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October 2, 2025

Kristi Onstot
Executive Secretary
Executive Council
State Capitol
LOCAL

Re: Retention of Special Counsel

Dear Ms. Onstot:

Our office requests authorization under Iowa Code section 13.7 to retain the James Otis Law Group, LLC, as special counsel. Special counsel will provide legal services and representation to Iowa with respect to investigations into and possible litigation of certain business practices of General Motors (GM) and OnStar. The investigation and possible litigation will involve each company's potential unfair or deceptive acts or practices. We also recommend under Iowa Code section 23B that the firm be retained on a contingent-fee basis.

The Attorney General has determined that it is necessary and appropriate to retain private special counsel to assist her office in the investigation of and potential litigation against GM and OnStar for these reasons:

- The investigations and potential litigation will involve complex and potentially novel claims that have not been litigated to judgment in any state court.
- Extensive resources will be required, as any potential litigation will be time- and labor-intensive.
- Potential litigation may include, but is not limited to (i) extensive motion practice, including potential complex issues of first impression; (ii) extensive, time-consuming discovery of multiple corporate entities, including numerous depositions, and potentially extensive motion practice to ensure compliance with

the state's discovery requests; and (iii) identifying experts and then potential expert reports, responses, and discovery.

- The anticipated complexity of any case arising from these investigations requires counsel with a full range of trial- and appellate-level experience litigating complex matters involving both state and federal law.

We recommend James Otis Law Group, LLC because of its experience litigating complex cases across a range of subject areas in both state and federal courts. James Otis Law Group, LLC has valuable experience in high-stakes litigation along with a deep understanding of consumer privacy issues, which the State needs in this complex investigation of GM and OnStar and any resulting litigation.

Our office has determined that this proposed contingent representation is both cost effective and in the public interest. And we have determined that a procurement process is not feasible under these unique circumstances. We therefore recommend approval of James Otis Law Group, LLC, as special counsel. The engagement will be governed by a separate contingent fee agreement under Iowa Code section 23B.3.

Yours truly,

A handwritten signature in black ink, appearing to read "S. Blankinship", with a stylized flourish at the end.

Steven Blankinship
Chief Deputy Attorney General