

## **Event Title:**

Complete Divorce Discovery Guide for Paralegals: With Sample Requests and Checklists

## **Event Date and Time:**

April 10, 2024 -- 10:00 AM EDT - 05:00 PM EDT

## **Event Agenda:**

*All times are shown in Eastern time.*

### **I. Tips and Tricks for Obtaining Evidence From Electronic Devices (With Checklists)**

*10:00 - 11:00, Jocelyn A. Stachowske*

- A. What to Look For, Where to Look For It, and How to Obtain It
- B. Commonly Overlooked Sources of Data
- C. Facebook and Social Media: Discovery How-Tos and Pointers
- D. Smartphone/Tablet Discovery (Including Instagram, Snapchat, and Other Photo- and Video-Sharing Apps)
- E. Practical Guidance for Drafting Subpoenas for Social Media and Other Digital Records
- F. Best Practices for Managing Electronically Stored Information (ESI)
- G. Helpful E-Discovery Tools, Software, and Applications

### **II. Medical and Mental Health Records Checklists**

*11:15 - 12:15, E. Chris L'Hommedieu*

### **III. What Financial Records and Tax Returns Can Show You (With Samples/Checklists)**

*12:15 - 1:15, Anne D. Barber*

- A. Bank Statements, Pay Stubs, and Other Financial Info
- B. W-2, 1099, 1098, 1044 Forms
- C. Other Tax Forms You May Need
- D. Practical Techniques for Finding Hidden Assets

### **IV. Best Practices in Organizing, Managing, and Preparing Documents for Trial**

*1:45 - 2:45, Anne D. Barber*

- A. Bates-Stamping and Indexing Documents
- B. Maintaining Privilege Logs: Legal Best Practices
- C. Keeping Up Production Logs
- D. Practical Techniques for Tracking and Organizing Documents From the Client
- E. Tactics to Collect and Manage Information From Opposing Parties
- F. Preparing Discovery/Exhibits for Trial

### **V. Guidelines for Drafting Discovery Requests and Responses (With Samples and Checklists)**

*2:45 - 3:45, John H. Killeen*

- A. Information and Documents to Obtain from Clients (With Checklist)
- B. Techniques for Crafting Interrogatories and Requests for Production of Documents
- C. Responding and Objecting to Interrogatories and Requests for Documents
- D. Insights on Summarizing Answers and Documents for Your Lawyer
- E. Top 5 Tips for Drafting and Using Requests for Admissions

Essentials of Assisting With Depositions (Including Witness and Depositions Checklists)

VI. **Top Ethical Considerations in Discovery for Paralegals**

4:00 - 5:00, *John H. Killeen*

- A. The Unauthorized Practice of Law (UPL)
- B. Communicating With Clients
- C. Safeguarding Client Confidentiality
- D. Duty of Candor in Discovery
- E. Competence
- F. Ethical Considerations Concerning E-Discovery
- G. Dealing With Difficult Clients and Opposing Counsel

**Event Description:**

How confident are you in your ability to draft complete and targeted discovery requests, track down hidden assets, and collect deleted data off phones? In this comprehensive program, our seasoned faculty provide you with effective strategies for managing the discovery process in divorce cases, along with sample checklists and forms to add to your tool kit. You don't want to miss this practical course - register today!

- Receive practical tips for crafting discovery requests and responses.
- Discover cutting-edge social media and smartphone evidence discovery strategies.
- Examine best practices for collecting and reviewing tax returns.
- Learn tips for obtaining key medical records.
- Find out how to better organize and prepare discovery documents for trial.

**Who Should Attend:**

This **intermediate level course** is designed to provide paralegals with essential guidelines for conducting discovery in divorce cases. Those who should attend include:

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

**Event Bio:**

**[Anne D. Barber](#)** is a solo practitioner at Anne D. Barber Attorney at Law LLC. She represents clients in adoption, child custody, child support, father's rights, guardianship and conservatorship, paternity, prenups and marital agreements, restraining orders, same sex family law matters. Ms. Barber earned her B.A. degree, cum laude, from Harvard University and her J.D. degree from Cornell Law School. She is a member of the New Hampshire Bar Association and is admitted to practice law in New Hampshire.

**[John H. Killeen](#)** is a shareholder and principal in the litigation section of Bodker, Ramsey, Andrews, Winograd & Wildstein, P.C., where his areas of practice include estate and probate litigation, divorce and family law, commercial litigation and civil litigation. He is a member of the State Bar of Georgia, and the New Jersey State and New York State bar

associations. Mr. Killeen earned his B.A. degree from Vanderbilt University, his J.D. degree, cum laude, from Syracuse University College of Law and his M.B.A. degree from Emory University.

**E. Chris L'Hommedieu** is the owner and founder of L'Hommedieu Law Office P.A. in Lewiston, Maine, where he focuses on bankruptcy law, personal injury, disability and family law. He is admitted to practice in Maine and the First Circuit. Mr. L'Hommedieu earned his B.A. degree, magna cum laude, from Ithaca College and his J.D. degree at the University of Maine School of Law. He is the president of Community Little Theater in Auburn.

**Jocelyn A. Stachowske** is an attorney at Stachowske Law, PLLC located in Dover, New Hampshire. She has spent over 12 years focusing her practice on family related legal issues, incorporating her background in social work to provide a compassionate, intelligent approach to problem solving. In addition to family law, Ms. Stachowske has experience in wrongful death, motor vehicle accidents and dog bite cases. She earned her B.A. degree from St. Anselm College and her J.D. degree from Quinnipiac University School of Law. Ms. Stachowske has served as former president and vice-president of the Strafford County Bar Association, co-editor of the *Trial Bar News* Family Section, and has been a guest speaker at The University of New Hampshire School of Law. She is admitted to practice in New Hampshire and Maine at the District Court and Supreme Court levels.