

Tips & Best Practices on Drafting Interrogatories, Document Requests, & Admissions CLE

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Discovery tools

Formulating expert questions

How to structure discovery

What are the best practices?

The discovery plan starts when you
meet with the client

What questions will you ask?

Mental Checklist:

Facts of Case

Social Security Number

Addresses

Witnesses

Where have you lived?

What is your full name?

What else do I need to draft
discovery?

What facts do you think led to this?

Who are you going to call as
witnesses?

What is your opponent doing? How are they going to present the evidence?

Where is my Complaint?

Jurisdiction's Jury Instructions

Witnesses

What documents will the opposing party produce?

Contention Interrogatories

Any type of information that can support any affirmative defenses.

HIPAA/Employment Authorizations

What are other authorizations do you need to complete discovery?

What is the other side going to do?

Ask what does the Plaintiff want?

Discovery Tools to Consider:

E-mails

Computer Systems

Metadata

Internet Resources

Facebook postings and pictures

Instagram postings during a certain period of time

Release from opposing party to
contact social media to request certain
posts

What do you want to know from the
opposing party's expert witnesses?

End of Materials