

March 15, 2021

Hal C. Hawes  
General Counsel  
Williamson County Commissioner's Court  
710 S. Main Street, Suite 200  
Georgetown, TX 78626

*Via Email Transmittal*  
*hhawes@wilco.org*

Lt. Francesco Saenz  
Williamson County Sheriff's Office  
508 S. Rock Street  
Georgetown, TX 78626

*Via Email Transmittal*  
*fsaenz@wilco.org*

Re: Civil Action No. 1:21-CV-00172; *Charles William Thornburg v. Williams County, Texas, et al*; In the United States District Court for the Western District of Texas, Austin Division

Dear Sirs:

Germer PLLC ("the firm") has been retained by Travelers to represent Williamson County in response to the above-referenced lawsuit ("the lawsuit") filed by Charles William Thornburg. At this stage of the litigation, Travelers has also agreed that I and the firm may represent Williamson County and Lieutenant Francesco "Frank" Saenz in this matter, subject to the undersigned parties confirming their informed consent to joint representation.

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 and Lt. Frank Saenz;
2. The undersigned parties have reviewed the lawsuit and Plaintiff's 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 undersigned parties agree that their interests would not be materially affected by the joint representation described above;
4. The undersigned 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;

**GERMER BEAMAN & BROWN PLLC**

ONE BARTON SKYWAY • 1501 S. MOPAC EXPRESSWAY, SUITE A400 • AUSTIN, TX 78746  
PHONE: 512.472.0288 • FAX: 512.472.0721

5. The undersigned parties are not aware of any existing conflict of interest between themselves and Williamson County as it relates to the above-referenced matter, at least through the pretrial phase of the litigation;
6. The undersigned parties agree to notify me immediately in the event either of them discover or declare a conflict of interest between Williamson County and Lt. Saenz as it relates to the above-referenced matter or if the undersigned 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. Lt. Saenz agrees 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 undersigned parties agree that nothing in this joint representation agreement changes or modifies their coverage agreement with Travelers; and
9. The undersigned 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 they 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 or email.

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

Sincerely,

**GERMER PLLC**

  
Ben Zinnecker

Hal C. Hawes  
Lt. Francesco Saenz  
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**AGREED TO BY:**

By: Valerie Covey  
Valerie Covey  
Commissioner Precinct No. 3,  
As Presiding Officer of the Williamson  
County Commissioner's Court

Date: 3-16-21

By: \_\_\_\_\_  
Lt. Francesco "Frank" Saenz

Date: \_\_\_\_\_