

INSTRUCTIONS TO EMPLOYMENT LAW CLIENTS

1. **PREPARE A CHRONOLOGY:** One of the most important ways I can help you is to know the order in which events occurred. Please prepare a chronology beginning with the first day you began working for your former employer and provide detailed accounts of every act of harassment or discrimination that occurred while you were employed. You should provide dates as best you can and the names and addresses of any person who may have witnessed the events. The chronology should also include the dates and the names of any persons who you complained to about the harassment, discrimination or other action taken against you.

2. **DO A WITNESS LIST:** For each person who you think may have information that is helpful to your case, please provide the following:

- (a) Name;
- (b) Last known address;
- (c) Telephone number
- (d) Date of birth;
- (e) Social Security;
- (f) What does the person know or how does she/he know it?;
- (g) Is the person in management?;
- (h) Is the person likely to be favorable or unfavorable toward you?

3. **TALK TO NO ONE:** Do not talk to anyone about your case or the facts of your case except me or any investigators hired by me. Do not give any written or verbal statements directly to anyone with the employer including their attorneys. Do not sign any papers or forms pertaining to your employment without checking with me first. Do not discuss your case or the facts surrounding your case with friends, co-workers or associates. You should also instruct family members to not discuss your case.

4. **GIVE ME ALL DOCUMENTS IN YOUR POSSESSION:** I need all of the documents that you have that pertain to your work situation. You should search your basement, attic, garage, computer and anywhere else that you may have documents relating to your employment. It is very helpful to me if you organize the documents and provide an explanation of what they mean. Do not write or mark on the document itself as I may need to use it as an exhibit in a deposition or at trial. I do not want to share your comments to me with the lawyer representing your former employer.

5. **DO NOT STEAL OR SNOOP:** Do not take company records that do you belong to you. This would include accessing files or information which you are otherwise are not entitled to know about or have access to. Obtaining records or accessing files which you otherwise do not have access to, can seriously affect the amount of damages that you otherwise might be entitled to. Please identify those records you think will be helpful to your case and I will make a formal request for them during the course of your lawsuit.

6. **APPLY FOR UNEMPLOYMENT BENEFITS:** If you have been terminated or forced out of your job then you should apply for unemployment benefits with Iowa Workforce Development. Please let me know immediately if your former employer contests your claim for unemployment.

7. **LOST WAGES AND EARNINGS:** It is very important that you keep an accurate written record of every place you have sent an application or obtained an interview. If you interview with a prospective employer you should note the date of the interview, who you interviewed with and the position you interviewed for. If you receive decline or rejection letters from prospective employers you should keep those. The reason for keeping these documents is that the lawyer for the employer will try to argue that you were not making a genuine effort to find other employment. The best way to rebut this argument is to have written proof of extensive and diligent efforts to find work.

8. **DOCTOR VISITS:** If you have received medical treatment because of emotional distress or anxiety caused by work then you should be honest and forthright with your health care providers at all times. You should not minimize your ailments, but don't exaggerate them either. If you begin treating with new doctors or are referred to different doctors, please make sure and let me know their names and addresses.

9. **KEEP COPIES:** When you send me records, bills or other documents, keep a copy for yourself.

10. **QUESTIONS:** I will probably not contact you until I have something definite to report. I will be contacting you for depositions, answers to interrogatories and when your case goes to trial. If you have specific questions regarding these instructions or any other matters regarding your case, please let me know. In general, it is easier and more efficient to respond to written letters and e-mails than phone calls.