

Event Title:

Discovery Responses and Document Production: A Paralegal's Ultimate Guide

Event Date and Time:

July 17, 2024 -- 11:00 AM EDT - 06:00 PM EDT

Event Agenda:

All times are shown in Eastern time.

I. Responding to Requests: Rules, Pitfalls, and Tips

11:00 - 11:45, Kathryn Ziegler

- A. Interrogatories
- B. Requests for Admissions
- C. Requests for Production of Documents
- D. Subpoenas (for Deposition/Documents)
- E. Deposition Notices
- F. Public Records Requests

II. Proper Use of Discovery Objections

11:45 - 12:30, Jan I. Berlage

- A. Overview of Discovery Objections (w/Master List)
- B. When and How to Use Common Objections
- C. Buzzwords and Getting Your Phrasing Right
- D. Commonly-Misused Objections
- E. Attorney Preferences and Practical Pointers

III. Document Review and Production

12:45 - 1:45, Jenna M. Prosceno

- A. Finding, Collecting, and Organizing Documents
- B. Reviewing the Documents to be Produced
 1. Relevance and Responsiveness
 2. Privileges and Confidentiality
 3. Other Issues to Watch Out For
- C. Bates-Stamping
- D. Redaction
- E. Duplication
- F. Indexing of Documents
- G. Producing the Requested Documents; Submission/Service
- H. Managing Large-Volume Document Productions
 - I. Common Mistakes in Document Production

IV. Electronic Productions; Preserving, Collecting, and Producing ESI

2:15 - 3:15, Robert J. Kasieta

- A. E-Discovery Rules and Case Law You Need to Know
- B. Preserving ESI/Legal Hold Notices
- C. Formulating an E-Discovery Plan
- D. Collecting, Processing and Reviewing ESI
- E. Producing ESI
- F. Common Missteps With Respect to ESI

V. PDF, TIFF, and Native File Productions: Paralegal Tips and Tricks

3:15 - 4:00, Robert J. Kasieta

VI. **Discovery, Privilege, and Production Logs (w/Samples)**

4:15 - 5:00, Mark West

- A. What to Log, What Not to Log - Best Practices
- B. Discovery Responses
- C. Subpoena Logs
- D. Deposition Logs
- E. Client Document Logs
- F. Privilege and Redaction Logs
- G. Production Logs
- H. Electronic Discovery Logs

VII. **Ethical Issues in Discovery for Paralegals**

5:00 - 6:00, Kathryn Ziegler

- A. Confidentiality and Privilege
- B. Inadvertent Disclosures: Sender vs. Receiver
- C. Ethical Issues in E-Discovery
- D. Handling Uncooperative or Untruthful Clients

Event Description:

Do you know all the tips and tricks for making objections in discovery? Are you aware of the best approaches to reviewing, bates-stamping/indexing of documents, and managing other aspects of the production process? In this program, seasoned faculty will share their hard-won insights for answering requests and handling traditional and electronic productions with finesse. Enhance your skills - register today!

- Obtain best practices for responding to interrogatories, RFAs, RFPs, and other requests.
- Gain practical insights on making objections to discovery requests.
- Learn how to effectively review documents for privilege, responsiveness, and other issues.
- Get pointers on bates-stamping, redaction, duplication, and indexing of documents.
- Explore how to best manage electronic productions and work with PDF, TIFF, and native file formats.
- Receive tips on keeping proper discovery, privilege, and production logs.

