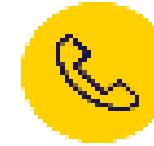


# USRM 7 Mandatory SLA Discussion Points – Calls Required – Effective 6/25/25



Call #	Topic / event to discuss	Interaction initiator	Timeframe	Description
1	<b>Initial Case Evaluation (ICE) Litigation Budget</b>	Attorney	Case referral	<ul style="list-style-type: none"><li>Discuss strategy, discovery, action plan, task assignments, and completion dates</li><li>Discuss budget based on strategy of case</li></ul>
2	<b>Written Discovery Responses</b>	Adjuster	On receipt	<ul style="list-style-type: none"><li>Discuss discovery responses and impact to strategy</li><li>Attorney advises of discovery issues</li></ul>
3	<b>Depositions</b>	Attorney	Pre- & post- deposition	<ul style="list-style-type: none"><li>Discuss upcoming depositions as necessary</li><li>Post-deposition, mandatory call to discuss deposition impact, strategy, and next steps</li></ul>
4	<b>Experts</b>	Adjuster / Attorney	All stages	<ul style="list-style-type: none"><li>Attorney and claims discuss need, identification and timing of expert retention strategy</li><li>Claims uses Vendor tool</li><li>Discuss expert report impact</li></ul>
5	<b>ADR and Pre-Trial</b>	Adjuster / Attorney	All stages	<ul style="list-style-type: none"><li>Discuss ADR options and strategy before and after hearing; Attorney notifies dates</li></ul>
6	<b>Trial Prep</b>	Adjuster / Attorney	Submission	<ul style="list-style-type: none"><li>Discuss trial plan submission</li></ul>
7	<b>Trial</b>	Adjuster / Attorney	Throughout	<ul style="list-style-type: none"><li>Discuss any concerns / issues throughout</li></ul>

# Countrywide SLA – USRM - Key Activities and Timelines – Effective 6/25/25

Activity	Communication	Ownership	Timeline	
Legal Referral, Strategy Selection and Action Plan	Claims recommends initial strategy at time of referral or Claims communicates to Legal any change in strategy	Claim Task	At time of referral	
	Legal to <b>call claim</b> partner to discuss and collaborate on case			
	Legal agrees or recommends alternative strategy, i.e., particularly if case ripe for early resolution/settlement and whether any dispositive motion practice might be effective.			
	Legal provides Initial Case Evaluation with action plan and dates for completion (the detail of the evaluation will be contingent on the complexities of the case). <ul style="list-style-type: none"> <li>When <b>defense expenses (fees + costs)</b> are anticipated to exceed \$5k a Litigation Budget will be provided.</li> <li>When <b>defense expenses (fees + costs)</b> are anticipated to be below \$5k, a Cost Range Estimate will be provided and include the following:               <ul style="list-style-type: none"> <li>Pleadings</li> <li>Motion Practice</li> <li>Paper Discovery</li> <li>Conferences</li> <li>Depositions</li> <li>Other litigation costs</li> </ul> </li> <li><b>Exception for AFA Program Cases:</b> Firms will provide an estimate of litigation expenses not included in AFA pricing; Claims will utilize the AFA Program Tool for <b>defense fees</b> by Phase/Tier</li> </ul>			
	Legal indicates next contact point on all cases after referral			
	Legal to provide viability of success on potential motions pertaining to liability and/or damages, both upon initial review and going forward.			
	Legal to timely advise Claims of any value changing events or critical information developed			
	Legal to notify Claims if plaintiff attorney inquires about settlement	Legal Task	At time of event or upon receipt of information	
	Claims will notify Legal of Settlement discussions (Legal will notify Claims if handling negotiations)	Claim Task		
Settlement	Legal will assist when and where appropriate	Legal Task		
	Negotiation is a Claims' task	Claim Task		
	Claims will draft Release via use of Release builder			
	If Claims settles the case, prepares the Release and submits it to the Plaintiff attorney, claims to notify Legal of the details			
	Should Claims receive the executed Release, the Claim Representative will forward Release to Legal.			
	Legal will file any necessary closing paperwork and will follow up for the executed Release as needed.	Legal		
	Legal will contact claims and notify insured client and provide copies upon receiving any time limited demands or offers of judgment.	Legal Task		
Time Limit Demands or Offers of Judgement	Adjuster to receive a direct e-mail with documents, and Legal to document file with forwarding of documents to claims' imaging	Claim and Legal Task	Same day or next business day if received after hours	

