

Intro:

This is Michael Cowen and welcome to Trial Lawyer Nation. You've got to have the right case because if you take it up and it's the wrong case, then you can make some really bad law that's going to affect a lot of plaintiffs. There's always an answer, the joy is in finding. One of the reasons that I love being a lawyer is this exact process. The way we live our life has nothing to do with the presentation sequence at trial. As trial lawyers, we pick up and move on and keep going. You're losing or gaining one out of every 10 jurors, which can really make a huge difference in the ultimate result of the case. Whatever you think about, you create. Learn all you can and never stop. And then have the guts to try case after case, after case. Welcome to the award winning podcast, Trial Lawyer Nation, your source to win bigger verdicts, get more cases and manage your law firm. And now here's your host, noteworthy author, sought after speaker and renowned trial lawyer, Michael Cowen.

Michael Cowen:

Today on Trial Lawyer Nation, I have my partner Malorie Peacock. Malorie, how are you doing today?

Malorie Peacock:

Good, good. I'm just working away. I'm excited to be back on the podcast.

Michael Cowen:

Me too. We've had a lot of great guests lately. But we usually do you an internal, you and Sonia, I mean, either you are Sonia every month and you both have been so busy, even hard to book.

Malorie Peacock:

Things have really picked up since things opened up after COVID. And unfortunately, it looks like we had a brief reprieve, and now things are starting to slow down again. So I'm a little disappointed about that.

Michael Cowen:

Yeah, me too. But hopefully, numbers start going down again and we all get back to normal life. That's my big wish. But nothing we can do about that today. But there is something we have been working on. This is a big project we've been doing as a group in our firm, and that's to develop a set of draft minimum standards to be followed in all cases. Why did we do that?

Malorie Peacock:

So we talk a lot on the podcast about how we work up a case and what our goals are and what our ideal standards are for working up a case. Our ideal standards work in every case, but you have to consider what the cost of doing a lot of internal work on cases, spending a lot of money on them. I mean, some cases, you just can't spend that kind of money. But what we wanted is something that wasn't ideal, but was something that we could track within the firm to make sure pieces are moving along at a pace that we felt comfortable with.

Malorie Peacock:

And so what we wanted to come up with is a group of standards that, one, we can track, but two, tell us how the case is coming along and how it's moving along. So that we can make sure that we're really pushing it as quickly as we possibly can within the bounds of the rules and within the bounds of our

dockets. I mean, so that you're not spending all your time working on one case but you can move things at a pace that makes sense.

Michael Cowen:

And I actually haven't talked to you about this yet, but I think I'm going to have a two set of standards. So we're going to have the minimum ones, which we're going to talk about today. And then we're going to have kind of an ideal average that we want people ideally to meet. And so we'll have like a red, yellow, green system. So if you don't meet one of our minimum standards in a given month, then you'd have a red score on that area. But then if your average is over what we want our ...

Michael Cowen:

So let's just say like our minimum standard is you have to send discovery out within 30 days of the first date you can, but ideally, it's 15. So you'd be red if you went on a case without sending discovery after 30 days. You'd be yellow as long as you had met the minimum and all. But then you'd get a green if it was an average like 15 days. So we can do something to kind of encourage people to go above and beyond the minimum.

Malorie Peacock:

Yeah, I like that. Because I think what we don't want what the minimum standard is people to fall into being too comfortable with just meeting the minimum standards. They're minimum, just things you must do in cases if you're going to work at this firm. But what you don't want is people to just tick off the boxes of the minimums and not think about ideally how to work up the case or what you can do to really, really push it if you have the time.

Michael Cowen:

One thing we did with these minimum standards is I just didn't write them myself, or you and I just didn't come together and write them ourselves, but we involve the entire firm. Why is that? My entire firm, all the lawyers at the firm.

Malorie Peacock:

Right. So there's a few reasons. One, because one person's ideas aren't as good as seven or eight people's ideas. I mean, we can all learn from each other and we can all think about things differently, and those perspectives are important. But also two, when you're developing some kind of minimum rule that we all have to meet, one, you need it to be realistic. So you want to hear what people have to say about whether they think it's realistic and they think that it's doable. But then two, the more important thing is that you get buy-in from the people that you're giving these rules to.

Malorie Peacock:

So we found throughout the years that the more that we have a top-down approach to rulemaking, the harder it is to enforce. But when we have a group making the rules and agreeing to them, and having their voice heard, people are more likely to embrace them, more likely to want to meet those standards, and I guess less likely to have excuses.

Michael Cowen:

Yeah. And I found that getting the group involvement was important, because I had a list of what I called non-negotiables, which was all lie evidently, because I said they're non-negotiables in people didn't do them for the last four years and still kept their jobs. So evidently, they were not ... I have a different version of non-negotiable than the one I thought it was. But I think part of it is I didn't include buy-in. The other part is I sent a memo out in 2017 and forgot that people may never have received or may have forgotten about a memo I sent in 2017.

Malorie Peacock:

So I think we decided to retire the term non-negotiable because of that. Just because if you say a word over and over and it doesn't have any meaning, then you don't want that to be associated with our new minimum standards that we want to have meaning.

Michael Cowen:

Yeah. I think the important thing is we're going to have to, when we get our new case management system tuned in where we can track this more easily, that we report on these weekly, so if there's any exceptions, any deviations from the minimum standards, we catch them right away. And hold each other accountable, and then try to fix the issue that led to them. Well, let's just kind of dive in.

Malorie Peacock:

Yeah.

Michael Cowen:

So one of the first things we want to make sure that happens is when a case comes into the office, someone starts working on it. It just doesn't sitting in a file somewhere. So what is one of the things we do to make sure that the attorney gets to know the client and gets working on the case?

Malorie Peacock:

So for those of you that are going to be following along on the podcast, just a little roadmap for you guys, there's going to be 10 of these. We didn't purposefully come up with the number 10, it just happened to be the number that we came up with when we were done. But I like the number 10 because it's a nice round number and it's easy to follow. So number one is that we set up an initial client meeting. So when the case comes in that we have an amount of time to get that meeting set up. And so that way, it's on the calendar, and you're meeting with the client. Meeting with the client at the very beginning of the case is really just critical to starting to build the relationship between the lawyer and the client.

Malorie Peacock:

Also, you get critical information. I mean, oftentimes, the lawyer is the only one who knows what questions to ask and how to ask them to get the information that we really need to get the lawsuit on file. It also makes the client just feel so much more comfortable. They've met with their lawyer right away, and so that they have at least a voice if it's over the phone, but hopefully face to go with their lawyer. So our standard ended up being that within seven days of the keys getting assigned to an attorney team, that an initial client meeting will be scheduled. But there's actually like a little bit of a caveat to that. Michael, what is it?