Who Should Attend:

This **intermediate level** course is designed to give attendees the knowledge and skills they need to effectively answer written and production discovery. Those who should attend include:

- Paralegals
- Legal Technicians
- Legal Assistants
- Legal Support Staff

Event Bio:

[Jan I. Berlage](#) is a partner with Gohn Hankey & Berlage LLP. His practice focuses on general business litigation, ranging from commercial disputes to bankruptcy to intellectual property. Mr. Berlage has extensive experience in trials, arbitrations, mediations, and administrative hearings, including arguments before the Maryland Court of Appeals and the U.S. Court of Appeals for the Third and Fourth circuits. He has secured major jury verdicts and large settlements for both businesses and individuals, as well as successfully defended against multi-million dollar claims in both state and federal court. Prior to private practice, Mr. Berlage served as law clerk to the Honorable E. Stephen Derby, U.S. Bankruptcy Court for the District of Maryland. He has taught pretrial litigation practice at the University of Maryland School of Law, and served on the Board of Governors for the Maryland State Bar Association and the U.S. Commission on Civil Rights, Maryland State Action Committee. Mr. Berlage is a fellow of both the American and Maryland State bar associations, presents regularly at CLE courses, and has been the chair of numerous committees at both the national and state level. He earned his B.A. degree, with honors, from Wesleyan University; his J.D. degree from the University of Virginia School of Law, where he served as executive editor of *The Journal of Law & Politics*; and is a member of Phi Beta Kappa.

[Robert J. Kasieta](#) is the founder of Kasieta Legal Group, LLC in Madison, Wisconsin. He is a certified civil pre-trial and trial specialist by the National Board of Trial Advocates. Mr. Kasieta practices in civil litigation, with an emphasis on plaintiff personal injury and employment cases, as well as commercial litigation. He has written and taught extensively in the areas of trial practice, personal injury law and insurance law, and is an instructor of trial practice at the University of Wisconsin Law School. Mr. Kasieta is admitted to practice before the U.S. Supreme Court, as well as the U.S. Court of Appeals for the Seventh and Eleventh circuits, and all Wisconsin courts. He is a member of the Dane County Bar Association, State Bar of Wisconsin and the American Association for Justice. Mr. Kasieta earned his B.S. degree, summa cum laude, from Northern Michigan University and his J.D. degree from Marquette University Law School.

[Jenna M. Prosceno](#) is a civil litigation paralegal at Baird Mandalas Brockstedt & Federico, LLC. With nearly 20 years of experience in personal injury litigation, she now concentrates on contract and construction law on a litigation team with a general practice firm. Ms. Prosceno has a background in law firm start-up organization and in law firm administration. She has also handled all aspects of personal injury cases from the initial client contract, through and including trial preparation and participation. Ms. Prosceno's case management experience includes client and witness interviews, medical research, legal and factual research, as well as coordinating document production for trial. She is a graduate of Delaware Technical and Community College and the University of Delaware.

[Mark West](#) is a sole practitioner in San Gabriel, where he practices in plaintiff personal injury and wrongful death, products liability law, medical malpractice, and business civil litigation. He has published several articles and frequently lectures. Mr. West is admitted to practice in the Northern, Central and Southern U.S. District Courts in California; Ninth Circuit Court of Appeals; and Supreme Court of the United States. He has also been admitted pro hac vice in the state and U.S. District Court for Nevada and the U.S. District Court for Minnesota. Mr. West is a member of the American and Los Angeles County bar associations, State Bar of California, Consumer Attorneys Association of Los Angeles, Consumer Attorneys of California (past legislative district coordinator), and the American Trial Lawyers Association. He earned his B.S. degree from New Hampshire College (now

Southern New Hampshire University) and his J.D. degree from Southwestern University School of Law.

[Kathryn Ziegler](#) is a paralegal with Waples & Hanger in Indianapolis. Her work as a paralegal is primarily in the federal courts of Indiana, with occasional casework in state courts. Ms. Ziegler's firm practices plaintiff litigation, specializing in constitutional and civil rights law. She is a commissioned notary, and a member of the Indiana Paralegal Association and National Paralegal Association. She has experience on how to handle ethical issues that arise in her role. Ms. Ziegler assists her attorneys in day-to-day legal duties, including screening clients and preparing discovery requests. She earned her B.A. degree from Purdue University and her Paralegal Certification from Indiana University -Purdue University at Indianapolis.