

ORAL HISTORY OF DWIGHT D. MURRAY
Fourth Interview
March 22, 2018

This is the fourth interview of the Oral History of Dwight D. Murray as part of the Oral History Project of the Historical Society of the District of Columbia Circuit. The interviewer is Gene Granof. The interview took place at Mr. Murray's office in Washington, D.C., on Thursday, March 22, 2018.

Mr. Granof: Last time we left off, you had just gotten out of the Marines and you took off your uniform and went immediately to the orientation at Georgetown Law School.

Mr. Murray: I rode my motorcycle down to Quantico to get what they call an exit physical, which was really brief, overseen by a corpsman, and then a doctor, to make sure that your record is clean in case you have any kind of disabilities that you're going to file a claim with later on, you want to make sure that there's a basis for that in your record. Once I got my physical completed, I went home, took off my uniform, put on some civilian clothes, and drove down to the main campus of Georgetown where the Georgetown Law School orientation was conducted. I drove on campus, and you have to remember this is my first time on a college campus in a long time. Most of my exposure has been to the Marine Corps, Marine Corps bases, and it was a shock, it was a culture shock to drive onto Georgetown's campus. I thought I could handle it, because I had been interacting with civilians for a year since I've been back, and I didn't have a problem with that, I'm kind of an easygoing guy.

Mr. Granof: What year was this?

Mr. Murray: This was 1971. Anti-war demonstrations, the beginning of the hippie movement, a lot of social changes had gone on while I was in the Marine Corps, especially

while I was in Vietnam. And I was surprised at the appearance of the student body for the law school, the entry class, because being a Marine Corps officer, you're used to a certain discipline, and there was no discipline, and I had to check myself. I said to myself wait a minute, this is not the Marine Corps, you can't expect people to be lined up in an orderly fashion. You cannot expect that kind of discipline. Just because people are walking around and they look disorganized, that should not upset you. But it did, because I noticed it. And, I became aware that I noticed it.

Mr. Granof: And the dress?

Mr. Murray: And the dress -- torn sweatshirts, unkempt clothes.

Mr. Granof: Beards?

Mr. Murray: Beards. Unshaved. Hair not trimmed, and whatnot. All of this was new to me, but I sucked it up, went in, listened to the orientation, and then looked forward to starting law school. I went to Lerner's Book Store, not too far from Georgetown Law School at 600 New Jersey Avenue. There was only one building there; it was a new law school. It just opened, and I would be, my class, the '71 entry class, would be the first class that graduated and completed their entire legal education in the brand new building. So, after I got oriented, bought my books, read my class schedule, that's when the bell rang, and life began to change because law school was a completely different environment. It was tough, it was interesting, I was trying to adjust to the change, the social change, the atmosphere, the more relaxed environment as opposed to a disciplined military Marine Corps environment. And I got used to some of the stares of people who knew I was

former military because I still had some military garb; I didn't have enough money to buy a whole new wardrobe. I still had my jungle boots that I wore, and I'd use those to ride my motorcycle. And I had some other military garb that I wore on occasion. It took me a while to build up a wardrobe, so I didn't have to wear military stuff when I went to class. But I found comfort in sitting in the back row of the class with some other veterans. We all kind of bonded. Some of us were Vietnam veterans, some of us were just in the National Guard, and some of us were people who were in the Reserves, so they sort of looked up to me because I was in the Marine Corps, and I had been in Vietnam. But it was comforting because these guys, we developed a friendship, we formed a study group, and we helped each other.

The most interesting story I have to tell about my experience in law school, the first time I got called on to recite, in Torts class, by Professor Frank Flagel, a brilliant professor, nice guy, excellent teacher, one of the best teachers that I had my entire time at Georgetown. As soon as I heard my name, the military instinct kicked in, I jumped out of my chair, I yelled "Yes, sir," and I scared the bejesus out of him, because he's used to students when they're called on, to stand up sheepishly, but I popped out of my chair because that's what I'd been doing for three years -- the last three years -- when a senior officer would call you, you'd stand at attention, yes sir, you know, get your orders, yes sir, turn around and do what you have to do. I realized how deep that tradition was imbedded in me. The veterans, they burst out laughing, they thought it was funny, and to me, I thought it was funny, too, because it showed the cultural shock that I was still trying to

adjust to. It really demonstrated that I still had a way to go, and the other students -- who probably thought this guy went to Vietnam, this guy was in the Marine Corps -- they were whispering about me, but now they knew, now they knew. And, you know, they treated me okay, but I was never a part of their group. I was never part of their group because I fought in a war that most of them protested against. And that experience was interesting, but it didn't bother me. I was there to get an education, I was there to graduate, and I was there to get a job in the legal profession. I didn't take any of that stuff to heart.

Mr. Granof: How many people were there in your entering class at Georgetown?

Mr. Murray: It was a huge class, a big school. In my Torts class, the Torts class and the Civil Procedure class, they took down the partition in the room, so I had about 150 people in the class. It was a huge class.

Mr. Granof: That was a big class.

Mr. Murray: It was a big class, and that's why I was kind of surprised when I got called on. It was in the first week, the first two weeks of class. I was prepared, and I recited, and when the professor tried to stop me because I was on a roll, I'd say, "Excuse me, sir, I'm not finished." And he wasn't used to being talked to like that. You know, I could tell, and I had to self-examine myself, I said, "Well you've got to slow down, this is not the Marine Corps, you've got to adjust, and you're going to have to adapt." And that's what I did.

Mr. Granof: And did they have different sections of Torts?

Mr. Murray: Well, they had different sections of Torts, but that was such a popular class, and he was such a popular professor, they combined sections, and that's why they had

it in a big room. Another section they combined was Civil Procedure, a section that was taught by Professor Sherman Cohn. Sherman and I have become friends, after I graduated, because we saw each other at bar functions, and we still do see each other on occasion. In fact, he's of counsel to this firm right now. We became of counsel around the same time. But he still teaches law over at Georgetown. An excellent professor, very, very knowledgeable.

Mr. Granof: Were you required to take specific courses in your first year? When I went to law school, different era, but we didn't have any choice. The first year was Contracts, Torts, Property, Civil Procedure.

Mr. Murray: It was the same when I went. We had Contracts, Torts, Property, Civil Procedure, Criminal Law, and then the next year, Criminal Procedure. But all of the courses I identify were year-long courses, and you didn't get examined until December of the first semester, and you only got examined in one course, and that was Criminal Law, and then the next year, you took Criminal Procedure. Might have been vice versa. I forget which one. But the other courses, like Contracts, Civil Procedure, and Torts, your exam was at the end of the year.

