

SECRETARY OF  
05 FEB 16 A

**Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page.**

- |  |  |                                    |   |
|--|--|------------------------------------|---|
| 1. Registrant Name<br><b>Covington &amp; Burling</b>   |  |                                    |   |
| 2. Address <input type="checkbox"/> Check if different than previously reported.<br><b>1201 Pennsylvania Avenue, NW, Washington, DC 20004</b>                |  |                                    |   |
| 3. Principal Place of Business (if different from line 2)<br><br>City: _____ State/Zip (or Country) _____  |  |                                    |   |
| 4. Contact Name<br><b>Richard C. Shea</b>  |  | Telephone<br><b>(202) 662-5599</b> | 5. Senate ID #<br><b>11195-1977</b>                 |
| 7. Client Name <input type="checkbox"/> Self<br><b>Hybrid Plan Information Coalition</b>   |  | 6. House ID #<br><b>31827130</b>   |   |
| <b>TYPE OF REPORT</b> 8. Year <u><b>2004</b></u> Midyear (January 1-June 30) <input type="checkbox"/> OR Year End (July 1-December) <input type="checkbox"/> |  |                                    |   |
| 9. Check if this filing amends a previously filed version of this report <input type="checkbox"/>  |  |                                    |   |
| 10. Check if this is a Termination Report <input type="checkbox"/> ⇒ Termination Date _____  |  |                                    | 11. No Lobbying Activities <input type="checkbox"/> |

12. Lobbying Firms	13. Organizations
<b>INCOME</b> relating to lobbying activities for this reporting period was:	<b>EXPENSES</b> relating to lobbying activities for this reporting period were:
Less than \$10,000 <input checked="" type="checkbox"/>	Less than \$10,000 <input type="checkbox"/>
\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ <div style="text-align: center; font-size: small;">Income (nearest \$20,000)</div>	\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ <div style="text-align: center; font-size: small;">Expenses (nearest \$20,000)</div>
<b>14. REPORTING METHOD.</b> Check box describing the accounting method used. See instructions for a description of options.	
<input type="checkbox"/> <b>Method A.</b> Reporting amounts using LI definitions only	
<input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b)(8) of the Internal Revenue Code	
<input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(m) of the Internal Revenue Code	

Signature  Date February 16, 2005  
Printed Name and Title Richard C. Shea

Registrant Name Covington & BurlingClient Name Hybrid Plan Information Coa

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in registrant engaged in lobbying on behalf of the client during the reporting period. **Using a separate page code,** provide information as requested. Attach additional page(s) as needed.

15. General issue area code RET (one per page)

16. Specific lobbying issues

**Legislation relating to hybrid pension plans**

17. House(s) of Congress and Federal agencies contacted

☒ Check if None

**United States Senate**

**United States House of Representatives**

18. Name of each individual who acted as a lobbyist in this issue area

Name

Covered Official Position (if applicable)

**Richard C. Shea**

**Robert S. Newman**

**Katherine M. Gongora**

19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if N



Signature  Date February 16, 2005  
Printed Name and Title Richard C. Shea