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March 30, 2026

Kristi Onstot  
Executive Secretary  
Executive Council  
State Capitol  
L O C A L

Re: Request for Special Counsel - Patterson Law Firm

Dear Kristi:

Our office requests appointment of outside counsel under Iowa Code section 13.3(1) in *Zimmerman, Holly v. Independence Mental Health Institute and State of Iowa and Second Injury Fund of Iowa*, a case filed by a state employee. Because the resolution of this claim may turn on whether the State of Iowa or the Second Injury Fund must pay workers' compensation benefits, our office cannot represent both defendants.

In order to avoid a conflict of interest, the Civil Litigation Division has contacted Ryan Clark of the Patterson Law Firm, L.L.P., 505 5th Avenue, Suite 729, Des Moines, Iowa 50309-2390, to represent the Second Injury Fund. Mr. Clark has agreed to represent the Second Injury Fund at the rate of \$175.00 per hour. Our office will represent the State of Iowa.

Accordingly, we request Executive Council approval to retain Mr. Clark to represent the Second Injury Fund in this case.

Sincerely,

Steven Blankinship  
Chief Deputy Attorney General