Mr. Granof: That is the way it was with us, and it was almost scary.

Mr. Murray: Yes, but I was a History major, so I was used to digesting a whole book and getting ready for being examined on anything that was in the book. My History professor had a standard examination question that he asked on every exam. Therefore, everyone in the class knew what the examination question was going to be, the first-year class, and it would start with the word, "Trace." And he had an acronym, PERSIA. He said, "Trace the political, economic, religious,

scientific, intellectual and artistic development, from” and then he would do a span of maybe a hundred years, and the exam period was unlimited. I would spend three to four hours writing his examination, on that one question.

Mr. Granof: So, you were used to that?

Mr. Murray: Yes, I was used to that, so that didn't bother me, I was used to digesting a lot of stuff, but what I was concerned about was whether or not I was absorbing the materials. You'd talk to other students. I didn't know anybody who went to law school, and I definitely didn't know any lawyers, so you didn't have anybody to talk to, and most of the guys who were veterans like me were in the same boat. We didn't know anybody who went to law school, but I heard from talking to the people that there would be a point in time where the light would go off, where all of a sudden things would begin to make sense, and I knew the light went on sometime in mid-October because in the discussion groups, not only would I participate, but also I would understand what other people were talking about. So, I thought that I must be absorbing the materials. Therefore, I stopped worrying about it. We had one guy in my study group who was a Marine, smart guy but he just couldn't pull it all together, and he dropped out after the first year; he didn't come back. He was a nice guy, smart, but for whatever reason, he just couldn't pull it together. And by pulling it together I mean take an abstract set of facts and apply the legal principles that you learned. He just couldn't do that, for whatever reason.

Mr. Granof: So, you took Contracts and Civil Procedure. Did the professors use the Socratic method?

Mr. Murray: They used the Socratic method, but many of them were not very good at it quite frankly. Frank Flagel was good at it, Sherman Cohn was good at it, but the rest of them were not. And I found that not unusual because in my entire educational career, you could probably count the really good teachers on one hand with a couple of fingers missing. That's through grammar school, high school, college, and then law school. So that didn't surprise me. You learn the law by self-discipline, reading, and working hard. That's how you learn the law. And it helps to have a discussion with other people. It helps to listen to the class discussion, but to learn the principles that you have to apply to the set of facts you're dealing with is just sitting down, reading, and studying, and working hard. That's just it. And once I realized that, that's what I did.

Mr. Granof: You've said that the purpose of first year law school, regardless of the course, was to "get you to think like a lawyer."

Mr. Murray: Analyze everything.

Mr. Granof: To analyze it, to use evidence, not to let your preconceptions color your thinking, or at least dominate your thinking.

Mr. Murray: Yes, that's right, and to that purpose even the teachers who were not good at the Socratic method, you would learn something from the discussions, and from the readings. It was tough because I've never liked homework, I never did like homework. And there was a lot of homework in law school.

Mr. Granof: A lot of reading.

Mr. Murray: Well, that's homework to me. It's work that you have to do but you don't necessarily want to do it, but you have to do it. It's taking you away from other

things, and my daughter was, by this time, she was one year old when I started law school, and it took me away from spending time with her. We had a two-bedroom apartment, and I had my desk in my bedroom. I would close the door, but she would knock on the door and open the door and come in, and then you have to spend time with her, you know, you can't chase her out, so I would spend half-hour, 45 minutes, until she got tired or bored, and wanted to do something else, then I would go back to studying.

Mr. Granof: So that's hard being at law school and having a family?

Mr. Murray: It was very hard. A lot of people did it. It was tough, because you couldn't devote your time to your family. It was especially hard on my wife, Elodie. Think about it for a moment. A few months after we got married, I went off to OCS. I was absent. All through my training at Quantico, I was gone for a large part of the time during our first year of marriage. Then one month after we celebrated our first anniversary, I was off to Vietnam, leaving her behind with a baby on the way.

Mr. Granof: And your wife was working?

Mr. Murray: My wife was working at the time; I was going to law school. And the routine was I would take my daughter to the day care, because my schedule was more flexible in the morning. My wife would pick up my daughter in the evening because her schedule was more rigid, she got off at a certain time. So that's how we managed the first several years. And for me, the first year, what was extremely difficult were the writing assignments, the research assignments, which meant that I had to go to law school and spend time in the law library on the weekends.

Mr. Granof: Yes, this was before computer research.

Mr. Murray: You had to go to a law library, you had to do the assignments, you had to write the memos, do the briefs, you had to do all that stuff.

Mr. Granof: So, you did have writing assignments in your first year?

Mr. Murray: You had writing the first year. And it was okay; it wasn't anything really dramatic that I remember, other than how to organize a brief, and how to do footnotes, but that was the old-fashioned way. They didn't have computers where you press a button and automatically a footnote drops down. You had to do it the hard way, and I was lucky enough that I had a typewriter. I learned how to type when I was 13 years old. I had a horrible bicycle accident at that age. As a result of my injuries, I was laid up for a while and I learned how to type while I was laid up. I got hit by a car, and for a month or so while I was recovering, that's when I learned how to type. So, I was lucky enough to know how to type, to be able to do my own typing. That really helped in law school. The study group also helped, but that study group broke up after the first year because a couple of guys got jobs as law clerks in law firms, and then we went in different directions. We took different paths in other words. Some guys took specialized courses in their second and third years, so we very seldom saw each other except on occasion we got together, you know, for drinks or just to catch up on each other. And that was kind of sad, because I liked those guys, and every once in a while, I'd call them up and we'd get together, especially one or two guys.

One of the guys in my study group in law school, Jerry McGowan, became the Ambassador to Portugal. Another study partner, Russ Lucas, started a

communications law firm and hired Jerry McGowan. In 1978 or '79, a few years after I graduated, they wanted me to come practice with them. They had started their own communications firm, which was on the ground floor of cell phones. They were writing all these licenses, getting all these applications. They'd say "Dwight, we guarantee you will be rich." And I said "Well, what does it involve?" And they told me, and they said, "You won't be happy, but you'll be rich." I said, "No thanks."

Mr. Granof: Good for you.

Mr. Murray: I said, "No thanks, no thanks." And they're both rich, they're both rich now. But you know I wanted to be happy, and I wanted to enjoy what I was doing.