Michael Cowen:

Well, it's not that the meeting actually has to take place in those seven days, it has to get set. So by the end of the seven day period, the meeting's on the calendar. And the reason for that is ideally, yes, we would be meeting with our clients right away. But what if the lawyer's in trial or on vacation or absolutely slammed? I mean, we don't want to rush through this. So it may be we need to get someone else to talk to the client to get some initial information. But as long as that meeting gets set, get put on the calendar fairly soon thereafter, but also make it realistic. Because what we don't want to do is, well, I'm in trial, and I'm going to go do an initial client meeting during lunch or on a break when I'm not focused. Either I'm not going to be focused on my trial, I'm not going to be focused on the client. So we also wanted to make it, because it's a minimum standard, we wanted to make it realistic.

Malorie Peacock:

Yeah. And two, when we were making these standards, we were trying to avoid having 18 exceptions to what the rule was because we didn't want the exceptions to eat up the rule, and then people never really knew if they were meeting the standard or not. What we want is these rules to be clear and easy to follow. Because if they're not, then you're going to get exceptions. I mean, you're just going to get people with excuses. And you never know if the excuse is applicable. And so it's hard to enforce.

Michael Cowen:

Yeah. And we, like I said, we just want to make sure that we can have in our software system practice stuff for us. So if people are making the appropriate entries in the case management system, we can just get a monthly or weekly report or going at any time and see if anyone's not met a minimum standards, we can fix it.

Malorie Peacock:

Right. So commandment number one is get the initial client meeting on the calendar. So what's number two?

Michael Cowen:

Well, the attorney will file suit within 60 days of the initial client meeting. And this one is a big change because I used to want suit filed within a week of actually having the file assigned. And now we've changed it to 60 days after the initial meeting. And then even then we had a couple of exceptions. But first of all, why did I get talked into having such a big 60 day period to get that lawsuit on file?

Malorie Peacock:

So I keep going back to the fact that these are minimum standards. So there's something that we want to be able to apply in every single case, if possible. So whatever kind of case it is, whatever is going on with it, we want it to be able to be done within 60 days. And so as we were having the conversation amongst the lawyers, we said, well, really most cases could get filed within a week or two of having the case assigned. But one of the issues was, well, you got to meet with the client before you file the lawsuit, of course, because what if the client tells you, you absolutely may not file a lawsuit on my behalf. Well, we need to deal with that. Or what if the client says something that's a little bit different than the way that you understood the case to be. You want to make sure that you're getting it right.

Malorie Peacock:

But then sometimes when we get a case, we get it at the very beginning of a case. So since we're a referral base, sometimes we get it a day after the crash happens, sometimes we get it six months after the crash happened. But when we get it a day after the crash happens, sometimes we want to do a little investigation. Sometimes we want some reports to be available before we file the lawsuit to make sure that we've done our due diligence and we have the right defendant. So there's research that needs to be done or experts that need to be called. And again, that's not every single case. But we wanted this standard to be applied in every case. So we needed to make it a minimum for every kind of case that comes in the door.

Michael Cowen:

Exactly. And often, we do have to do an investigation on liability or see the damages are going to be bad enough to merit a lawsuit. But within 60 days of meeting the client, we should know that. Now there are two exceptions. Malorie, what are they?

Malorie Peacock:

So the first one is we get a case in and we're not sure if it's a case that's right for our firm. So every once in a while we get a case in, and as we're doing the investigation, we think, you know what, this isn't a case that makes sense for our firm to do for whatever reason. It could be that we think that the referring attorney is better off keeping the whole fee and settling in pre-lit because it's not going to go well if we try to litigate it. Or sometimes it's just we get the case and we say, you know what, this is a case that needs to be litigated in Iowa. And with the damages and is traveling to Iowa, it doesn't make sense for me to be the one that litigate this. Let's hook you up with an attorney in Iowa.

Malorie Peacock:

So there's a lot of different reasons that we might decide we don't want to litigate the case. But once we file it, oftentimes we're kind of stuck. I mean, it's hard to get out of cases once you've already filed them. But if you haven't filed them, it's easier to get out of it if you need to. So that's exception number one. Exception number two is, if we're going to file the case in some other state other than Texas, which does happen because we have a national practice, if there's some rule in that state that prevents us from filing it within 60 days, or some reason that we can't.

Malorie Peacock:

So some kinds of government claims that you make, you have to give a certain kind of notice. And then you have to wait a period of time before you can file it. And it's just a mandatory waiting time. So stuff like that, we can't file it within 60 days, and we shouldn't rush to do that and break the rules to do it. I mean, we needed exceptions for those kinds of things.

Michael Cowen:

And so even for these exceptions, though, we don't want people just to be able to check the box, hey, the exception applies and then not just the case on file just because they're too busy or too lazy to get it done. So we also have a requirement that you have to let me know that these are the reasons that we might not want to litigate the case or this is what's keeping us from filing it. And I either have to agree with you or I have not responded to you yet for the exception to apply. Because I may say, tough up. Suck it up, Buttercup. Follow lawsuit, which I do say sometimes. Like, I know you have doubts, but this is a case we're taking, I believe in it and file away.

Malorie Peacock:

Yeah. I think that that's an important piece of it. Because remember, the minimum standards are for us as both the lawyer team individually, but also for the management team to be able to easily see if people are moving their cases along. And so the management team needs to know if an exception is valid or not. We can't be wondering in every single case, does it apply? Does it really ... I mean, this is supposed to help us avoid having to go in and research the answer to every one of these questions in order to get a good report on a case.

Michael Cowen:

Yes. Okay. So the next thing is once you get your lawsuit on file, you want to start the discovery process. So that starts the written discovery. Until this year, we could just attach our written discovery with the pleadings and serve it on the defendants in Texas. And now they don't let us do that anymore. They make us do these mandatory initial disclosures, and we can't send anything else out until those come due. I guess the nice theory is that the defenses can be nice enough to give us like 95% of what we need in that initial disclosure, and then we just have to do targeted discovery now. I know that's a fantasy that would ever really happen. But that was the intent of the drafters of the rule.

Michael Cowen:

And frankly, they're usually going to be getting that from us. I mean, we're going to be giving them all our medical, our before and after witnesses, photos, they're going to get 95% of what they need from us. But I have a feeling we're very rarely going to get 95% of the aggravated liability evidence from the defense in a mandatory disclosure. So we had to figure out how quickly then do we want to send it out? And again, my initial thought was, why don't we be ready to send it that day? And I got talked off that ledge, too. What was the minimum standard for that?

