INTRODUCTION

Many of our clients are asking important questions about legal issues related to the COVID-19 pandemic. This issue of our Newsletter attempts to addresses many of these issues.

As always, please feel free to contact us with any questions you may have in relation to any of the topics covered in this Newsletter. This is a fluid situation and many issues, such as the response of various levels of government are continuing to evolve.

A special thank you to all of your members who continue to work despite the challenges and risks to themselves and their safety and health.

We wish everyone good health.

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A. THE ONTARIO LABOUR RELATIONS BOARD – PROCESS IN THIS TIME OF COVID-19

Melissa Kronick

This article is a summary of some new processes in place at the Ontario Labour Relations Board (OLRB/the Board) in this time of COVID-19.

Firstly, the OLRB, at the time of writing, has cancelled all **in-person hearings** up to and including May 4, 2020. However, the Board will consider requests for teleconference and video conference hearings (probably by Skype Business or Zoom) in appropriate cases. Rule 38.5 of the Board's Rules (pre-existing) deals with electronic hearings. There is a body of caselaw under Rule 38.5 from "pre COVID-19 days" which the Board may look to, but as the Board has suspended in-person hearings for the immediate future, and as the technology is more advanced and user-friendly, it is my view that the Board should take a broader approach to such requests, and as well for requests to have more issues determined through written submissions.

In a recent decision dealing with a request for a teleconference or video conference hearing, the Board declined a request by the Labourers Union to have a hearing continue by video or teleconference. There had been lengthy in-person submissions on a particular issue already made by the Labourers, and there were large volumes of materials which had been difficult to manage even in person. The Board found in these circumstances that to continue by teleconference or video conference would be unfair and not appropriate: *Berkim Construction Inc.,* Decision of Vice Chair Maurice Green dated March 30, 2020.

The Board will continue to accept applications, Section 133 grievance referrals, interventions and responses, but all forms, responses, submissions, documents and any materials must be filed electronically. The Board's mail room is closed, so you cannot file anything by fax or courier. (March 25, 2020)

For applications for certification and termination, membership evidence must also be filed electronically.

In addition, for certification, displacement and termination applications, the Applicant is now also required to confirm to the Board that the Employer is continuing to operate and carry on business. The forms (A-1, A-6, A-71 and A-77) have been modified to include this additional declaration directly as part of the application forms.

At a recent OLRB Advisory Committee meeting held on March 30th, the Board dismissed the suggestion made by some management side labour law firms that it should suspend the filing and processing of applications for certification indefinitely because of the COVID -19 Crisis.

The Board has also determined that it will continue to consider any request for an extension of a time period on a case-by-case basis. In its March 23, 2020 Notice to the Community it states:

> "**Please be advised that the Board is exercising its discretion <u>NOT</u> to suspend the time periods in which steps must be taken in its proceedings. So long as the required declarations that an employer is continuing to operate and carry on business have been made, the Board will process applications in the usual course. The Board will continue, however, to exercise its discretion to extend timelines at the request of the parties to proceedings, as may be appropriate in all of the circumstances and where there is a specific and compelling reason to do so."**

At the March 30th OLRB Advisory Committee Meeting, the Board also dismissed a request made by some management side labour law firms that the Board should make a blanket extension of time periods during this time of COVID-19 Crisis.

The Board has continued to issue Default Decisions in Section 133 Grievance Referrals. However, the Applicant was required to confirm that it had direct knowledge that the Employer was operating (*Van Horne Construction Limited*, decision of the Bernard Fishbein, dated March 31, 2020).

So, what does all this mean? It is my view that, for now, Board is intent on carrying on its statutory mandate and modifying its processes to allow it to do so The landscape is changing daily for everyone, including the Board and, of course, all this is subject to any additional emergency measures that may be made by the Province.

B. THE WSIB'S APPROACH TO COVID-19

Rita De Fazio

As of April 5, 2020, there were 4,038 confirmed cases of COVID-19 in Ontario, including 146 deaths related to COVID-19. As the number of confirmed cases continues to grow daily, those who are still working have growing concerns about contracting COVID-19 while on the job.