Mr. Granof: Sure.

Mr. Murray: Let me skip to graduation, to clerking, and starting a law practice. I clerked for Judge Murphy. I should not skip over that.

Mr. Granof: Well, you've got the first year of law school with these courses, and you got through it. Were you concerned at the end about the exams?

Mr. Murray: No, I wasn't concerned about the exams. They had guys who had read all the books before the first day of class. They had guys who were 3rd, 4th generation lawyers in their family. They had guys who had a lot more outside experience in the legal profession than I did. When I took Corporations law, I didn't know about stocks; nobody talked about that stuff around my dinner table, and my friends certainly didn't talk about stocks or dividends. I didn't even know what the Dow Jones Industrial Average was. But you know you keep your ears open, your eyes open, you learn, you pick up things. I knew I was at a cultural disadvantage, but I

felt I could overcome any disadvantage with hard work. Now did I think I would ever make Law Journal? No, I didn't kid myself, but I said even if I lucked up and got invited to join a law journal, I don't think I would have accepted it because that just wasn't me. I did reasonably well in all my courses. I don't know what my ranking was, but I did reasonably well.

Mr. Granof: So, you were pleased with the outcome of the first year?

Mr. Murray: I was pleased with the outcome of the first year. One of the guys in my study group made Law Journal, and he was a guy that participated least. I found out when he made Law Journal that he was a Harvard grad. I didn't know that the entire time. I knew that he was National Guard and that he grew up in Boston. That's all I knew about him. And he was a nice guy. His name was David Long. When he graduated, he got a job with a Wall Street law firm which I didn't think he would be happy at, and it turned out that he wasn't. But you know I wasn't interested in a lot of the things that drove a lot of the other law students. I wasn't interested in becoming a member of the Law Journal. I was interested in doing well, and more important, I was interested in learning the law and becoming a very good lawyer. That was more important to me than anything.

And I'll tell you just a brief story. I had 88 credits in my last year. All I needed was 80 to graduate. And it was 2:00 o'clock in the morning when I came to a decision. I was studying for my last exam, which was the Uniform Commercial Code. And I said to myself, "Why are you doing this to yourself? You don't need this exam, why are you killing yourself?" I made the decision to drop the course. And I dropped the course the next morning before the exam.

Even though I made the decision to drop the course, I continued to study. When I made up my mind, I was going to drop the course, I still continued to study, because I wanted to learn about Article 9. I already knew a little bit about Article 2 because we had Article 2 Sales in Contracts. But Article 9 Secure Transactions fascinated me, so I continued to study. I wanted to learn. And I was interested in learning the law, interested in mastering the law, and I use that word deliberately because the more I got to know, the more I realized it could never be mastered. All you could do is your best. You will never learn all there is to know -- ever -- but that's the beauty of it. There's always something new to learn. So, I just kept at it, just kept at it.

Mr. Granof: Was there a time that you decided to move in a particular direction? At the end of the first year, was there some area of the law that really interested you and you said I'm going to do this?

Mr. Murray: I wanted to try cases. That's what I wanted to do. I thought I had a talent for that part of the profession. And I thought that would be -- if I had any kind of gift -- that's what I wanted to explore.

Mr. Granof: I remember you saying that even before law school, from an early age, you knew you wanted to be a litigator.

Mr. Murray: Not a litigator. Litigator and trial lawyer are two different things. And I tell people that. A litigator may never see the inside of a courtroom, or maybe argue a motion or something like that, maybe take a few depositions. Trial lawyers go to trial, so they take that work product and they put it into action. A litigator will never know whether or not that plan had any merit to it. In other words, can they convince the

trier of fact about the merits of their case? A trial lawyer will tell you the plan had merit or it didn't, because either a judge at a bench trial will decide or a jury will decide. So that was the ultimate challenge.

Mr. Granof: That's interesting. I never thought about that distinction.

Mr. Murray: I told a client this. I was representing 3M, and I went up to meet the General Counsel of 3M, and he said "Well, Dwight, we got a lot of lawyers," and I said, "You've got a lot of litigators." And he looked at me and said, "What's the difference?" And I told him, "A litigator looks under every rock. A trial lawyer knows which rocks to look under, and when you're paying by the hour that means a lot." And he said, he paused, he rocked in his chair, "You've got a point." And his whole philosophy changed because he started hiring law firms like mine. I worked for 3M for quite some time. He was the third general counsel that I had met. I had a history with 3M, but he started hiring other law firms instead of these silk-stocking law firms where they just churn the hours and whatnot. And he got better results; he got better results because these guys were trial lawyers that he hired. And they knew their way around the courtroom. But that was my ambition, to become a trial lawyer. At least I had to try it. I didn't know whether or not I would be successful. But I felt confident that I would be successful.

Mr. Granof: The first year really doesn't offer you a lot of opportunity to do that.

Mr. Murray: No. But the third year I joined a clinical program, called the D.C. Law Students in Court, and it was on the civil side where young third-year law students like me represented people in Small Claims Court or Landlord & Tenant Court. And most of the law students gravitated towards the Landlord & Tenant Court because they

had a manual about Landlord & Tenant Court. The book had motions, it had the steps that you follow and whatnot. I didn't want that. I wanted to go to Small Claims Court where you represented people in contract disputes, labor disputes, simple automobile accidents -- these were the same kind of cases that a person would be trying on the outside. And there wasn't a manual for small claims court. You had to take the case -- get the facts, do the research, prepare the case, and try the case. And I had more trials by the end of my third year than anybody else in the clinical program because Landlord & Tenant Court resolved cases by motions or a settlement, but in Small Claims Court there were trials -- very few settlements, mostly trials. And I would hang around the court, most people went on spring vacation, but I've never been on spring vacation in my life. I would be the only law student in court picking up cases, so I had a pretty active trial calendar. By the time I graduated from law school, I had at least 5 trials, bench trials, under my belt, which was pretty good. So, I knew the system.

Mr. Granof: These were in Superior Court?

Mr. Murray: The trials that I had were all in Superior Court because Superior Court had a rule that allowed a law student to try cases as long as that student is supervised. But by the second semester, this was a two-semester commitment, I had reached the point where I needed very little supervision, and my supervisor was probably in the building somewhere but not next to me in the courtroom when I was trying a case. He would be walking in and out of the courtroom, but he knew me well enough to know that I came in prepared. It was interesting because I learned a lot. I learned not only where to stand in court, the simple stuff, but learned how to read judges,

and I learned how to listen to the testimony and how to read witnesses. I also learned how to identify the salient points of a case that you want the fact finders to remember when they're making a decision. So those were good things that I picked up as I went along.

