

Solicitation Number R-10-034-MF
Legal Services for Labor & Employment Law
Questions and Answers
May 5, 2010

1. **Question:** What is meant by the term “involved in” and “claim or litigation” in question 10(c) of the Respondent Questionnaire?

Answer: Question 10(c) of the Respondent Questionnaire will be revised as follows:

“Has your firm or any member of your firm been a **defendant party** to litigation with the San Antonio Water System or any other federal, state or local government or private entity during the last 10 years?”

2. **Question:** What is meant by the term “litigation” used in question 10(d) of the Respondent Questionnaire? Does the term “litigation” include administrative matters before TCEQ and Water Districts or only actual lawsuits? Please clarify.

Answer: Question 10(d) will be revised as follows:

“Has your firm or any member of your firm either individually or as representative of another person or entity filed a claim or lawsuit **against** the City of San Antonio, SAWS or CPS Energy within the last 10 years?”

The response should include administrative matters as well as actual lawsuits.

3. **Question:** What is the estimated amount SAWS spent in 2009 for outside counsel for Labor and Employment Law, Construction Litigation and Tort/Negligence Defense?

Answer: It is estimated that SAWS spent approximately \$482,532 in 2009 on outside counsel for Labor and Employment Law.

It is estimated that SAWS spent approximately \$637,752 in 2009 on outside counsel for Construction Litigation.

It is estimated that SAWS spent approximately \$98,617 in 2009 on outside counsel for Tort/Negligence Defense.