

Legal Team — Operating Procedures

Document ID: ACME-LEGAL-001 | Classification: Internal Use Only

1. Team Overview

The Legal Team provides legal counsel on regulatory compliance, contracts, intellectual property, employment matters, and litigation management for ACME Medical Devices.

2. Team Leadership

Role	Name	Contact
General Counsel	Angela Martinez	amartinez@acmemeddevice s.com
Associate GC, Regulatory	Dr. Robert Kim	rkim@acmemeddevices.com
IP Counsel	Steven Chang	schang@acmemeddevices.c om
Contracts Manager	Nicole Brown	nbrown@acmemeddevices.c om

3. Mandatory Rules

3.1 Contract Execution Authority

- <\$50,000 total value: VP level
- \$50,000-\$500,000: SVP + Legal review required
- >\$500,000: CEO signature required
- >\$2,000,000 or multi-year: Board notification required
- NO ONE may sign contracts outside their authority — automatic termination

3.2 Litigation Hold — CRITICAL

- When notified of litigation hold: PRESERVE ALL DOCUMENTS immediately
- Disable auto-delete on emails for custodians
- Notify IT within 24 hours to preserve backups
- Document destruction during hold = felony (obstruction of justice)

3.3 Regulatory Communications

- ALL FDA, FTC, or DOJ communications must go through Legal
- NO employee may respond to regulatory inquiry without Legal present
- Warning letters, 483s, subpoenas: Notify GC within 1 hour

4. Required Approvals

Action	Approver	Form
NDA/CDA execution	Contracts Manager	ACME-NDA-001
Settlement >\$100K	GC + CEO + Board	ACME-SET-001
Patent filing	IP Counsel + CPO	ACME-PAT-001
Regulatory submission	Regulatory Counsel	ACME-REG-001

5. Legal Gray Areas & Escalation

5.1 Government Investigations

If ANY government agency (FDA, FBI, DOJ, SEC, state AG) contacts any employee: Do NOT answer questions. Politely request to schedule with legal counsel present. Notify GC immediately. This is not optional.

5.2 Whistleblower Situations

If an employee reports suspected wrongdoing: Document carefully. No retaliation of any kind. Escalate to GC and HR immediately. Confidentiality is paramount — disclosure could expose company to additional liability.

6. Outside Counsel

Practice Area	Firm	Approved By
FDA/Regulatory	Hyman, Phelps & McNamara	GC
Patent Prosecution	Fish & Richardson	IP Counsel
Product Liability	Arnold & Porter	GC
Employment	Littler Mendelson	GC