

LAW CLERK

Litigation PROJECTS

DRAFT MOTION FOR NEW TRIAL

FLAT FEE
\$1,500

PROJECT DESCRIPTION

I need a Rule 59 "Motion for New Trial" drafted for a defendant who failed to respond to a Motion for Attorneys' Fees.

PROJECT DETAILS

I need a Rule 59 "Motion for New Trial" drafted for a defendant who failed to respond to a Motion for Attorneys' Fees. The fee award was entered on April 12, 2018. Attorneys' fees were awarded against defendant on the argument that defendant had signed a guaranty containing an indemnity clause that indemnified the third-party claimant from the risk that a broker had been used and was owed a commission in connection with the borrower (and guarantors) obtaining a loan refinance. The amount of attorneys' fees awarded the third-party claimant was over \$120,000.

COMMENTS



EXCEEDED EXPECTATIONS

I was thoroughly impressed with the quality of work product delivered. Colleen was spot on with her analysis and arguments.

MOTION TO COMPEL

FLAT FEE **PROJECT DESCRIPTION**
\$800

I need a motion to compel prepared related to a request for production of documents. I have the majority of the research completed. The issues are producing documents in native format or in a format usable by the requesting party, some notes taken during a deposition that we want to obtain, and some relevancy issues related to whether some contracts need to be produced. Golden rule letters have been sent, as well as several follow-up requests.

PROJECT DETAILS

The requests and objections will be provided.

COMMENTS



EXCEEDED EXPECTATIONS

Absolutely amazing work product. Emmett did a wonderful job. He was on time and certainly grasped the issues at hand. I recommend him without hesitation and look forward to working with him again.

DRAFT A MOTION FOR SUMMARY JUDGMENT, STATEMENT OF MATERIAL FACTS, SUPPORTING AFFIDAVITS, ETC IN A BANKRUPTCY ADVERSARY

FLAT FEE **PROJECT DESCRIPTION**
\$500

I have already filed a rule 12(b)(6) motion to dismiss plaintiff's complaint, and the judge dismissed one of the counts. In total, you will have 3 briefs provided in word format that have already been filed and that should be extremely helpful as much of the law will be the same and now we will be able to inject our own facts via affidavits.

PROJECT DETAILS

The plaintiff has filed an adversary pleading opposing a chapter 7 discharge pursuant to 11 usc 523. Originally, they also had four claims under 11 usc 727 but dropped those claims in the amended complaint the court forced plaintiff to file. The 3 previously filed briefs should be helpful in drafting this responsive brief. A word version of our answer will help with the client's affidavit and we also have a rough draft affidavit from a third party witness affiliated with the plaintiff. I think this brief should take you between 7-10 hours to adequately draft and the supporting brief should be 15-20 pages.

COMMENTS



EXCEEDED EXPECTATIONS

Erin provided fast, high-quality work. I highly endorse this attorney.

DAUBERT MOTION

FLAT FEE **PROJECT DESCRIPTION**
\$2,000

Daubert Motion to exclude an expert.

PROJECT DETAILS

We are defendants in a fraudulent transfer case. Plaintiff has disclosed an expert who does not do much more than restate Plaintiff's facts and perform simple calculations and create charts. Ultimately, the report is misleading as a result. I would like a Daubert motion to exclude the expert. The selected Lawclerk will have to review the report and deposition transcript, and draft the motion with references to both.

COMMENTS



EXCEEDED EXPECTATIONS

David did a great and thorough job analyzing the expert report and deposition transcript to include the necessary cites in the motion. He was very responsive and made revisions to the project as requested in a timely manner. I appreciate his extra effort.

DEMAND LETTER FOR RETURN OF FUNDS

FLAT FEE **PROJECT DESCRIPTION**
\$400

I need a demand letter seeking return of funds.

PROJECT DETAILS

The client was subject to a writ of garnishment. The client has no account, although two of his businesses do. Despite being put on notice that the accounts did not belong to the client, they paid approximately \$12,000 on the garnishment, to the harm of the businesses. This will be a very straight forward demand letter, and I anticipate it will take no more than three or four hours.

