

# LAW CLERK

## Class Action PROJECTS

### RESPONSE TO DEFENDANT'S MOTION TO DISMISS OR IN THE ALTERNATIVE RECONSIDER CLASS CERTIFICATION

**FLAT FEE**  
**\$600**

#### PROJECT DESCRIPTION

This is the Class Action that you drafted a document on my behalf previously. The mortgage company has retained new counsel who has now filed a Motion to Dismiss (defense 2nd Motion to Dismiss); however, there are some new arguments and in the alternative they are asking that the class be limited to only persons living in Illinois.

#### PROJECT DETAILS

Please draft a response for me to meet the August 8th date for filing my response. If you need additional time, let me know and I will draft a quick motion requesting additional time.

#### COMMENTS



#### EXCEEDED EXPECTATIONS

Deirdre is an outstanding law clerk and does amazing work. She remains conscientious and responsive at all times. I absolutely love having her work on my assignments and projects.

## RESPONSE TO EXPEDITED MOTION TO STAY DISCOVERY

### FLAT FEE PROJECT DESCRIPTION

**\$1,200**

Response to Expedited Motion to Stay Discovery Pending a Motion to Compel Arbitration. Motion, Response and Reply filed and motion is fully briefed waiting the court's decision. Plaintiff, our client, has served discovery on Defendants.

Challenging position to be in as the Court more often grants a stay. Please have Federal Court litigation experience.

### PROJECT DETAILS

You would need to look at the fully briefed motion to compel as well as the complaint. Motion to stay is 8 pages plus exhibits. Three hours to review; two hours to research and outline the response; and three hours to draft the response.

### COMMENTS



#### EXCEEDED EXPECTATIONS

I'm very pleased to work with Michael. His experience offered insight on how to approach complicated issues and helped to arrive at a good balance. The work was completed in a professional and timely manner.

## BANKRUPTCY COURT MOTION

### FLAT FEE PROJECT DESCRIPTION

**\$525**

Draft a Motion to Determine a Settlement is Not Property of the Bankruptcy Estate. Conduct case law research to support said Motion. The settlement at issue stems from a products liability class action. A faulty medical device that was inserted in the debtor several years prior to the debtor filing bankruptcy, but the debtor was unaware of the cause of action until several years after the bankruptcy case was closed. Our main adversary in this matter will be the Chapter 7 Trustee.

### PROJECT DETAILS

I have several cases to get you started on research and I also have a few forms you can review to assist in drafting the motion. This is a case of first impression for our judge while other bankruptcy courts appear to be split on the issue. There is no binding 11th circuit precedent that I am aware of. I anticipate the motion will be 4-5 pages and should take 4-5 hours to research and draft.

### COMMENTS



#### EXCEEDED EXPECTATIONS

James did an excellent job. He wrote a great brief that was exactly what I need, he completed the assignment well before the deadline, and he was extremely responsive throughout the process. I hope I get to work with him again in the near future.

## CLASS ACTION LAWSUIT

### FLAT FEE PROJECT DESCRIPTION

**\$600**

Class action complaint involving a cancelled music festival. The complaint must comply with Florida law.

### PROJECT DETAILS

This is a class action complaint involving ticket purchasers' purchase of tickets to a three day music festival that was cancelled. Promoter refuses to issue refunds. This is a refund class action lawsuit. The class is all ticket purchasers to the music festival throughout the U.S. Please note, the promoter's website Terms of Use prohibits class action lawsuits. The Plaintiff did not agree to the terms of use and/or Terms of Use are not binding pursuant Florida law.

The causes of action should include: Breach of contract; negligent misrepresentation; deceptive trade practices; promissory estoppel and/or unjust enrichment. Complaint should seek injunctive relief.

### COMMENTS



#### EXCEEDED EXPECTATIONS

Lindsay grasped the matter quickly, did some smart research, and provided a first class pleading on time.

## RESPONSE TO A PETITION FOR PERMISSION TO APPEAL FROM ORDER GRANTING CLASS CERTIFICATION

### FLAT FEE PROJECT DESCRIPTION \$750

Need an attorney to file a response to the DEFENDANT-PETITIONER'S PETITION FOR PERMISSION TO APPEAL FROM ORDER GRANTING CLASS CERTIFICATION. We filed a Federal Class Action law suit and the court has granted our Motion to certify the class. The Defendant is a mortgage service company and has filed a Petition for Permission to Appeal the Order Granting Class Certification.