# Countrywide SLA – USRM - Key Activities and Timelines – Effective 6/25/25

Activity	Communication	Ownership	Timeline
Investigation Activity	Update after activity is completed, highlighting impact on strategy (anything completed by Claims or Legal outside of the normal discovery through the court systems i.e., hospital trace, ISO search, social media search)	Claim and/or Legal Task	10 business days
	Legal will update Claims indicating any impact on strategy, or no impact if appropriate, and will indicate the next touch point.	Legal Task	
Written Discovery	Legal identifies appropriate written discovery including tailored non-standard discovery to strategically defend the claim.	Legal Task	5 business days
	Legal to provide written discovery received to claims file as soon as possible but no longer than 5 business days of receipt.		
	Legal provides discovery received to Claims, with a high-level summary, analysis and impact on case, indicating what if any impact on file strategy as well as indicating next steps; and if Plaintiff's responses are incomplete, Legal to outline what is missing and next steps to pursue (e.g., Motion to Compel.)		10 business days
	If Plaintiff Counsel asserts that our discovery responses were incomplete, Legal to advise Claims along with how alleged to be incomplete		5 business days
	Claims reviews discovery and collaborates with and <b>calls Legal</b> ; Legal updates the Strategy and Plan 	Claims	10 business days
	If records are obtained through subpoena, Legal to obtain those records.	Legal	
	If records are obtained via authorization, Claims is to obtain the records.	Claims	
Motions to Compel	Legal to communicate expected date of receipt of response to written discovery	Legal Task	10 days after filing of discovery
	Legal will file motions to compel on overdue discovery. When necessary, Legal will discuss and align with claims on when motions to compel are not advised; local custom and practice is a factor in this motion practice		10 business days of discovery responses being overdue
Depositions	Legal notifies claims of scheduled depositions	Legal Task	10 business days of receipt of notice of scheduled deposition
	Legal contacts claims (call if necessary), prior to the deposition to discuss strategy; if a PLG matter, the PLG handling attorney is the contact. Communication is documented to file by Legal.		Minimum 5 business days prior to scheduled deposition
	Legal advises of any change in deposition schedule as well as the reason for the change and any impact.		2 business days
	Claims to provide legal any specific deposition questions or issues to be addressed in depositions (verbal or written)	Claims Task	
	Legal provides claims with summary of deposition including impact to strategy and further handling recommendations; if a PLG matter, the PLG handling attorney is the contact however the PLG Contact Attorney who conducted the deposition will be involved to provide both the summary and participate in any post deposition call with Claims..	Legal Task	10 business days upon completion, or 5 business days if there is a deadline such as a PFS, TLD, discovery end date or if something discussed could materially change the case strategy
	Legal <b>calls claims</b> after the deposition to discuss case and future strategy; if a PLG matter, the PLG handling attorney is the contact. 		5 business days

# Countrywide SLA – USRM - Key Activities and Timelines – Effective 6/25/25

Activity	Communication	Ownership	Timeline
Experts	Joint ownership of expert selection between Claims and Legal is expected.	Claims and Legal Task	Upon request legal will provide expert recommendation in 5 business days
	<b>Claims and legal to call to</b> discuss the need, type, identification and timing of expert retention strategy. 		
	Legal (Attorney handling file) will recommend either a specific expert to utilize, or a specific type of expert to utilize. In congested litigation venues, Legal may list several experts in order of preference.		
	If neither Claims or Legal has a recommendation, both are required to review available resources and reconvene to finalize expert selection.		
	Claims will then use its vendor tool to retain that recommended expert at the appropriate cost		
	Joint ownership is also expected on defining what questions we are asking the expert to address, what information should be provided to the expert (medical records, photographs, estimates, other expert reports, etc.), and whether we are requesting a written or verbal report. Legal will contact claims and confer.		
	Claims schedules IMR/IME's when needed and provides scheduled date to legal.		
	Legal advises Claims on expert disclosure deadlines and provides status upon receipt of any scheduling order.		
	Claims receives and sends report to Legal		
	<b>Claims and legal to call</b> on outcome of expert report, impact to case and any recommended changes to strategy or next steps 		
Scheduling Orders	Legal documents file regarding impact and next steps.	Legal Task	5 business days after receipt of report
	Claims completes CERS (PL) / strategy note (SC) with analysis and impact to strategy and plan.		
Scheduling Orders	Legal to contact claims and provide claims with copies of all scheduling orders, highlighting trial date, discovery cutoff date, expert designation dates and dates for dispositive motions; Legal to update Claims on any scheduling changes	Legal Task	5 business days of receipt or sooner if deadline requires
Pre-Trial Conference and ADR	Legal to notify Claims of any Pre Trial Conference or Settlement Conference dates, or ADR scheduling's, as well as any changes to those scheduled dates	Legal Task	5 business days after receipt of scheduling
	<b>Legal to call</b> claims and discuss strategy for conference (i.e., propose mediation, ADR, etc.) or ADR 		1 week prior to conference/ADR
	Legal to provide claims any submissions.		1 week prior to conference
	Claims and Legal to summarize as appropriate conference events, findings and action items; if there are unknowns at the time of the pre-trial discussion/report that Legal will update Claims as they develop	Claims and Legal Task	5 business days