COMMENTS



EXCEEDED EXPECTATIONS

Excellent letter that I can send out with no changes. I would definitely use again.

CORPORATE VEIL PIERCING AND UNIFORM TRANSFER ACT SUMMARY JUDGMENT

FLAT FEE **PROJECT DESCRIPTION**
\$1,200

I need assistance building out the legal arguments (and integrating facts) for this summary judgment memo.

PROJECT DETAILS

Multiple corporate defendants and individual defendants, with counts against each for piercing, and against the individuals for fraudulent transfers.

COMMENTS



EXCEEDED EXPECTATIONS

Raymond is a terrific writer/researcher. I usually alert him before I post projects, in hope that he is available to handle them.

MOTION TO TRANSFER VENUE FOR FLORIDA CIRCUIT COURT CASE

FLAT FEE **PROJECT DESCRIPTION**
\$350

I need a Motion to Transfer Venue for a Florida circuit court case. We believe the lawsuit was filed in the wrong county and we want to move to transfer the case to another Florida county.

PROJECT DETAILS

Estimated length of motion: 5 pages

COMMENTS



EXCEEDED EXPECTATIONS

Dan drafted an excellent motion to dismiss or to transfer venue. He conducted his own case law research, found many applicable cases, and drafted a well-organized, well-written motion. He also completed the project in a very timely fashion.

TRO/TI APPLICATION

FLAT FEE PROJECT DESCRIPTION

\$750

I need an Application for an Emergency TRO/TI in an existing case in Texas involving fraud by a GC against a homeowner. The TRO & TI should be geared towards freezing the GC's funds immediately after his bankruptcy case is dismissed tomorrow around 11am or so Central Standard Time.

PROJECT DETAILS

I'll upload a draft TRO/TI application that i ask you to immediately scrub the previous case's information. You'll then need to craft that document to match up with this case's facts and to include the exhibits, which i can post, too. But the point to the judge is to drive home that as of tomorrow, the crooked defendant (a GC) will lose his protections from the BK court case that is about to be dismissed due to his own failure to pay creditors, which was his intent. He filed the BK in Ch. 13 when we filed the initial lawsuit against him, as well as others. We demanded to continue against his LLC in an arbitration without having this crook as a defendant as the defendant, through his LLC, filed liens on my client's house. We had to get those removed, and thus proceeded in the arbitration w/o the individual defendant. That arbitration trial was last week & we await a result. But the crook knew to try to manipulate the timing of the BK case to be dismissed right after that trial thinking we'd leave him alone. Key here: he sold his mansion during the BK case w/ a huge amount of profit that we believe was ill-gained as he used plaintiff's stolen trust money (from a construction loan she paid out to him) to build his house. So we wish to ask the court to freeze that money & restrain the defendant from spending it while we have an opportunity to litigate our fraud claim against him individually.

COMMENTS



EXCEEDED EXPECTATIONS

Matt, you did well in this tight time crunch for me. You and the other attorneys at Lawclerk.legal are helping me meet my deadlines with style and substance. Thank you for helping me help my client - a good woman who was incredibly wronged by a bad guy.

DRAFT COMPLAINT FOR PARTITION ACTION CA CCP 872

FLAT FEE PROJECT DESCRIPTION

\$1,000

Light research and draft complaint for partition for joint owners of real property. Our position is that our client owns 100% of the property - despite title being held 50/50 as joint tenants. This position is based on our client engaged in litigation with the bank resulting in a settlement of the bank cancelling the mortgage leaving the property free and clear. This settlement well exceeds the actual value of the property.

PROJECT DETAILS

Estimated time to complete the project of drafting the partition complaint after light research is a total 10-12 hours. This is based on 4-5 hours research and 6-8 to complete the draft of the complaint. Research is to solidify our position that client may seek 100% share based on him receiving credit for personally suing the bank and settling by removing mortgage--which benefited estranged joint owner (ex-girlfriend). The bank lawsuit case was based on bank foreclosing while client was on active military duty.

COMMENTS



EXCEEDED EXPECTATIONS

Lynne was able to complete the project on time with very little guidance. The work was excellent. Highly recommend.

