

As solo attorneys and boutique law firms know, going to trial is intense and demanding. All of one's senses and skills have to be on point. Having a co-counsel or right-hand person (as if she is a 2nd chair) to observe, assist, respond, and produce, will enable you to stay focused on the case.

Therefore, let me tell you what I do when coming in for a trial.

Pre-trial preparation: Do you need me at the pretrial stage? Are your trial exhibits and witness list done?

I will assist with all aspects of pre-trial preparation. If all the groundwork has been completed, I will thoroughly review all the information pertaining to the case, including the complete file and the trial binder, in advance of the trial. It is crucial for me to have an in-depth understanding of the case. This review will encompass the case itself, exhibits, trial binder, witnesses, equipment, testimony, and other relevant details

I thoroughly review all exhibits before, during, and after the trial to ensure familiarity. This enables me to quickly locate any exhibit referenced by the attorney during trial. Additionally, I collaborate closely with you and your witnesses, assisting with tasks such as coordinating flights, travel arrangements, and arranging for video testimony as necessary.

If technology is needed for video testimony, video recordings, freeze frames, photos, or audio, I can oversee the hiring and coordination of materials with the company, or I can handle it myself from my computer or the court evidence presentation system, depending on how technical requirements.

While I am not an attorney, one of my most valuable skills is serving as an attorney's second chair. To fulfill this role effectively, I must be thoroughly familiar with the case, including reading all trial briefs, and deposition transcripts, and reviewing all evidence.

Sharing my observations: I work on ideas for direct, cross, openings, and closings. I give attorneys great ideas. I have the perspective not only as a trial paralegal but also as a juror.

If you want that extra thumb on the scale: I present myself professionally, remain pleasant before the jury, and always appear confident and positive. I make eye contact with the jurors, relate well to people, and get along well with the judge's staff.

Even for lighter tasks, if you need someone to brainstorm with during a break or to order food, I am readily available for you.

Voir and gathering information on social media about the juror. Sometimes things move

very quickly and I may not be able to gather information on everyone, but I make every effort. Occasionally, significant details stand out to me. I serve as a sounding board during voir dire, taking detailed notes on the jurors.

I am available before and during the trial to brainstorm, offer critical insights, and act as a second set of eyes for the attorney. I often notice details that the attorney might miss. For instance, while the attorney is focused on addressing the judge, I can observe the reactions of the jury

It has been my experience, that the uncertainties of trials, such as trial continuances, can often surpass initial expectations. Therefore, it's crucial to remain flexible and adaptable in such situations

Being someone's right-hand person is invaluable to me because I am deeply invested in our success.

Best Regards,
Diane Polonsky, Trial Paralegal

ABOUT THE PROCESS AND FEES

1. Pretrial Preparations:

- I am available for pretrial preparation as needed.
- If trial exhibits are ready, I will review all case information, including the complete file and trial binder, to ensure thorough understanding before the trial.

2. Availability:

- I am available from early morning until late evenings Sunday to Thursday.
- On Fridays, I am available until 3 or 4 PM, and on Saturdays, I am available until an hour past sundown.

3. Costs:

- The daily rate for trial includes air transportation from Nevada, Uber fees, hotel accommodation fees, food, and miscellaneous costs as they arise. Las Vegas attorneys include trial fees, parking, food and miscellaneous cost as they arise.
- Hotel and airline fees are to be prepared by you directly, but I will assist you in obtaining the necessary information for these payments.

4. Prepayment:

- A prepayment of \$1,275 per day is required, as my time will be solely allocated to your case during the trial.
- The deposit for Uber and transportation will be determined based on the number of trial days.