information, please contact [nheilmann@cohenlaw.com](mailto:nheilmann@cohenlaw.com)

## Cohen & Grigsby Attorneys Selected for Best Lawyers List

Fourteen of Cohen & Grigsby's attorneys have been included in the 2003-2004 edition of *The Best Lawyers in America*®. Those selected for the list include **Christopher B. Carson**, the firm's recruiting chair, for business; **Charles C. Cohen**, founder and chairman, for corporate mergers and acquisitions and securities; **Henry C. Cohen**, vice president of the firm's Florida Office Committee, for tax law; **V. Susanne Cook**, chair of the International Business Group, for international trade and finance; **R. Michael Daniel**, chair of the Estates and Trusts Group, for trusts and estates; **Robert S. Grigsby** for personal injury litigation; **E. Donald Ladov**, chair of the Labor and Employment Group, for labor and employment;

**Lawrence M. Lebowitz**, chair of the Immigration Group and the firm's vice president of marketing, for immigration law; **John E. Lynchski**, founder and Healthcare Practice Group chair, for labor and employment; **Richard R. Nelson II**, founder and the firm's president, for business litigation; **Hugh W. Nevin, Jr.**, founder and former president, for corporate mergers and acquisitions and business law; **C. Eric Pfeil** for trusts and estates; **Jonathan M. Schmerling** for trusts and estates; and **Thomas C. Wettach**, chair of the Intellectual Property Group, for intellectual property. The 2003-2004 edition marks the listing of Robert S. Grigsby for 20 consecutive years and both Charles C. Cohen and Hugh W. Nevin, Jr. for 10 consecutive years.

"We are pleased with the recognition this publication provides to our attorneys," said **Jack W. Elliott**, the Firm's executive vice president. "In addition to being excellent attorneys, each of these individuals exemplifies our Firm's dedication to client service and results."

The current listing is the result of the tenth survey undertaken by Woodward/White, Inc. To compile the current database, lawyers throughout the United States were asked to rate the clinical abilities of other lawyers in other areas of specialization. Only those attorneys who earned the consensus support of their peers were included, and listings cannot be bought. Inclusion in the *Best Lawyers* list is considered to be a singular honor for the profession.

# Social Security Number “Mismatch” Letters: Do Not Ignore Them

by Matthew T. Phillips

Each year, employers are required to file Forms W-2 with the Social Security Administration (“SSA”), which reports (among other items) the wages paid to employees for the previous calendar year. The SSA then uses this data in order to register “credits” for qualifying employment to eligible employees. These credits are then used to determine the entitlement to benefits under Social Security.

*Employers with a high mismatch rate can expect more scrutiny from the government.*

As part of this process, the SSA is often unable to post large numbers of qualifying credits to particular employees because the Social Security Numbers provided on the Forms W-2 do not match SSA records. For example, in 1999, approximately 216 million W-2s were forwarded to the SSA, but over 5 million W-2s contained incorrect information including many “mismatched” Social Security Numbers.

Previously, the SSA would only notify employers of the mismatch problem if an employer had a “mismatch rate” in excess of 10 percent. In other words, a mismatch letter was only sent if the U.S. employer’s annual filings resulted in a mismatch between SSA records and employee names or Social Security Numbers for 10 percent or more of the employer’s employees. Beginning in 2002, the SSA has sent

mismatch letters to employers with *one or more* mismatch. Accordingly, many employers are receiving, for the first time, letters from the SSA indicating that there has been a mismatch of the information provided on the Form W-2 and SSA records.

Employers which have received such mismatch letters must not only pay the fines (\$50 per violation) which the Internal Revenue Service charges for failure to submit an employee’s correct Social Security Number on a wage report, but also carefully review their obligations under the Immigration Reform and Control Act, which requires verifying the employment eligibility of all employees and provides penalties for the knowing employment of illegal workers.

Once the mismatch letter is received, the employer should first determine whether a clerical error has resulted in the mismatch, i.e., the Social Security Number was entered incorrectly on the Form W-2. If it appears that a clerical error is not the cause of the problem, the employer should notify the employee of the discrepancy. If a Social Security card was used as the basis of the employee’s proof of employment eligibility on Form I-9 (which must be completed for *every* employee within three days of hire), the employer should ask the employee for alternative proof of eligibility. Other acceptable forms of employment eligibility are identified



Matthew T. Phillips

on the back of Form I-9. If the employee admits during this process that he or she is unauthorized for employment, the employer has no choice but to terminate the employee immediately.

