

### **AUSTIN** BEAUMONT HOUSTON SAN ANTONIO TYLER

www.germer.com

### BEN ZINNECKER

Principal

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February 8, 2022

Shannon Francis
Williamson County Commissioner's Court
710 S. Main Street, Suite 200
Georgetown, TX 78626

Officer Alyssa Hoffman Williamson County Sheriff's Office 508 S. Rock Street Georgetown, TX 78626

Sgt. Ariel Korn Gibson Williamson County Sheriff's Office 508 S. Rock Street Georgetown, TX 78626

Medical Officer Jose Garza Williamson County Sheriff's Office 508 S. Rock Street Georgetown, TX 78626

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

Officer Fernando Morales Williamson County Sheriff's Office 508 S. Rock Street Georgetown, TX 78626

Roberto Rodriguez 128 Hermatite Lane Jarrell, TX 76537 sfrancis@wilco.org

Via Email Transmittal

Via Email Transmittal alyssa.hoffman@wilco.org

<u>Via Email Transmittal</u> ariel.gibson@wilco.org

Via Email Transmittal jose.garza@wilco.org

Via Email Transmittal rvela@wilco.org

Via Email Transmittal fmorales@wilco.org

<u>Via Email Transmittal</u> rodriguez500182@gmail.com Re: Civil Action No. 1:21-cv-00615-LY; *Bernardo Acosta v. Williamson County, Texas, et al.*; In the United States District Court for the Western District of Texas, Austin Division

#### Dear Addressees:

Germer PLLC ("the firm") has been retained to represent Williamson County in response to the above-referenced lawsuit ("the Lawsuit") filed by Bernardo Acosta. At this stage of the litigation, Williamson County has also agreed that I and the firm may represent Williamson County, Alyssa Hoffman, Ariel Korn Gibson, Jose Garza, Ruben Vela, Fernando Morales, and Roberto Rodriguez, 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 Alyssa Hoffman, Ariel Korn Gibson, Jose Garza, Ruben Vela, Fernando Morales, and Roberto Rodriguez;
- 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;
- 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 any of them discover or declare a conflict of interest between Williamson County and Alyssa Hoffman, Ariel Korn Gibson, Jose Garza, Ruben Vela, Fernando Morales, and/or Roberto Rodriguez 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. Williamson County and Alyssa Hoffman, Ariel Korn Gibson, Jose Garza, Ruben Vela, Fernando Morales, and Roberto Rodriguez agree that Germer PLLC may withdraw as counsel for any of them and continue to represent Williamson County and the other parties in the event any 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 and the remaining parties; and
- 8. The undersigned parties will cooperate with the defense of this Lawsuit, and keep me apprised of their current mailing address, cell phone number, and email 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

By:	Bill Gravell, Jr. Valerie Corky Williamson County Judge Commissioner Precinct 3	Date: 2-22-22
By:	Officer Alyssa Hoffman	Date:
By:	Sgt. Ariel Korn Gibson	Date:
By:	Medical Officer Jose Garza	Date:
By:	Lt. Ruben Vela	Date:
By:	Officer Fernando Morales	Date:
By:	Roberto Rodriguez	Date:

By:	Bill Gravell, Jr.	Date:	
	Williamson County Judge		
By:	Officer Alyssa Hoffman	Date: <u>2/8/22</u>	
By:	Ariel Gison	Date: 2/8/22	
By:	Sgt. Ariel Korn Gibson	<b>Date:</b>	
	Medical Officer Jose Garza		
By:	Lt. Ruben Vela	Date: 2/8/2022	<del></del>
By:	Officer Fernando Morales	Date:	
Ву:	Roberto Rodriguez	Date:	

By:	Bill Gravell, Jr. Williamson County Judge	Date:	
By:	Officer Alyssa Hoffman	Date:	-
By:	Sgt. Ariel Korn Gibson	Date:	
Ву:	Medical Officer Jose Garza	Date: 02/09/	10012
By:	Lt. Ruben Vela	Date:	
By:	Officer Fernando Morales	Date:	
By:	Roberto Rodriguez	Date:	

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By: Bill Gravell, Jr. Williamson County Judge	Date:
By: Officer Alyssa Hoffman	
By:Sgt. Ariel Korn Gibson	Date:
By:	Date:
By:Lt. Ruben Vela	Date:
By:Officer Fernando Morales	Date:
By: Roberto Rodriguez	Date: 2-10-22

By:		<b>Date:</b>	
•	Bill Gravell, Jr. Williamson County Judge		
By:	Officer Alyssa Hoffman	Date:	
Ву:	Sgt. Ariel Korn Gibson	Date:	
By:	Medical Officer Jose Garza	Date:	
By:	Lt. Ruben Vela	Date:	
By:	Officer Fernando Morales	Date:	2-11-22
By:	Roberto Rodriguez	Date:	