FEBRUARY 2022

In Brief

McHenry County Bar Association

Quarterly Newsletter

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2021/22

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Date	Event	Location	Time
APRIL 7	Criminal Law Meeting	Virtual	Noon
APRIL 12	Family Law Section Meeting	Virtual	Noon
APRIL 19	Board of Governors Meeting	Virtual	Noon
APRIL 26	General Meeting	Virtual	Noon
MAY 5	Criminal Law Section	Virtual	Noon
MAY 6	Law Day	Michael J. Sullivan Judicial Center	11:00 a.m.
MAY 10	Family Law Section	Virtual	Noon
MAY 12	Civil Law Section	Virtual	Noon
MAY 17	Board of Governors Meeting	Virtual	Noon
MAY 25	Prairie State Legal Services Meeting (In Lieu of General Mtg)	TBD	Noon
MAY 24	General Meeting	Hybrid	Noon

Inside this issue:

President's Page

By Peter Carroll

2020/2021 MCBA President

Distinguished Service - - Good for the Profession

Every year at Law Day, a Distinguished Service Award is given to a member of the Bar "in recognition of dedicated service and contributions to the citizens of McHenry County." This year it will be awarded to Elizabeth "Beth" Vonau, for her lengthy list of charitable work, including the Crystal Lake Service League, United Way of McHenry County, CASA McHenry County, Turning Point, and Girls on the Run, among others. Past recipients of this award have been involved in programs like Boy Scouts, coaching youth teams, serving on the McHenry County College Board or other school district boards, church service, etc. Attorneys have much to offer charitable associations, including leadership, organizational skills, and a good sense of the legalities of running a service organization. We can help such organizations stay out of legal trouble. Many of our members have been serving on the boards of the McHenry County Charitable Foundation, youth music programs, church governing bodies, Rotary, Kiwanis, Lions, and have contributed their time and energy to animal shelters, Home of the Sparrow, Administer Justice, Horizons for the Blind, Children's Advocacy Center, Jaycees, local food pantries . . . you can fill in the blank.

Whenever attorneys donate their time to an organization there is a good chance that the reputation of the legal profession will improve. Yes, expanding your contacts through a service organization can bring clients into your office. But showing dedication to public service also informs members of the not-for-profit world that the stereotype of self-seeking attorneys is not always true.

And so, I encourage attorneys to donate some of their skills to the public at large. Pick a cause that you have some passion for. When you do, society will look more favorably upon all attorneys. Get out there, and do your part.

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ZOOMING AND YOU: SOME COMMON SENSE TIPS FOR REMOTE APPEARANCE IN A COURTROOM LEARNED THE HARD WAY

By Drake Shunneson, JD, LLM

As the pandemic nears the two-year mark, our professional lives have changed dramatically. And the most obvious change is the availability of Remote Appearance via Zoom in the McHenry County Circuit Court. While a benefit in the pandemic, Zoom has also created some challenges for many of us. Recently, the Honorable Judge Hansen released Appendix F to the Guidelines for Virtual Courtroom Proceedings in the Twenty-Second Judicial Circuit to encourage appropriate and effective Zoom appearances. Appendix F provides a list of things to consider that everyone should review for attending zoom court including proper attire, cameras operational, identification of your proper name, etcetera. Appendix F provides a unique insight into the court's viewpoint of potential issues. In addition to Appendix F, from a practicing attorney's perspective, there are some simple, and very basic, common sense tips I as a practitioner have learned and recommend based on my own experience. And yes, I learned these tips the hard way.

1. HARDWARE: To the extent possible, you want to try to appear remotely on your computer, in your office, and not on your phone. Ideally, your office is set up with three computer monitors so that you can Zoom into court while also being able to look at your electronic file as well as your calendar. This avoids the panic caused by accidentally leaving the Zoom courtroom when you meant to minimize your screen to look at your file.

