



7 THINGS WE ARE DOING TO  
KEEP YOUR CASES MOVING  
DURING THE COVID-19 CRISIS

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# 1. HEARINGS

Pursuant to DIR newswire release 2020-29 dated April 03, 2020, effective April 13, 2020, there are no trials or lien conferences. All status conferences, expedited hearings, MSC's and priority conferences are being heard by a direct conference line for each independent judge.

We are appearing Telephonically for each hearing on your behalf. Prior to each of these hearings we have sent a letter to applicant attorneys and we are attempting to make prehearing contact with them via telephone.





## 2. DEPOSITIONS



While most the depositions were rescheduled in the month of March and the beginning of April, we are beginning to reschedule all depositions as quickly as possible, prioritizing any deposition that may have a “decision date”.



Additionally, we are utilizing various mediums such as “Zoom conferencing” or “GoToMeeting” to conduct depositions.



Moreover, we are working with your partners, the court reporters and court reporting services to coordinate the utilization of these online mediums to move forward with depositions.



If you need a deposition, please contact us as we are able to conduct depositions in a quick and expeditious fashion utilizing these methods.



### 3. COMMUNICATIONS WITH APPLICANT ATTORNEYS

Towards ensuring that we are actively attempting to resolve case in chief matters, we are actively contacting every applicant attorney on every case that we have by correspondence, emails and/or telephone.



We are requesting that applicant attorneys review their cases, discuss with their client, and discuss with us any potential for a resolution. While we recognize that many cases are still early in the discovery process or pending further discovery, we are optimistic that under the current extenuating circumstances, there may be some cases that seek resolution instead of an elongated period of "unknown".





## 4. COMMUNICATIONS WITH LIEN CLAIMANTS



Currently, there are no lien conferences and no lien trials. This means that lien claimants are more likely than not to at least discuss a resolution of their outstanding claims in a more meaningful fashion than usual.



As such, we are reaching out to every single open lien claim in every open lien case we are handling. We are sending correspondence and utilizing emails and telephone calls to attempt to resolve outstanding lien claims on your behalf for a reduced value and without the need for future lien conferences or lien trials.



## 5. QME EVALUATIONS

Multiple Qualified Medical Evaluators have either unilaterally canceled evaluations or have requested they be canceled due to the Covid-19 crisis.



We are actively working with the QME's and applicant attorneys in order to ensure that timely evaluations are scheduled with notices being sent out by our office to ensure that the applicants are aware of the rescheduled date. We will continue to follow-up to confirm applicants have appeared.





## 6. COMMUNICATING WITH CLIENTS



We will continue our ongoing communications with you, our clients, by mail, telephone and email.



We will continue to provide you updates on every case, including any developments that occur, and provide you with a comprehensive breakdown of any legal, medical, or factual issues that may impede on our progress toward the resolution of any case.



## 7. OTHER DISCOVERY

- IN THOSE MATTERS THAT WE ARE UNABLE TO NEGOTIATE A SETTLEMENT AT THIS JUNCTURE, WE WILL CONTINUE ON OUR AGREED-UPON DEFENSE STRATEGY OF CONDUCTING DISCOVERY, INCLUDING, BUT NOT LIMITED TO SUBPOENAING RECORDS, OBTAINING SUB ROSA VIDEO, NOTICES TO PRODUCE, WORK CHECKS, OBTAINING MSAs AND CMS APPROVAL, COMPLETING DEPOSITIONS, CROSS-EXAMINING AME/QME's.
- OUR GOAL IS TO EXPEDITIOUSLY AND COST-EFFECTIVELY RESOLVE ALL OUTSTANDING MATTERS.



# THANK YOU

AS ALWAYS, WE THANK YOU FOR TRUSTING OUR FIRM FOR YOUR LEGAL NEEDS. WE HOPE ALL OF YOU STAY SAFE AND HEALTHY DURING THIS DIFFICULT TIME. WE WILL SOON BE ABLE TO HOPEFULLY RETURN TO SOME RESEMBLANCE OF THE WORLD THAT WE USED TO KNOW, ALBEIT IT MAY NOW CONTAIN SOCIAL DISTANCING AND FACEMASKS.

WE ARE HERE TO PROVIDE OUR LEGAL SERVICES IN THE BEST AND MOST EFFICIENT MANNER POSSIBLE. IF YOU HAVE ANY QUESTIONS OR CONCERNS, PLEASE FEEL FREE TO CONTACT ME PERSONALLY, OR ANY OF OUR ATTORNEYS OR STAFF. SINCERELY, CHRIS HEFLEY

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