The Workplace Safety and Insurance Board (WSIB) provides compensation to workers who experience an illness or injury that arises out of and in the course of employment. In response to the current pandemic, the WSIB has released an Adjudicative Approach Document that provides guidelines for decision-makers. The WSIB has previously dealt with communicable diseases such as Severe Acute Respiratory Syndrome (SARS) in a similar fashion. As with adjudication of SARS claims, claims that arise as a result of COVID-19 will be adjudicated on a case-by-case basis.

Who Will be Granted Entitlement for an Illness Resulting from COVID-19?

Claims for entitlement to COVID-19 will only be granted if the illness arose as a result of an individual's work. In determining whether there is a causal connection between one's work and a diagnosis of COVID-19, the decision-maker will consider whether:

1. The nature of the worker's employment created a risk of contracting the disease to which the public at large is not normally exposed; and

2. The WSIB is satisfied that the worker's COVID-19 condition has been confirmed.

While the criteria for a successful COVID-19 claim may seem broad at first glance, there is no telling whether the policy will be as broad in application. The vagueness of the criteria leaves it open to decision-makers to unnecessarily limit entitlement based on arbitrary factors that are not outlined in the policy. For instance, while it may be likely that a healthcare worker will be considered to experience a greater than normal risk of exposure to COVID-19, there is no indication that those in public-facing jobs, such as grocery store clerks, will be assessed as having a greater risk than one that the public at large is normally exposed to. There is no clarity regarding whether workers who are exposed to less than ideal conditions on the job, such as those in the construction industry without running water or soap available, will be assessed as being at a greater risk.

The WSIB's Adjudicative Approach Document outlines factors a decision-maker may consider in determining whether a worker's COVID-19 condition has been confirmed include considering whether the incubation period aligns with the exposure and onset of the illness. A decision-maker may also consider whether a worker has a confirmed diagnosis of COVID-19. These considerations also pose challenges. While Ontario has been ramping up testing capabilities recently, the province is still prioritizing testing for individuals who meet a set of specific criteria, meaning that those with mild symptoms will likely be told to remain home and self-isolate rather than being tested for COVID-19. As family doctors and walk-in clinics do not currently have the capability of testing for COVID-19, it is unclear whether doctors will be able to provide a medical opinion that will be accepted by the WSIB in the absence of confirmation of the COVID-19 diagnosis through testing. Moreover, in the event that an individual is diagnosed with COVID-19 but is asymptomatic or is sent home from employment on a precautionary basis, the WSIB will not provide coverage.

As with other claims, workers who are granted entitlement may be eligible for loss of earnings benefits to compensate for missed time from work as well as healthcare benefits and benefits in the event of a permanent impairment.

C. OHSA AND HEALTH CARE WORKERS IN THE TIME OF COVID-19

Aleisha Stevens

While many businesses have been ordered closed and the general population practices social distancing, these measures designed to "flatten the curve" and prevent the spread of COVID-19 are not available to most workers in the healthcare industry. Deemed an "essential service", employees in institutions such as hospitals and long-term care homes continue to attend work to ensure the ongoing health and wellbeing of the population.

Although Ontario's *Occupational Health and Safety Act* allows employees to refuse dangerous work, Health Care workers and workers in hospitals and other care institutions have a more limited right to refuse work than others. They are generally not entitled to refuse unsafe work that is inherent in their work – such as exposure to virus – or when their refusal to work would directly endanger the life, health or safety or another person.

The reasonableness of a refusal to work on the part of a Health Care worker will be assessed on an individual basis. For example, a workplace may not pose a risk of danger if an employee is in a low-risk age bracket and healthy. The conclusion may be different for an older worker with a pre-existing condition or a compromised immune system. Individuals at greater risk will require heightened accommodation from employers, which may include working from home where possible, or approved leave from work.

Employers have a positive obligation to take all reasonable steps to ensure the safety of employees. A failure to do so – by failing to provide the necessary tools to safely perform the work - means that even Health Care workers could invoke the right to refuse dangerous work. Examples could include the following:

- A lack of proper PPE;
- A failure to staff properly if it creates a work hazard; or
- A failure to abide by a Medical Officer of Health directive or guideline regarding proper protocols.

In certain workplaces where there is a higher risk of infection, greater precautions are expected. This includes monitoring who has access to the facility, regular disinfection, proper protective equipment and constant communication and education. With reports of hospitals and long-term care employers running short of N95 masks for front-line workers, the industry is seeing an increase in work refusals. Whether they are justified is determined by the Ministry of Labour on a case-by-case basis.