2. BE SMART ABOUT APPEARING IN TWO COURTROOMS: If you have to appear Remotely in two courtrooms at the same time, then I have found it to be good practice to appear in one courtroom on your computer, while simultaneously using your phone to appear in the other courtroom and "check in" using the "chat" function. Then you can usually come back to the second courtroom on your computer once you have finished with the first courtroom. Of course, this will not save you from the possibility that you log into one courtroom on your phone while waiting in another from your computer and then, by Murphy's law, having both judges call you at the same time, but such is life.

3. LOCATION LOCATION LOCATION: Not once, not twice, but thrice I personally have been in court talking to a judge and had my two-year-old daughter come rushing into the makeshift home office room. And yes, one of the times it occurred happened to be the day I decided that my black sweatpants were going to be sufficient even though I had a gut feeling that was a bad idea (because it's ALWAYS a bad idea). And yes, all three times I had forgotten to lock the door. As embarrassing as this was, there are lessons here. Always think ahead about precisely where you want to appear remotely. Also, make sure you really think through any possible distractions that could be an issue. Finally, be mindful of Judge Hansen's Appendix F and of what the judges will expect. For example, personally I am unaware of one single judge that likes to see anyone appear remotely in his or her car so to the extent you can avoid pulling over and appearing remotely, then you should. This is not to say that it is always possible. Indeed, you may be just stuck with a room where there is a possibility a toddler can come rushing in at any time and anything else is not possible. Of course, the goal should not be to give up though, but to make sure you are in the best location you can be and that you have done everything in your power to minimize any possible distractions not only for your own sanity, but out of the proper respect for the court and for your client that both truly deserve.

4. ATTIRE: Yes it is important you wear proper attire for court. AND to do your best in this brave new world to make sure your clients are aware of proper attire as well. This makes sense for lawyers, but talking to clients about proper attire can be tricky. Good news is Appendix F provides you with an easy way to advise your client without offending them. Find it. Save it to your files to send to clients because if, for example, you see your client appear in a bathrobe while still in his or her bed, then making it standard practice to share Appendix F with him or her may be good practice.

5. MUTE BUTTONS: They are great. They work. Use them. Make sure your clients' use them. I can assure you there can be a lot of stress and restless nights after being told by another lawyer in a courtroom that your client did not mute himself or herself while you were on the phone with them while appear ing remotely.

6. TECHNICAL ISSUES: If you have a bad connection, then make it known. If your connection has a delay and you find yourself interrupting a judge or counsel, then making the court aware of your technical issue is going to help more than if you simply ignore the issue.

7. REMEMBER PUBLIC SPEAKING STILL TERRIFIES YOUR CLIENT: According to a quick Google search, about 77% of the population has a fear of public speaking. If you really need to talk to your client while appearing remotely with a judge, sheriff, clerks, opposing counsel, and everyone else then perhaps either calling your client and/or requesting a break out room is the right move in the moment instead of being frustrated later after court when your client calls upset because he or she did not fully understand what was going on while court was in session. Zoom may be just an everyday, mundane occurrence for you, but I assure you, it is stress- inducing for every single one of your clients to a degree that a practitioner may simply have a hard time understanding.

8. YOUR CLIENT DOES NOT HAVE THE ZOOM LINK: Ok some do, but many, if not all, of your clients, would like you to make it easy for them by providing them with the Zoom link. You can easily Zoom into court. But simply asking a client to appear remotely in court via Zoom, will get you in trouble. Trust me…Send your clients the link via email with instructions if they ask for it.

9. PRACTICE MINDFULNESS AND OVERALL, REMEMBER TO USE COMMON SENSE: Be fully present in the courtroom and give it your full attention. Be aware that you ARE in a courtroom and the judges will expect you and your clients to behave accordingly. Be as respectful to counsel, the judge, and opposing parties as you would if you were in court. Remember to be respectful of the court's time as if you were in a courtroom with dozens of colleagues, a judge, a sheriff, clerks, opposing parties and other individu als because that's where we are even when we appear remotely. Once you practice being mindful of this, then you will find a little common sense will go a long way in successfully navigating this brave new world of Remote Court Appearances.