Malorie Peacock:

So the standard that we came up with is within 30 days of the date that we can actually first send discovery. So whatever that date is, depending on what the rule is. So in Texas, it's the day that initial disclosures are due, which are 30 days after the defendant's original answer. In federal court, it's when you do the 26(f) conference. In Illinois, it's when the court tells you can. In different jurisdictions, it's different. And so we wanted, again, to make this apply in every situation. So we said within 30 days of the date that you're allowed to under the rules.

Malorie Peacock:

And the reason for 30 days as opposed to the day is because we do still want people to be putting thought into the discovery that they're sending out. I think we've talked about it on the podcast before. But looking at the discovery, and not just using form discovery is important to us. And thinking about the requests that you're making and making sure that you're being strategic about it really helps move the case forward and is critical to the case. So we wanted to make sure that we weren't encouraging people to just use forms, that we were still giving people time to think about it.

Michael Cowen:

But any more than 30 days, it may fall between the cracks or not get your stuff in time, and you're going to start to run into get jammed up when your expert disclosure deadlines are coming up or your discovery deadlines are coming up.

Malorie Peacock:

Right. And again, they are minimum standards. It doesn't mean you can't send it out the day that you're able to if it's ready to go. I mean, it doesn't mean you wait for 30 days, this was the thing that we thought would be doable in every single type of case. So we're really thinking of it more in a case where we have a personal injury that doesn't fit into a typical pattern. Like it's not a trucking case, or it's not a car wreck case, or there's something a little odd about it that makes us need to really think more about the type of discovery. And it takes a little research to figure out, what should this defendant have? What should they have been doing at the outset to try to craft your discovery in a way that actually gets you documents? So if you had a workplace injury, depending on what it is, you're going to have different questions and different requests for documents. So again, we wanted it to apply in every kind of case, not just trucking cases.

Michael Cowen:

Yeah. So that's pretty simple. So get your discovery out. That's the third commandment. The fourth commandment or the fourth minimum standard has to do with getting deposition set. And by getting deposition set, we mean like offensive depositions, not just letting them depose our clients. But a trucking case, deposing the driver and the safety director or the driver and the dispatcher. So what is the standard for that?

Malorie Peacock:

So again, we based it on the time that you can actually start doing discovery, depending on the jurisdiction. So we said, from the time you can start doing discovery, it should be noticed within 45 days to occur at some time in the future. Not to occur within 45 days, but just so that it's on the calendar and it's scheduled so you have a target date for the deposition.

Michael Cowen:

So within 45 days, the deposition notices will go out for what we call our offensive depositions, the that are the defendants people. And sometimes they don't agree with you, and then they'll fight you and not give you dates, but 45 days is long enough to do all the meet and confer requirements to send letters, requesting them to send emails, and finally just noticing them and then they could quiz them if need be. And you go set that for hearing but you've got to be aggressive on this stuff. Because again, what the defense will do is say, well, we want to depose the plaintiff the first.

Michael Cowen:

And you'll say, okay, depose my plaintiff. Well, we're not ready to depose the plaintiff. The plaintiff is still treating and we don't have all the medical yet. Okay. Well, when are you going to be ready to depose the plaintiff? We don't know. Well, we still want to depose the defendants. Well no, not until we depose the plaintiff at some unknown future date. And you have to say no, and just notice them. And go before the court and tell the judge, depose my plaintiff when they want, but what I want to do is to depose their people, and there's no rule that says I have to wait until they feel like letting me do it. Almost every time we end up getting dates before the hearing when we do that.

Malorie Peacock:

Right. Yeah. And so it's making sure that we're moving that ball forward to get the deposition scheduled, because the defense has no problem running out the clock. Delay is the friend of the defense, it's not

the friend of plaintiffs. And so if we're not moving the ball forward, they're definitely not. So they don't care about having to ask for continuances, and they don't care about whether or not you miss your expert deadline because you didn't have the evidence you need. This is the way that you are aggressive in a case. But again, these are minimum standards, so we gave ourselves some cushion of time and we put 45 days here. Again, it doesn't mean you can't get it done within the first seven days if you need to, or if you want to and you're ready. Just wanted to make it so that you could apply it in every case.

Michael Cowen:

Absolutely. Okay. So you get your case, you've got your deposition set, you've got your discovery out. But we want to make sure that the case doesn't fall between the cracks after that. What do we do to make sure that we don't have weeks and months go by without someone looking at a case? Which can happen really easily when you're working on your other cases.

Malorie Peacock:

Yeah. This is a requirement that we instituted, I can't remember how many years ago it was now, Michael, that we started doing this. And it's gone through a couple of iterations of what it means. But we have a term of art at our firm that's called a file review. And a file review, I say it's a term of art, because it doesn't mean just looking at the file. We have a very specific list of things that the attorney should be looking at, and questions they should be answering during each of the file reviews. And they're supposed to happen monthly, every 30 days. Now, that doesn't mean you can't do more file work. It doesn't mean you can't look at the case more than every 30 days. But it's like I said, it's a very specific review of the file that we require. Michael, I'm trying to think how many questions it is-

Michael Cowen:

I actually got it in front of me. So have we followed our lawsuit? Have we served all the defendants? Have all defendants filed their answers? Are we following two procedures for getting deposition set, which including, have we drafted corporate requisition deposition topics? Is it in federal court? Have we set our 26(f), which is the initial discovery conference? How have we sent out letters requesting deposes? Have we notice the deposes? We notice some of their queries? Can we set those for hearing? Have we reviewed the discovery responses? Do we need to compel anything?

Michael Cowen:

Do we have a trial date and a scheduling order in place? Have we spoken to the client in the last 30 days? How's he or she doing? What's the status of medical treatment? Do we need to do anything to assist the client and getting appropriate treatment? Do we need experts? If so, who have we hired? Who do we need to hire? Have we done what we agreed to do at the last meeting? Do we need to update the star rating? And we can talk about star ratings next, although that's not part of the 10th amendment. But we give every case a one to five-star rating.

Michael Cowen:

Have we calculated certain deadlines for Texas for filing medical bills? And here's the big one, what should we do in the next 30 days to move this case closer to resolution? And finally, is there anything we need to discuss with Michael Cowen? That way, it's just a place to note that. It sounds like a lot more than it really is because a lot of these things, once they're done, they're done, and you don't have to keep addressing them every month. But it really is a way just to keep that case moving.