Unions can help their membership by ensuring individuals are considered and assessed on a case-by-case basis for leave or accommodated positions. It is also crucial to ensure that employers have a known policy regarding employee safety during the COVID-19 pandemic. The policy should include protective measures being taken and, wherever possible, preservation of wages and benefits where employees cannot work due to COVID-19.

D. ZOOMING IN ON LABOUR ARBITRATION IN THE TIME OF COVID-19

Meg Atkinson

COVID-19's impact on in-person hearings in Ontario

Since COVID-19 was declared to be a pandemic by the World Health Organization on March 11, 2020 and confirmed cases in Ontario began to grow, legal proceedings across the province, and indeed the country, have been affected. On March 17, 2020, Ontario enacted a Declaration of Emergency under the *Emergency Management and Civil Protection Act* and on March 23, 2020, the Government of Ontario declared a closure of all "non-essential" workplaces.

With the Ontario Superior Court of Justice suspending regular operations on March 15, 2020, the Ontario Court of Appeal doing the same on March 17, 2020, and the Ontario Labour Relations Board ("OLRB") doing the same on March 19, 2020, most (if not all) labour arbitrators have determined that it is not possible to hold in-person labour arbitrations at this time. Most arbitrators have offered to adjourn scheduled hearings free of charge; many have offered to convene the hearing through online technologies, including primarily through an app called Zoom.

Although tele- or online hearings may be new to many in the labour arbitration community, they have been used in other legal forums, including for legal matters affecting persons in remote communities. The Human Rights Tribunal of Ontario and the Canada Industrial Relations Board ("CIRB") have been holding hearings regarding procedural matters over the telephone for years, and the CIRB has also, for a long time, used secure video conferencing for proceedings on the merits. Ontario Courts and the OLRB are also moving in the direction of proceeding online through applications such as Zoom, CourtCall, and perhaps others.

Videoconferencing technologies are proving to be relatively well adapted to the usual needs of those who engage in labour arbitration,[i] providing some hope in the labour community that hearings can proceed notwithstanding the public health emergency caused by COVID-19.

What is Zoom?

Zoom is a videoconferencing platform that is emerging as the current online forum of choice among labour arbitrators for holding labour arbitrations and mediations. It is free to download and intuitive to use.

The Zoom app allows a "host" to convene a meeting (a hearing). For a labour arbitration, the host would be the arbitrator or another third party to the arbitration (ex: Atchison and Denman). The host must share a link with all persons who wish to participate in the hearing from home. Participants must download the Zoom app onto their device (ideally a laptop with a camera) in advance of the hearing, and simply click the link at the designated meeting start time through the app. In a standard meeting, the camera's image of the participant, along with their voice, is shared with other participants in the meeting over the internet, and all participants can see one another.

Zoom can also be used to convene meetings between counsel, the union and the grievor to prepare for arbitration. In this case, the "host" would be your CaleyWray lawyer, and the meeting functions in the same way.

In a mediation/arbitration setting, the host can set up virtual "rooms;" including a union caucus room, a management caucus room, and a room for counsel to "meet" with the arbitrator/mediator. Once the individuals are in their designated "room," they can speak among themselves without other participants who are not in the room hearing what is being discussed.

In joint sessions, the Zoom app allows a participant to share a document or image from their own computer screen with all other participants in the meeting (or a room). This makes it easy to review and present documents, including video documentation, all together. This has proved very helpful to prepare for the arbitration. Sharing draft documents over Zoom makes drafting and finalizing Minutes of Settlement or other documents highly efficient.

Our firm is pleased to report that several CaleyWray lawyers have already used Zoom to engage effectively in meetings, mediations and arbitrations.

[1] We are aware of some legal and privacy concerns in relation to Zoom; we are monitoring and understand that various bodies are engaged to address these concerns and improve security and privacy on Zoom and other online platforms. We invite any further feedback and information from our clients as we continue to navigate this new territory.

Guidelines for procedure for online hearings

Since the COVID-19 crisis has emerged, some members of the labour arbitration community have been working together to create Guidelines for procedure on how online labour arbitrations might proceed.

The author of this article has participated in an *ad hoc* group of approximately 50 labour lawyers from both the union and management side to develop guidelines for parties to use either as a starting point to generate their own guidelines, or to adopt and agree to for a particular arbitration scheduling process. The Guidelines include obligations of the arbitrator and the participants, pre-hearing matters, process considerations, how to handle documents, how to handle witnesses, and how to handle closing arguments.