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Employers beware: recent changes create major roadblocks to non-compete and non-solicitation agreements in Illinois

By Jake Leahy

In recent years, non-compete agreements have become increasingly prominent as state legislators continue to make an effort to restrict their application to low-wage workers. Consistent with that trend, at the start of this year, new Illinois non-compete and trade secrets restrictions, as per the Freedom to Work Act, went into effect.

Notably, although the law went into effect on January 1, 2022, the law is not intended to be retroactively applied to employment agreements. Therefore, businesses that include non-compete agreements for their employees need only to be aware of these restrictions moving forward.

Previously, the Freedom to Work Act applied to non-compete agreements for low-wage workers. The existing law generally defined low-wage workers as an employee who makes less than minimum wage or less than thirteen dollars an hour. The statute also was ambiguous as to whether the restriction precluded non-solicitation agreements for these individuals.

The new law makes some major changes to this existing framework. Now, "low-wage" will be defined as any employee who makes less than $75,000 annually. Surely, this new threshold is a far cry from the previous threshold that was established.

Likewise, the legislation says that any employee with a salary below $45,000 will not be eligible to be subject to a non-solicitation agreement.

While these new restrictions apply to non-compete and non-solicitation agreements, they do not apply to confidentiality, non-disclosure, trade secret protection, or similar types of agreements.

Non-compete agreements generally have been subject to a variety of restrictions implemented by state courts as to their enforceability. This law seeks to codify the restrictions that have already been established in Illinois. Non-compete agreements have already been deemed to be enforceable only when there is "adequate consideration" exchanged. *Fifield v. Premier Dealer Services, Inc.*, 993 N.E.2d 938 (Ill. App. Ct. 2013).

The statute says that "adequate consideration" is met if:

1. "The employee worked for the employer for at least 2 years after the employee signed an agreement … or
2. The employer otherwise provided consideration adequate to support an agreement to not compete or to not solicit, which consideration can consist of a period of em ployment plus additional professional or financial benefits or merely professional or financial benefits adequate by themselves."820 ILCS 90/20

Employers might not be off the hook just because their employees make over $75,000 annually. Employees who may be subject to non-compete agreements under the new law will have to be informed of their rights. The law says that an agreement "not to compete or a covenant not to solicit is illegal and void unless:

1. the employer advises the employee in writing to consult with an attorney before entering into the covenant andthe employer provides the employee with a copy of the covenant at least 14 calendar days before the commencement of the employee's employment or the employer provides the employee with at least 14 calendar days to review the covenant. *An employer is in compliance with this Section even if the employee voluntarily elects to sign the covenant before the expiration of the 14-day period.*

820 ILCS 90/20 new (*emphasis added*)

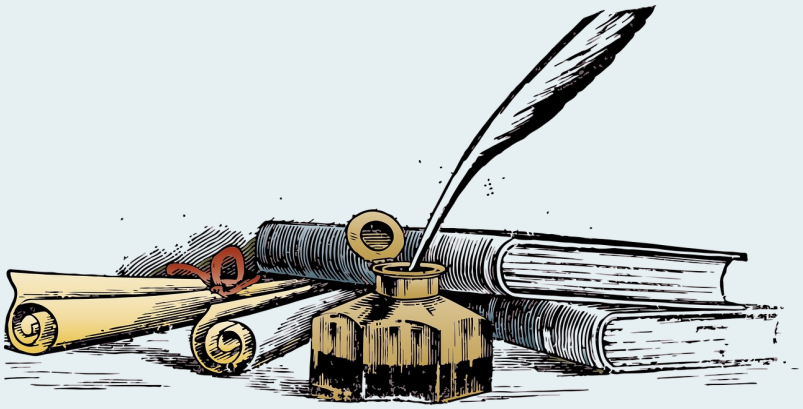
Another consideration here, especially for businesses, is that the Attorney General is tasked with enforcing if a company is "engaged in a pattern and practice prohibited by the act." 820 ILCS 90/30 (new). The Attorney General is authorized to initiate a civil action against the entity and seek $5,000 for a violation or $10,000 for any repeat violation that takes place. Since making a mistake in violation of the act surely can be expensive, businesses should be cognizant of not recycling previous employment agreements that may no longer meet statutory requirements.

