



**CENTRALBIDDING**  
FROM CENTRAL AUCTION HOUSE

**SOQ 24-016-Provide Various Professional Legal Services for Jefferson  
Parish**  
Jefferson Parish Government

Project documents obtained from [www.CentralBidding.com](http://www.CentralBidding.com)  
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## **Professional Legal Services Questionnaire Instructions**

- The Professional Legal Services Questionnaire shall be used for outside legal services.
- **The Professional Legal Services Questionnaire should be completely filled out. Complete and attach ALL sections. Insert “N/A” or “None” if a section does not apply or if there is no information to provide.**
- Questionnaire must be signed by an authorized representative of the Firm. Failure to sign the questionnaire shall result in disqualification of proposer pursuant to J.P. Code of Ordinances Sec. 2-928.
- All subcontractors must be listed in the appropriate section of the Questionnaire. Each subcontractor must provide a complete copy of the Professional Legal Services Questionnaire, applicable licenses, and any other information required by the advertisement. Failure to provide the subcontractors' complete questionnaire(s), applicable licenses, and any other information required by the advertisement shall result in disqualification of proposer pursuant to J.P. Code of Ordinances Sec. 2-928.
- If additional pages are needed, attach them to the questionnaire and include all applicable information that is required by the questionnaire.

## Professional Legal Services Questionnaire

### A. Person or Firm Name & Principal Address:

Mouledoux Bland Legrand & Brackett, LLC  
701 Poydras Street  
Suite 600  
New Orleans, LA 70139-7701

### B. Name, Title, & contact information of Firm Representative, as defined in Section 2-926 of the Jefferson Parish Code of Ordinances, who is licensed to practice law in the State of Louisiana with a minimum of five (5) years' experience:

Mark E. Hanna  
Member  
Telephone: (504) 595-3000  
Cell: (504) 400-1081  
Facsimile: (504) 522-2121  
Email: mhanna@mbllb.com

### C. Location of the principal:

701 Poydras Street  
Suite 600  
New Orleans, Louisiana 70139-7701

### D. Please check the legal field or fields in which Firm is qualified to perform services for Jefferson Parish and include the number of years of experience in that particular field.

<input type="checkbox"/> Bond Services (Years: <u>      </u> )	<input type="checkbox"/> Science & Technology Law (Years: <u>      </u> )
<input type="checkbox"/> Elections (Years: <u>      </u> )	<input checked="" type="checkbox"/> State & Local Government Law (Years: <u>32</u> )
<input checked="" type="checkbox"/> Administrative & Regulatory (Years: <u>40</u> )	<input type="checkbox"/> Taxation (Years: <u>      </u> )
<input type="checkbox"/> Antitrust Law (Years: <u>      </u> )	<input checked="" type="checkbox"/> Tort Trial & Insurance Practices (Years: <u>44</u> )
<input checked="" type="checkbox"/> Business Law (Years: <u>35</u> )	<input checked="" type="checkbox"/> Complex Litigation (including asbestos litigation) (Years: <u>32</u> )
<input type="checkbox"/> Criminal Justice (Years: <u>      </u> )	<input type="checkbox"/> Securities (Years: <u>      </u> )
<input checked="" type="checkbox"/> Dispute Resolution (Years: <u>20</u> )	<input type="checkbox"/> Ethics Law (Years: <u>      </u> )
<input checked="" type="checkbox"/> Environmental, Energy & Resources (Years: <u>35</u> )	<input checked="" type="checkbox"/> Civil Service Matters (Years: <u>32</u> )
<input type="checkbox"/> Health Law (Years: <u>      </u> )	<input checked="" type="checkbox"/> Civil Rights & the Constitution (Years: <u>32</u> )
<input type="checkbox"/> Intellectual Property (Years: <u>      </u> )	<input checked="" type="checkbox"/> Municipal Representation (including liability & intergovernmental conflicts) (Years: <u>32</u> )
<input type="checkbox"/> International Law (Years: <u>      </u> )	<input checked="" type="checkbox"/> Code Enforcement Matters (Years: <u>20</u> )
<input type="checkbox"/> Labor & Employment Law (Years: <u>      </u> )	
<input checked="" type="checkbox"/> Public Contract Law (Years: <u>24</u> )	