Mr. Granof: Did Georgetown have at that time a trial practice course, other than the program you just described?

Mr. Murray: That program was part of the trial practice course. It was a clinical program. They also had an appellate program. They had several different clinical programs, depending on the variety of interests of law students because not every law student wanted to be a trial lawyer. Some of them were interested in administrative law, some of them were interested in just criminal work. I wasn't interested in that because I did a paper on plea bargaining in my first year at Georgetown, and I became disenchanted with the criminal justice system. I knew that leg was an essential element to the system, but it just turned me off -- the process turned me off -- but I understood how necessary it was to do that. I interviewed some former convicts as part of my paper, and I remember a guy told me, "Plea bargaining is a great system, young man, because where else can you do a crime with a maximum sentence of 25 years, and then plead down to 5 and get out at 2?"

Mr. Granof: That's one way of looking at it.

Mr. Murray: You can't beat that. And the guy was absolutely right. And the judges I interviewed, the judges said, "Look, if there wasn't plea bargaining the whole system would shut down. Young man, do you think I can try every case that

comes up? Impossible.” I had an idealistic point of view that everybody deserved their day in court, but the realistic point of it is some people don’t want to take the chance. Guilt or innocence sometimes doesn’t make a difference; it’s whether or not you want to take a chance given the weight of the evidence, especially today when the U.S. Attorney’s office writes an indictment. I defended a lawyer many, many years later in a legal malpractice claim filed by a guy that he represented in a criminal case. Very well-to-do businessman. Pled guilty. I read that indictment, and I said to myself, it would have been stupid for him to plead not guilty because they had him dead to rights; they had evidence dead to rights against him, but he thought the lawyer did something wrong. We were able to resolve that. But getting back to my opinion on the criminal justice system that disenchanted me -- the paper I wrote on plea bargaining disenchanted me -- so I focused more on civil law.

Mr. Granof: And did your experience confirm your predilection that this is really what you wanted to do?

Mr. Murray: Yes. When I clerked, the judge I clerked for, Tim Murphy, he was a great man, a great mentor. The reason why I got the job was because he was a Marine, he spent time in the Marine Corps, and when I applied, my Marine Corps service was on my application. Therefore, he called me in. We hit it off right away, and we became friends until the day he died. But, in any event, yes, it satisfied my predilection.

Mr. Granof: You said this is what you want to do and when you started doing it you said, “Yes, this is exactly right for me.”

Mr. Murray: Judge Murphy knew that I was interested in trying cases where they had good trial lawyers.

Mr. Granof: Did your affiliation with Judge Murphy begin in the third year of law school or afterwards?

Mr. Murray: Afterwards. You know, it's like I said. When I came into this town, I didn't have anything. Everything I owned was in the trunk of my car, along with my wife's stuff. Well, she had more stuff than I did. I didn't know anybody, didn't have anything. A military background was a big help because I was able to get a couple of summer jobs as a result. I got a job with the Defense Contract Audit Agency, and then I got another summer job with the Navy Court of Military Review, and those were very good and interesting experiences. The Navy Court of Military Review was appellate work. Defense Contract Audit Agency was Defense contract work. Interesting, but not to my liking. The guys I worked for were very good at it, very kind to me, and showed me the ropes, but it was something I could not do for the rest of my life.

Mr. Granof: When you got out of law school, you knew you wanted to be a trial lawyer?

Mr. Murray: Yes, and Judge Murphy helped me in that regard. I didn't get accepted by the U.S. Attorney's Office. I think I did poorly in the interview because the guy asked me "Do you think you can send some of your black brothers to jail?" And I looked at him, I got really close to him, face to face, and I said "Sir, I'm a combat Marine. You think that's tough? You don't know what tough is." So, in other words, I challenged him. He was trying to challenge me, but I challenged him right back. I don't think it came across too well, but I was insulted by the question.

Mr. Granof: He was not African American?

Mr. Murray: He was African American. And from what I could see, he was a good man, but he asked the wrong question at the wrong time to the wrong person. That's the way I looked at it. I didn't pass the interview, and Judge Murphy, to his credit, called around. He knew this law firm called Carr, Jordan, Coyne & Savits at the time. And most of these guys were Marines. So, they said, send him over.

Mr. Granof: What was your affiliation with that law firm?

Mr. Murray: I didn't know anything about them. I sent out about a hundred resumes. I got maybe three calls for interviews. Everybody said, you have a good resume, good to know you, thank you for your service, more of a curiosity kind of thing than anything else. Some of the practices, when I got to know what kind of work they did, I wasn't interested, but the Carr, Jordan firm was exactly what I was looking for. And Judge Murphy knew it, and these guys were all Marines, so they were, you know, just like the brotherhood all over again. I started that job on July 1, and I thought I went to heaven because I was in trial all the time.

Mr. Granof: In other words, when you were out of law school, you started with Carr, Jordan?

Mr. Murray: No, I started as a clerk for Judge Murphy.

Mr. Granof: How did you get to Judge Murphy?

Mr. Murray: I sent my resume to about every judge.

Mr. Granof: You thought a clerkship would be helpful?

Mr. Murray: I thought a clerkship would be helpful. And I thought I would get accepted by Judge Harry Alexander. I didn't know much about Judge Alexander. But we had the same background. He grew up in New Orleans, I grew up in New Orleans. He

graduated from Xavier University, I graduated from Xavier University. He went to Georgetown Law School; I went to Georgetown Law School. Judge Alexander didn't even call me in for an interview. I got an interview with Judge Murphy and one or two other judges, but Judge Murphy and I hit it off right away. I was so glad he made me the offer because, like I said, we became good friends from the time I clerked until the day he died. And I was at his house when he died. He was very instrumental in my career. He pointed me in the direction of the Carr, Jordan firm.

Mr. Granof: Just preliminarily, how would you evaluate your overall experience in law school? I mean, it sounds like it was a good experience.

Mr. Murray: Overall experience was good because I learned a lot. But when you look at it from my perspective, a guy that never liked school, who never liked homework, and who was doing homework all the time, it was not enjoyable. It was a means to an end. A path that I had to go through to achieve an objective. Some people liked that process. They liked school, they liked academia. I never did. It was always a means to an end for me. Some classes I really enjoyed. But the work was relentless and always required reading and it interfered with the time I could spend with my family.