Attorney General enforcement is not the only mechanism available. The statute provides for any prevailing employee in civil litigation or arbitration against an employer who wrongfully used a non-compete agreement, the employee is entitled to the recovery of legal fees associated with the claim.

To recap, employers need to first be aware that there will be hefty penalties for any new non-compete or non-solicitation agreements which run afoul of the statutory requirements. Any "low-wage" employee who makes under $75,000 must not be subject to a non-compete and any employee who makes under $45,000 must not be subject to a non-solicitation agreement.

For any employees who are above the aforementioned thresholds, they need to be given 14 days notice to review and there must be adequate consideration provided. Surely the question of "adequate consideration" will be heavily litigated, especially given that the statute includes a fee shifting provision for a prevailing party.

Jake A. Leahy is a current law student at the University of Illinois Chicago School of Law (formerly the John Marshall Law School). He also serves as a board member and board vice president of Bannockburn School District #106.



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On the first issue, to the best of our knowledge, *In Brief* is a responsible legal source. On the second issue, each author needs to review Rule 795(d)(7) and, considering the content of the article, determine whether the article is a "law-related article" that "deal[s] primarily with matters related to the practice of law, professionalism, diversity issues, mental illness and addiction issues, civility, or ethical obligations of attorneys." For example, an article on a recent fundraiser or networking event would not qualify for MCLE credit. Likewise, a non-substantive news-type feature, such as an article reporting on another speaker's presentation or another attorney's accomplishments, would not qualify for MCLE credit.

If your article was published in *In Brief* and you choose to claim hours you spent writing it toward your MCLE requirement, please keep the following elements of Rule 795(d)(7) in mind:

· Authors must keep contemporaneous records of the time they spend preparing an article.

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· Authors can only earn credits for the reporting period in which an article was published, regardless of when it was written.

· Republication of any article entitles to the author to no additional CLE credits unless he or she made substantial revisions or additions.

For more information, visit the MCLE Board's Web site at http://www.mcleboard.org.

McHenry County Bar Association

Welcomes our newest member….

Jake A. Leahy

Law student at University of Illinois Chicago School of Law

Practicalities of Mitigating Wage Loss

By Patrick Gorman

Mitigation is a legal principle requiring a plaintiff to minimize damages. Mitigation has application in both tort and contract law and in a variety of contexts within each. The focus herein will be on the practical aspects of mitigation of wage losses or, as the client may describe it: Do I have to get a job?

A typical jury instruction on mitigation of damages will read as follows:

> The plaintiff must make every reasonable effort to minimize or reduce his damages for loss of compensation by seeking employment. This is called mitigation of damages.
>
> If you determine that the plaintiff is entitled to damages, you must reduce these damages by (1) what the plaintiff earned and (2) what the plaintiff could have earned by reasonable effort during the period from not being considered for a position in his usual occupation until the date of the trial.
>
> You must decide whether plaintiff was reasonable in not seeking or accepting a particular job. However, the plaintiff must accept employment that is "of a like nature." In determining whether employment is "of a like nature," you may consider: (1) The type of work, (2) The hours worked, (3) The compensation, (4) The job security, (5) The working conditions, and (6) Other conditions of employment.
>
> The defendant must prove that the plaintiff failed to mitigate his damages for loss of compensation.
>
> If you determine that the plaintiff did not make reasonable efforts to obtain another similar job, you must decide whether any damages resulted from plaintiff's failure to do so. You must not compensate that plaintiff for any portion of his damages that resulted from his failure to make reasonable efforts to reduce his damages.