## Professional Legal Services Questionnaire

<input type="checkbox"/> Public Utilities Law (Years: _____) <input type="checkbox"/> Communications Law (Years: _____) <input checked="" type="checkbox"/> Transportation Law (Years: <u>35</u> ) <input checked="" type="checkbox"/> Property (Years: <u>24</u> ) <input type="checkbox"/> Trust & Estate Law (Years: _____) <input type="checkbox"/> Other/specific project as required by the advertisement (Years: _____)	<input type="checkbox"/> Oil Spill Litigation (Years: _____) <input type="checkbox"/> Public Finance (Years: _____) <input checked="" type="checkbox"/> Land Use, Planning & Zoning Law (Years: <u>24</u> ) <input type="checkbox"/> Economic Development (Years: _____) <input checked="" type="checkbox"/> Construction Law (Years: <u>20</u> )
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**E. List all subcontractors anticipated for this Project. Please note that all subcontractors must submit a fully completed copy of this questionnaire, applicable licenses, and any other information required by the advertisement. See Jefferson Parish Code of Ordinances, Sec. 2-928(a)(3). Please attach additional pages if necessary.**

Name & Address:	Specialty:	Worked with Firm Before (Yes or No):
1. None.		
2.		
3.		
4.		

## Professional Legal Services Questionnaire

### **F. Professional Training and experience in relation to the type of work required for the outside legal services.**

Mouledoux Bland Legrand & Brackett is an experienced law firm of forty-two (42) attorneys dedicated to providing the highest level of professional legal services, enabling Mouledoux Bland Legrand & Brackett to consistently resolve matters for our clients in the most effective and expedient manner possible. State-of-the-art research, communications and office management tools provide our clients with the most up-to-date resources regarding all areas of law and industry. (Please see attached additional information.)



### **G. Size of Firm and capacity for timely completion of newly assigned work considering the number of professional and support personnel required to perform the type of outside legal services tasks and the Firm's current unfinished workload.**

Mouledoux Bland Legrand & Brackett has forty-two (42) attorneys, fourteen (14) paralegals and fifteen (15) other support staff able to fully support the legal needs of our clients. Our experienced associate attorneys and paralegals will be utilized where appropriate, productive and cost-efficient. Mouledoux Bland Legrand & Brackett attorneys work in teams on larger cases and where otherwise appropriate to timely meet deadlines and to separate useful facts and data within often extensive documents beneficial to the client's interests. Significant events such as trials, hearings and depositions will be attended by only the most senior, experienced attorneys. Mouledoux Bland Legrand & Brackett takes pride in its efficient, cost-effective representation of its valued clients.

## Professional Legal Services Questionnaire

<b>i. Please specify the total number of support staff that may assist in the completion of a matter for each area of the law selected above: <u>15</u></b>		
<b>ii. List any attorneys that may assist in the completion of a matter for each area of the law selected above. If necessary, please attach additional documentation that demonstrates the employment history and experience of the Firm's attorneys that may assist in the completion of this Project (i.e. resume). Please attach additional pages if necessary.</b>		
Name:	Legal Field:	Years of Experience in Legal Field:
<b>1.</b>  Mark E. Hanna	State and local government Tort trial and insurance practice Civil Rights Municipal representation Dispute resolution Complex litigation Civil Service matters Business law Public contract Transportation Construction	35
<b>2.</b>  Wilton E. Bland, III	Transportation Tort trial and insurance practice Environmental energy and resources	49
<b>3.</b>  Georges M. Legrand	Tort trial and insurance practice Transportation defense	45
<b>4.</b>  Alan G. Brackett	Administrative law and regulatory Tort trial and insurance practice Complex litigation	40
<b>5.</b>  Trevor M. Cutaia	Tort trial and insurance practice Civil Rights Municipal representation Transportation Construction	14

Kathryn L. Briuglio	Tort trial and insurance practice Civil rights Municipal representation Transportation Construction	2
Dominic J. Carmello	Tort trial and insurance practice Civil rights Municipal representation Transportation Construction	2

## Professional Legal Services Questionnaire

### **H. Past performance by person or Firm on Parish contracts. Please attach additional pages if necessary.**

Mouledoux Bland Legrand & Brackett previously defended Jefferson Parish in the case of "Skyline Steel, LLC v. TL Hawk, et al", No. 801-824, Div. I in the 24th Judicial District Court. This construction matter was concluded with a voluntary Motion to Dismiss as to all defendants, including Jefferson Parish. The Judgment of Dismissal was signed by the Court on April 3, 2020.