Malorie Peacock:

Yeah. It's to make sure that you're meeting the benchmarks in the case in a timely way so that you can avoid getting almost there to trial and realizing, oh, my gosh, I am not ready. I don't have my medical bills proven up or I don't have a doctor that's ready to testify, or I don't have whatever it is, and then you have to get to continue. So it's really to avoid that ... When you read the questions, it sounded like a lot of questions. But it's actually like a one page document. I mean, all of the questions and their answers can really fit on one word document. And it's really supposed to be not super quick, because you need to do a little bit of digging and reviewing during the file review. But it's supposed to be something that doesn't take all day. It's supposed to be something that you can do with your team once a month that helps move the case forward without being a pain in the ass.

Michael Cowen:

Yeah. And that really was a hard line to define. We've really messed with it over the years to kind of fine tune it, is what's not enough detail? I think it started with just the question, what do we need to do in the next 30 days to move the place closer to resolution? Our trial. And then we had to get more specific to make sure things weren't falling between the cracks. But then I've been too specific before too. So I think this is a nice change. The star rating, it's not part of our 10 minimum standards, but I just wanted to mention what that is. And that's based on something called the Pareto principle, which is that some guy named Pareto, in Italy, found that 80% of results tended to come from 20% of efforts.

Michael Cowen:

I've actually tracked that in cases before where often 80, sometimes 90% of our fees come from the top 20 cases, 20% of our cases. And sometimes half or more of the firm's fees come from the top 5% of cases. And so we kind of have a star rating of one to five stars based, and it's kind of a matrix on the probability of winning and the likely fees of the firm. And so for like us, a five-star case would be we're more than 75% likely to win, and we're more likely to get at least a \$200,000 fee, which is typically the one of the decent size case. And then going down from there, whereas a one-star case would be one that has less than a 50% chance of winning, and a less than \$100,000 fee, which is something that maybe we shouldn't even taken. We got to either get this thing off our dock, or even think about getting out of it.

Michael Cowen:

And all in between, because I thought if we focus more on your four and five-star cases, not that you let the other ones fall off, you still have to meet the minimum standards for the other ones, but you're going to get a lot more bang for your buck if you focus on your four and five-star cases. We rewrite the monthly because things happen in cases. You take a deposition, and you get aggravated liability facts, your chances of winning goes up, your case value goes up. Your client had a sore back, well, now your client is going to get back surgery.

Michael Cowen:

Well, all sudden, that value went up. The client had back surgery, and unfortunately, it didn't work, and they have to get another one or they never work again. Well, it's awful for the client, but the case star rating just went up because it became a bigger case. Not that we ever would wish that to happen, but the fact is it does change by the case. And so we need to keep alert for that so that we really, really push those bigger cases.

Malorie Peacock:

Yeah. And the star rating can go down too. So you think that you have this great case, and then you find out that your client was deported. And you need to figure out, now what am I going to do? I mean, now they can't appear for anything or maybe they got arrested, and it's some kind of crime that's definitely going to come in at trial that we need to think about how that might affect the case. Or maybe you thought that the liability facts were one way and your expert comes back and says, hey, that's not the way this happened, that's impossible, or something. And so there's reasons it could go down too. And you want to be conscious of that, because you don't want to keep spending as much time on that case that now has a decreased value. Something else needs to take its place. You don't let it fall through the cracks. But you need to balance out where you're spending your time and be thinking about it.

Michael Cowen:

And if anyone's thinking about doing something to start rating at your firm, which you should, the numbers have to be based on your firm and your docket. And so what a five-star or four-star case four years ago would now be a two or three-star case at a firm because our average case value has gone up. So at another firm, but we might think as a medium sized case, maybe a huge case. And then there's probably some firms out there where forced a case to us is when they don't even want. There's cases where there's firms that don't even ... I was talking to a lawyer saying, I don't want any cases where it's going to be under a million dollar fee to the firm after referral fee. And I said, "One, awesome for you. And two, if you want to send all your 1 to \$5 million cases somewhere else, I'll take them."

Malorie Peacock:

And actually, to figure that out, Michael, we ran the numbers for like, it was a couple of years. And we did some averages to kind of see how the 80%/20% ended up shaking out.

Michael Cowen:

And the top 5%.

Malorie Peacock:

Right. And so we did run those numbers, we didn't just make it up or estimate or guess. I mean, it was based on math.

Michael Cowen:

Yeah. And every few years, we'll need to run them again and see what's happening. Let's get back to our 10 minimum standards, our 10 commandments at our law firm. Number six is not only do we have to do good work on the case, but the client has to have some idea of what we're doing on the case, and we need to know what's going on with the clients. So how do we make sure we do that?

Malorie Peacock:

So there's another term of art at the firm, but every 30 days monthly, we have what we call a client contact. So I say it's a term of art because a client contact at our firm isn't just talking to the client, because we talk to the client more than every 30 days. It is actually a set of specific questions and specific information that needs to be relayed to the client and the client needs to relate to us. So it's a little bit longer than just a short phone call. I mean, usually they only take maybe about 10 minutes, but

it is a longer conversation to give the client an update about what's going on in their case, and to make sure we understand what's going on with the client.

Michael Cowen:

Got it. So it's we, of course, start off with a, how are you doing? And then when they say fine, then you have to go a little deeper like, okay, well, do you have any symptoms? You have any pain? Any problems? When did you last see a doctor? Who was that? Let's go through the list. These are doctors of the hospitals we know you've been to. Have you been to anyone else we missed? Need any assistance in sending any future doctor's appointments? I mean, are you sitting here waiting thinking someone did something for you? Are you still in pain and not getting good treatment? Is there any way we can help you with that?

Michael Cowen:

Remind the client about anything coming up in the case? We have trial on this date. You have your deposition coming up on this day, and we're going to meet with you on this other day. Or you having mediation just to make sure they know what's going on. And then anything that needed, based on the case review, anything you need to talk to the client about also just discuss. Now we have a little more flexibility like the initial client meeting and the file reviews, those are things that lawyers have to be involved in. Now the client contacts, it just needs to be someone on the team. Why is that?

Malorie Peacock:

Yeah. So often on the day-to-day, the paralegal is the one that taking the call from a client and talking to the client because lawyers are doing depositions or their hearings or they're doing whatever. And so it's hard to drop what you're doing and jump on the phone with a client just whenever they call. And so it's often easier when the paralegal already has the client on the phone to just go ahead and ask these questions. And we didn't want to make it so strict that the lawyer always had to do it, because then you're getting a bunch of calls from the client when you could have addressed things in a call with a paralegal the day before.

