

Estimated Budget

Activity	Description	Hours Partner	Hours Associate	Hours Paralegal
PRE- TRIAL				
Investigation	Witness interviews, document collection and review	10	25	25
Pleadings	Response to amended complaint or cross-complaint (not anticipated)	0	0	0
Dispositive Motions	Motion for Summary Judgment or Summary Adjudication; Motions for Judgment on Pleadings (not anticipated)	15	25	0
Legal Research	Specific public contract issues; local Court rules; specific discovery issues	5	15	0
Written Discovery	Propound and respond	5	35	0
Document Production	Organize, review and prepare chronology of Plaintiff's production; prepare City's production	5	20	50
Third Party Discovery	Subpoenas and review of corresponding production	5	15	5
Depositions	Anticipate approximately 6 fact witness depositions, 4 expert witness depositions (includes attorney preparation)	15	45	10
Discovery Motions	Motions to Compel, Motion to Limit Admissibility (In Limine); Expanded Discovery	5	15	0
Other / Case Management	Client communications, reports, meet and confers, site inspection, other investigation	20	30	0
Settlement Negotiations	Mediation, Settlement Conference, Mediation Reports	20	10	0
Expert consultations	Conferences with experts	10	10	0
Status Conferences	As set by Court	0	5	0
TOTAL PRE-TRIAL HOURS	455	115	250	90
Rate		\$ 375.00	\$ 325.00	\$ 200.00
TOTAL PRE-TRIAL LEGAL FEES	\$	\$ 43,125.00	\$ 81,250.00	\$ 18,000.00
TRIAL				
Trial Prep		60	80	30
Trial		70	60	20
TOTAL HOURS	210	130	140	50
Rate		\$ 350.00	\$ 300.00	\$ 200.00
TOTAL TRIAL LEGAL FEES	\$	\$ 45,500.00	\$ 42,000.00	\$ 10,000.00
PRE-TRIAL EXPENSES	\$	include experts		
TRIAL EXPENSES	\$	include experts		
TOTAL OF ALL FEES & EXPENSES	\$	389,875.00		

This estimate is preliminary, does not include writ applications or appeals, and will be updated based upon developments in this case.

The actual costs will increase or decrease based upon the conduct of the opposing parties, counsel, the court or by other reasons beyond our control.