Mark Hanna and Trevor Cutaia are currently representing the Parish of Jefferson pursuant to Resolution No. 13790 to provide legal services in "Parish of Jefferson v. Belle Pass Marine Transportation, LLC and ABC Insurance Company", 24th JDC, No. 811-484. Div. A., and "in re Belle Pass Marine Transportation, LLC", USDC-EDLA No. 21-275. This case involves a claim to recover damages from Belle Pass Marine Transportation for damage to a Jefferson Parish waterline in the Gulf Intracoastal Waterway between Crown Point and Lafitte allegedly caused by the company's vessel. The parties reached a recommended settlement on July 28, 2023 in the amount of \$175,000 that was later approved by Parish Council Resolution No. 142430 on August 9, 2023. Both cases have subsequently been dismissed.

### **I. Adversarial legal proceedings between the Parish and the person or Firm performing professional services, in which the Parish prevailed, and excluding those instances or cases where the person or Firm was added as an indispensable party, or where the person or Firm participated in or assisted the public entity in prosecution of its claim. In the event that the person or Firm fails to provide accurate and detailed information regarding legal proceedings with the Parish, including the absence of legal proceedings, the person or firm shall be deemed unresponsive with regard to this category, and zero (0) points shall be awarded. Please attach additional pages if necessary.**

There are no adversarial legal proceedings between the Parish and Mouledoux Bland Legrand & Brackett or its attorneys in which Jefferson Parish prevailed.



## Professional Legal Services Questionnaire

**J. Prior successful completion of projects of the type and nature of legal services, as defined, for which Firm has provided verifiable references. (List no more than 10 projects.)**

**1.**

Thomas v. Officer Robert Tewis, et al, United States District Court, Eastern District of Louisiana, No. 21-cv-00698

in this excessive force and claims of unreasonable seizure in violation of the 4th Amendment, Mark Hanna and Trevor Cutaia represented the defendant officers of the East Jefferson Levee District. The officers were granted summary judgment on September 8, 2022 and the matter is currently on appeal to the United States Fifth Circuit Court of Appeals.

**2.**

Wilson v. City of Bastrop, et al, United States District Court, Western District of Louisiana, No. 20-cv-351

In this deadly force case, Mark Hanna, Trevor Cutaia and Joseph Trytten secured summary judgment based on qualified immunity as to the involved police officers. The Court also dismissed the Monell claim against Bastrop. The Judgment of Dismissal was affirmed by the U.S. Fifth Circuit Court of Appeals in case No. 21-30204 on February 21, 2022.

**3.**

Muthuswamy v. Michael Liberto, et al, United States District Court, Eastern District of Louisiana, No. 19-cv-112

In this use of force action brought under 42 U.S.C. §1983, Mark Hanna and Trevor Cutaia represented Officer Michael Liberto of the Covington Police Department. Officer Liberto's Motion for Summary Judgment was based on the Heck bar as plaintiff had previously pled guilty to resisting arrest. There was no appeal from the Court's Judgment of Dismissal.

**4.**

Verdin v. Cook, et al, United States District Court, Eastern District of Louisiana, No. 18-cv-548

In this use of force action brought under 42 U.S.C. §1983, Mark Hanna and Trevor Cutaia represented sheriff's deputies Cook and Cehan, formerly of the Terrebonne Parish Sheriff's Office, in an excessive force case brought pursuant to 42 U.S.C. §1983. The matter was dismissed on summary judgment based on the deputies' qualified immunity. The dismissal was affirmed by the U.S. Fifth Circuit Court of Appeals in case No. 19-30588 on March 10, 2020.

