

Complex Litigation Work Flow

A Primer (Reminder) for Lead (and other)
PARALEGALS

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Complex Litigation Work Flow

Intake: Initial Client Interview/Engagement



Identify Data/Documents Locations
and custodians with client



Litigation Hold Notice to Client*
(opponent(s)?; third parties?)

Client Status Update

Determine if Team Meetings are Needed,
Frequency by Stage



Set a Schedule and Reminder for Client Updates



Staffing Plan



Budget?*

Complex Litigation Work Flow

Prepare Data/Document*
Search Instructions and Select Population to Receive



Select review tools, storage method, and database



CONSIDER: Retrieval/report tools, secure sharing technology for clients, co-counsel and experts and trial presentation software

Pleadings

Issue List*
(Heart of Complex Litigation)



If Federal Court:
Initial Disclosures; Scheduling Order and Conference.

If State Court:
Complex Case Designation and Schedule Order.

*Always Consider How to Handle
Discovery Limitations and Experts*

Discovery Plan*

eDiscovery Plan



Begin Client Document Review
(Privilege Log; Numbering)



Written Discovery to Opponent



Expert Selection

Discovery Plan*

Review Non-Client Documents



Depositions (1st Stage, usually facts)



Follow up Written
Discovery/Requests to Admit



Additional and Expert Depositions



Expert
Reports

Motions Plan*

Preliminary Motions



Discovery Motions



Dispositive Motions



Pre-Trial Motions

Trial Themes*

Develop and Simplify, paint a picture, make your evidence tell a story



Shrink to Contested Issues;
Link to Evidence/Witnesses for Each Theme



Draft Opening/Closing

Complex Litigation Work Flow

Thank you

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803.253.8275

mmanos@nexsenpruet.com

N | P

www.nexsenpruet.com