Malorie Peacock:

But two is oftentimes if there's a need for help setting up medical appointments, or if there's records to be ordered, because we find out that there's some other provider that the client went to that we didn't know about, or some ... But the paralegal is the one doing that. So they get the information from the client, they can act immediately to do what they need to do to call the doctor or order the records or whatever they need to do to make sure that they're getting the stuff done that came up during the client contact. So it kind of removes the step a little bit too.

Malorie Peacock:

Also, a lot of our clients just because of where our practice is speak Spanish, and not all of our lawyers speak Spanish. So I'm one of them that doesn't speak Spanish. And so the paralegal would have to be involved in that client contact with me in order to make it happen. So it would be much more difficult to coordinate that happening.

Michael Cowen:

Yeah. But then we don't require the ... It has to be the paralegal that does it. Because the other thing is not all paralegal speak Spanish and so sometimes we have to get someone else to do it. Another thing is if the lawyers already talking to the client, the lawyer can go ahead and get it done. Take that off the paralegals plague. It's a team approach, but it just has to get done by somebody. And again, the lawyer is the captain of the ship. And so the lawyer has to make sure that someone in her team or his team has gotten it done every month.

Malorie Peacock:

Yeah.

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Michael Cowen:

These are ones that we actually already any exceptions get brought out at our weekly attorney meeting every Friday afternoon. It's not that we're trying to rag on people, but just that public accountability seems to have been the only thing to get these done, which is if you're behind on the file review or your team's behind on client contacts, we're going to ask you about it in front of everybody else saying, hey, this happened. What's your plan? How are you going to fix this?

Michael Cowen:

It hasn't ever stayed a problem. If it's stayed problem, then someone would have to make a decision whether they really want to work here or not. Because we don't want to just fire people willy-nilly. But these are minimum standards. And if you want to work here, you have to meet them because I don't know about you, but I wouldn't want to have a lawyer who didn't look at my file for a whole month and didn't think about my case for a month. I wouldn't want a lawyer that wouldn't keep me up-to-date, check on me. So we're just trying to give the clients the kind of service that we would want.

Malorie Peacock:

And not just the clients but our referring attorneys too. What we definitely want our referring attorneys to feel when they send case our way or that they partner with us on a case is that we're actively working on it and we can tell them exactly what happened. I mean, so if something comes up with a client, we can tell them immediately. And it's not 90 days from now that we say like, 90 days ago, this weird thing happen with the client. And they feel like, how did you not know about this for three months? And so it's really also about offering service to referring attorneys also, so they feel confident that we're not letting their important case that they referred to us slip through the cracks.

Michael Cowen:

And sometimes the client will go radio silent. They won't be able to their cell phone bill, and they won't have the cell phone anymore, they'll move and not tell us. So it also gets us when we can't get ahold of someone within the 30 days, then we start using heroic efforts to find them. Sending them letters, sending them texts, calling at different times, sending an investigator out, doing a skip trace to see if they moved somewhere because we don't want to accidentally lose the client. Because then they'll fall into summary judgment, we'll need to get an affidavit from them within a couple of weeks, or they'll have a deposition coming up, we'll need to find them. We want to catch those things early while we can fix them and not when we're under stress because we've got something big coming up.

Malorie Peacock:

Right. I mean, we have had clients like that, that they're just down on their luck. They're going from house to house, they're changing phone numbers constantly. The client knowing what our expectation is that we need to talk to them at least every 30 days helps too. Like, if we have that conversation with them, and they know that not only are we expected to talk to them, but they are expected to talk to us, we're one of their first calls when they got a new cell phone. By the way, Malorie, this is my new cell phone number because they know what their role is, too.

Michael Cowen:

And I will tell you one kind of side effect I didn't think of is we don't get many clients calling us asking us for information because we're keeping them well-informed. They're not calling our referring lawyers saying, hey, I don't know what's happening in my case. What's going on? So it's really helped with our client relations, keeping our clients happy, and keeping our referring partners happy.

Malorie Peacock:

Yeah. And the last time that I have to spend as a lawyer calming down a client, because nobody's talked to them, and they're upset and they don't know what's going on, the more I can spend working on their case. We don't get calls like that anymore, where one of the partners has to call the client and calm them down. I mean, we haven't gotten those in years and years, and years because of this, I think.

Michael Cowen:

Yeah, absolutely. So we've got our case that's moving along, we're doing our discovery, we're setting our deposes, we're keeping track of the case. The client's happy and well taken care of, getting all their medical treatment. What's the next thing we need to do to make sure we're going to get price drawn and this case is going to either get resolved for good money or get tried?

Malorie Peacock:

Getting a trial date. Making sure that we have either a trial date if the court will allow us to have one or at least a scheduling order that sets deadlines in the case to get the case moving. I know there's a lot of federal courts they give you a scheduling order, but they don't get to trial date. So it's really about getting the scheduling order and getting deadlines on the calendar that people have to comply with. Because nothing makes a defense attorney look at the case more than a deadline approaching. Making sure they have their experts designated or the discovery done that they need done. And it's the same with us. We're deadline driven by nature for a litigation practice. And so it helps us make sure that we're continuing to push as hard as we can on the case. So commitment number seven is about getting a scheduling order or preferably if you can in the jurisdiction a trial date on the calendar.

Michael Cowen:

Yeah. And then the deadline for that is 120 days from the time that the first defendant files an answer.

Malorie Peacock:

Right. In Texas, that is very doable. Because in Texas, the way that you get a trial date is you ask the court for one. There's different procedures in different counties. But our Rules of Civil Procedure allow us to go to the court and say, hey, give us a trial date. There are jurisdictions that don't allow that. So we do have some exceptions for this one based on what the court will allow and what the Rules of Civil Procedure in that jurisdiction permit you to do. So the exceptions we have are if a court just won't give you a trial date. So for example, the example I gave with the Federal Court, I mean, you can't make them do something within 120 days. And if they want to set your scheduling conference for six months from now, I mean, unfortunately, you just have to deal with it. That's what you have.

Malorie Peacock:

In some other jurisdictions that we've practiced in, you can't ask for a trial date or a scheduling order in advance, they want to give you dates as you go through the case. So they want you to get past written discovery, and then they want you to do witness discovery, and then they want you ... So that could be an exception, too. But I have found that those jurisdictions, at least for us, are few and far between. I mean, most of the time, you can at least get some kind of scheduling order entered within 120 days.

Michael Cowen:

The only other one is if there is a strategic reason for not sending to a trial and I approved it, because again, I don't want to just give someone the ability to create an exception to this really important rule whenever they want. There aren't very many situations. The biggest one is the client is still treating, and you're on a court that sets the rocket dockets. Like, you follow up the case right after the crash because it's the trucking case, you want to get that evidence while it's still exists. But you don't know whether this is going to be one where your client is going to get better with therapy or they're going to need back surgery. So you don't want to have an expert deadline in three months. In that jurisdiction, you may want to sit on it a little longer. But then I have to have agreed to that in writing for that exception to apply.

