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LARRY J. SIMMONS
PRINCIPAL
BOARD CERTIFIED
LABOR AND EMPLOYMENT LAW
PERSONAL INJURY TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

ljsimmons@germer.com

December 16, 2019

Honorable Bill Gravell, Jr.
County Judge
Williamson County, Texas
710 W. Main Street, Suite 101
Georgetown, Texas 78628

VIA EMAIL TRANSMITTAL
bgravell@wilco.org

Bradley R. Brown
4909 Sunrise Street
Killeen, Texas 76542

VIA U. S. MAIL

Adrian D. Nira
176 S. Kelly Street
Bartlett, Texas 76511

VIA U. S. MAIL

Carlos A. Paniagua
313 Turquoise Way
Jarrell, Texas 76537

VIA U. S. MAIL

Ty R. Roggenkamp
16760 Ronald W. Reagan Blvd.
Apt. 2118
Leander, Texas 78641

VIA U. S. MAIL

Re: ***Amanda McCoy, Et Al v. Williamson County, Texas, Et Al***; Civil Action No. 1:19-cv-01163-LY; In the United States District Court for the Western District of Texas, Austin Division
Germer No.: 100397

Dear All,

Germer PLLC ("the firm") has been retained by Travelers to represent Williamson County in response to the above-referenced lawsuit ("the lawsuit") filed by Amanda McCoy, individually and as dependent administrator of, and on behalf of, the Estate of Daniel Lee Charles McCoy and Daniel Lee Charles McCoy's heirs-at-law. At this stage of the litigation, Travelers has also agreed that I and the firm may represent you and the County in this matter, subject to you and the County confirming your informed consent to joint representation.

GERMER PLLC
AMERICA TOWER
2929 ALLEN PARKWAY, SUITE 2900
HOUSTON, TEXAS 77019
PHONE: 713.650.1313 • FAX: 713.739.7420

The terms and conditions of the proposed joint representation are as follows:

1. Under this defense agreement, Germer PLLC will provide joint representation to Williamson County, Texas; Bradley R. Brown; Adrian D. Nira; Carlos A. Paniagua; and Ty R. Roggenkamp;
2. The parties have reviewed the lawsuit and Plaintiffs' allegations and consent to Germer PLLC's joint representation;
3. In accordance with the principles set forth in Rule 1.06 of the Texas Rules of Professional Conduct, the parties agree that their interests would not be materially affected by the joint representation described above;
4. The parties have consented to and have agreed to the joint representation after a full disclosure of the existence, nature, implications, and possible adverse consequences arising from the common representation and the advantages involved, if any;
5. The parties are not aware of any existing conflict of interest between you and Williamson County as it relates to the above-referenced matter, at least through the pretrial phase of the litigation;
6. The parties agree to notify me immediately in the event any of them discover or declare a conflict of interest between Williamson County, Texas; Bradley R. Brown; Adrian D. Nira; Carlos A. Paniagua; and Ty R. Roggenkamp as it relates to the above-referenced matter or if the parties discover the existence of facts which alter the basis of their informed consent to this joint representation agreement, so that any actual or perceived conflict may be promptly addressed;
7. Bradley R. Brown, Adrian D. Nira, Carlos A. Paniagua and Ty R. Roggenkamp agree that Germer PLLC may withdraw as counsel for them and continue to represent Williamson County in the event either party declares a conflict, or if Germer PLLC withdraws from representing them in this matter and that they waive any conflicts associated with such continued representation of Williamson County,
8. The parties agree that nothing in this joint representation agreement changes or modifies their coverage agreement with Travelers; and,
9. The parties will cooperate with the defense of this lawsuit, and keep me apprised of their current mailing address, cell phone number and e-mail address as long as you are represented by Germer PLLC.

Please confirm your consent by signing in the space provided below and return a signed copy back to my office by facsimile.

December 16, 2019

Page -3-

Thank you for your cooperation. Please feel free to call with any questions.

Sincerely,


GERMER PLLC



Larry J. Simmons

LJS/taw

AGREED TO BY:


By: _____
Williamson County, Texas

12-17-19
Date

Bradley R. Brown

Date

Adrian D. Nira

Date

Ty R. Roggenkamp

Date