MOTION TO DISMISS AND MEMORANDUM FOR DEFAMATION CASE

FLAT FEE PROJECT DESCRIPTION

\$500

My client was a third-party witness in a federal case matter alleging discrimination based upon the Law School Admissions denying testing accommodations to the extent Doe requested. My client holds a PhD and she conducts counseling. She was asked by a fellow physician friend to meet with Doe's son for a possible evaluation. She agreed and when she arrived at the agreed upon location, my client met with Doe and Doe's father. Doe's father proceeded to do most of the talking while his son appeared withdrawn. The purpose of the meeting was to get my client to draft a letter to the LSAC indicating that Doe required additional time and specifically as requested by Doe's father, Doe should be allowed one day per section. Doe had a type written letter prepared to go to LSAC and he asked my client to execute said document. Unfortunately she did so. LSAC granted the request but did not allow a full day, however they simply provided Doe with double the amount of time. Doe appealed their decision and once again drafted a letter for my client to execute. Doe's father repeatedly attempted to reach my client however, my client and her husband were out of town camping. Doe took it upon himself and forged Doe's signature. My client was called to testify as a witness for the Defense, LSAC. She testified that she did not execute the 2nd letter and that she felt cornered when executing the first letter.

Doe is now suing my client for defamation based upon her testimony as a third party witness.

My client hired me after a technical default had been entered. I filed a Motion to vacate and it was heard on 1/16 and granted. I am contemplating filing a Motion to Transfer the Case matter to the same judge presiding over the Doe vs. LSAC case matter. It makes sense as it arises out of the same transaction or occurrence.

PROJECT DETAILS

This Project is for a Motion to Dismiss the Complaint at Law on the basis that: 1) Plaintiff fails to adequately state a cause of action and 2) I am certain that there is a law against having a cause of action based upon testimony of a third party witness.

COMMENTS



EXCEEDED EXPECTATIONS

Fabio completed my project within 48 hours of accepting the assignment. It was absolutely fabulous

COMPLAINT (BREACH OF CONTRACT, FIDUCIARY DUTY, ETC.)

FLAT FEE PROJECT DESCRIPTION

\$400

Drafting of a complaint in Superior Court of Fulton County, Georgia

PROJECT DETAILS

My client loaned approximately \$30,000 to her boyfriend and alleged co-member of an LLC formed by her boyfriend. He runs a trucking business. It was intended that my client would be a member in the LLC, but the housekeeping on the loan was not great.

COMMENTS



EXCEEDED EXPECTATIONS

Great job, professional, and timely. I had a few edits due to my tastes, but I hope to work with her again.

DRAFT AN ANSWER TO DISPOSSESSORY ALONG WITH A COUNTERCLAIM BASED ON ADVERSE POSSESSION; ALSO, DRAFT A MOTION TO DISMISS

FLAT FEE PROJECT DESCRIPTION

\$500

My client has lived in a mobile home on a piece of real property for nearly 15 years and the people he purchased the property from were in physical possession of the property from 1995 until the transfer to the client -- combined, they have occupied the property long enough to have an adverse possession claim. A neighbor whose family previously owned the land filed a dispossessory action to evict the client on the basis that he is the rightful owner. In GA, when title is in dispute, you must file an ejectment action not a dispossessory action. I want to file a motion to dismiss on those grounds. I also want to file a counterclaim raising the adverse possession claim.

PROJECT DETAILS

I have some extremely rough drafts of an answer and a petition to quiet title under the theory of adverse possession that should be of some use when putting together the answer and counterclaim. I also have some case law but you will need to do your own independent research. I have not started on the motion to dismiss based on the dispossessory action being the improper remedy, but I would expect that to be a relatively simple 2-3 page document that will take less time than the answer and counterclaim. All together, I would expect this to take you 7-10 hours.

COMMENTS



EXCEEDED EXPECTATIONS

Frank was great to work with. He accepted a project with a convoluted set of issues that I was struggling to straighten out, and quickly sorted through them and drafted a pleading that was just what I wanted. I hope to work with him again.