The importance of mitigating lost earnings cannot be overstated: if an employee loses their job earning $100,000.00 a year, then files a lawsuit for wrongful termination, but simply sits home without seeking replacement employment, when their case comes to trial in three years and they ask the jury for $300,000.00 in lost wages, the jury would be in error to award that amount or potentially any amount. An employee claiming wrongful discharge cannot simply sit back and wait for their day in court. They must be busy mitigating their damages.

The terminated employee may view successful mitigation as a double-edged sword in that, while they should be happy that they have replaced their lost wages, that mitigation will reduce any amount they can hope to recover from their former employer. By way of example, if an employee is terminated from a job earning $100,000.00 a year on a Friday and on the following Monday they start a different but comparable job earning $100,000.00 a year, they will not have any lost earnings as a component of their wrongful termination case. There may be other components to consider, such as emotional distress, other economic losses, attorney's fees and so forth, but the component of lost earnings will be out of the picture.

So, to maximize the wrongfully terminated employee's lost wages, they must mitigate, but how do they do that? More importantly: how do they show mitigation? They must ultimately satisfy a jury that they have made reasonable efforts (even *every* reasonable effort) to find and accept replacement employment

Those efforts begin with an active job search. This practitioner has told, and sometimes shocked or offended clients, by saying they should be putting as much effort into finding a job as they previously had *working* a job. In most instances this won't be practicable, but if a member of the jury (or the jury as a whole) would have this mindset, the wrongfully terminated employee would do well to follow such advice. In most instances, it is not possible to spend forty hours a week in a job search, but significant amounts of time should be allocated for this purpose. Consider the expectations of a juror who has been unemployed and had to work hard to get back into the workforce.

The client must explore all available resources for potential employment from old fashioned paper ads in newspapers and trade magazines to online employment services such as Monster and Indeed and the websites of potential employers. The client should contact local schools, especially community colleges or their alma matter to determine if they have job listings or resources. Headhunters and other professionals can be engaged to help in the efforts. No stone should be left unturned for fear that you will encounter a stubborn juror who takes the position that the client should have made efforts that they failed to exercise.

Once the client has identified those potential employers, they actually have to make applications for the employment which may vary from walking in cold, filling out an online form, sending a traditional letter and application or whatever the circumstances require. After that application is made, the client must follow up. Sure, it's likely that the potential employer will have no interest, but the reason for the process is to show the jury that the plaintiff has tried to mitigate damages. If, to continue this example, on cross examination, the former employer's attorney challenges the plaintiff, "Did you follow up on any of your job applications?" and the answer is, "No" plaintiff is unlikely to win the hearts or verdict of your jury. If, on the other hand, the answer is, "Yes," and you can produce a follow up letter for each of those applications, plaintiff's sincerity and credibility will be beyond reproach.

In the same spirit, when the plaintiff is offered any interview, they need to take that interview. The plaintiff does not want to have to testify to a jury that they were offered an opportunity to talk to someone about a job and decided to turn it down (unless that plaintiff has a really good reason). Whether the interview results in a job or not, the jury needs to hear that the plaintiff took every interview offered them. That jury also needs to hear and see that that interview was followed up with an email or letter expressing application and interest.

None of the plaintiff's efforts will mean much unless adequately documented. We recommend a daily log detailing activities and time, retaining copies of letters and resumes transmitted to potential employers, and retaining emails and letters received in response. The daily log should have phone calls, interviews and follow-ups, including the who, what, when and where. This will allow the practitioner to avoid that sick feeling in his stomach when, in discovery, plaintiff is asked to produce records and they don't have any. It will also allow the practitioner the thrill of introducing a stack of mitigation documents at trial.

