

**LINKE v. RAMIREZ/CITY OF RIVERSIDE****LITIGATION BUDGET 2022-07-11**

Court

Case #

Riverside Superior Court	PROFESSIONAL RATES			
CVRI2100730	PARTNER	SR. COUNSEL	ASSOCIATE	PARALEGAL
	\$380.00	\$325.00	\$275.00	\$170.00

BUDGET			
ATTORNEY FEES	EXPERT COSTS	LITIGATION COSTS	TOTAL BUDGET
\$210,400.00	\$116,000.00	\$14,700.00	\$341,100.00

TOTAL HOURS				
PARTNER	SR. COUNSEL	ASSOCIATE	PARALEGAL	TOTAL
500	-	-	120	620

BUDGET		Hours	Hours	Hours	Hours	Total Hours	Total Fees
L100	Case Assessment, Development & Administration						
L110	Fact Investigation/Development	40	0		10	50	\$ 16,900
L120	Analysis/Strategy	20	0		5	25	\$ 8,450
L130	Experts/Consultants	5				5	\$ 1,900
L140	Document/File Management				10	10	\$ 1,700
L150	Budgeting					0	\$ -
L160	Settlement/Non-Binding ADR	20				20	\$ 7,600
L190	Other Case Assess., Develop. & Admin.					0	\$ -
	Subtotal	85	0	0	25	110	\$ 36,550

L200	Pre-Trial Pleadings & Motions						
L210	Pleadings	10			10	20	\$ 5,500
L220	Prelim. Injunctions/Provisional Remedies					0	\$ -
L230	Court Mandated Conferences	5				5	\$ 1,900
L240	Dispositive Motions	25					\$ 9,500
L250	Other Written Motions & Submissions					0	\$ -
L260	Class Action Certification & Notice					0	\$ -
	Subtotal	40	0	0	10	25	\$ 16,900

## Discovery

L310	Written Discovery	15			15	30	\$ 8,250
L320	Document Production	10			5	15	\$ 4,650
L330	Depositions + Witness Prep	30				30	\$ 11,400
L340	Expert Discovery	50			15	65	\$ 21,550
L350	Discovery Motions	10				10	\$ 3,800
L390	Other Discovery	15				15	\$ 5,700
	Subtotal	130	0	0	35	165	\$ 55,350

## Trial Preparation & Trial

L410	Fact Witnesses	40			20	60	\$ 18,600
L420	Expert Witnesses	30				30	\$ 11,400
L430	Written Motions & Submissions	25			20	45	\$ 12,900
L440	Other Trial Preparation & Support	50			10	60	\$ 20,700
L450	Trial & Hearing Attendance	100			0	100	\$ 38,000
L460	Post-Trial Motions & Submissions					0	\$ -
L470	Enforcement					0	\$ -
	Subtotal	245	0	0	50	295	\$ 101,600

## Appeal

L510	Notice of Appeal	5			5	\$ 1,900
L520	Designation of Record	10		10	20	\$ 5,500
L530	Opening Brief/Research	30		10	40	\$ 13,100
L540	Analyze Opposing brief/Research	15		0	15	\$ 5,700
L550	Reply Brief	20		5	25	\$ 8,450
L560	Oral Argument Prep and Appearance	10			10	\$ 3,800
L570					0	\$ -
	Subtotal	90	0	0	25	\$ 38,450

### Costs and Expenses - Experts

Defense Expert Fees (assume accident recon; orthopedic; economist; life planner w/ reports)		\$	100,000
Plaintiff Expert Fees at deposition (assume four experts)		\$	16,000
		\$	116,000