Malorie Peacock:

Right. Again, not something that happens very often. But we wanted to make these rules able to apply in every situation so that when we run reports, we know what the issue is. That we don't have to go do a bunch of digging, and figure out, okay, why is this case not set for trial. It's going to be immediately obvious to us, well, that federal court hasn't set the trial because they haven't had their pre-trial yet and there's nothing the lawyer could do about it. Or Michael has approved waiting because this client is treating, and in this court, we're going to get too tight of deadlines to meet or whatever. We want it to be an easy on/off switch.

Michael Cowen:

So the next one is, one of the things we also want to do is make sure that we are not settling cases too cheap. And the other thing, so you have a less experienced lawyer or just someone that hasn't looked at the case just quite at the right way, selling it too cheap. But at the same time, we've also found that, especially with newer lawyers, the firm that they hear us talking about are bigger cases and big

numbers. And sometimes people get a little over enthusiastic on case that don't merit as big of a number. We want to maximize the value of every case. But that's the maximum value for that case. And not every case is a seven figure case, unfortunately. So what do we do to make sure that we are setting appropriate settlement values for our cases?

Malorie Peacock:

So commandment number eight is one of my favorite things that we implemented within the last year. Well, now it's been probably like a year and a half at the firm. And it's a weekly case valuation roundtable that we do. We do it every Tuesday and we do it at lunchtime. So we have lunch. Now that we're in the office, we have lunch brought in. And all the lawyers meet and we talk about each other's cases. So any lawyer can present a case at the case valuation roundtable. And the purpose of it is to talk about the case and talk about what we think the value of the case is.

Malorie Peacock:

We get everybody's opinion, and then the person leaves there knowing, okay, this is what I should send the demand for, and this is my end goal or endgame for negotiations. And if I don't get there, I feel confident that we can just go try this case because I've talked to other people about it. So commandment number eight is that an attorney must present their case to the weekly roundtable before sending a demand or before just engaging in settlement negotiations. So what we found is that what Michael said, sometimes people get a little too zealous, or they just want to get into and out the door and they don't put enough thought into it.

Malorie Peacock:

They say, we'll just demand the policy limits. But your policy limits are \$10 million and your case is worth \$100,000. So your demand means nothing and it doesn't move the ball forward. I mean, you need to have the right message for the right case. And so it's either doing a demand or entering into negotiations to make sure you're negotiating in a way that's going to get the best bang for your buck.

Michael Cowen:

The other thing is we've we found that some cases the lawyer thought was ready for the band. And we said no, you need to do more work. Either the client should get another medical opinion or often the ... Only half of the value in the case in my mind comes from the damages, other half comes from aggravated liability and you need to do some more digging. You don't have answers to these questions, you need to take some more depositions, compel some discovery to find out whether we have aggravated liability before you can put a value on this case.

Malorie Peacock:

Yeah. We also think a lot about the jurisdiction that we're in, and how we're allowed to present the case, and what we're going to be allowed to do at trial. In some federal courts, the judges don't let you do more dire. That makes a little bit of a difference for how we value the cases in those jurisdictions. Especially with newer lawyers that may or may not have ever practiced in certain jurisdictions, having those conversations early helps kind of temper this case may be worth this much an ex-jurisdiction but it's worth a different amount in this different jurisdiction.

Michael Cowen:

But I also think two other things are good there from having a group. One is you do get ... No one's as smart as everyone. So you do get one of our Rodney Jew expressions. Rodney Jew is a trial consultant or a litigation strategist, I think he calls himself. But he does have some good ideas and that's one of them. So you do get everyone's ideas, you're less likely to miss something. But the other thing is lawyers are competitive. And I have found that settlement values have gone up since we did this because people want to do better. People want to one up each other by getting more money than someone else thought they could get, having more money than someone else got on a similar case. And it's been a good thing all around, I think.

Malorie Peacock:

Yeah, I think so. I love them. I personally, I think it's a lot of fun. I mean, one of my favorite perks of being aware is getting to brainstorm with other lawyers. So for me, it's some of the most fun I have all week.

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Michael Cowen:

Let me go to number nine, and this is probably one of the least popular ones. But I think it's important. And it's one that I kind of didn't message right when I first did it because I didn't ... I was feeling too much like an insurance company when I did it. Which is, I require in their short reports, but I require a report 90 days before the expert deadline and 90 days before trial to be filled out and submitted to me by the lawyer handling the case. They're not that complicated. Like the expert one is, in this jurisdiction, do we need reports or do we just need to designate? Because you need to know that. Do we need to hire any experts? Have we hired them? Have we given them everything we need?

Michael Cowen:

Do we need to do any discovery to make sure they have what they need? Do we need to hire any more? Those kind of things. And for trial, it's a little more complicated. But do we have our witnesses lined up? Do we have photos of clients doing the things they loved before? Do we have photos or videos of them the hospital? If they have them. Do we have enough before and after witnesses? Do we need to do graphics? Can a witness show up at trial? Are our medicals proven up or do we need to get a doctor to testify? Will that doctor come live or do we need to take the trial deposition? But these are things we need to think about. We don't want to be thinking about them at the last minute.

Malorie Peacock:

So why 90 days? I mean, how did we come up with the number 90 days?

Michael Cowen:

Because it's far enough. It's not so far in advance that it's hypothetical, that you've had enough time to work up the case, have an idea whether it's really going to go to trial. A lot of cases would settle before

the 90 days for trial. Smaller ones, at least. You've had enough time to do some discovery and your clients medical treatment to go to see whether you need experts. Much less than 90 days, you don't have time to fix things. Like if you need to do more discovery, if you need to go find more witnesses, you need to do it early enough where you can actually fix any problems. Then if I identify something, I need to have time to look at the report and talk to you. So if I identify something else that we can have a meeting about it, and again, fix it before it becomes a problem.

Malorie Peacock:

Yeah. Because if you're doing the expert review 30 days before your expert designation, and you say, you know what, I going to need a life care planner in this case, you may or may not be able to get someone that can get a report knocked out and a record review and an evaluation of the client done within your deadline and the deadline that you need to meet. The same with your pre-trial evaluation. I mean, if you need to go take another deposition, there's scheduling involved. It doesn't just happen from one day to the next. And so you need enough time to get that done. Or if you need to send out another set of requests for production, you say, you know what, we're still missing X. You still have time to do that. But if you did it 30 days, on day 30, that's your last chance to send a request for production. And if you don't get it out that day, it's too late. So that's the thought behind 90 days.