Mr. Granof: And you had a family.

Mr. Murray: And I had a family. And I was concerned about, how does a guy like me get a job in a strange town where he has absolutely no anchor, where he knows no one, where there's absolutely no connection. I was concerned about that, I was really concerned about that, and I said to myself, "Well, if I have to struggle to get cases

at the courthouse and hang out a shingle, then at least I could do that.” So I was prepared to do that, but I knew that to learn the right way I would have to go to a firm where they would teach you, where they would have, you know, you start off with a small case and then learn as you go. And this firm that Judge Murphy provided the introduction to, Carr, Jordan, Coyne & Savits, was that firm. It was a good fit, a perfect fit.

Mr. Granof: But before that, let me ask you about your clerkship. So, you clerked for Judge Murphy after law school for a year?

Mr. Murray: Yes.

Mr. Granof: And what was that like? You said he was a mentor.

Mr. Murray: He was one of the hardest working individuals you’ll ever meet. He was the only judge that I know that could have two, three things going on at the same time, and be on top of all three of them. He would have a jury out and call another jury for the next case, and then hear another case while he was waiting for that jury to come down. He was a relentless worker, and he was a perfectionist, and he was demanding. He was a very good teacher.

Mr. Granof: Were you his only clerk?

Mr. Murray: I was his only clerk. You know there were times when, whenever he was in trial, I was there, which meant I had to come back and work late at night and on weekends to do the office work as a law clerk, to do memos, to do briefs, to do orders for him to sign. But I learned a lot watching because whenever there was a good lawyer trying a case, he’d say, “You might want to come to court, Dwight, got some good lawyers trying cases.” I would spend the whole time watching

these trials, but at the same time the work was piling up in chambers. But I was learning, and that's what I wanted to do. And he kept me so busy I would carry my lunch in my coat pocket, and whenever there was a recess, I would take a couple of bites of the sandwich, and then when the recess was over, go back to the courtroom because he very seldom took lunch; he just worked right through everything. In this city the taxpayers got more than their money's worth out of Judge Murphy.

Mr. Granof: I've heard that the Superior Court was a mixed bag. They had many judges who were just outstanding, and Judge Murphy was one of them. Then they had other judges.

Mr. Murray: Yes, and that's true. In the old days they had some judges who were very interesting, and some judges who were characters, some judges you'd come back from the courthouse and say, "Hey, guess what I saw today, guess what I heard today, or guess what this judge did," and everybody would laugh because it was humorous. And some of these judges engaged in inappropriate conduct. That's not the case now. I think the judges who sit on the Superior Court are high quality, they have excellent academic backgrounds, excellent education, excellent experience. My only criticism would be -- this was a long-standing criticism -- they had more judges with a criminal law background than judges with a civil law background. And that's a problem because in criminal law there's a criminal law bench book for judges. Civil law covers so many fields -- products liability, torts, medical malpractice, contracts, real estate, domestic relations, you name it, it covers the gamut -- there's no way you can master this entire field. It takes time.

So I don't care how smart you are, where you graduated in law school, what Ivy League school you went to, if your experiences in the legal profession are limited to criminal law, when you step into civil law it's a whole new different ballgame. And the problem with that is that the clients pay for the learning curve of the judges because some judges don't manage the case properly, because they can't see where it's going, they haven't been there before. Take a judge like Judge Murphy, or Judge Braman, Judge Weisberg or Judge Gray, some of the other really good judges -- I know I'm forgetting a lot of the good ones. They have the experience, they've been there, they can see where a case is going, and if it's slowing down, they know how to speed it up. But other judges, they don't know, and they won't tell you they don't know. Lawyers are not only there to represent their clients but also to help with the administration of justice. The judges, with the help of the lawyers, should work to speed the case along.

One of the nice experiences that happened to me when I was practicing, I had a pretrial conference, a status conference, and I told the judge, "Well judge, we have to supplement a 26(b)(4) statement," which is an expert witness statement. The judge looked at me and said, "What's that?" And you know what? I was glad he asked the question, as opposed to faking it and then looking it up later on, because then you can explain it to him. I'm there to educate the judge about my case and so is my opponent there to educate the judge about his/her case. The more he knows, she knows, the better the case will go. At least that was my thought. I learned a lot from Judge Murphy. I learned a lot about judges,

learned a lot about lawyers, learned a lot about the discipline in a courtroom, and it was a tremendous experience.

Mr. Granof: So, I would assume that Judge Murphy had a fair share of criminal cases.

Mr. Murray: He had when I was his clerk. He sat in every division, except the Tax Division. So, as his clerk I had experience in the Criminal Division, the Family Division, the Child Neglect Division, and the Civil Division. It was a tremendous broad span of law being thrown at you on a regular basis, and I remember one time the bailiff was late coming in, and the Judge said, "Call the Court to order." So he said, "The next time I tell you to do that you'd better know how to do it," and I watched and I learned, and the next time he told me to do that, I knew how to do it. You learn, you learn.

Mr. Granof: Were there any lawyers that you saw that were terrific?

Mr. Murray: Oh, yes. Ken Mundy; Judge Mencher, he tried a case and did an excellent job; Judge Henry Greene was principal Assistant U.S. Attorney, tried a big evidentiary hearing trying to get a recording admitted, and Henry Greene, Judge Greene, did a fantastic job, he completely demolished the expert, demolished him, just through cross-examination and preparation. And to this day I still remind him of that. I saw some very good lawyering as a clerk with Judge Murphy. And Ken Mundy did a fantastic job in a case. It was a good experience.

I tell young lawyers now if you got a clerkship with a trial judge, try to get a clerkship with an appellate judge. If you got a clerkship with the U.S. District Court judge, after that's over get a clerkship with an appellate judge because it builds your resume, and you'd be surprised how many doors that opens

after you have an appellate clerkship. I didn't know because no one sat down and said "Dwight, if you want to do this, these are the steps you have to take." But I learned a lot, like I said; keep your eyes open, and you learn even more. And I learned that if you want to, if you have your eyes set on certain firms, certain firms won't even open a door for you unless you have certain tickets punched along the way, and you got to know what those punch holes should be. A federal clerkship at the appellate level is one way to get in those doors, that's if you want that kind of practice. I didn't particularly want that kind of practice because I wanted to be in the courtroom, and I knew that big firms did not give that opportunity to young associates. The firm that I went to did.