The hard working plaintiff is likely to be offered a job and if that job is within the plaintiff's locale, industry, typical duties, and with comparable pay and benefits, the plaintiff will be hard pressed not to take the job or, in other words, the plaintiff may have a difficult time explaining to a jury why they did not take that job. If, on the other hand, the job is half way around the country, outside the plaintiff's typical industry, the plaintiff has no real background in the duties, or the pay and benefits aren't comparable, it may be far easier to explain the decision to pass on the offer to the jury but, the plaintiff should be prepared to explain their rationale to a jury.

(Continued on page 14)

The factors of geography or locale, industry, duties and pay/benefits are likely the major areas within which the terminated employee (and potentially his jury) will consider the reasonableness of mitigation efforts. The final "x-factor" is the passage of time. The employee may, after weeks or months of unsuccessful job searching, be willing to accept broader parameters for these considerations. And the considerations must be reasonable in the first place. By way of example, if the employee is unwilling to travel more than a mile away from their home for their replacement employment, that position may not sit well with a jury (especially if one of the members commonly commuted two hours to their employment!).

Remember that the employee's view of their mitigation is not what matters. It is the judge's or jury's view that is important within this context. Obviously, these considerations set aside the employee's potential objectives to work close to home, to stay with their industry, to have a particular job and/or make a particular salary. To the extent that those professed needs are based more in a physical or actual need, they will be more believable as reasons to forgo job opportunities than if they are simply the product of the employee's emotional need. For example, if an employee must work within a certain geography so that they are available for childcare or to oversee an aging parent, that testimony will probably be more convincing than if they say that they simply don't like to drive or fear a longer commute. Similarly, a refusal to move outside of a given industry can be more or less explained: if the employee has spent forty years in a particular industry, it may be difficult for them to move outside of that industry (or it may be high time that they do so). If a plaintiff is only willing to accept employment as a driver for a horse drawn carriage, simply because that is the only work they have ever known, proving mitigation to a jury may well be impossible. If you are limiting your job search to opportunities with specialized duties because this allows you to maximize your potential, some measure of explanation will be necessary. If plaintiff cannot accept a job paying less than a certain amount or providing a certain level of benefits, be prepared to tie those financial requirements to needs that the jury will be able to understand. They may view plaintiff's needs very differently if they require a certain salary so that you can keep a roof over their head, take two vacations a year or pay the month installments on their yacht. Everything is situational and everything is viewed through the eyes of that jury.

The two most important words in this writing: effort and jury. The *jury* hearing the employee's case will need to believe and appreciate that the employee has made real and significant *efforts* to obtain replacement employment. If the employee convinces their jury of this, they will succeed in their claim for lost wages. If not, their failure to mitigate will serve to bar those damages.

With the support of McHenry County Bar Association members like you, the MCBA has successfully hosted a Law Day event in some form or fashion for years. This year's Law Day celebration will begin in the Spring with elementary school visits. Our volunteers will be in local classrooms introducing young learners to some of the basic principles of our justice system. Then, on April 22, MCBA will host a half-day program for high school age students at McHenry County College designed to reinforce the students' knowledge of the Constitution and the rule of law and to highlight legal-related career opportunities available in our community.

On May 6, 2022, our celebration culminates with a ceremony followed by a luncheon. Please plan to attend our May 6 Law Day Ceremony at the Michael J. Sullivan Judicial Center beginning at 11am. This ceremony will honor our 2022 Liberty Bell and Distinguished Service award winners as well as the three (3) middle-school age winners of the MCBA Law Day Essay Contest. The courtroom ceremony will be followed by a noon luncheon at Bull Valley Country Club featuring speaker Samuel Adam, Jr., who represented former Governor Rod R. Blagojevich. CLE credit is available for the luncheon event.