MOTION TO COMPEL DISCOVERY

FLAT FEE PROJECT DESCRIPTION

\$400

This is a slip and fall in a bathtub/shower at a Holiday Inn Express. I represent the plaintiff. We asked for all prior slip and falls within 5 years of the date of the incident and were told there were none. My expert says the tub is one of the slickest he has ever tested and if they say there were no falls they are lying. They said there were no falls. I need to investigate further. I served another Rogg asking for names, addresses and phone numbers of all employees for 5 years prior to the fall. Defendants will not answer that Rogg. We need a motion to compel a response to that one simple interrogatory.

PROJECT DETAILS

My thought is a motion to compel that is likely less than 5 pages. Discovery is broad and we are clearly entitled to the information.

COMMENTS



EXCEEDED EXPECTATIONS

Mary was excellent, asked appropriate questions and reviewed additional pleadings to get the full scope of the motion I was requesting. She did a great job. Great communication and work. I would use her again for sure.

JURY INSTRUCTIONS

FLAT FEE PROJECT DESCRIPTION

\$150

I need a complete set of jury instructions. Ohio Jury Instructions.

PROJECT DETAILS

I represent a Defendant in a DAMAGES ONLY action in a DEFAMATION suit. The question of the "statement" has already been determined. I need a set of jury instructions on the DAMAGES section only.

COMMENTS



EXCEEDED EXPECTATIONS

I have had Scott do several projects and I have been impressed with the time and detail he puts into them.

MOTION FOR SANCTIONS

FLAT FEE **PROJECT DESCRIPTION**
\$250 Motion for Sanctions

PROJECT DETAILS

David, I really liked your work last time, and I need your assistance on another project. I want to file a motion pursuant to California Code of Civil Procedure sects. 128.5 and/or 128.7. Assume that I will satisfy the "Safe Harbor" Requirements in the code.

Here is the deal, in the other case, they have taken the position that "NOTHING HAPPENED IN CALIFORNIA" and as such, Texas law should apply to the California venued case. Plaintiffs lost that motion.

Now they take the position, hey well the manufacturer acted in California so as to give rise to specific personal jurisdiction in California (see the Bristol-Myers Squibb v. Superior Court Case in briefs uploaded).

This is a direct contradictions. More to the point, I had to fight 2 motions to apply Texas law, and a motion for summary judgment (based on Texas law). I want to seek sanctions against Defendant for this frivolous pleading. I want to argue that the initial pleadings were frivolous, and I want to be paid for the work on those two motions and the MSJ (I hired experts, etc.).

I want you to ask for sanctions against the attorneys (not the clients). You only need to write the brief, leave blanks for the specific facts not included in the briefs I have attached for you. I will provide the declarations and the safe harbor letter.

COMMENTS



EXCEEDED EXPECTATIONS

David, is an excellent writer, a thoughtful researcher, and did an excellent job.

DEMURRER DEFAMATION

FLAT FEE **PROJECT DESCRIPTION**
\$250 I need a memorandum of law (brief) supporting that failure to plead defamatory language with specificity is fatal to a complaint for defamation. Also, try to come up with a backup public policy argument why reporting something to a public body isn't protected and support the argument with case law. Also, that damages (emotional pain and suffering) are insufficient to give rise to the cause of action.

PROJECT DETAILS

Estimate length: 6 pages. Time: 8 hours.

COMMENTS



EXCEEDED EXPECTATIONS

She did a great job on a tight deadline.

DRAFT RESPONSE TO INTERROGATORIES AND REQUESTS TO PRODUCE IN FEDERAL COURT

FLAT FEE **PROJECT DESCRIPTION**
\$250 I need you to draft the written responses to interrogatories and requests to produce. This case is a suit on a commercial note in federal court.

PROJECT DETAILS

This should be pretty straight forward. I will provide you with some forms to help save time. I think this will take 4-5 hours.

COMMENTS



EXCEEDED EXPECTATIONS

This was my second time working with Deirdre and, once again, she provided quality work with a quick turnaround time.