Mr. Granof: After Judge Murphy, could you have looked at the U.S. Attorney's office?

Mr. Murray: No, because I was disenchanted with criminal practice. Looking back, I think that was a mistake I made. Not a big mistake by any stretch of the imagination, because it would have been interesting to try a bunch of federal cases, you know, by the seat of your pants because these guys were trying misdemeanors; they never meet the witness, they're flying by the seat of their pants, and that's kind of interesting. It teaches you good cross-examination techniques on the fly. Good direct examination techniques on the fly. But at the time I wasn't interested in learning on the fly. I was interested in learning how to do things the right way, you know, methodical preparation, working a case up. I wasn't interested in somebody giving me the file when I walk in the courtroom and then working from that by the seat of my pants. To me, there was no thrill to that. If I could have gone into Felony I section right away, that would have been interesting; but that

wasn't likely. And I don't blame them, because I didn't have the experience for that. It's just like when I started with the Carr, Jordan firm, I didn't start off with medical malpractice cases or products liability cases. I started off with the small cases, and then worked my way up.

Mr. Granof: And so, was it Judge Murphy who put you in touch with Carr, Jordan?

Mr. Murray: Carr, Jordan, Coyne & Savits.

Mr. Granof: And how big a firm?

Mr. Murray: It was about maybe 20 lawyers, they were all trial lawyers, every single one of them. They had an office in D.C., one in Maryland, one in Virginia. And all they did was try cases. I was trying my first case within one month after joining the firm. And I was trying cases, one a month.

Mr. Granof: So, they had lawyers in Maryland and Virginia?

Mr. Murray: Yes. And I got a desk and an office.

Mr. Granof: You were in the D.C. office?

Mr. Murray: I was in the D.C. office. First day on the job they rolled a cart in with files. They said, "These are your cases." And you knew you're going to get the dregs – all the cases nobody else wanted. But that was okay. I got some really bad cases, but I tried a bunch of them. That's how I learned.

Mr. Granof: What kind of practice did they have?

Mr. Murray: Well, they had an insurance defense practice. There are two ways to learn how to try cases when you come out of law school. You can either join the Public Defender's Service or U.S. Attorney's Office, or Commonwealth Attorney's

office, where you try criminal cases, represent the City Council, the city, the county, or the federal government.

Mr. Granof: That's in Virginia.

Mr. Murray: Yes. Or Maryland. State's attorney. Or you can join a firm like Carr, Jordan Coyne & Savits where you learn how to try cases. That's difficult these days because insurance companies started their own law firms, and now they have captive firms that they give that work to rather than give it to firms like where I learned. As a result of the change, it's more difficult for lawyers to learn the right way. Now when I learned they -- my firm -- gave you all the help you needed. They have a budget for Continuing Legal Education, so you can take CLE courses to sharpen your skills, to learn new ways of doing things, to keep up on the rules of evidence. It was good, and like I said, I thought I had died and gone to heaven. I never thought I would retire because it was so much fun. Lot of work, but this was different work. This is homework, but it's different; it was not work done for abstract purposes. It was homework in preparation for trial. Therefore, you have an objective, you have a goal.

Mr. Granof: How long were you there? Was this where you spent your career?

Mr. Murray: Thirty-seven years.

Mr. Granof: Thirty-seven years at Carr, Jordan?

Mr. Murray: Yes, 37 years. It was Carr, Jordan, and then it became Jordan, Coyne, and the firm went through several changes. But I was basically with the same firm for 37 years.

Mr. Granof: You became a partner in the firm?

Mr. Murray: Right.

Mr. Granof: When you left, how big a firm was it? Did it grow?

Mr. Murray: Well, it's a good point. It compels me to tell a story about the nature of this firm, what kind of a place it was. The biggest we ever got was about 70 lawyers, and to me, that was too big.

Mr. Granof: How many of them were in D.C.?

Mr. Murray: Most of them were in D.C. We occupied like two, three floors, in the building. And we had a huge environmental practice. We did a lot of stuff. We expanded a little bit, and then one day the client that gave us a lot of their environmental work, which was a major portion of our practice, called up and said, "There's a new manager, and he wants to give all these cases that you had to another firm." We went from having all these environmental cases to losing all of them.

Mr. Granof: Did he say why?

Mr. Murray: Just a change in leadership. A new manager comes in, he wanted to give it to his college roommate's law firm. The decision to transfer the cases had nothing to do with the firm's competence. It was a decision based on contacts, and influence.

Mr. Granof: That's interesting.

Mr. Murray: Yes, and I've seen it before. You know you practice long enough you see a lot of different changes in the legal profession. A credit to the Jordan Coyne & Savits firm was that in most firms, people would have gotten pink slips the next day when a significant client was lost. But not the Jordan Coyne firm. That firm made the announcement, and they told everybody "We'll keep you as long as we can even though we believe we don't have work for everybody, but we believe it's

better for you to find a job when you already have a job than look for a job after you've been laid off." Most of those people found jobs, and we paid them while they were looking. That shows a loyalty. That's typical Marine Corps stuff that you don't find in other law firms. And another thing we did, when the first Gulf War broke out, we had six of our guys that were called up to serve, and we kept paying them while they were away. I don't know another law firm that would do that. They were getting paid combat pay, they were getting paid Marine Corps officer's pay, but we kept paying them, and that tells you a lot about the firm. I enjoyed being a part of that because they weren't money hungry or money greedy. They were interested in making money, don't get me wrong, but that wasn't the alpha and omega of their existence. There were a lot of things of character and loyalty and good stuff like that, old-fashioned stuff that made up their law firm. Made it a good place to work.

Mr. Granof: So, let's get some dates in here. You graduated from law school in '74. And you clerked for Judge Murphy from '74-'75?

Mr. Murray: Then I started with Jordan Coyne; Carr Jordan.

Mr. Granof: Carr, Jordan, and worked for them from '75 until?

Mr. Murray: '76 to 2012.

Mr. Granof: So, when you started out, they had maybe 20 lawyers and they did a lot of insurance defense work?

Mr. Murray: A lot of insurance defense work, a lot of corporate defense work.

Mr. Granof: So, corporate defense work. What kind of cases did you start out with? You must remember your first case.