Michael Cowen:

Yeah. And I give people seven day kind of bumper on case things are coming up. So ideally, they're 90 days before, but I'll take them up to 83 says before the deadline.

Malorie Peacock:

Yeah. The reason for that, too, is that Michael and the team want a report that's useful. So if you need to find something out before you finalize that report, that gives you a little bit of a cushion so that you're not filling it out on day 90 with a bunch of questions still. So that you're not like, well, this is still the question, and then you never go back and answer it. I mean, it gives you time to make sure that you're actually addressing what's in the report. But these things are like four questions alone. I mean, they're not super complicated, but it helps you just do a double check to make sure that we're not going to have any problems later on.

Michael Cowen:

Yeah. I kind of see it like being pilots. You get on the airline and your pilot and co-pilot have probably flown that airplane thousands of times. But still every time before they take off, they go through a checklist. Are the flaps up? Do we have fuel? Because you don't want to miss things. And it's when you've done it thousands of times, that's when you're most likely to miss a little thing. The same thing with our cases. I mean, a lot of its art. But when you get the little things done right, then you have time to focus on the big things. When you're always scrambling, oh, my gosh, we have a deadline coming up, and I'm not ready for it. We have to scramble to get this, we have to scramble to get that, then all your time and energy is taken up on that and you don't have the time and the calm state of mind you need to do the deep work to really maximize value per case.

Malorie Peacock:

Yeah. I agree. I mean, I do my best work when I'm calm. But when I'm stressed and I'm scrambling, first of all, I don't like to live that way or practice that way. I don't like to do that. And so when I am stressed, or I am scrambling, it's rare for me because you're you are making sure that you're doing those

checklists, and making sure you're getting just the basics down so that you have time to sit down and just think about a case, or just stare at a police report until you think of a way to visually represent it. And that takes time. For me, the creativity requires me to just sit there and stare. But if you don't have time to sit there and stare, then you don't have time to be creative.

Michael Cowen:

I probably spent 15 to 20 years of my practice in one managing one crisis after another and I'm tired of it. And I'm glad that you've helped me get me out of that and into ... It's so much more pleasant to practice when the little things are getting done right so you can focus on the big things. And you're not just always having to, oh, my gosh, we have this deadline tomorrow.

Malorie Peacock:

Yeah. Okay.

Michael Cowen:

So the last one, the 10th commandment is that any case that might go to trial, the attorney has to set a pre-trial meeting with me personally at least 60 days before the discovery deadline.

Malorie Peacock:

So Michael, this is something that you wanted, and you convinced to solve that it was a good idea. But why did you pitch it to begin with on the minimum standards?

Michael Cowen:

Yeah. Well, one is, frankly, I've tried a lot more cases than anyone else at the firm. One, I want to have idea about is this the case I'm going to try with you, or is this a case you're going to try with someone else? We try to always have two people, although I think there's some arguments that it's better to have one person try a case a lot of times, or at least do everything, talking to the jury. We just don't get enough trials and we want people to get experience. And even if person is talking jury, having someone else there makes a huge difference and it makes a lot easier. Heck, you and I do pretty well when we're together.

Malorie Peacock:

Yeah.

Michael Cowen:

The only one I've lost in the last four or five years is when I tried without you. So I want to be able to have that meeting. I also want to be able to brainstorm with people, come up with exhibit ideas, come up with testimony ideas. But I need to do it at least 60 days for discovery deadline because what happens invariably is I come up with ideas that require us to find additional witnesses or additional documents or visuals, those kind of things. And you need to be able to get them created, found and disclosed to their side in time to use them for trial. And if we do need to do some more discovery or take a doctor's deposition, which a lot of times I just think a little things we need to do to kind of like dot the I's cross the T's discovery.

Michael Cowen:

Until you've tried 100 cases, you don't realize that this might be an issue. But when you have, you're like, nah, we better get this nailed down. Everyone knows this is what happened, but we don't have it someone's exactly saying the right thing. We need to get this nailed down. And so I want it to be at least 60 days before it broke. Now I am going to try to mix this in with our monthly attorney meetings, if I can, so we don't have just so many meetings, we can't ... Especially me, I meet with lots of people that I don't have time to do anything else. But I do think that these are important. Plus, to some extent, I can't and don't want to try every case of the firm. But most of the time, I'm the reason that the case got referred in, I mean, let's be honest, and so they at least want to get my special sauce or my thoughts or my strategies. Even if it's a smaller case, I'm not going to try myself.

Malorie Peacock:

Yeah, I love the idea. And I think it is a big commitment of time on your part. But I was super excited about adding this to the minimum standards list because of the commitment on your part. And every time I talk to you about a case, you have some great idea that I never thought of or you've lived something that I haven't lived, so it didn't occur to me. I was thinking of an example, it was maybe a few years ago, me and you were going to try a case, and I've just never had this issue before. But we had a statement that was written in Spanish that was important to the case. And we had a translation of it, of course, but the rules require a specific kind of translation produced a certain amount of time in advance and we were lucky to catch it right when we had to produce it.

Malorie Peacock:

It never even occurred to me that that was a rule or something that we needed to do. And you just happen to mention it offhand to me, and I thought, you know what, we haven't gotten the certified interpreter statement issued, however long it is in advance. 30 days in advance of the trial or whatever the rule is.

Michael Cowen:

I got burned on that.

Malorie Peacock:

Right. You dealt with it before, so you know and now I know, because now I've dealt with it before. But before that, I've never dealt with it. It didn't even occur to me to look at that rule. So, Michael's experience coming into every single case is so important for our firm and for the success of any trial that we have.

Michael Cowen:

And even if we slip, I'll grow, which we're nowhere near right now, but I'll grow my ability to personally review every case. I think we need to at least get saying it wasn't me. Again, it's kind of like the monthly case valuation lunches. It's just making sure that we get the experience of the group and the kind of the knowledge that's been accumulated over the years of the firm, actually communicated to people and so that someone doesn't try case and, why didn't you do this? Well, no one ever told me about that.

Malorie Peacock:

Right. Exactly, exactly. So there were some commandments, possible commandments that didn't make the list, because the minimum standards discussion was a group discussion. Are there any that you can think of, Michael, that we talked about, and then ultimately didn't decide to put on the list?

Michael Cowen:

Yeah. There's one. I went with the group. I'm not sure I'm convinced that the group was right. But it wasn't a hill, I was willing. I mean, I always have the option of saying, okay, it's six to one or seven to one. We're six to one right now. We're hiring one more, at least. But I always have the ability to overrule the group, but I tend not to unless it's really one want to die on. And this wasn't one. But I liked the idea that we never agreed to continue on.