**5.**

Alexander v. Parish of St. John the Baptist, 12-173 (La. App. 5 Cir. 10/16/12), 102 So. 3d 904

Mr. Hanna represented the Pontchartrain Levee District when an all terrain vehicle (ATV) passenger filed a personal injury complaint against the parish, levee district and others after the ATV struck an above-ground water plant pipe line on the Mississippi River levee, resulting in a fractured mandible, broken cheek bone, fractured teeth and a fractured foot to the passenger. After extensive discovery and briefing on the summary judgment issues, Mr. Hanna obtained a judgment in favor of the levee district with the Court agreeing that the levee district did not owe a duty to the ATV passenger.

The summary judgment was affirmed on appeal.

## Professional Legal Services Questionnaire

6.

White v. City of Kenner ex. rel. Police Dept. 08-195 (La. App. 5 Cir. 09/16/08) 996 So. 2d 294

Mr. Hanna represented the City of Kenner and its police department in an action brought by the passenger in an automobile that had been involved in an auto accident at Loyola Drive and Interstate 10, alleging he was deprived of his right to pursue an action against an unknown driver. The plaintiff alleged that the investigating Kenner police officer failed to obtain the driver's information pursuant to Louisiana Revised Statute 32:398 and Louisiana Revised Statute 14:133. The trial court granted summary judgment to the City of Kenner. The Court of Appeal affirmed, finding the officer complied with his statutory duty to investigate the accident and did not file an accident report containing a false statement.

7.

Weaver v. Malinda, 05-693 (La. App. 5 Cir. 03/28/06) 925 So. 2d 763

Mr. Hanna represented the East Jefferson Levee District in several consolidated lawsuits brought after a catastrophic auto accident on Jefferson Highway resulting in two deaths and several serious injuries. The Levee District had entered into a contract with the State DOTD to maintain the neutral ground on Jefferson Highway by cutting the grass, a neighboring apartment complex had "adopted" the neutral ground under contract with Jefferson Parish and had a contract with a landscaper to maintain bushes and shrubs planted in the neutral ground. Plaintiff's contended that the bushes and shrubs presented a "sight obstruction" in violation of law. Following a hearing on a Motion for Summary Judgment after extensive discovery, the trial Judge granted Summary Judgment to the Levee District. The Louisiana Fifth Circuit Court of Appeal affirmed finding the Levee District did not have care, custody or control over the neutral ground near the intersection at the time of the auto accident.

8.

Board of Commissioners for the Lake Borgne Basin Levee District v. Hanover Insurance Company, US District Court, Eastern District of Louisiana, 06-CV-11417

Mark Hanna represented the Lake Borgne Basin Levee District in its extensive insurance action for damage and loss associated with Hurricane Katrina. After extensive and complex negotiations, the matter was settled favorably to the Lake Borgne Basin Levee District and Dismissed.

9.

Anderson v. St. Bernard Parish, 543 So. 2d 537 (La. App. 4 Cir. 1989)

A parish employee was seriously injured while working as a grass cutting tractor operator and sued the police jury and members of the police jury contending that because the grass was being cut on private property, that he was not limited to workers' compensation as his exclusive remedy against his employer. Mr. Bland represented the St. Bernard Parish police jury and filed a motion for summary judgment which was granted by the trial court. that the defendants were immune from suit in tort in that

10.

Tusa v. City of Kenner Police Department, 10-791 (La. App. 5 Cir. 05/10/11), 64 So. 3d 904

Mr. Hanna represented the City of Kenner and its police department in a state workers' compensation proceeding in which the Claimant alleged that he suffered a work related knee injury that caused him to retire. After trial, the workers' compensation judge denied Tusa's claim for supplemental earnings benefits ("SEB's") for his knee injury. The Louisiana Fifth Circuit Court of Appeals affirmed, finding that Tusa failed to prove his work related accident caused any knee disability.

### Professional Legal Services Questionnaire

**K. Use this space to provide any additional information or description of resources supporting Firm's qualifications for the proposed project.**

Mouledoux, Bland, Legrand & Brackett employs the newest in technology and a "paperless" approach to file management where appropriate and all attorneys in the firm have iPhones and remote access to case files providing 24/7 accessibility to the firm's network and clients. Mouledoux Bland Legrand & Brackett has the current capacity to take on new assignments, including matters for Jefferson Parish.