#### PROJECT DETAILS

Even though the Petition may be granted as a right, I am in need of a response objecting to the Motion.

I think the answer to the petition should focus on why the Court should not use its discretion to allow an appeal now. Rule 26(f) does permit a discretionary appeal from the certification of a class. However, the 7th Circuit has held that such appeal should only be allowed when the class certification decision might be considered a "death knell" for the losing party. Even then the petitioner also has to show that there is a high likelihood of winning the appeal. See *Blair v. Equifax Check Serv.*, 181 F.3d 832 (7th Cir. 1999). My cursory research suggests that the potential for damages in this case is not a "death knell" for the defendant and additionally, the success of the appeal is unlikely. I have also attached the memorandum supporting the motion to certify class as well as the reply brief, both of which convinced the District Court to certify the classes and each address the arguments raised for why it thinks it will win the appeal. They should assist in providing the background for the case and formulating arguments to deny the petition for leave to appeal.

### COMMENTS



#### EXCEEDED EXPECTATIONS

Dayna did an absolutely amazing job on my project!!!!

## COMPLAINT - CONSUMER CLASS ACTION

### FLAT FEE PROJECT DESCRIPTION \$500

We are looking for a creative, talented attorney to draft a class action complaint for us. The case concerns wage and hour violations by a large company with locations nation-wide. It would be a case filed in Pennsylvania state court obo employees based in Pennsylvania.

#### PROJECT DETAILS

We have a complaint that we started when we wanted to bring a complaint in federal court where the Defendant is based obo a national class. However, we determined that we only have state-based causes of action, so we are breaking that complaint up into single state-based complaints. We have the complaint that we are filing in D.C. for you to review/work off. We have paystubs and company documents from the employees in the Pennsylvania locations as well as intake forms. If you are familiar with wage and hour law, particularly in Pennsylvania, this project should take 1-2 days tops.

### COMMENTS



#### EXCEEDED EXPECTATIONS

Great attention to detail and thoughtful comments that highlighted issues in the research to keep in mind when reviewing the draft. Completed task in a timely manner. Very responsive to communications. Would hire again.

## FEDERAL COURT - NY LAWSUIT

**FLAT FEE**  
**\$600**

### PROJECT DESCRIPTION

Motion to Compel Limited Discovery in Federal Class Action lawsuit in New York.

### PROJECT DETAILS

In the present class action lawsuit, the Judge requests before a party files a motion, that a letter be filed not to exceed three pages. Defendants will be filing a Motion to Compel Arbitration/ Motion to Dismiss. We will provide a copy of the Complaint, motions and responses filed therein.

This is the first assignment of many on this matter. Looking for a long standing relationship.

### COMMENTS



#### EXCEEDED EXPECTATIONS

Very professional and thorough. Thoughtful analytical perspective and grasp of the long term goals of litigation.

## DRAFT A COMPLAINT

**FLAT FEE**  
**\$500**

### PROJECT DESCRIPTION

Draft a class action complaint. The issue is the product does not meet its label claim for its protein content. Please look at the uploaded complaint. This is a good example and legal issues are pretty much the same.

This case will be filed in Washington D.C. in the District Court of D.C. Please research the procedural rules well.

### PROJECT DETAILS

I will provide you the test results and the correspondence exchanged with the opposing counsel. I will also send you the settlement demand letter and the proof of purchase by the plaintiff.

Please refer to CAFA to ensure we meet all the procedural requirements. This company is small, therefore the numerosity of the class may be an issue.

### COMMENTS



#### EXCEEDED EXPECTATIONS

Chris is an outstanding attorney. His research and legal writing abilities are top-notch. Keep up the good work!

## RESEARCH AND CONSULTATION ON PROCESS OF ARBITRATING CLAIMS WITH JAMS

**FLAT FEE**  
**\$525**

### PROJECT DESCRIPTION

Looking for advice and counsel from an attorney who has extensive experience doing arbitration claims with JAMS anywhere in the United States. Process will start with initial phone conference to discuss parameters and project details. Please advise of your experience in response to this listing.

### PROJECT DETAILS

You will be required to provide research consultation and review of our process with regard to upcoming claims pursuant to JAMS Consumer Streamlined Practices. Three hours will be required for this project.

### COMMENTS



#### EXCEEDED EXPECTATIONS

First time working with Ryan. His work was timely, quick comprehension of many materials, and helpful summary on how to move forward. Ryan is now a member of our team.