

Louis G. Fazzi

Attorney & Counselor At Law

Re: *Proposed Case Against Former Employer*

Dear Potential Client:

At your request, I am sending you the enclosed questionnaire forms. Before you begin to work on these forms, there are several things you should know. Because I prefer to practice in a small law firm, I can accept only a portion of the cases I am asked to take. There are a number of general classes of cases which I do not take at all. These include but are not limited to situations where:

- The ex-employee thinks that the real reason for the firing (as opposed to the reason given by the employer) was the fact that he or she was injured on the job and filed (or was about to file) a workers compensation case; or
- The ex-employee thinks that the employer's sole and only motive was to deprive him or her of pension benefits (do not confuse this with the fact that you may have lost pension benefits as a result of the firing); or
- The company had less than 25 employees; or
- The company was headquartered out of state and all of the persons responsible for the firing were out of state.

The above list is not all-inclusive. If you fit one or more of the categories, however, I cannot assist you and you will need to consult another attorney immediately to determine what your rights may be. If you do not fit into any of the above categories, please continue.

These materials include a Questionnaire. It is most important that you follow the directions exactly and provide as much information as possible. The more information I have, the better I will be able to evaluate your situation.

ALSO, IT IS ABSOLUTELY ESSENTIAL THAT YOU SUPPLY A DETAILED CHRONOLOGICAL MEMO, LISTING THE DATES, EVENTS, AND NAMES OF THE PERSONS INVOLVED, BEGINNING WITH THE OCCURRENCES WHICH LED UP TO YOUR TERMINATION AND ENDING WITH THE TERMINATION ITSELF AND/OR OTHER ACTION TAKEN AGAINST YOU BY YOUR EMPLOYER. Without this memo, I will be unable to evaluate your situation. Also provide me with any supporting documentation you may have pertaining to this possible wrongful termination action, such as an employee handbook or manual and any correspondence or performance reports.

Louis G. Fazzi, Esq.
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When you have completed all the materials, make a copy of everything. I cannot make these copies for you so please do that yourself, either at a copy shop or other facility. Be sure the reproductions are readable. Send the copies and keep the originals for now.

It may take me at least six weeks to evaluate your case and to make a determination whether I will be able to represent you. Please keep your calls to a minimum until you hear from me, except in case of emergency. If you believe your statute of limitations is in danger of expiring, please let me know this, and why you think so, immediately. Thank you for your patience, understanding, and cooperation.

Very truly yours,

LOUIS G. FAZZI
Attorney & Counselor at Law

lgf/os
Enclosure

Form No.

CONFIDENTIAL QUESTIONNAIRE FOR ATTORNEY

PERSONAL

Your name: _____ Res. Phone _____
Address: _____ Date of Birth ___/___/___ Sex ___
City: _____ State: _____ Zip: _____
Present Employer: _____
Job Title: _____ Address: _____
City: _____ State: _____ Zip: _____
Annual Pay: \$ _____ Phone: _____
Spouse: _____ Employed? Yes ___ No ___
Ages of dependent children _____
To help determine the impact of your discharge, please give estimate of your total current
income: \$ _____ (Mo./Yr.)
Spouse: \$ _____ Sources: _____
Who referred you to us? _____
Address: _____
City: _____ State: _____ Zip: _____
Are you a member of a union? _____ If so, is the union handling your dispute?
_____ If not, why not?

HISTORY OF EMPLOYMENT DISPUTE

Name of employer with whom you have a dispute: _____
Telephone: (____) _____
Address: _____
City: _____ State: _____ Zip: _____
Date of hire: ___/___/___ Position: _____ Age: _____
Date of discharge: ___/___/___ Position: _____ Age: _____
Reasons employer gave for your discharge or other action taken:

Reasons you think you were discharged: _____

On a separate sheet, provide the following information: (Use the same paragraph numbers):

1. Describe the dispute in detail. Give the names and titles of persons present when you were terminated/sexually harassed and what was said by each.

2. State candidly and fully your understanding of the facts supporting the employer's position. Name unfavorable witnesses.
3. State the facts you believe support your position. Name favorable witnesses. Indicate where they are now located.
4. Did employer follow company procedures in handling the dispute or discharge? If not, explain and describe procedures not followed.
5. State the circumstances under which you went to work for the employer. Who initiated the offer? To accept the job, did you move? Give up a job? Rely on promises that were not kept?
6. Do you have a written employment contract? If so, attach copy.
7. Describe your performance evaluations. Give dates or attach copies.
8. Give dates of promotions and merit raises.
9. Have you filed any charges or claims against any public agency (i.e., discrimination, workers' compensation, unemployment, etc.)? If so, name agency and charge, date of filing and outcome.
10. Have you examined your personnel file? If so, state reasons employer gave for discharge or other action taken and any other fact or importance contained in or missing from the file.
11. Were you denied access to any records? If so, explain.
12. State financial effect of discharge or other action on your:
 - a. gross income
 - b. pension benefits
 - c. profit sharing
 - d. medical plan
 - e. other
13. State effect of your discharge or dispute on:
 - a. your health and your personal life
 - b. your family
 - c. your opportunities for other employment
14. Have you ever been discharged or asked to resign before? Give details.
15. Please give your work history since age 18. Enclose a resume if one is available.
16. Have you ever been involved in litigation before? Give details.