DEPOSITION TRANSCRIPT REVIEW, BOOKMARK, HIGHLIGHT AND SUMMARY W CITATION (120 PAGES)

FLAT FEE PROJECT DESCRIPTION

\$250

We need deposition reviews, summaries with citations and highlighting the most relevant excerpts from the depositions. This is a personal injury case aboard a flight, alleging physical and emotional damages.

Please capture as much detail as possible in bookmarks and summary. You just copy and paste verbatim responses where important to the bookmark.

PROJECT DETAILS

Need to have a pdf program that allows you to place colored boxes on the transcript to highlight relevant portions, and to bookmark pdf.

COMMENTS



EXCEEDED EXPECTATIONS

Really great work - crisp, clean, no typos, picked up on all the important details. Glad I found her on Law Clerk!

DAUBERT MOTION / MOTION TO STRIKE

FLAT FEE PROJECT DESCRIPTION

\$400

I need a Daubert Motion / Motion to Strike Defendant's Liability Expert. This is a maritime personal injury case where we represent the Plaintiff. Plaintiff was injured after he slipped and fell in a mud tank on an offshore oil rig. The Defendant's liability expert says the Plaintiff had "Stop Work Authority" or the ability to stop the job if he felt the work area was unsafe. The expert does not provide any technical expertise in his report. The jury does not need an expert to understand the concept of stop work authority and that everyone on the rig has stop work authority.

PROJECT DETAILS

This is not an overly complicated motion. I put one day as the period of time it will take, but someone with a little experience in drafting these type of motions should be able to complete it in half a day. There is a lot of law on the topic of what type of situation calls for expert opinion and what type of situation does not.

COMMENTS



EXCEEDED EXPECTATIONS

Roy did an excellent job on the motion I requested that he draft. I highly recommend Roy for any litigation matter.

MOTION TO VACATE/SET ASIDE JUDGMENT

FLAT FEE PROJECT DESCRIPTION

\$1,000

I need a motion to vacate/set aside judgment drafted pursuant to Rule 60, Arizona Rules of Civil Procedure. I would expect the motion to be 7-10 pages and address any and all applicable defenses relating to the underlying claims and any and all procedural bases for the motion.

PROJECT DETAILS

The motion to vacate is for a client who had a default judgment issued against him in June 2019. Auto accident where plaintiff pulled off side of road and then pulled back on hitting our client who was riding a motorcycle. Our client was riding his friend's bike-uninsured. Believing it was other driver's fault and police report supports our position-He moved to NJ, plaintiff did service by publication. He has good defense. AZ driver's license suspended.

COMMENTS



EXCEEDED EXPECTATIONS

Nicole has excellent legal research and writing skills. I am confident the client will appreciate her work on the motion practice.

JURISDICTION BRIEF

FLAT FEE **PROJECT DESCRIPTION**
\$1,000

Does the question of jurisdiction in Texas Civil Practices & Remedies Code Sect. 82.003(a)(7)(B) when applied in a case pending outside Texas, ask the Court to apply Texas law with respect to jurisdiction or the jurisdiction of the venue?

PROJECT DETAILS

We are in the midst of a lawsuit against an American distributor of a Chinese manufactured product.

The lawsuit is venued in California, because the distributor is domiciled here. However, Texas substantive law applies. In particular, Texas Civil Practice and Remedies Code Sect 82.003. This statute exempts non-manufacturing sellers from liability with seven exceptions.

The 7th exception, (82.003(a)(7)(B)), provides that a non-manufacturing seller is not liable if the manufacturer is not subject to the jurisdiction of the Court.

We believe that this inquiry may have the California court apply questions of Texas jurisdiction to the case. We are no 100% sold on this idea, but want to make an argument. Specifically, 82.003 is a substantive law, as has been argued and briefed in this case. 82.003 being a substantive law, means that the jurisdiction question arguably becomes a substantive law issue and should be ruled on according to Texas law.

COMMENTS



EXCEEDED EXPECTATIONS

Very thorough brief on a very complicated issue. Made the brief readable.

