

John and Jacqueline Patton of Patton & Ryan in Chicago



From left: Jacqueline Patton, John Patton

By Mike Bailey

It was a huge case involving several law firms and carrying national implications. Some of the brightest legal minds in the country gathered to discuss strategy and how to attack a recent witness's testimony.

The group agreed to focus on the shifting statements made in testimony, but Jacqueline N. Patton — just 18 months out of law school and an associate in her highly respected father's firm — had a different idea.

"The issue was (a witness) made inconsistent statements (on the stand)," says John W. Patton, nationally renowned attorney of the eponymous **Patton & Ryan LLC** law firm in downtown Chicago. The defense team agreed to focus on those points until Jacqueline raised another line of thinking.

Through her thorough and exhaustive research of all documents in the case, "she discovered glaring inconsistencies not just in testimony, but also in written pleadings and briefs that would undermine the witness's credibility," John Patton says. She

truly felt those documents were important.

"I did not want them to slip through the cracks," she says.

Ultimately, when the defense presented its case, it argued the significance of the inconsistent statements in the written pleadings as evidence of the pattern of deceit. The result was successful; the court in its initial round of rulings indicated that argument was persuasive in the way the court would rule.

While his peers may have been impressed, her father was well acquainted with Jacqueline's research abilities and theory formulation. "She's smarter than I am," he says.

Law partnerships can test the bonds between even the best of friends, but family partnerships have broad implications across a spectrum of relationships. John and Jacqueline Patton have not only survived, but have fully triumphed because of a relationship built on mutual respect, trust and a strong foundation that began years ago. Because of the synergy they developed over the years, they complement

each other perfectly. As a result, Patton trusts his daughter implicitly. Thus, her role in the firm is crucial to its success and to that of her father, whom she idolizes.

Patton & Ryan is a pre-eminent trial firm often hired to assist defense teams in difficult litigation. John Patton, a founding partner of the firm who has tried well over 100 cases nationwide, often "parachutes in" during a crucial phase of trial preparation to lend a fresh set of eyes and a wealth of trial experience. His practice is basically to serve as a legal SWAT team, called in on a moment's notice in catastrophic loss trials. He is therefore on stand-by in all 50 states, ready to drop into a case, come completely up to speed quickly, and participate in the most crucial point of a trial.

As such, most of his weekdays were spent in trial or preparation, but he made sure his weekends were free to coach his daughters' softball, basketball and soccer teams. "I worked late at night so I could be there on the weekends," he remembers. "A lot of sleep deprivation, but I was in every team picture. We won a lot of championships with those teams. And both my girls continued to be as competitive as their father, not only in athletics, but also in academics, as they made their ways from OLPH to Loyola Academy and on to the University of Illinois."

"He treated everyone fairly," remembers Jacqueline. "He was always encouraging us, and I never felt he was too hard on me. He was there for every game and every milestone." That

foundation of respect, trust and mutual experiences laid the groundwork for the big stage on which father and daughter now participate.

Jacqueline, who joined the firm after passing the bar exam a year and a half ago, agrees that stepping into a prominent role in a nationally known firm is a little nerve-wracking.

"I'm aware these are big shoes to fill. And I know there's a bit of a shadow factor that (I'm practicing in). But I view his presence as a big plus. If I need help, I can ask him and there isn't any better teacher," she says.

'What Did the Judge Say Then, Daddy?'

In truth, her attorney preparation began as a small child. Jacqueline often attended her father's trials and occasionally would get him to discuss legal matters and trial theories over the dinner table, which she says has been invaluable as she develops her career as an attorney. Her father encouraged that development. "When Jacqueline was in high school and college, she would attend conferences in Chicago with me," he recalls.

In addition, Jacqueline says, her skills were also honed by being raised in a home in which both parents were attorneys. Roxanne, John's wife and Jacqueline's mother, would often adjudicate minor family disputes, but only after hearing arguments. "Every request was a negotiation," Jacqueline laughs, noting that in addition to being an attorney, her mother has a degree in child psychology.

