

Date: [Date]

To: [Client Name]

[Client Address]

[City, State, Zip]

Re: Notice of Conflict of Interest and Consent to Joint Representation

Dear [Client Name],

As you are aware, [Law Firm Name] ("the Firm") represents you in connection with legal claims regarding [Name of Case/Product/Medical Device]. We are writing to formally advise you that the Firm also represents numerous other individuals (the "Co-Plaintiffs") with similar claims against the same defendant(s).

1. Joint Representation

Under professional ethics rules, a lawyer may represent multiple clients in the same matter only if the lawyer reasonably believes they can provide competent and diligent representation to each client and each client provides informed consent to the potential conflicts of interest.

2. Potential Conflicts of Interest

While all Co-Plaintiffs share a common interest in establishing the liability of the defendant(s), conflicts may arise regarding:

- The allocation of settlement funds among Co-Plaintiffs.
- Differences in the severity of injuries or specific facts of each case.
- Limited financial resources of the defendant(s) to pay all claims.
- Strategic decisions that may benefit some plaintiffs more than others.

3. Confidentiality and Privilege

In a joint representation, information shared by one client with the Firm regarding the case may not be kept confidential from the other Co-Plaintiffs. However, the attorney-client privilege remains protected against third parties and the defendants.

4. Aggregate Settlements

If a global or aggregate settlement is offered, the Firm will provide you with a detailed description of every claim involved and the proposed distribution. You will have the right to accept or reject your specific portion of the settlement.

5. Withdrawal

If a conflict arises that cannot be resolved, the Firm may be required to withdraw from representing one or all Co-Plaintiffs in this matter. In such an event, you would need to seek independent legal counsel.

6. Informed Consent

By signing below, you acknowledge that you have read this letter, understand the potential

conflicts involved in joint representation, and voluntarily consent to the Firm representing you and the Co-Plaintiffs simultaneously.

Sincerely,

[Attorney Name]
[Law Firm Name]

ACKNOWLEDGMENT AND CONSENT

I have read this Conflict Waiver Letter and I understand the risks and benefits of joint representation. I hereby consent to [Law Firm Name] representing me and other Co-Plaintiffs in this matter.

[Client Signature]

[Date]