DISCOVERY

FLAT FEE **PROJECT DESCRIPTION**
\$200

Happy New Year! I ask for a draft of Request for Production, Interrogatories, and perhaps some Requests for Admission to be served upon Defendants. Plaintiff Client owns a 25% interest in company with a former friend. It's an LLC and both are members. Defendant friend solicited plaintiff's \$20k investment. We filed suit accusing the Defendant friend & the Defendant company of excluding plaintiff from profits, refusing to turn over books+records despite demand, among other problems (e.g. Defendant's renege on a lease agreement Plaintiff signed; Plaintiff client is the owner of a truck on which she is responsible for the loan, but the defendant company continues to use the truck despite non-payment). So we need discovery to help firm some of this up & specifically target the books and records as my client has evidence Defendant company continues to operate and earn income (lots of it!) despite claiming to me & my client that it no longer is in business.

PROJECT DETAILS

Discovery requests don't need to be too onerous. It's not my goal to overwhelm my opponent with requests. I'm looking for targeted attacks to prove up our elements (and essential facts) of our causes of action along with seeking to uncover how the Defendants hide the revenue that continues to stream in.

COMMENTS



EXCEEDED EXPECTATIONS

Go, Paul, Go! Thank you for the work. You'll be on my future short list.

PROPOUNDING DISCOVERY

FLAT FEE **PROJECT DESCRIPTION**
\$500

I need form interrogatories, special interrogatories and requests for production prepared to thoroughly vet Plaintiff's claims in the lawsuit in issue.

PROJECT DETAILS

Self explanatory I believe. I will upload some pertinent documents.

COMMENTS



EXCEEDED EXPECTATIONS

Jennifer continues to do excellent thorough work.

RESPONSE TO MOTION FOR SUMMARY JUDGMENT

FLAT FEE **PROJECT DESCRIPTION**
\$750

I need to respond to a motion for summary judgment regarding the distribution of proceeds in a partition action. The partition action involves the sale of a residence which has already taken place and the proceeds from the sale are being held in escrow.

PROJECT DETAILS

I will provide the motion and all attachments. I will also provide an affidavit from my client and her deposition transcript (which is very short). I also have a memo with relevant case law. I believe an issue of fact exists as to whether a gift was intended or not. My goal is to win the MSJ and get this case to trial. I am also hopeful of deposing Bill but I don't believe he will be helpful. Other than the deed, there are no writings, text messages, etc. regarding the property and the intent of the parties.

COMMENTS



EXCEEDED EXPECTATIONS

Jordan's pleading was right on point with Arizona law. She went above and beyond and I would highly recommend her.

UCC-1 RESEARCH

FLAT FEE **PROJECT DESCRIPTION**
\$1,000

Hi Frank I've decided I would like multiple people to look at the issue as it is critical to how we proceed.

Here was the prior post: I need someone to review opposing counsel's argument regarding the sufficiency of a UCC-1 description in Nevada and the efforts to subsequently cure any deficiency and then research and draft the argument in a memo as to why opposing counsel is wrong (unless he is correct).

PROJECT DETAILS

I expect this project to take someone familiar with this area of law (secured transactions) less than 10 hours.

COMMENTS



EXCEEDED EXPECTATIONS

Well developed memo on a complicated issue.

DOCUMENT REVIEW 5

FLAT FEE **PROJECT DESCRIPTION**
\$1,500

This is a document review project. I have approximately 10,000 pages broken into two batches of approximately 5,000 pages that need to be reviewed for subject matter. The reviewer will need to complete a spreadsheet that will be provided, which will require the reviewer to identify information responsive to 40 inquiries, like bates numbers, document title, authors, recipients, description of the document, and whether certain names, terms, and ideas are discussed.

The reviewer will be required to review the protective order entered in the case and sign an agreement providing that the reviewer has read and is bound by the protective order.

PROJECT DETAILS

Some of the files include large spreadsheets that can be quickly reviewed, as well as documents that simply require being identified by bates number and that they have been withheld as non-responsive or privileged. However, there are other documents that will need to be closely reviewed and more substantive responses provided. My best estimate is that the project will take approximately 15-20 hours to complete the review and spreadsheet.