Even if the employee ultimately can prove employment eligibility by providing other documents which meet I-9 requirements, this does not mean, in the view of the Immigration and Naturalization Service, that the employee will not be subject to a penalty for previously obtaining employment with false documents. More importantly for the employer, it is unclear whether the *employer* could be held liable for previously employing such a worker. Generally, there is no liability for the employer if the documents with which the employer was previously presented would not, to a reasonable person, appear false. Employers with a high mismatch rate, however, can expect more scrutiny from the government with respect to the “reasonableness” of their prior inquiry.

Please note that in addition to the I-9 compliance issues discussed above, such “mismatch” situations raise further concerns for employers regarding state and federal tax withholdings, which are beyond the scope of this article. In the event that your company is provided with a mismatch letter by the Social Security Administration, please feel free to contact any Cohen & Grigsby attorney to discuss how to resolve the situation effectively.

✉ For more information, please contact [mphillips@cohenlaw.com](mailto:mphillips@cohenlaw.com)

# Don't Give Up Your Patent Rights: Emerging Businesses, Be Aware of the Bars

by John A. Monocello

To achieve business-related goals, emerging businesses with intellectual property often are placed in the position of having to disclose their intellectual property to potential customers or to organizations with whom a partnership is sought. The often time-sensitive need to disclose inventive technology to foster profitable relationships, however, must be

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balanced with the need to protect the intellectual property from exploitation. Knowledge of a few patent law fundamentals will assist in striking that balance.

United States Patent Law requires that a patent application be filed within one year after either 1) patenting or describing an invention in a printed publication anywhere in the world, or 2) publicly using the invention or placing the invention on sale in the United States; either action will act as a bar and affect the patent timeline. If one year lapses from the time that any of the above events occur, you will be barred from obtaining a patent in the United States.

Emerging businesses disseminating white papers or brochures describing their inventive technology

need to be mindful of the bar associated with describing the invention in a printed publication. The publication will only act as a bar if it describes to those skilled in the art how to



John A. Monocello

practice the invention. Depending on the audience, publications to be distributed to investors or potential partnering organizations could be worded in such a way that one skilled in the art still could not practice the invention after reading the publication. However, if there is a need to disclose the inventive aspects of the technology so as to enable one skilled in the art to practice the invention, be aware that you must file a patent application which covers those inventive aspects within one year of your publishing.

If you are fortunate enough to generate potential buyers, understand that placing the inventive technology on sale will also start the one year clock. Whether a product qualifies as "on sale" when there has been no completed sale will depend on factors such as discussions related to specific prices, quantities, and time for delivery, and the capacity to deliver if an order were placed.

Publicly or commercially using the invention, if the use is not for experimental purposes, will also act as a bar. As with the publication bar, the public use will only act as a bar if the "use" places in the public's possession the inventive aspects of the invention, for example, that which is recited in the claims of the patent application. Businesses that intend to demonstrate

their product or provide the product to potential customers on a trial basis should be aware of the possible deleterious effects.

The statutory bars can be avoided by filing a patent application preferably before publishing, publicly or commercially using, or placing the technology on sale or within one year of these events. If the business is contemplating publication, commercial use, or sale of the technology, it should contact a patent attorney regarding the best way to avoid losing patent rights. If there is enough time, filing a standard patent application (a "non-provisional" application) will sufficiently preserve patent rights.

However, if the need to disclose the inventive technology is more imminent, another option is a provisional patent application, which does not need to contain claims and thus reduces the time needed to prepare the application. Provisional applications must be converted into non-provisional applications within one year of filing, and will allow the non-provisional application to retain the earlier filing date.

Businesses preparing to disclose or sell their inventive technology should be aware that the one year period in which to file after a disclosure is available in the United States but not necessarily available in most foreign countries. If foreign rights have a potential value to the business, it should file either of the above applications *before* initiating any sort of publication, public or commercial use, or placing the inventive technology on sale.

For more information, please contact [jmonocello@cohenlaw.com](mailto:jmonocello@cohenlaw.com)

## Changes in U.S. Immigration Law After September 11, 2001: Positive and Negative

by Hugh W. Nevin, Jr. and Matthew T. Phillips

As could be expected, U.S. immigration law has been the subject of frequent debate following the events of last fall. While some of these changes have brought additional scrutiny on the process of obtaining U.S. visas and entering the United States, other changes, surprisingly, have provided additional flexibility to certain visa holders.