The *ad hoc* group is working closely with the Ontario Labour-Management Arbitrators' Association to get the association's approval of the Guidelines as well. It is anticipated that the Guidelines will be finalized by April 10, 2020 or sooner, and subject to review by the *ad hoc* committee after the community has reviewed the Guidelines, used the Guidelines, and is able to offer feedback for improvements. CaleyWray will share these Guidelines with any clients seeking a copy; simply ask a CaleyWray lawyer.

Waiting for an in-person hearing versus proceeding online or remotely

Some parties and counsel have expressed a desire to wait until the COVID-19 emergency passes and reconvene an in-person hearing at that time. Adjourning may be a desirable option for some cases, particularly those where the credibility of a witness to be cross-examined is at play or the litigation is document heavy. However, depending which projections one reviews, it is quite possible that a hold on in-person hearings will last for another number weeks, and more likely, months. For this reason, some arbitrators have determined that a hearing will proceed remotely or online in some form over one of the parties' objection. After all, the adage remains true, particularly for those on the union side: labour relations delayed are labour relations denied. Accordingly, in deciding whether to adjourn or proceed online, one must balance competing interests.

There is no single or correct answer to the question of whether to proceed online or adjourn to an in-person hearing day. It is recommended that you consult with your CaleyWray Lawyer to weigh the pros and cons and make the decision that is right for your file. The good news is that you do have options and, in appropriate cases, videoconferencing platforms are emerging as viable substitutes for in-person mediations and hearings.

E. USE OF ELECTRONIC MEMBERSHIP EVIDENCE IN AN APPLICATION FOR CERTIFICATION

Jesse Kugler

In *United Steel*, 2019 CanLII 123094, the Ontario Labour Relations Board was required to consider the issue of whether or not it should accept electronic membership evidence in support of an Application for Certification. The Board permitted the applicant to do so, but with a cautionary note. The cautionary note was made because the request to rely upon electronic membership evidence was not opposed. Accordingly, the Board noted that it could modify its decision in the face of submissions which oppose the use of electronic membership evidence.

The Board confirmed that its historical practice was to require original membership cards to be filed in support of an application for certification. The Board noted, however, that there was no requirement stipulated in the *Labour Relations Act* or in the Board's rules of procedure that mandated membership evidence must be in the form of paper membership cards.

The decision notes that in filing the application for certification, the Union included a detailed description of the procedure that was utilized in order to collect the electronic membership cards. Specifically, a software program called Adobe Sign was utilized. This permitted a hyperlink to be emailed to each person who then typed in the required fields on the membership card, which included name, date, company name, etc. There was also an opportunity to sign the card using the Adobe "draw" function which permitted a person to sign the card. Significantly, once the card was completed, the software automatically sent a verification request back to the email in the card seeking confirmation of identity. Both the electronically created membership card, as well is the confirming email, were then forwarded to the organizer who utilized this in completing the Form A-4 filed in support of the application for certification as required by the rules of the Board.

In his assessment of the foregoing, Alternate Chair Matthew Wilson noted that the security features utilized by the applicant provided arguably stronger protections than the traditional paper membership card. In support of this conclusion, the Alternate Chair noted the fact that the automatic email that is generated requiring verification of identity, which is then subsequently forwarded to the organizer once again confirming the identity. He also noted that an electronic membership card is encrypted and cannot be modified. On the basis of these security features, he concluded that the electronic membership evidence utilized satisfy the requirements of the *Labour Relations Act*.

The decision concludes with the following observation:

> The acceptance of electronic membership evidence should come as no surprise to the labour relations community as this Board continues to take steps that embrace technology in furtherance of the purposes of the *Act*. Several recent developments illustrate the Board's utilization of technology in its processes. It allows electronic signatures on settlements filed with the Board, most often in matters under the *Employment Standards Act, 2000* where the parties may be unrepresented and not present at the Board. It has conducted hearings by way of Skype and teleconference to either accommodate individuals' needs, enhance accessibility, reduce costs or achieve efficiency of scheduling. The Board now allows electronic filing of most applications and submissions, which has improved accessibility and efficiency. It frequently conducts representation votes electronically and by telephone with the same objectives in mind. While each technological advancement carries its own risks, it has been the Board's experience that the enhanced accessibility and efficiencies outweigh these risks.