# Countrywide SLA – USRM - Key Activities and Timelines – Effective 6/25/25

Activity	Communication	Ownership	Timeline
Trial Prep	Legal submits final trial plans <ul style="list-style-type: none"> <li>Legal will provide information: <ul style="list-style-type: none"> <li>On the jurisdiction</li> <li>Any prior similar case jury verdicts</li> <li>Jury pool</li> <li>Judge issues</li> </ul> </li> </ul>	Legal Task	2 month prior to trial
	Claims reviews and confirms <b>via call</b> final trial strategy with Legal	Claim Task	2 months prior to trial
	Claims schedules Pre Trial Call with Legal if needed 		30 days before trial
	Legal provides outstanding pretrial motions, expected results, and impact	Legal Task	
	On a case reserved at \$25,000 or lower, Pre Trial report will be streamlined.		2 months prior to trial
Trial	Claims and Legal discuss trial developments highlighting impact to strategy 	Claim and Legal Task	Claims and Legal to agree prior to Trial on cadence and method of communication

# Appendix A – Pre-Trial Report

PAL Defense Counsel Pre-Trial Report	
Prepared and sent 60 days before trial	
<p>The trial plan should be a succinct summary of the whole case. When it is read by Claims and insureds, there should be no doubt that Counsel has a total grasp of the facts, issues, witnesses, etc. The plan should convey that Counsel, in concert with his/her client, has a blueprint as to how the case will be presented at trial.</p>	
<p><b>WARNING: ENSURE THIS REPORT DOES NOT INCLUDE THE FOLLOWING NPI:</b></p> <ul style="list-style-type: none"> <li>• home address</li> <li>• dates of birth</li> <li>• social security numbers</li> <li>• tax id numbers or EINs</li> </ul>	
<p><b>***PAL Defense Counsel Pre-Trial Report***</b></p>	
Claim #	
Adjuster	
Date Prepared	
Case Caption	
Client(s)	
Trial Date	
Court	
TRIAL STRATEGY	
Has there been an agreement with claims to put this case into Trial Strategy?	
TRIAL PLAN OVERVIEW	
Facts of the case and how they will be presented at trial, including expected witnesses and testimony:	
LIABILITY	
Plaintiff's theory of liability, including allegations against Co-Defendants:	
Theory of defense and facts in support thereof, including applicable immunities:	
Estimated % chance of verdict in favor of insured:	
Estimated comparative negligence of parties:	
DAMAGES	
<p><b>Personal injury:</b> Describe injury, permanency claimed, pre-existing conditions and causal relationship of injury to accident. Include age, sex, marital status, occupation at time of loss, current occupation or disability status and IME results, if applicable.</p>	
Alleged Medical Specials: \$	
Verified (Y/N)?	

Alleged Future Medical: \$	
Alleged Lost Wages: \$	
Verified (Y/N)?	
Alleged Future Income Loss: \$	
Can future damages be reduced to present value?	
Estimated comparative negligence of parties:	
Property damage and other non-personal injuries:	
Have punitive damages been pled? If yes, explain the threshold requirements, amount recoverable.	
Pre-judgment and post-judgment interest potential? If so, how calculated?	
Lien holders:	
ASSESSMENT	
Venue:	Jurisdiction:
<p><b>Key strengths and weaknesses of the case:</b> <i>Include an assessment of the jurisdiction, any prior similar case jury verdicts, jury pool, judge, opposing counsel, parties, key witnesses (include brief statement of favorable and unfavorable testimony including experts) and the venue (advantage or disadvantage to all parties/jury pool):</i></p>	
Settlement status (Last demand, last offers):	
Pre-trial motions, motions in limine <b>expected results and impact:</b>	
Verdict potential (insured and all parties): To Be Discussed by Claims and Legal	
Should a hi-lo be considered?	
Statutory caps (if any):	
Settlement potential and recommended strategy (if applicable): To Be Discussed by Claims and Legal	
What are your proposed jury instructions? Is plaintiff likely to agree? What will the jury see on the verdict form?	
OTHER	
<p>Have Claims and Legal informed the Insured/Defendant and has Claims informed the Excess/Umbrella carrier of all demands and offers?</p> <p>Should an appeal be necessary, what are the rules of the court?</p> <p>Number of days to file Post-Trial Motions, number of days to appeal, potential costs of appeal, cost of appeal bond (or will available policy coverage be acceptable)?</p> <p>Other issues, concerns and comments.</p>	
<p><b>Next Contact Point</b></p> <p><b>EXPENSE ESTIMATE</b></p> <p>Update expense estimate through trial. If the previous estimate is still applicable, there should be an affirmative statement to claims acknowledging that the previous budget is still viable.</p>	

## Appendix B – Cost Range Estimate Example (used for cases under \$5000 in expected fees/costs)

- Pleadings - Prepare Answer, 1 hour @ \$150
- Motion Practice – Prepare Motion to Compel Discovery, .8 hour @ \$150
- Paper Discovery - .5 hour @ \$150
- Conferences – Prepare and attend pre-trial conference @ 4.5 hours @ \$150
- Depositions – Plaintiff and defendant, 7 hours @ \$150
- Other litigation costs – IME exam and report
- Anticipated incurred costs prior to trial prep - \$2070