"Sometimes we'd have to

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remind Dad that we were not witnesses on the stand," she says. "But I also learned how to think on my feet and respond very quickly. And also that I didn't always get what I wanted."

Roxanne's willingness to forego her own career to raise and school their children allowed John to build his practice. Jacqueline says that while her father did talk about his cases with the family upon request, he tried to separate time for work and family as much as possible. She notes that he wasn't always successful.

"Once after a long day of trial, my dad was reading me a bedtime story about ponies. Apparently he dozed off mid-story because he woke up to me asking, 'Then what did the judge say, daddy?' He definitely launched into closing arguments or something in his sleep." That upbringing provided a foundation for Jacqueline's interest in the legal profession.

An English major, Jacqueline knew from the very beginning of college that she wanted to be an attorney. Moreover, she knew she wanted to practice with her father.

"Colleagues of mine and even judges I knew suggested that she really should work at another firm for a few years before joining me," John says.

"But I did not think that was good advice. She has the innate skills to be successful. She is very smart and an excellent writer and researcher. When you are going through the hiring process (the applicant) is in full sales mode," he says, often hiding character flaws or professional deficiencies.

"But I've known her from childhood to adulthood. I know the skills she brings to the table. I can't think of any better way to know (an applicant's) true strengths. With her, (I wasn't getting the sales pitch), I knew the essence of the individual. I wanted someone who is honest, loyal and has the ability to communicate. She hits it out of the park on all three."

Jacqueline never thought of working elsewhere. She says she understood the basis of the contrary viewpoints and weighed the chance to find her style and own identity before joining her father. But she never seriously considered applying anywhere else.

"I wanted to work with my dad. I worked there as an undergrad, and I knew I would get opportunities (with his firm) that I could never get elsewhere. I can't imagine I would have learned anywhere near as much as quickly as I have if I had first worked somewhere else."

Jacqueline's current role is conducting research, writing briefs and motions, developing theories on argument presentation and cross-examination preparation. "The fact is, to litigate these significant cases, any trial lawyer will tell you that the backbone to any case is the motions, briefs, and legal arguments. Jacqueline also has a talent in crafting cross-examination questions from carefully reviewing documents," Patton says.

In fact, that give and take on legal theories is Jacqueline's favorite part of the job. On the rare days when her father is not in front of a jury, he will meet with other law-

yers and staff at the firm in a spirited give and take. The discussion will center on various aspects of a pending case, the factors necessary for a positive result and how best to proceed. That discussion — in which dissent is encouraged until a consensus is reached — produces the best results, Patton says.

That is also what Jacqueline enjoys most about working at the firm. "I love trial team meetings, strategizing with other attorneys in a close environment." Sometimes, because of the last-minute calls for help that characterize Patton's practice, those meetings are intense and full of energy. "Focused," as she puts it. "He thrives on it too or he wouldn't take those last-minute parachute cases," she says.

While the age difference and social background can be a negative for some partnerships, it is a decided plus for the Pattons. "I wouldn't know Facebook if it was right in front of me," John admits. But because she grew up in the era of social media, Jacqueline is well skilled in discovering useful items on Facebook, Twitter, Instagram and other platforms as part of her exhaustive research. "I am totally dependent on Jacqueline for that skill and experience," he says.

What does she find that is useful? "You'd be surprised what people (post on open forums)," she says. Plaintiffs pleading grievous injury will post pictures of themselves playing tennis, he says. Experts hired by the other side will have posted contradictory statements or engaged in shameless self-promotion.

In other cases, plaintiff's experts will have testified for the defense in a previous case, showing they will testify according to which side is paying them.

Jacqueline's role is expanding as she gains experience. As she gradually emerges from the perception of practicing in her father's shadow, her father says she has already begun to formulate her next negotiation — changing the firm name to "Pattons & Ryan."