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First, with respect to increased restrictions, the Immigration and Naturalization Service ("INS") has proposed a limitation on the initial period of authorized stay for the holders of both B-1 "business visitor" and B-2 "tourist" visas. The INS proposed these changes because some of the individuals involved in the terrorist attacks were present in the United States with B-1/B-2 visas or had entered the United States with those visas and remained beyond their authorized period of stay. Previously, B-1/B-2 visa holders could be admitted for a period of up to six months and then obtain an extension of up to an additional six months upon approval of a timely-filed application. The INS is now proposing to limit the initial period of stay to a "reasonable

period," which it states would typically be 30 days. Also, extensions will be granted to provide a maximum stay of only six months. Further, the basis for such extensions may well be restricted. Previously, the INS accepted a wide range of reasons for an extension of stay. Going forward, the INS may only accept truly unforeseen circumstances or humanitarian factors as acceptable grounds for an extension.

Second, the authorities are applying more scrutiny to the processing of visa applications at U.S. Consulates. This scrutiny has resulted in longer processing times and more frequent requests for additional documentation. Further, the Consulates now require, for all males between the ages of 16 and 45, a completed Form DS-157 which requests (among other items) additional information regarding political affiliations and military training.

As noted, while some changes in U.S. immigration law have resulted in additional restrictions on the process of obtaining visas and entering the United States, other changes have provided increased flexibility to certain visa holders.

First, the spouses of E-1 "treaty trader" or E-2 "treaty investor" visa holders, as well as the spouses of L-1A "managerial" or L-1B "specialized knowledge" company transfer visa holders, may now obtain work authorization in the United States. The work document, known as an Employment Authorization Card, may be obtained from the INS, is valid for a period of one year, and may be extended in one year increments during the authorized period of stay. In a curious twist, the E or L visa holder is only authorized to work for the company which obtained the visa

for them, while the spouse of such a visa holder is, with their Employment Authorization Document, allowed to work for any employer in the United States in any field.

Second, companies which have an approved "blanket" petition, where the INS has recognized the existence of a necessary "qualifying relationship" between a U.S. company and related company abroad, may now obtain L-1 visas for employees after only six months of employment abroad. Previously, the INS required at least one year of employment abroad.

While the authorized periods of stay for B-1/B-2 visa holders may be restricted, and while additional time may be required in order to obtain visas from U.S. Consulates, other changes, including increased employment options for the spouses of E or L visa holders and a reduction in the employment requirement for certain L visa holders, have provided additional flexibility.

☒ *For more information, please contact [hnevin@cohenlaw.com](mailto:hnevin@cohenlaw.com) or [mphillips@cohenlaw.com](mailto:mphillips@cohenlaw.com)*

### Area Code Change— Florida Office

Please note that our area code in Florida has changed, and the new numbers are as follows:

Telephone: (239) 390-1900

Telefax: (239) 390-1901

The 941 area code will automatically roll forward to 239 until March 10, 2003, after which a message will instruct you to dial 239.

## Pennsylvania Turnpike Commission Employs Cohen & Grigsby As Its Bond Counsel:

*Law Firm Continues Key Role in Shaping Region's Financial Health*

**T**he Pennsylvania Turnpike Commission used Cohen & Grigsby as bond counsel to help the Commission complete its planned refinancing of nearly all its \$1.2 billion outstanding debt.

To complete the refinancing program, the Pennsylvania Turnpike Commission sold \$449 million in variable-rate revenue bonds to refinance bonds issued in 1992. The transaction is the culmination of a financing plan that was instituted in 2001 and has enabled the Commission to save an estimated \$50 million and diversify its debt portfolio. In total, the Commission will have refinanced approximately \$900 million

of its mainline system debt.

"The Pennsylvania Turnpike is one of the principal economic drivers in the Commonwealth," said **Chuck Brodbeck**, the head of Cohen & Grigsby's Tax-Exempt Finance Group. "The 530-mile system not only provides a primary link between all of the major industrial centers within the state, but also links the Eastern seaboard to the U.S. interstate highway system going west. We are pleased that our work will help ensure a stronger Pennsylvania highway system for years to come."

The project is one of many significant bond counsel assignments Cohen & Grigsby has received in

recent years. *The Bond Buyer*, an industry trade publication, ranked the law firm second on its list of bond counsel for municipal bond issues in 2001 in Pennsylvania.

The law firm has served on a range of financings in western Pennsylvania, including the \$874 million Regional Destination Financing Plan (Plan B), the City's Economic Development Fund backed by a portion of the City's Regional Asset District receipts, and the Pennsylvania Turnpike Commission's issuance of Oil Franchise Tax Bonds to finance a portion of the Mon Valley Expressway.

## Cohen & Grigsby Attorneys Elected President and Appointed Membership Chair of Pittsburgh Chapter of American Inns of Court

**C**ohen & Grigsby announces the election of **Nancy L. Heilman** as President and the appointment of **W. Scott Hardy** as Membership Chair of the American Inns of Court, University of Pittsburgh Chapter.

