


**AGENDA PLACEMENT FORM**

(Submission Deadline – Monday, 5:00 PM before Regular Court Meetings)

**Date:** July 15, 2024  
**Meeting Date:** July 22, 2024  
**Submitted By:** Bill Moore  
**Department:** County Attorney  
**Signature of Elected Official/Department Head:**  
Bill Moore

<b>Court Decision:</b> <small>This section to be completed by County Judge's Office</small>
 <b>July 22, 2024</b>

**Description:**  
Executive Session, Government Code Section 551.071, Consultation with  
Attorney, Pending Litigation, Courthouse News Service v. Joanna Staton, Bell  
County District Clerk, et al, Cause No. 4:24-cv-00368, In the United States  
District Court for the Eastern District of Texas, Sherman Division.

**Motion: Retain Grant Blaies and Move Forward; with Authorization for**  
**County Judge to Sign**

(May attach additional sheets if necessary)

**Person to Present:** Bill Moore

(Presenter must be present for the item unless the item is on the Consent Agenda)

**Supporting Documentation:** (check one)     PUBLIC     CONFIDENTIAL

(PUBLIC documentation may be made available to the public prior to the Meeting)

**Estimated Length of Presentation:** 20 minutes

**Session Requested:** (check one)

Action Item     Consent     Workshop     Executive     Other \_\_\_\_\_

**Check All Departments That Have Been Notified:**

County Attorney     IT     Purchasing     Auditor  
 Personnel     Public Works     Facilities Management

Other Department/Official (list) District Clerk

**Please List All External Persons Who Need a Copy of Signed Documents  
In Your Submission Email**

**BLAIES & HIGHTOWER, L.L.P.**

Attorneys and Counselors  
A Registered Limited Liability Partnership

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(817) 334-8294

Grant D. Blaies

July 15, 2024

Hon. Christopher Boedeker  
Johnson County Judge  
Johnson County Courthouse  
2 North Main Street  
Cleburne, TX 76031

Re: ***Representation of District Clerk, David Loyd, Cause No. 4;24-cv-00368-SDJ, Courthouse News Service v. Joanna Staton, et. al., pending the United States District Court, Eastern District of Texas ("Lawsuit")***

Dear Judge Boedeker:

We appreciate the opportunity to represent David Lloyd, sued in his official capacity as the District Clerk of Johnson County. As Mr. Lloyd has been sued in his official capacity, Johnson County shall be considered a Client under the terms of this representation (hereinafter collectively "Clients"). This will confirm that we agree to represent Clients' interests pursuant to the terms set forth in this letter. It is our understanding that the Commissioners Court of Johnson County has approved the retention of our law firm for such representation.

I will have primary responsibility for Clients' representation and will utilize other attorneys and legal assistants in our firm as I feel necessary or appropriate in my professional judgment. Obviously, we cannot guarantee the outcome of any matter. Any expression of our professional judgment regarding this matter or the potential outcome is, of course, limited by our knowledge of the facts and based on the law at the time of expression. It is also subject to any unknown or uncertain factors or conditions beyond our control.

The hourly rates we charge for this representation are \$295.00/hour for partners, \$225.00/hour for associate attorneys, and \$105.00/hour for legal assistants. We will also bill for expenses incurred on Clients' behalf during the course of the representation, and we will itemize these expenses at regular intervals. Examples of these expenses include charges for photocopying, postage, facsimiles, long-distance telephone calls, travel and conference expenses, delivery or courier charges, and computer-aided research. Clients also agree to incur third-party expenses, including the retention of experts, private investigators, etc., should we believe such retention is in the best interest of the Clients. Prior to retaining any experts, private investigators, or incurring other third-party expenses, we will inform Clients of our intent and give Clients an opportunity to discuss. Clients agree that we are authorized to incur these expenses on Clients' behalf, and Clients agree to pay such expenses promptly upon notification of same.

Hon. Christopher Boedeker  
Johnson County Judge  
July 15, 2024  
Page 2

We will submit periodic, usually monthly, invoices to you for fees, expenses, and our out-of-pocket disbursements, Clients agree to pay those invoices promptly. We will submit those monthly statements to the address you have provided above, or to another address upon your request. These statements may contain privileged information, such as references to our communications with you and descriptions of work we have performed. Those privileges could be waived, however, if someone other than the client sees the privileged material. Therefore, we recommend that you keep all of our bills in a separate file for “attorney-client privileged materials” and maintain the file in a secure location.

Increasingly, conflict of interest is a concern for lawyers and their clients today. Rules concerning conflicts of interest vary with the jurisdiction. In order to avoid any uncertainty, our policy is that the Texas Disciplinary Rules of Professional Conduct will be applicable to this representation. By signing this letter, Clients agree with that policy. Our representation in this matter is limited to Clients and does not include anyone else such as employees, officers, directors, investors, partners, or family members. Further, by engaging us to represent Clients in this matter, Clients have not engaged us to represent Clients generally or in any other specific matter. Clients agree that our representation will be limited defending them in the above-referenced lawsuit. Additionally, we are accepting this engagement on the understanding that our representation of Clients will not preclude us from accepting any other engagement from any existing or new client, provided that: (1) such engagement is not substantially related to the subject matter of any services we are providing to Clients; (2) in accepting such other engagement we would not impair the confidentiality of proprietary, sensitive, or otherwise confidential information Clients have provided to us, and (3) Clients consent to such engagement if the matter is adverse to Clients.

Finally, in accordance with requirements imposed on all Texas attorneys, be advised that links to the State Bar of Texas’ grievance process and professional requirements, including the Texas Lawyer’s Creed, may be found at [www.texasbar.com](http://www.texasbar.com). I look forward to working with you and thank you for your confidence.

If you have any comments or questions concerning this letter, please contact me. Otherwise, I would appreciate it if you would execute and return this letter so that we may begin this representation. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "GRANT D. BLAIJES", with a horizontal line underneath.


GRANT D. BLAIJES

Hon. Christopher Boedeker  
Johnson County Judge  
July 15, 2024  
Page 3

GDB/lb

APPROVED AND AGREED

JOHNSON COUNTY

By:   
\_\_\_\_\_  
Hon. Christopher Boedeker  
County Judge

Date: July 22, 2024