Mr. Murray: I don't remember my first case. At one time and for a long time I did, and I was surprised that the longer time went on, the more I forgot about the cases I handled, because I handled a lot of them. A lot. I used to remember all my trials. Now I can't remember all my trials; I just remember the bad ones -- the ones that I lost, particularly the ones that stand out. The ones that I won I forget them, quite easily as a matter of fact. But the ones that I lost I remember. The ones that had some dramatic moments I'll remember, but I tried over a hundred cases. I know guys that tried a lot more than that, and they have the same problem that I have. You know, tell me some facts, and oh yes, I remember that case. But I have to have that little jump start, can't remember the names of the people but the facts I mostly remember.

Mr. Granof: What kind of cases?

Mr. Murray: The kind of cases I handled to start off?

Mr. Granof: Well, yes. I mean here you are, a brand-new lawyer, although you've had some limited experience in Superior Court and in the Clinical Program at Georgetown, and you've seen how trials operate with Judge Murphy, but that's one thing. Suddenly here you are with clients who are paying and expect results.

Mr. Murray: And expect results. For most of the cases that were in the firm, the trial attorney had to evaluate the case for the client before trial on a form that was called a trial evaluation form. This form requested certain information that the client felt was necessary in order to make a decision whether or not to go forward with the trial or settle the case. And I would always fill my trial evaluation out tight, and by tight, I gave myself little room for error. If the demand on a small case, let's say

when I started out, the demand might be \$25,000. If I wanted to settle the case, I could write it up that we don't have a chance of winning, so why not offer \$15,000, so you settle somewhere in between. I wasn't like that. If the demand was \$20,000, I would say the case is worth \$5,000 if I thought it was \$5,000. So, then the spread would be too much to work out a settlement.

Mr. Granof: You honestly thought it was worth \$5,000?

Mr. Murray: I honestly thought it was worth \$5,000. I didn't say that because I wanted to try a case; I said that because I honestly believed that was the value of the case. In other words, I did not do a trial evaluation to induce the client to settle the case to avoid the trial. My evaluations were my honest belief about the value of the case.

Mr. Granof: Well, here you are, a new lawyer, how do you know what the case is worth?

Mr. Murray: You talk around, you talk to people, you look at what they call the multiplier. You usually use the specials, the medical specials, multiply the medical specials by a factor. Now the multiplier will determine how much the case is worth. A case that's close on liability will lower the multiplier. A case where liability is slam dunk, the higher the multiplier. A case where you have no chance of winning, and the other side has a good witness, and you're going to get creamed in court is a very high multiplier. Because you want it to settle, you want to protect the client's assets. That's what I was all about, protecting the client's assets. I was not afraid to go to trial, so that is why my evaluations were what I called tightly projected. The clients appreciated it because the clients knew when an attorney was puffing up the value of a case to avoid a trial. The clients also

knew that I wasn't afraid to go to trial to back up my evaluation numbers. If protecting the client's assets meant going to trial, then I went to trial.

Mr. Granof: Did you interview witnesses?

Mr. Murray: Yes. I interviewed witnesses.

Mr. Granof: So, you had the file?

Mr. Murray: We took depositions. Oh, yes, you did the whole workup.

Mr. Granof: Before you wrote the client memo?

Mr. Murray: The trial evaluation would be the last thing you do after the case was worked up. You got the discovery, you took the depositions, you reviewed all medical records, and then you make a determination as to the value of the case, and you write that trial evaluation.

Mr. Granof: But the first thing you're doing, you get this file and you have to decide to start with, presumably a complaint has been filed?

Mr. Murray: I'll tell you how it starts. You get a complaint.

Mr. Granof: The complaint's been filed?

Mr. Murray: The complaint's been filed. They want you to file an answer. You file an answer. Then I've always had a practice that I file my discovery, my interrogatories, my request for production of documents, with my answer. That way you can put it aside.

Mr. Granof: You're a brand new lawyer. Is that what you started out doing?

Mr. Murray: I started out sending discovery requests out when I filed my answer because I knew that once I got the discovery out, I could then wait 30 + days for the discovery responses to come in, whatever it is; most of the time my opponents

were late with their responses. Eventually I am going to get the discovery responses. Once the discovery responses come in, I schedule the depositions of the parties and witnesses. So you have steps to go through.

Mr. Granof: But you knew this to start with?

Mr. Murray: Yes. I knew this to start with.

Mr. Granof: So, you come in and you think it's a good idea immediately to file interrogatories, document production requests?

Mr. Murray: Yes, you get the case moving. Filing the Answer and sending out discovery requests gets the case moving and that gets you the information you need to make a decision and an initial assessment of the case in determining the next step. You get the interrogatory answers back, you get responses to the request for production of documents back, you get some medical records back, and then you learn not to trust the responses to request for production of documents. You send out subpoenas, but you have to know who to subpoena in order to get certain records. So, you learn that when you get all this information, you take depositions.

Mr. Granof: So, then you decide on a deposition schedule. By the way, where were these first cases tried? Were they in Superior Court?

Mr. Murray: I had some in Superior Court, I had some in federal court, you know, as a young lawyer. I'll just tell you a brief story. My first experience before Judge Gesell. I don't know if you knew Judge Gesell.

Mr. Granof: Yes.

Mr. Murray: Judge Gesell. Brilliant judge. Hard task master. Young lawyer, me, appearing before Judge Gesell, and I wasn't intimidated by anybody, let me tell you, and I wasn't intimidated by Judge Gesell, but I went there, you know, he looked at me and he said, "Mr. Murray, explain to me why you raised this defense in your answer." And the reason I raised the defense in the answer, I said, "Well, Judge, this is a standard response that we file with just about every complaint in order to protect and preserve our affirmative defenses." He leaned over the bench and said, "Mr. Murray, the next time you file any pleading in my court, or any court, make sure you have a factual evidentiary basis to do that." And I said, "Yes, sir." And the way he said it was like a teacher to a student, as opposed to trying to crush me, because I didn't take it that way. I learned something and I've been following his advice ever since. This occurred over 40 years ago.

Mr. Granof: Well, this must have been in a status conference, a pretrial conference.

Mr. Murray: It was the first status conference, first status conference, and he locked my heels, as they say in the Marine Corps, and read me the riot act but in a very gentle teacherly sort of way.

Mr. Granof: So, he didn't want just boilerplate, pro forma stuff?

