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Via email: laura.jimenez@nuecesco.com, melissa.vela@nuecesco.com

Laura Garza Jimenez, County Attorney

Melissa Vela, Chief of Litigation

Nueces County Courthouse

901 Leopard Street, Room 207

Corpus Christi, Texas 78401

Re: *David Longoria v. Nueces County et al.*, No. 2:20-cv-00263 in
the U.S. District Court, Southern District of Texas (RRVW
File No. 64569)

Dear Laura and Melissa:

This letter confirms our assignment to represent the following employees of the Nueces County Sheriff's Office in this matter: Javier Zapata Jr., William Fielder, and Richard Culp.

As discussed, our per-hour rates for this assignment are: partner (including "of counsel" lawyers with 10 or more years' experience) \$350.00, associate \$200.00, and paralegal \$95.00. We encourage you to discuss fees or billing with us any time you have questions or concerns.

We will bill monthly for fees, costs and expenses incurred, with payment due within 30 days. We will provide estimated budgets on request. We will obtain your consent prior to incurring any significant expenses. Chargeable expenses may include, by way of example, postage, filing fees, long-distance telephone expenses, courier fees, outside copying fees, certified documents, travel expenses, and court-reporting fees. Also, we will charge for reasonable printing and copying performed by us at 10 cents per page for black-and-white prints and copies and \$1.00 per page for color prints and copies. Should retention of expert witnesses be desirable or necessary, we will discuss their retention with you and ask that they bill you directly.

Please note that our ability to disclose information to you about this matter will be subject to our ethical obligations under applicable law to Mr. Zapata, Mr. Fielder, and Mr.

Culp. Our engagement will be "at will" and may be terminated at any time by written notice to the other party, subject to our ethical obligations to those individuals, though such termination will not affect liability for services rendered and expenses incurred to that point or reasonably necessary to close or transfer the matter.

Please be advised that our firm represents Nueces County in *Johnnie Barrera v. Nueces County*, No. 2020CCV-60201-2 in the Nueces County Court at Law No. 2. That suit arises from a vehicle operated by a county employee colliding with a bicyclist on or about April 14, 2019. We also represent Nueces County in *Diana Bond v. Nueces County*, No. 20-40050 in the United States Court of Appeals for the Fifth Circuit. That suit arises out of a drug-overdose death at the Nueces County jail. We are aware of no relationship between those suits and the *Longoria* suit that would affect the defense of either suit or the confidentiality of our communications with each client in each suit. We will advise you if a conflict arises that would require our withdrawal from the defense of either or both suits.

We thank you for this representation opportunity.

Sincerely,

ROYSTON RAYZOR
VICKERY & WILLIAMS L.L.P.



Myra Morris
Brian Miller

Barbara Canales, County Judge