**L. To the best of my knowledge, the foregoing is an accurate statement of facts.**

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

*Mark E. Hanna*

MARK E. HANNA

MEMBER

JUNE 7, 2024

## **Professional Legal Services Questionnaire – Section F. Additional Information**

Mouledoux, Bland, Legrand & Brackett has been the recipient of numerous accolades including being rated as an “AV” law firm (highest rating) by Martindale-Hubbell Legal Directories and is listed in Best’s Recommended Insurance Attorneys. The firm was selected by a Fortune 500 Company client for inclusion in the exclusive list of “Go To” law firms in Corporate Counsel Magazine and has been listed in City Business as one of the “Best Places to Work.” Several of Mouledoux, Bland, Legrand & Brackett’s attorneys have individually received Martindale-Hubbell’s highest “AV” rating, have been listed in “Super Lawyers” and in New Orleans Magazine’s annual list of “Top Lawyers”.

Our firm knows the law when it comes to representing governmental entities.

Mark E. Hanna has received Martindale-Hubbell’s highest rating of “AV” preeminent, 5.0 out of 5.0 and is currently listed as a “Super Lawyer” in civil litigation defense and as a “Top Lawyer” in municipal law in New Orleans Magazine. Mr. Hanna is a 1988 graduate of Tulane University Law School. As a result of Mr. Hanna’s 35 years of experience in Municipal Law, he has represented numerous political subdivisions in Southeast Louisiana including:

1. St. Tammany Parish Sheriff
2. City of Mandeville
3. City of Covington
4. St. Bernard Parish School Board
5. St. Bernard Parish Government
6. Lake Borgne Basin Levee District
7. Orleans Parish Levee District
8. Jefferson Parish Sheriff
9. Jefferson Parish School Board
10. East Jefferson Levee District
11. City of Kenner/Kenner Police Department
12. St. Charles Parish Sheriff
13. City of Westwego
14. City of Gretna
15. Terrebonne Parish Sheriff
16. Pontchartrain Levee District
17. St. John Parish School Board
18. St. John Parish Sheriff
19. Southeast Louisiana Flood Protection Authority – East
20. St. Tammany Parish Government
21. Patterson City Government
22. City of New Iberia
23. City of Plaquemine
24. City of New Roads
25. City of Bastrop
26. St. Tammany Parish Mosquito Abatement District

27. Hurstville Security and Neighborhood Improvement District
28. City of Franklinton

Mr. Hanna has first-chaired jury and bench trials throughout the State and Federal Courts and has argued appeals in the Louisiana Supreme Court; First, Second, Fourth and Fifth Circuit Courts of Appeal and the United States Fifth Circuit Court of Appeal.

Mr. Hanna has been active with the Defense Research Institute (DRI) and its Civil Rights and Government Liability Committee, where he currently serves on the Steering Committee, served as 2017 Program Chair, and as Land Use SLG Chair, and with the Claims and Litigation Management (CLM) Alliance, where he has been a member of the Municipal Law committee. Mr. Hanna has also participated in meetings of the Louisiana Association of Levee Boards. Mr. Hanna has been a speaker to the Jefferson Parish Attorney's Office, DRI, CLM and the Public Risk Insurance Managers' Association ("PRIMA") on a number of issues pertaining to municipal law. Mr. Hanna's speaking engagements include:

1. Claims and Litigation Management (CLM) Alliance, Annual Conference, March 24, 2011, "Civil Rights and Government Liability: Case Evaluation and Claims Handling"
2. Jefferson Parish Attorney's Office, May 5, 2011, "Initial Procedural Defenses to Liability Under 42 U.S.C. § 1983 and Louisiana State Law in Code Enforcement Cases"
3. Claims and Litigation Management (CLM) Alliance, webinar, November 16, 2011 "The Strategic Use of Heck v. Humphrey to Bar or Potentially Limit Plaintiff's Claims under § 1983 and State Law"
4. Defense Research Institute, Civil Rights and Governmental Tort Liability Seminar, February 2-3, 2012, "No Lawyer? No Problem! Practical Tips for Handling Pro Se Litigants"
5. Louisiana Association of Defense Counsel, Associate Skills Set Seminar # 3, April 5, 2012, "Mediation and Arbitration"
6. ADR, Inc., February 21, 2013, "Mediation vs. Arbitration: What is Best for Your Case?"
7. Claims and Litigation Management (CLM) Alliance Annual Conference, April 11, 2013, "Risk Management Perspectives for Representing Municipal Clients"
8. Honorable Order of the Blue Goose International, September 17, 2013, "Case Evaluation and Claims Handling in Louisiana"