COMMENTS



EXCEEDED EXPECTATIONS

Lauren was a pleasure to work with. She kept in good contact, had great questions, and provided through comments. I would definitely work with Lauren again.

DRAFT DISCOVERY DEMAND LETTER DUE TO FAILURE TO RESPOND TO REQUESTS TO PRODUCE DOCUMENTS

FLAT FEE **PROJECT DESCRIPTION**
\$100

I am defending against a lawsuit filed by a credit card company. I served the plaintiff with requests to produce and they haven't responded. I would like to send them a formal demand letter.

PROJECT DETAILS

This should be short and sweet. 1-2 hours of your time.

COMMENTS



EXCEEDED EXPECTATIONS

Eve is a great lawyer!!

RESEARCH FOR CASE LAW RELATED TO COMMERCIAL LEASE / ESTOPPEL CERTIFICATE

FLAT FEE **PROJECT DESCRIPTION**
\$150

I need case law -- preferably in North Carolina, but if on point, it can be outside of NC -- that says that an estoppel certificate signed by a commercial tenant does NOT amend or alter the terms of a commercial lease unless the lease or certificate explicitly say so.

PROJECT DETAILS

In my case, the lease says that the Term begins September 1, 2017. The estoppel certificate later says that the "Commencement Date" is September 5, 2017. A personal guaranty says that it is in force for two calendar years from the beginning of the Term. I want the guaranty to expire on August 31 or September 1, and not September 5. North Carolina is best, but anything on point is helpful.

COMMENTS



EXCEEDED EXPECTATIONS

I was having trouble finding case law on a fine point of law, and he was able to find good support for me.

MOTION FOR SUMMARY JUDGMENT AND MOTION FOR 57.105

FLAT FEE PROJECT DESCRIPTION

\$450

Motion for Summary Judgment on affirmative defenses and a Motion for Sanction under Fla. Stat 57.105. The client repairs vintage automobiles. He is being sued for damages under a repleving action for a vehicle that was used for parts several years ago.

PROJECT DETAILS

Motion for Summary Judgment on affirmative defenses and a Motion for Sanction under Fla. Stat 57.105. The client repairs vintage automobiles. He is being sued for damages under a repleving action for a vehicle that was used for parts several years ago.

COMMENTS



EXCEEDED EXPECTATIONS

This is my third project that I have with Erin and she continues to impress me with her quality of work and speed of execution. I look forward to continue working with her. Thank You Erin!

OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

FLAT FEE PROJECT DESCRIPTION

\$1,000

This project involves researching and drafting an opposition to a motion for summary judgment filed by the defendant university in pending litigation in federal court. We represent the student plaintiff who is asserting claims for violations of her rights Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, as well as a breach of contract claim. Factual research will include reviewing the pleadings, the parties' document disclosures, written discovery responses, and deposition transcripts.

PROJECT DETAILS

This project involves researching and drafting an opposition to a motion for summary judgment filed by the defendant university in pending litigation in federal court. We represent the student plaintiff who is asserting claims for violations of her rights Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, as well as a breach of contract claim. Factual research will include reviewing the pleadings, the parties' document disclosures, written discovery responses, and deposition transcripts.

COMMENTS



EXCEEDED EXPECTATIONS

Ahmad did a great job with this brief synthesizing all of the facts in the case, researching and citing to current case law and incorporating feedback to expand the arguments where necessary. We will be using him again.

MEET AND CONFER LETTER

FLAT FEE PROJECT DESCRIPTION

\$350

I need a meet and confer letter addressing reasons why demurrer to complaint for failure to state facts sufficient to state a cause of action and motion to strike attorneys' fees and punitive damages portions of complaint are well taken.

PROJECT DETAILS

I will provide a copy of the complaint and some research I've already done, and an email I've sent outlining the issues generally. I think this project will take up to 3 hours to complete. I envision receiving a letter to opposing counsel that I can send to him requesting that he dismiss the case or in the alternative amend and to strike certain portions.

COMMENTS



EXCEEDED EXPECTATIONS

Very bright and thorough. Provided me with an extremely well written and researched work product. Very pleasant and professional. I couldn't be more pleased.