



## Memorandum

**Date:** January 16, 1998

**To:** [Seminar Students]

**From:** John-Mark Stensvaag *JMS*

**Re:** *Suggested Organization of Plaintiffs' Strategy Memos*

The purpose of this memo is to suggest a possible organization for the initial Plaintiff's Strategy Memo. You need not adhere to this suggestion, but the following strikes me as a pretty thorough list of the topics that you will probably want to cover, in a reasonably logical order:

- I. Client
- II. Potential Defendant(s)
- III. Currently Available Documents
- IV. Violations
- V. Causes of Action
- VI. Remedies
- VII. Forum
  - A. Court (State or Federal)
  - B. Subject Matter Jurisdiction
  - C. Venue
- VIII. Anticipated Procedural Steps
- IX. Anticipated Defenses/Obstacles
- X. Issues Needing Legal/Factual Research
- XI. Prospects for Recovery
- XII. Other Strategy Considerations
  - A. Press conference or press release?