Michael Cowen:

So it used to be a role like 10 years ago at the firm, we would say in the first phone call to the other lawyer, now I just want to talk to you about something, I'm going to be really agreeable if you need to extend your expert deadline, you need extra time to answer a discovery, you need a smooth things around. Any of that stuff, I'm going to be perfectly agreeable, except for one thing. And that's continued to trial. Under no circumstance will I agree to a continue to the trial. So I'll work with you so we can both be ready for the trial, but we're not going to agree to continuance. I'm just going to tell you that right up front from day one.

Michael Cowen:

And we stuck to it and our cases resolved more quickly, because we would be ready for the first trial date. Even when the judge granted a continuance, it would be opposed by us. And so then when they wanted the second continuance, so the judge already got one. But I got overruled that there were too many situations where maybe we should agree to one, that if we were too strict, then when we needed more time, people want to get us back. I'm not sure that shouldn't be the rule. That should at least be the goal, I think, is being ready the first time and not agreeing to continuance because the other side is not ready. But I decided to not put that as a minimum standard because other people were so passionately against it.

Malorie Peacock:

Yeah. We were really, really trying to come up with a group of minimum standards that without question, we could apply in every single case. And I think for some of us, there were a lot of questions about that continuance one. That doesn't mean that we're going to just now agree to continuances all the time. Because remember, these are our minimum standards. And ideally, we're not agreeing to continuances at all. We try to stick with that. But these are minimum standards. We obviously work up cases faster and with different ... I mean, there's additional things we do. I mean, we don't just do the minimum here. I keep saying that, because I don't want people to think, well, this is all you do at the ... I mean, this is all you do to work up a case. But no, it's not. It's just the minimum. And it's something that we want it to be trackable and applicable in every case.

Michael Cowen:

And the other reason I gave in on that one is that I think one of the problems with me trying to have standards in the past is that they were just mine. And like you said, they were top-down. And I wanted people to feel like they had a voice and that I listened. If I never gave up on anything ... Now, there are things I won't give in on, the client contacts, the file reviews, those are things I will not give in on.

Actually, all the 10 minimum standards, I will not give in on. And there was some argument. Not everybody liked the idea of having a roundtable every single case before we do any kind of settlement negotiations, but that one I held firm on, I said no.

Malorie Peacock:

Yeah. It was a long discussion that we had. This isn't something that we came up with in 20 minutes. We started from scratch, and we went from there. And we listened to everybody's ideas. We turned down people's ideas, we accepted people's ideas, but we all had a lively, long conversation about it. And at the end, I think everybody agreed with every single standard on the list. I mean, because they felt heard out, and now they understand the perspective of it. Why did we want this to be a minimum standard, and what was its value? So even if they didn't agree with it, initially, I think by the end, everybody felt at least like they understand it, and that it has some value by being on this list.

Michael Cowen:

I think that's important as you build from culture. To have buy-in, to have people say that these are standards I'm going to hold myself and others accountable to, they really have to be hurt in the creation of those standards. Now, of course, when new people join the firm, they're going to have to live with what we already have. And that's hopefully the current culture would just take them there. But probably every four or five years, we had to go revisit them to see if there to be any changes. I know we didn't make any changes. But even Lencioni six questions, why do we exist? How do we behave? So our core values or our strategies for success.

Michael Cowen:

I mean, when we have our annual management team off site, we revisit them. I mean, are these still really our core values? What we do is litigate personal injury cases for a plaintiff. Once a year, we look at is that still what we want to do? Or do we want to open to a different practice area? But right now, it's still the only thing we want to do. But you do have to kind of look at these things on a regular basis too, to make sure that you still have buy-in from your team.

Malorie Peacock:

Yeah.

Michael Cowen:

Okay. Well, those are working for us. And we're still working on the implementation, the software wise, but at least we have an agreement that we're all going to do this stuff. And by and large, we already are doing these things anyway. It's just one way to track to make sure that at least the minimum are done on cases, and then we can start focusing on the ideal. I hope that this has been useful to you all. One other thing, because this is going out soon. If you want to be at a firm, let's say you're a zero to three-year lawyer, because that's what we're looking for. And you want to be at a firm that will invest in you, that will help work on your development so you can more than meet the minimum standards. We are hiring to associates.

Michael Cowen:

We really are looking for true ... We've had a lot of applications from 20 and 30-year lawyers, and I'm complimented and I'm flattered, but we really want to develop people from scratch. And that way we

don't have to kind of unbreak other people's ways of doing things. We want someone that can start right away with ours. And plus, it's just a joy that comes from, like I did with you, you're developing someone that's not done this kind of work before and over the years watching her or him become a master of the craft, like you have. So if you are interested, send me your resume, michael@cowenlaw.com.

Michael Cowen:

We're closing applications of September 1st, but we're hiring at least two associates. And I hope one of you are listening and think you might be the right fit, you'd have to move to San Antonio, Texas and get licensed in Texas if you're not a Texas person. But we have a great practice, a great firm. And if you think you might be the right fit for our family, send me an email.

Malorie Peacock:

Sounds good. I can't wait to see who applies.

Michael Cowen:

Yep. Okay, Malorie. Well, I will talk to you soon. And everyone. I'll see you all or at least you all will hear from me on our next episode of Trial Lawyer Nation.

Outro:

Thank you for joining us on Trial Lawyer Nation. I hope you enjoyed our show. If you'd like to receive updates, insider information and more from Trial Lawyer Nation, sign up for our mailing list at triallawyernation.com. You could also visit our episodes page on the website for show notes and direct links to any resources in this or any past episode. To help more attorneys find our podcast, please like, share and subscribe to our podcast on any of our social media outlets. If you'd like access to exclusive plaintiff lawyer only content in live monthly discussions with me, send a request to join the Trial Lawyer Nation insider circle Facebook group. Thanks again for tuning in. I look forward to having you with us next time on Trial Lawyer Nation.

Outro commercial:

Each year, the law firm of Cowen | Rodriguez | Peacock pays millions of dollars and co-counsel fees to attorneys nationwide on trucking and commercial vehicle cases. If you have an injury case involving death or catastrophic injuries and would like to partner with our firm, please contact us. You can reach Delisi Friday by calling 210-941-1301 or send an email to delisi@cowenlaw.com. That's D-E-L-I-S-I@cowenlaw.com. She will coordinate a time for Michael Cowen to speak with you in person or by phone to discuss the case in detail and see where we can add value in a partnership.

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