**Nancy Heilman** is a Partner in the Firm's Litigation Group and Labor and Employment Group and concentrates her practice in defending employers in employment litigation cases before federal and state courts, representing business clients in general commercial litigation, and formerly representing plaintiff companies in environmental insurance coverage lawsuits. She formerly served as a law clerk to The Honorable Joseph F. Weis, Jr. and The Honorable Carol Los Mansmann, U.S. Court of Appeals for the Third Circuit, and The Honorable Maurice B. Cohill, Jr., and The Honorable

Alan N. Bloch, U.S. District Court for the Western District of Pennsylvania. Nancy earned her B.A. (summa cum laude, Phi Beta Kappa) and her J.D. from the University of Pittsburgh in 1979 and 1987, respectively.

**Scott Hardy** is an Associate in the Firm's Labor and Employment Group and concentrates his practice in representing employers in general labor and employment matters and employment litigation matters. Scott earned his B.A. (magna cum laude) from Allegheny College in 1993 and his J.D. from Notre Dame Law School in 1996.

"I'm pleased to serve in an organization which conscientiously promotes the skills and ethics of those in the legal profession," said Nancy Heilman. "Having served under four federal judges, I can confirm that the American Inns fills a need which benefits all—the public, attorneys, and judges alike." Scott Hardy also

remarked, "The formal mentoring process of American Inns is quite effective. How to be a good lawyer is not taught in most law schools; most good lawyers learned their way through the help of mentors."

American Inns are patterned after the English Inns of Court and were established by Chief Justice Warrant E. Burger, former Solicitor General Rex Lee, and Senior United States District Judge A. Sherman Christensen. Through mentoring, the Inns are designed to improve the skills, professionalism and legal ethics of the bench and bar. The Inns help newer lawyers to become more effective advocates with a keener awareness of ethics and civility. There are over 300 American Inns of Court in all 50 states and the District of Columbia.

## Cohen & Grigsby Adds Two Attorneys

**C**ohen & Grigsby announces the addition of two attorneys to the Firm.

**Beth A. Boyce** joins the Estates and Trusts Group as an Associate. She concentrates her practice in the area of estate planning and administration and tax matters, including comprehensive estate planning involving strategies for minimizing wealth transfer taxes, gift and generation-skipping transfer tax consequences of lifetime and testamentary transfers. Beth earned her B.A. and B.M. (magna cum laude, Phi Kappa Phi) from Duquesne University in 1992, her J.D. (High Honors, Florida State University Law Review, Order of the Coif) from Florida State University College of Law in 1995, and her LL.M. in Taxation from the University of

Denver College of Law in 1996. Prior to joining Cohen & Grigsby, Beth was an associate with the law firm of Buchanan Ingersoll in Pittsburgh.

**Geoffrey B. Dendy** joins the Litigation Group as an Associate. He concentrates his practice in counseling owners, general contractors and subcontractors in all areas of construction litigation, including construction law and public contracts, government contracts, and commercial litigation. Geoff earned his B.A. from the College of William & Mary in 1994 and his J.D. (cum laude; Associate Editor, Kentucky Law Journal) from the University of Kentucky College of Law in 1997. Prior to joining Cohen & Grigsby, Geoff was an associate with the law firm of Kilpatrick Stockton in Atlanta.

## Cohen & Grigsby Appoints New Estates and Trusts Group Head

**C**ohen & Grigsby announces the appointment of **R. Michael Daniel** as Head of the Estates and Trusts Group.

Cohen & Grigsby's Estates and Trusts is comprised of 11 attorneys and 4 paralegals who counsel U.S. and foreign corporations, partnerships, individuals, and families in developing tax planning strategies, administering estates and trusts and handling tax controversy matters and other adversarial proceedings.

Mike concentrates his practice in family business planning, income tax planning, estate planning, charitable planning and estate administration, including administration of highly complicated estates. His practice also involves valuation of diverse holdings of closely held interests, lifetime and testamentary distribution to family members and the resulting tax treat-

ments, establishing private foundations and organizing family charitable offices, and federal and state level tax audits. A retired Colonel in the United States Marine Corps Reserve, he is a past chair of the Real Property, Probate and Trust Law Section of the Pennsylvania Bar Association and a past president of the Greater Pittsburgh Council, Boy Scouts of America. Mike earned an A.B. in 1968 and a J.D. in 1971 from the University of North Carolina at Chapel Hill. He resides in Upper St. Clair.

