

## LITIGATION PLAN AND COST ESTIMATE - September 6, 2023

Caption: Richard de Aragon, Jr., Jessica Tonkovich v	Brief Case Summary - Discrimination(Race)
Responsible Firm Attorney: IRM	Harassment (Race); Retaliation; 1102.5
Case No.:	Whistleblower; Labor Code 232.5
Responsible Firm Attorney: Atkinson, Andelson, Loya, Ruud and Romo	Proposed Staffing: Irma Rodriguez Moisa, Angelo Mishriki

<b>I. PREDISCOVERY</b> (Identify and list under each heading)	<b>Est. Hours</b>	<b>\$ per Hour</b>	<b>Total</b>
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<u>Case Evaluation/ Preliminary Research:</u> Review all file materials, client conference, investigative report	40	\$350.00	\$ 14,000.00
<u>Drafting and Responding to Pleadings:</u> Demurrer; Meet and Confers	10	\$350.00	\$ 3,500.00
<b>TOTAL</b>			<b>\$ 17,500.00</b>

<b>II. DISCOVERY</b> (Identify and List under each heading)	<b>Est. Hours</b>	<b>\$ per Hour</b>	<b>Total</b>
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<u>Fact Investigation:</u> Reviewing documents, emails, minutes, etc.	30	\$350.00	\$ 10,500.00
<u>Witness Interviews:</u> Interviews of potential witnesses and co-workers (estimate of 10) , including IBEW staff and prepare	85	\$350.00	\$ 29,750.00
<u>Witness Preparation for Deposition:</u> We anticipate preparing for and defending 7-8 depositions and taking both of Plaintiff's depositions	85	\$350.00	\$ -
<u>Taking Depositions:</u> Plaintiffs' deposition	35	\$350.00	\$ 12,250.00
<u>Defending/Attending Depositions:</u> We anticipate defending/attending approximately 7-8 depositions	75	\$350.00	\$ 26,250.00
<u>Drafting Discovery:</u> Written interrogatories and requests for documents	20	\$350.00	\$ 7,000.00
<u>Discovery Responses:</u> Respond to Requests for Documents, Special Interrogatories and Form Interrogatories	40	\$350.00	\$ 14,000.00
<u>Evaluation of Discovery:</u> Review and analyze responses/documents	35	\$350.00	\$ 12,250.00
<b>TOTAL</b>			<b>\$ 112,000.00</b>

<b>III. MOTIONS</b>			
(Identify and list under each heading)	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
<u>Procedural:</u> None intended.			0
<u>Discovery:</u> One discovery motions	30	\$350.00	\$ 10,500.00
<u>Summary Judgment:</u> We will continue to evaluate whether the case is appropriate for summary judgment. We have included the amount in the budget in case motions are appropriate.	200	\$350.00	\$ 70,000.00
<u>In Limine:</u> We anticipate five motions in limine.	50	\$350.00	\$ 17,500.00
<u>Other:</u> N/A			0
<b>TOTAL</b>			<b>\$ 98,000.00</b>

<b>IV. PRETRIAL/ TRIAL</b>			
(Identify and list under each heading)	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
<u>Court Conferences:</u> We anticipate four conferences.	20	\$350.00	\$ 7,000.00
<u>Mediation/ Arbitration:</u> Attending and preparation for mediation and mandatory settlement conference (two briefs).	40	\$350.00	\$ 14,000.00
<u>Trial Preparation:</u> Preparation of trial documents and witness preparation.	120	\$350.00	\$ 42,000.00
<u>Trial:</u> We anticipate a seven day trial with two counsel being present and paralegal for technical support	250	\$350.00	\$ 87,500.00
<b>TOTAL</b>			<b>\$ 150,500.00</b>

<b>V. MISCELLANEOUS</b>			
(Identify and list under each heading)	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
<u>Settlement Matters:</u> Mediation			\$15,000
<u>Administration/ Client Report/ Calls:</u>	40	\$350.00	\$ 14,000.00
<u>Expenses:</u> Deposition Transcripts			\$ 40,000.00
Copies			\$ 3,500.00
Trial Graphics			\$ 10,000.00
Jury Consultant			\$ 20,000.00
E-Discovery			\$ 10,000.00

<u>Expert Fees:</u> economic, psychiatric (2 plaintiffs)	\$ 50,000.00
<u>Miscellaneous:</u>	\$ 10,000.00
<b>TOTAL</b>	<b>\$ 172,500.00</b>

<b>VI. TOTAL PROJECTED EXPENSE FOR CASE</b>			
	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
I. PREDISCOVERY		\$	17,500.00
II. DISCOVERY		\$	112,000.00
III. MOTIONS		\$	98,000.00
IV. PRETRIAL/ TRIAL		\$	150,500.00
V. COSTS		\$	172,500.00
<b>GRAND TOTAL</b>		<b>\$</b>	<b>550,500.00</b>