Civil Trial Call

Case Number: 17LA220

Plaintiff: Dori Candir-Nu770

Defendants: Village of Algonquin, et al

Thomas DiCianni

Plaintiff's Attorney: Chase Pekar

Sherwood Law Group, LLC

Defendant's Attorney: Illinois Attorney

General, et al

Judge: Kevin G. Costello

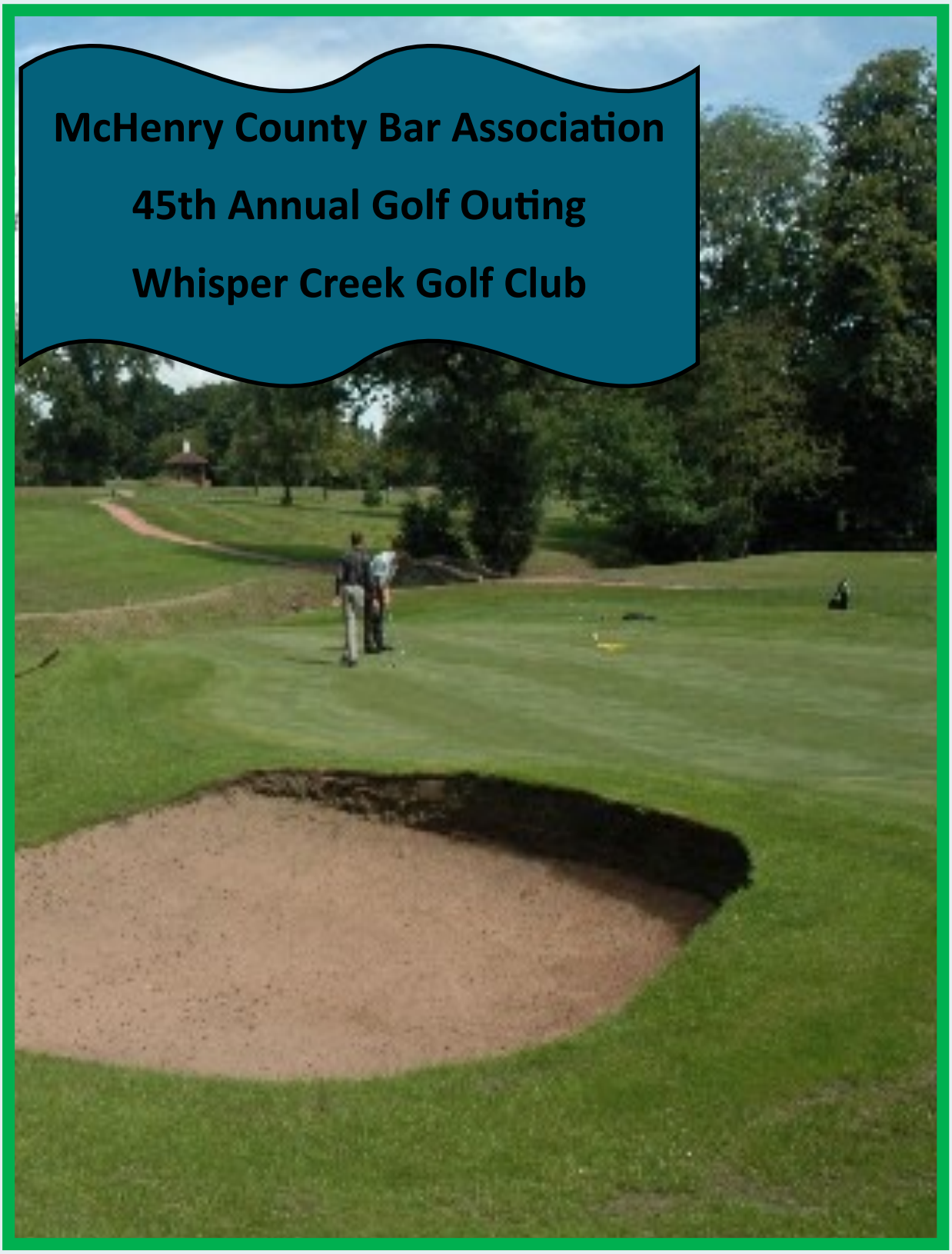
Dates: March 7—March 9, 2022

Verdict: Defendant

Net Total Verdict:

SAVE THE DATE

AUGUST 6, 2022



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