"Mike brings to the Estates and Trusts Group a wealth of experience and depth of understanding. In addition to being an excellent attorney, he exemplifies our Firm's dedication to client service and results," said **Richard R. Nelson, II**, President of the Firm.

## Cohen & Grigsby Presents

### Hot Topics for Emerging Businesses—Now and Later

Wednesday, October 23, 2002  
8:30 a.m. – 10:30 a.m.  
Rivers Club  
One Oxford Centre  
Pittsburgh, PA

### Enforcing Your Company's Non-Compete Agreements and Protecting Its Trade Secrets

Thursday, November 7, 2002  
8:30 a.m. – 10:30 a.m.  
Sheraton Station Square  
7 Station Square Drive  
Pittsburgh, PA

### How to Get the Most Money When You Sell Your Company

Tuesday, November 19, 2002  
8:00 a.m. – 10:30 a.m.  
Sheraton Hotel  
Warrendale, PA

Thursday, November 21, 2002  
8:00 a.m. – 10:30 a.m.  
Hilton Hotel  
Southpointe, PA

Seminars are offered at no charge to clients and friends. For more information, please contact Jenny Pearson at (412) 297-4847 or visit our website at [www.cohenlaw.com](http://www.cohenlaw.com).

## cg2 Presents

### The Ins and Outs of Employee Handbooks—From Essentials to Best Practices

Tuesday, October 29, 2002  
8:30 a.m. - 10:30 a.m.  
Rivers Club  
One Oxford Centre  
Pittsburgh, PA

Seminars are offered at no charge to clients and friends. For more information, please contact Jenny Pearson at (412) 297-4847 or visit our website at [www.cg-2.biz](http://www.cg-2.biz).

## APPOINTMENTS

**Brian Belanger** has been appointed to be a member of the council of the Allegheny County Bar Association's Business Law Section.

**Charles Cohen** and **David Kalson** are serving as adjunct professors at the University of Pittsburgh School of Law teaching "Enterprise Organization and Finance," an upper level seminar that takes students through the life cycle of a hypothetical start-up biotech company.

**Henry Cohen** was reelected Chairman of the Board of Directors of The Children's Institute.

**Scott Hardy** has been appointed to the HR Network Committee of the Pittsburgh Technology Council.

**Nancy Heilman** has been appointed to chair the Legal Advisory Committee to the Board of the *General Church of the New Jerusalem*, Bryn Athyn, PA.

**David Kalson** is the recipient of the 2002 William and Olga Stark Leadership Award, given annually to a young leader rendering outstanding service to the Pittsburgh Jewish Community.

**Lawrence Lebowitz** is serving as an adjunct professor teaching the Immigration Law course at the University of Pittsburgh School of Law.

**Hugh Nevin, Jr.** was elected president of the Beaumaris Land Company, Ltd.

**Matthew Phillips** was appointed to the National Alumni Advisory Board of Ohio Wesleyan University.

**Evans Rose, Jr.** was elected to the Executive Committee of the Board of Trustees of the University of Pittsburgh. He will continue to serve as Chairman of the Nominating Committee and as a member of the Institutional Advancement Committee.

**Evans Rose, Jr.** was recently appointed by Governor Mark Schweiker as a member of his Judicial Advisory Commission for Allegheny County. The Commission will convene this month to interview attorneys seeking appointment to the vacancy on the Court of Common Pleas of Allegheny County, which was created by the death of Judge Paul R. Zavarella.

**Mark Stabile** was selected as one of "50 On The Fast Track" as designated in *The Legal Intelligencer and Pennsylvania Law Weekly*. "50 On The Fast Track" is a group of 50 attorneys under the age of 40 recognized for what they have achieved in their careers and for the potential they show to be leaders of the Pennsylvania bar in the future.

## Address Changes and Updates

Please send mailing address and e-mail address corrections and updates to us at 412-297-4900 or [info@cohenlaw.com](mailto:info@cohenlaw.com).

*The information in this publication is for the purpose of informing and educating our clients about various aspects of the law and is not intended to be used as legal advice. If you have questions concerning any of the topics, please contact your Cohen & Grigsby attorney.*

*The hiring of a lawyer is an important decision that should not be based solely upon advertisements. Before you decide, ask us to send you free written information about Cohen & Grigsby's qualifications and experience.*

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## Diversity Lottery 2004

The registration period for the next Diversity Lottery will be from **October 7 through noon on November 6, 2002**. For more information and instructions on how to apply, please visit the Immigration News page on our website at [www.cohenlaw.com](http://www.cohenlaw.com), or contact a member of our Immigration Group at 412-297-4900.