9. Claims and Litigation Management (CLM) Alliance, Annual Conference, April 10, 2014, "Emerging LGBT Issues for Municipalities, Schools and Other Public Entities"

Mr. Hanna is a member of the Louisiana State Bar Association, the Defense Research Institute, Claims and Litigation Management Alliance, the Louisiana Association of Defense Counsel, the New Orleans and Jefferson Bar Associations and the Louisiana Bar Foundation.

Mr. Hanna has addressed numerous legal matters for the Lake Borgne Basin Levee District including civil service and employment matters; tort and general liability defense; real estate matters, including servitudes, title opinions, etc.; general litigation including "takings" of property and inverse condemnation proceedings; public bid law; insurance matters; contracts; oil and gas matters as well as criminal investigations and addressing media requests for investigative interviews.

Wilton ("Will") Bland, III has received Martindale Hubbell's highest rating of "AV" preeminent, 5.0 out of 5.0 and is currently listed as a "Top Lawyer" in transportation law as well as admiralty and maritime law in New Orleans Magazine. Mr. Bland is a 1975 graduate of Tulane University Law School. As a result of Mr. Bland's 49 years of practice, he has represented Parish Governments in casualty and personal injury matters and defended the Louisiana Dept. of Wildlife and Fisheries in numerous vivrio oyster death cases. Will has handled numerous jury and bench trials to verdict in the State and Federal Courts across Louisiana. Mr. Bland is a member of the Louisiana Association of Defense Counsel.

Georges M. Legrand has received Martindale Hubbell's highest rating of "AV" preeminent, 5.0 out of 5.0 and is currently listed in Super Lawyers. Mr. Legrand is a 1979 graduate of Loyola University Law School. Mr. Legrand has 45 years of experience in defending tort, trial and insurance practice cases and several years of transportation defense work. Mr. Legrand is a member of The Louisiana Association of Defense Counsel and has received The City Business Leadership in Law Award for his skill in the legal community as well as his contributions to civil activities.

Alan G. Brackett has received Martindale Hubbell's highest rating of "AV" preeminent, 5.0 out of 5.0 and is currently listed in Super Lawyers and New Orleans Magazine Top Lawyers in the field of workers compensation law and insurance law. Mr. Brackett has an AVVO rating of 10.0, superb. Mr. Brackett is a 1984 graduate of Tulane University Law School. Mr. Brackett is a member of the Louisiana Association of Defense Counsel as well as the New Orleans Association of Defense Counsel. He has litigated administrative law and regulatory practice matters and tort, trial and insurance matters for 40 years. He also has extensive experience in defending asbestos cases.

Trevor M. Cutaia is currently listed as a Super Lawyers Rising Star in civil litigation defense. Mr. Cutaia is a 2010 magna cum laude graduate of Loyola University Law School where he was a William L. Crowe Sr. Scholar and an editor of the Loyola Law

Review. He currently represents municipal and other governmental clients in a broad range of matters, including in 42 U.S.C. §1983 litigation and state law matters. He also has extensive experience in insurance and general casualty defense.

Kathryn L. Briuglio is a 2022 cum laude graduate of Loyola University Law School where she obtained certificates in Social Justice and Law, Technology and Entrepreneurship. She currently represents municipal and other governmental clients in a broad range of matters, including in 42 U.S.C. §1983 litigation and state law matters. She also has extensive experience in insurance and general casualty defense.

Dominic Carmello is a 2022 graduate of Loyola University Law School where he participated as a judge in the Louisiana High School Moot Court Competition. He currently represents municipal and other governmental clients in §1983 and state law matters.

Mouledoux, Bland, Legrand & Brackett has the experience, manpower and resources to handle many legal issues encountered by Jefferson Parish.