



**Litigation  
Menu of Services**

<b>Pleadings</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
File Opening/Setup	\$500	\$1,000	\$1,500
Factual Investigation	\$1,050	\$1,750	\$2,450
Complaint	\$1,400	\$5,250	\$10,500
Answer	\$1,050	\$1,400	\$3,500
Dispositive Motion (e.g., motion to dismiss/for judgment on the pleadings) (per motion)	\$5,000	\$8,750	\$12,250
Response to Dispositive Motion (per response)	\$5,000	\$8,750	\$12,250
Replies/Further Responses (per reply/response)	\$2,500	\$4,500	\$6,125
Amendments to Pleadings	\$1,050	\$1,750	\$2,450
<b>Discovery</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Preparation of Interrogatories/Requests for Production	\$1,250	\$1,750	\$2,500
Preparation of Responses to Interrogatories/Requests for Production	\$1,250	\$1,750	\$2,500
Review of Document Production for Privilege/Confidentiality/Relevance (per 1,000 pages; limit: 10,000 pages)	\$700	\$1,160	\$2,120
Preparation/Rendering of Document Production	\$700	\$1,400	\$2,800
Privilege Log (per 10 documents)	\$145	\$175	\$408
Deposition (full-day)	\$5,250	\$7,000	\$8,750
Deposition (half-day)	\$2,625	\$3,500	\$7,000
Defend Deposition (full-day)	\$4,900	\$6,300	\$7,000
Defend Deposition (half-day)	\$2,450	\$3,150	\$4,550
Review/Analyze Documents Produced (per 1,000 pages; limit: 10,000 pages)	\$700	\$1,500	\$2,300
Discovery Motion (per motion)	\$5,250	\$7,700	\$10,500
Response to Discovery Motion (per response)	\$3,500	\$5,250	\$7,700
Replies/Further Responses (per reply/response)	\$1,750	\$2,625	\$3,850
<b>Experts</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Expert Search, Retention, and Setup	\$700	\$1,050	\$1,400
Preparation and Review of Expert Reports	\$1,050	\$1,400	\$2,100
Expert Deposition (full-day)	\$6,300	\$8,400	\$10,500
Expert Deposition (half-day)	\$3,150	\$4,200	\$8,400
Defend Expert Deposition (full-day)	\$5,880	\$7,560	\$8,400
Defend Expert Deposition (half-day)	\$2,940	\$3,780	\$5,460
Daubert Motion (Challenges to Expert Testimony) (per motion)	\$10,500	\$14,000	\$17,500
Response to Daubert Motion (per response)	\$7,000	\$10,500	\$14,000
Replies/Further Responses (per reply/response)	\$3,500	\$5,000	\$7,000
<b>Summary Judgment</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Motion for Summary Judgment (per motion)	\$10,500	\$14,000	\$17,500
Response to Motion for Summary Judgment (per response)	\$7,000	\$10,500	\$14,000
Replies/Further Responses (per reply/response)	\$3,500	\$5,000	\$7,000
<b>Hearings/Court Attendance (Excluding Trial)</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Initial Hearing/Structuring Conference	\$500	\$1,050	\$1,400
Discovery Hearing	\$700	\$1,050	\$1,400
Dispositive Motion Hearing/Evidentiary Hearing	\$1,400	\$2,100	\$2,800
<b>Pre-Trial</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Pre-Trial Conference	\$1,400	\$2,100	\$2,800
Pre-Trial Brief/Memorandum	\$5,250	\$10,500	\$14,000
Pre-Trial Motion/Motion in Limine (per motion)	\$1,050	\$2,100	\$3,500
Response to Pre-Trial Motion/Motion in Limine (per response)	\$840	\$1,680	\$2,800
Replies/Further Responses (per reply/response)	\$672	\$1,344	\$2,240
Witness Interview/Preparation (per witness)	\$1,050	\$2,100	\$3,150
Preparation of Exhibits and Materials	\$1,400	\$2,100	\$2,800
Opening Argument	\$2,800	\$3,640	\$5,096
Closing Argument	\$2,240	\$2,912	\$4,077
<b>Trial</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Trial (per day)	\$3,000	\$4,000	\$5,000
<b>Post-Trial</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Post-Trial Motion (e.g., motion for new trial, judgment as a matter of law, remittitur) (per motion)	\$8,400	\$11,200	\$14,000
Response to Post-Trial Motion (per response)	\$5,600	\$8,400	\$11,200
Replies/Further Responses (per reply/response)	\$2,800	\$4,000	\$5,600
Notice of Appeal	\$350	\$700	\$1,050
<b>Appeal (Internal Case)</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Initial Brief	\$11,550	\$15,400	\$19,250
Response Brief	\$10,395	\$13,860	\$17,325
Reply Brief	\$5,198	\$6,930	\$8,663
Oral Argument	\$6,300	\$7,560	\$9,072
<b>Appeal (External Case)</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Review of/Summarize Trial Transcript (per 100 pages)	\$291	\$349	\$419
Initial Brief	\$13,860	\$18,480	\$23,100
Response Brief	\$12,474	\$16,632	\$20,790
Reply Brief	\$6,237	\$8,316	\$10,395
Oral Argument	\$7,560	\$9,072	\$10,886
<b>Settlement Negotiations</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
Analysis of Strategy	\$350	\$700	\$1,050
Negotiations	\$700	\$1,050	\$1,750
Preparation of Settlement Agreement/Release	\$525	\$1,225	\$1,925

**IMPORTANT:** All prices above are fixed/flat fees. This means that, if applicable, for each service identified, the price listed covers all work associated with that service, including all communications. The price listed will be quoted at the beginning of said task and will not change. Fojo Dell'Orfano, PLLC has the discretion to determine whether a given service is of "Tier 1" complexity, "Tier 2" complexity, or "Tier 3" complexity. The assignment of a Tier to a particular service does not prohibit the assignment of a different Tier to another service within the same litigation matter.

**DISCLAIMER:** This document does not create an attorney-client relationship between you and Fojo Dell'Orfano, PLLC. Your case/matter may not qualify for a fixed/flat fee arrangement and, instead, may require a separate fee arrangement, whether hourly or otherwise. The fees listed above may change at any time, and Fojo Dell'Orfano, PLLC reserves the right to change these fees when it deems appropriate and/or necessary. Each fee listed above covers only the service with which it is associated. It does not cover any other service or task not identified. This is not a comprehensive list of litigation-related tasks and services. Other tasks or services may exist that may require a separate fixed/flat fee or a different fee arrangement. The fees above also do not include any out-of-pocket expenses for items such as filing fees, postage, or expert fees; such expenses are passed on to the client.