

Scope of Work for LSA for Castillo, Moriarty, Tran & Robinson

The City hires Attorney to represent it in litigation. Litigation as used in this Agreement shall mean all work as follows:

- (1) after a notice or summons has been served regarding tort claim litigation
- (2) a decision to initiate litigation, is approved by the City Council
- (3) meet and confer with clients on options for litigation strategy and receive approval for City's preferred course of action
- (4) prepare responsive pleadings for federal court including appropriate motions to dismiss or answer
- (5) meet with defendant officers, investigate case and explain proceedings
- (6) prepare for, meet and confer with opposing counsel on preparation of joint case management conference (CMC) statement and appear in Court for initial CMC
- (7) prepare discovery plan, propound written discovery, respond to plaintiffs' discovery, analyze plaintiffs' discovery responses
- (8) prepare clients and attend alternative dispute resolution (ADR) as ordered by federal court
- (9) prepare clients and defend clients' depositions, prepare for and depose plaintiffs and depose other witnesses as necessary and relevant
- (10) prepare Motion for Summary Judgment (MSJ) after meet and confer with clients on options and preferred strategy
- (11) Prepare for settlement conference, meet and confer with clients and attend MSC with clients
- (12) if case is not resolved by MSJ or settlement prepare for and attend jury trial of the case
- (13) review with clients appellate strategy and options following verdict, post verdict motions, if necessary.