Based upon the foregoing, it appears that the clear message of this decision is that it is very likely that the Board will continue to accept electronic membership evidence, but will only do so if sufficient security and validity measures are in place to persuade the Board that it can rely upon the membership evidence as being authentic. In this regard, the filing of an accurate and complete Form A-4 continues to be as important as it has been historically with applications for certification that rely upon membership evidence utilizing paper membership cards.

F. NEW PROVINCIAL AND FEDERAL LEAVE PROVISIONS IN RESPONSE TO COVID-19

Rita De Fazio

The Ontario provincial government and Federal government have introduced new legislation to ensure security of employment for individuals who must take time off from work due to the COVID-19 pandemic. These new measures ensure that employees have job security in light of circumstances that may require them to take a prolonged absence from work.

Provincial Leave

In response to the COVID-19 pandemic, the Ontario government introduced new legislation intended to protect employees. The *Employment Standards Amendment Act (Infectious Disease Emergencies)* provides job-protected leave for employees who are impacted by COVID-19. These new measures are retroactive to the date that the first presumptive case of COVID-19 was confirmed within Ontario, January 25, 2020 and will

not be repealed until COVID-19 is no longer designated as an infectious disease emergency.

Employees who are unable to work for the following reasons will be permitted to take job protected leave:

- The employee is unable to return to Ontario due to travel restrictions;
- The employee has been asked not to work by their employer due to concerns about spreading COVID-19 in the workplace;
- The employee has to provide care to a person for a reason related to COVID-19, for instance, parents who must stay home with their children due to school or daycare closures;
- The employee is being investigated, supervised or treated for a case of COVID-19;
- The employee is in quarantine or isolation in accordance with public health information or direction; or
- The employee is following an order under the *Health Protection and Promotion Act.*

The new legislation also provides leave from work for those who must care for the following individuals:

- A spouse;
- A child, step-child or foster child of the individual or their spouse;
- A child who is under legal guardianship of the individual or their spouse;
- A parent, step-parent or foster parent of the individual or their spouse;
- A brother, step-brother, sister or step-sister of the individual;
- A grandparent, step-grandparent, grandchild or step-grandchild of the individual or their spouse;
- A brother-in-law, step-brother-in-law, sister-in-law or step-sister-in-law of the individual;
- A son-in-law or daughter-in-law of the individual or their spouse;
- An uncle or aunt of the individual or their spouse;
- A nephew or niece of the individual or their spouse;
- The spouse of the individual's grandchild, uncle, aunt, nephew or niece;
- A person who considers the individual to be like a family member, provided the prescribed conditions are met (if any); or
- Any individual prescribed as a family member for the purposes of this section.

Employees will not be required to provide a medical note if they take leave but may be asked to provide evidence that is "reasonable in the circumstances". For instance, an employee looking to take leave to care for their child due to a daycare closure may be asked to produce evidence of the closure, such as a note from the daycare.

The length of leave that employees are permitted to take will vary based on the circumstances. For instance, someone who has been ordered to quarantine for 14 days will likely be granted leave for the duration of that time. In contrast, an individual who requires leave in order to care for a sick family may require leave of an undetermined duration.

Federal Leave

Bill C-13, the *COVID-19 Emergency Response Act* received Royal Assent on March 25, 2020. In addition to providing direct support and tax deferrals for both businesses and individuals, Bill C-13 also includes additional leave provisions for employees of federally regulated employers.

This Bill introduces a new provision to Part III of the *Canada Labour Code* that provides leave of up to 16 weeks for employees who are "unable or unavailable to work for reasons related to COVID-19". An employee who wishes to make use of this new provision must give written notice to their employer as soon as possible outlining the reasons for the leave and the length of the leave that they expect to take. While the employer may require employees to provide a written declaration in support of their reasons for taking leave under this provision, a certificate from a medical practitioner is not required.

This provision also prevents against reprisals and insures that benefits remain intact during these uncertain times. Health benefits, disability benefits and an employee's seniority will be preserved if they choose to take this leave. Employers are also forbidden from dismissing, suspending, laying off, demoting or disciplining employees who take leave under this provision or taking an employee's decision to take leave into account when making decisions regarding promotions.