Mr. Murray: He knew I was a young lawyer. Shucks, he probably knew I came out of the Marine Corps based on the firm that I came from. And the spit shine on my shoes. But he wanted to set me off on the right path right away, as opposed to me developing bad habits. And I tell you that was a good lesson. It's all about learning, so I learned from that. And I tried three cases in front of him. Won all three. These were bench trials.

Mr. Granof: And what kind of cases were they, if you can remember?

Mr. Murray: One automobile accident, one premises liability case, and I forget what the third one was about. But, you know, he was a good judge, a really good judge, and a smart judge. You know, he's the guy who used to handle the biggest cases in that courtroom because he was one of the smartest judges on that bench at that time. Handling cases from a young lawyer like me, he probably thought it was amusing, but it was a great experience for me.

Mr. Granof: And in your first year, I don't know if you recall, when did you actually set foot in a courtroom?

Mr. Murray: First month I was at the firm. The very first month, within a matter of weeks. I had my first trial within 30 days of joining the firm.

Mr. Granof: And did you have a partner, somebody overlooking?

Mr. Murray: No, if it was a small case, they'd bring you in and say, okay, tell me about the case, what are you going to do, how are you going to prove it, etc., etc. I was able to answer all the questions because I had that experience in the clinical program before, and I had experience as a law clerk before. So they left me pretty much alone, and they knew if I ran into trouble they would hear about it, because what they would normally do after the trial was over with -- they didn't tell you this, but I found out later -- one of the partners would call up the judge, and say "Judge, we had a young lawyer down there to try a case in front of you. How did he do?" Using that method as a follow-up process, the partners would get a report on its lawyers and how those lawyers performed. And the judges would say, "Oh, he did fine, he's got promise," or "Yes, he needs a little work," or whatever.

Mr. Granof: The judge has an interest in having competent attorneys appear before him.

Mr. Murray: That's right. It makes the judge's job easy. If you want to make a judge happy, have two good lawyers trying a case in front of him. The judge has absolutely almost nothing to do. The lawyers and the judge will control the flow of the case, but it's the lawyers who are writing and directing and starring in the play.

Mr. Granof: I still remember that from Irving Younger -- his tapes -- in which he said "If there are two terrific lawyers, drop everything, go down to the court and hear them because a case that would ordinarily take a month, they'll do it in a week."

Mr. Murray: Yes, that's right.

Mr. Granof: The case that would take a week, they'll do it in a day. A case that will take a day, they'll do it in two hours.

Mr. Murray: And he's absolutely right. And that's why judges want good trial lawyers in front of them. I mean there's nothing more exasperating than to be chewing out a lawyer in front of the jury because a lawyer constantly makes mistakes, or a lawyer is doing things, slowing up the process, covering things that are unnecessary, dragging it out, because they don't know what they're doing. Everybody thinks they can try a case until they get into the courtroom and try to do something when somebody says "I don't want you to do that. I object." And then that's when everything falls apart.

Mr. Granof: But you thought you could try cases. I mean you had a fair degree of self-confidence.

Mr. Murray: I thought I could try cases. I knew I would make mistakes, but also knew I would learn from my mistakes. And I knew I wouldn't make the same mistake twice. It's

all a process of learning. I knew I wouldn't do a perfect job, but I knew as time went on, my abilities would improve; at least that was my goal. I gave this example to my partners. My partners asked, "Why do you try so many cases?" I said, "Well, it's like a prize fighter. If you lay off two, three years, you lose your instincts, you lose your reflexes, you've got to stay in the arena. You've got to throw the punches and have the punches thrown back at you. Otherwise, your reflexes will diminish, and your skills will sort of wither on the vine."

Mr. Granof: Well, here you start out as a new attorney, you're given cases, and you're in court.

Mr. Murray: Yes.

Mr. Granof: And what did you know about conducting cross-examination? How did you know how to do that?

Mr. Murray: I bought a treatise, *Goldstein on Trial Techniques*. That was a set of books, it was a three- or four-volume set, and it gave you examples on cross-examination. Because you didn't learn cross-examination in law school. You got a little bit of an introduction to it in the clinical program, but you really learn cross-examination by doing it, and then having it explode in your face, and then realizing you pushed a little bit too far, that you were not disciplined enough to stop when you made your point, to sit down, like Irving Younger said. If you made your point? Sit down. You're not disciplined enough. You learn that through trial and error. You learn that through the scars on your back, from making mistakes, and you learn that by reading samples of cross-examinations, how to lead the witness; direct exam -- who, what, when, where, how, and why. You start off a question with one of those words, no objection. Cross-

examination, a question that calls for a yes or no response. You learn through doing, and they didn't teach you that in Evidence course because you're so busy trying to master the rules.

Mr. Granof: Principles of evidence, that's right. You see on TV and popular movies where the witness, you know, the Perry Mason style where the witness breaks down.

Mr. Murray: And that doesn't happen. Maybe once in a while it might happen if you're lucky, but for the most part it doesn't, and you want to structure your cross-examination so you make the points you want to make in closing argument. And if you made your points so you can argue to the jury effectively, then you stop because closing argument you can control, that's your bailiwick. Cross-examination, all you want is to get that witness to give you the information that you can use in closing argument.

Mr. Granof: That's interesting. Tying your cross-examination, well I suppose to your direct examination for sure, but looking ahead to the closing argument to really frame what you've done throughout the trial.

Mr. Murray: The whole trial, yes, just like the hub of the wheel and from every spoke, the rim, all supposed to point to that central theme of your case. As long as you've got that central theme covered, you've got a sufficient argument to make. And you can craft your argument, your persuasiveness in your closing, but you need to fill in the blanks. You need those spokes that point to the hub, and everything is tied together by the rim of the wheel. So that's what I tried to do. And it takes a while to learn. When I first started, my technique was to use the back of a legal binder and clamp on examination ideas, clamp on opening statement ideas. Then I

moved to the trial notebook where everything was in a notebook, all the examination stuff, the legal research stuff, the deposition transcripts. I'd have two, three binders sometimes. Then I went to the laptop. Laptop had everything in it.

Mr. Granof: But initially when you started out, you used the binder?

Mr. Murray: Yes, like a yellow notepad. The back part of the yellow notepad, the cardboard section, that was the key to me, because you can carry it around and it won't be flapping like loose-leaf paper, and you can write on it, you can make notes on it.

Mr. Granof: Well, we've been going for an hour and 20 minutes, so maybe it's good time to stop.

Mr. Murray: To set another meeting.

Mr. Granof: To do that. So, this concludes the fourth interview.