

LITIGATION PLAN AND COST ESTIMATE - September 6, 2023

Caption:	Brief Case Summary - Sexual Harassment, Failure to
Jonathan Buckley, Leslie Buckly v Wisniewski, City	Sexual Assault, Sexual Battery, IIED, NIED
Case No.:	False Imprisonment, Loss of Consortium
	Proposed Staffing:
Responsible Firm Attorney: Atkinson, Andelson, Loya, Ruud and Romo	Irma Rodriguez Moisa, Angelo Mishriki

I. PREDISCOVERY (Identify and list under each heading)	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
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Case Evaluation/ Preliminary Research: Review all file materials, client conference, investigative report	40	\$350.00	\$	14,000.00
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Drafting and Responding to Pleadings: Demurrer and Motion to Strike; Meet and Confers	15	\$350.00	\$	5,250.00
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TOTAL			\$	19,250.00
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II. DISCOVERY (Identify and List under each heading)	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
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Fact Investigation: Reviewing documents, emails, minutes, etc.	60	\$350.00	\$	21,000.00
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Witness Interviews: Interviews of potential witnesses and co-workers (estimate of 5) and prepare witness summaries	70	\$350.00	\$	24,500.00
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Witness Preparation for Deposition: We anticipate preparing for and defending Wisniewski deposition	25	\$350.00	\$	-
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Taking Depositions: Plaintiffs' deposition	35	\$350.00	\$	12,250.00
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Defending/Attending Depositions: We anticipate defending/attending approximately 5 depositions	50	\$350.00	\$	17,500.00
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Drafting Discovery: Written interrogatories and requests for documents	20	\$350.00	\$	7,000.00
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Discovery Responses: Respond to Requests for Documents, Special Interrogatories and Form Interrogatories	75	\$350.00	\$	26,250.00
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Evaluation of Discovery: Review and analyze responses/documents	50	\$350.00	\$	17,500.00
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TOTAL			\$	126,000.00
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III. MOTIONS			
(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 the motion is appropriate.	180	\$350.00	\$ 63,000.00
<u>In Limine:</u> We anticipate five motions in limine.	50	\$350.00	\$ 17,500.00
<u>Other:</u> N/A			0
TOTAL			\$ 91,000.00

IV. PRETRIAL/ TRIAL			
(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.	30	\$350.00	\$ 10,500.00
<u>Trial Preparation:</u> Preparation of trial documents and witness preparation.	100	\$350.00	\$ 35,000.00
<u>Trial:</u> We anticipate a seven day trial with one counsel being present only	110	\$350.00	\$ 38,500.00
TOTAL			\$ 91,000.00

V. MISCELLANEOUS			
(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			\$ 30,000.00
Copies			\$ 3,500.00
Trial Graphics			\$ 10,000.00
Jury Consultant			\$ 20,000.00
E-Discovery			\$ 10,000.00

Expert Fees: conomic, psychiatric	\$ 35,000.00
Miscellaneous:	\$ 10,000.00
TOTAL	\$ 147,500.00

VI. TOTAL PROJECTED EXPENSE FOR CASE			
	<i>Est. Hours</i>	<i>\$ per Hour</i>	<i>Total</i>
I. PREDISCOVERY		\$	19,250.00
II. DISCOVERY		\$	126,000.00
III. MOTIONS		\$	91,000.00
IV. PRETRIAL/ TRIAL		\$	91,000.00
V. COSTS		\$	147,500.00
GRAND TOTAL		\$	474,750.00