This leave provision will be repealed on October 1, 2020. A new provision will then be implemented as part of s. 239 "Medical Leave" which will allow for a 16-week medical leave of absence as a result of a quarantine.

Additional changes to the *Code* include a provision which indicates that employees may take leave under other sections of the Code including Compassionate Care Leave, Leave Related to Critical Illness and Medical Leave without a certificate issued by a health care practitioner. This provision will be repealed on September 30, 2020.

G. CANADA'S ECONOMIC RESPONSE PLAN TO COVID-19

Micheil Russell

The COVID-19 pandemic is an unprecedented challenge to the Canadian economy and represents significant potential hardships for a great many Canadians. The government has introduced a significant new benefit, the Canada Emergency Response Benefit, and has made changes to existing benefits to support employees impacted by the crisis.

The Canada Emergency Response Benefit (CERB)

It will provide a taxable benefit of $2,000 a month for up to four (4) months to:

- workers who must stop working due to COVID-19 and do not have access to paid leave or other income support;
- workers who are sick, quarantined, or taking care of someone who is sick with COVID-19;
- working parents who must stay home without pay to care for children that are sick or need additional care because of school and daycare closures;
- workers who still have their employment but are not being paid because there is currently not sufficient work and their employer has asked them not to come to work; and
- wage earners and self-employed individuals, including contract workers, who would not otherwise be eligible for Employment Insurance.

The CERB will be accessible through a secure web portal starting on April 6, 2020. Applicants will also be able to apply via an automated telephone line or via a toll-free number.

Employment Insurance Benefits

The one-week waiting period has been removed for claimants making a claim as a result of the loss of work because of the crisis. The level of benefit remains the same: employees will receive 55% of their gross wages, which is taxable, to a maximum of $573.00 per week.

A significant change has been made to work sharing plans. Historically, they were subject to lengthy review by Service Canada, as well as a requirement to include a recovery plan. This requirement has been eliminated and Service Canada is acting as quickly as possible to process and approve work sharing applications. Under a work sharing agreement, an

employee will be eligible to receive up to the maximum weekly benefit. The benefit amount is established in the normal way. In addition, employees are eligible to receive pay without penalty from their employer for working reduced hours.

Work Sharing Agreements

Work-Sharing (WS) is a program that helps employers and employees avoid layoffs when there is a temporary decrease in business activity beyond the control of the employer. The program provides EI benefits to eligible employees who agree to reduce their normal working hours and share the available work while their employer recovers. Work-Sharing is an agreement between employers, employees and the Government of Canada.

A WS must be agreed to between the employer and the union on behalf of its members. It will specifically indicate the extent to which hours will be reduced, as well as the duration. Historically, the government required a Recovery Plan to filed as part of WS agreement. This requirement is being waived in the context of application caused by the COVID-19 pandemic.

Wage Subsidy for Employers

In order to prevent lay-offs or to assist in the recall of employees, a wage subsidy has been introduced. Initially, it was set at only 10% of wages and had a wage cap. Eligibility was restricted to small and medium-sized businesses, among other eligibility criteria.

In response to criticism that the subsidy was inadequate, there was an announcement that the Canada Emergency Wage Subsidy would be introduced and provide a subsidy of up to up to 75% for eligible businesses. The increased subsidy will be available to all businesses that experience a 30% drop in revenue as a result of COVID-19. Public bodies such as municipal governments, schools, public universities, colleges and hospitals are not eligible.

The subsidy will cover up to 75% of a salary on the first $58,700.00 which could mean payments of up to $847.00 a week. The subsidy would be available for eligible wages paid between March 15th and June 6th, 2020. The subsidy is broken into three distinct phases of four weeks each and eligibility for each phase is determined by the revenue loss in the month in which each phase begins. Further details with respect to the program are still being prepared and will be announced in the coming weeks.

CaleyWray is recognized as one of Ontario's and Canada's leading labour law firms representing trade unions and their members, with a record of providing quality service for over 40 years.

We are a "full service" labour firm, providing experienced and effective representation to our clients in all areas of law that impact on trade unions and their members, including WSIB, Human Rights and Pay Equity.

This includes acting on behalf of Boards of Trustees of pension plans, health and wellness plans, apprentice plans, etc.

We pride ourselves on providing the highest quality legal representation at reasonable rates.

Our goal is to obtain the best results possible for our clients in a cost-efficient manner.

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