

## **Event Title:**

Paralegal Pitfalls and Pointers: Pleadings, Motions, Briefs, Discovery Requests and Answers

## **Event Date and Time:**

June 13, 2024 -- 02:00 PM EDT - 05:15 PM EDT

## **Event Agenda:**

*All times are shown in Eastern time.*

- I. **Powering Up Your Pleadings, Motions, Briefs, and Citations**  
2:00 - 2:45, *Jack R. Luellen*
  - A. Drafting a Well-Pleaded Complaint
  - B. Tips for Drafting Pleadings Around Complex Facts
  - C. Witness Statements and Affidavits
  - D. Response - Fine-Tuning Defenses, Counterclaims, etc.
  - E. Tips for Drafting Various Motions
  - F. Creative Insights on Writing Legal Briefs
  - G. Practical Tips: Citations and Cite Checking
- II. **Top 30 Typographical Errors, Grammatical Pitfalls, Words, and Concepts to Avoid**  
2:45 - 3:30, *Jack R. Luellen*
- III. **Discovery Drafting: Refining Your Requests and Polishing Your Responses**  
3:45 - 4:30, *Raeann Bromark*
  - A. Interrogatories
  - B. Requests to Produce
  - C. Requests for Admissions
  - D. Subpoenas
  - E. Public Records Requests
  - F. Drafting Better ESI Discovery Requests
  - G. Organizing and Reviewing Documents for Production
- IV. **MS Word, Adobe, and Metadata: Legal Document Creation Insights**  
4:30 - 5:15, *Raeann Bromark*
  - A. Document Production Tips
  - B. Creating Templates
  - C. Advanced Formatting Tips
  - D. Customizing Your Interface: Modifying Toolbars to Eliminate Extra Clicks
  - E. Useful Keyboard Shortcuts
  - F. Conversions to and from Other Formats
  - G. Document Review and Collaborative Tools
  - H. Automating Repetitive Tasks
    - I. Restricting Access/Permissions - Customized
    - J. Going Paperless with Adobe Acrobat and a Scanner
    - K. Creating Editable Forms and Questionnaires with Adobe - Case Study
    - L. Creating a Client Intake Questionnaire
    - M. Fast, Efficient Legal Document Review in Adobe
    - N. Helpful User Tips for Adobe Acrobat (Restricting Access/Permissions,

- Customizing Menus, Converting Documents from and into PDF Format)
- o. Be Mindful of Metadata (How to Find it, Scrub it, Keep it Intact)

### **Event Description:**

Litigation document mistakes can be distracting at best - and case-damaging at worst. Is your drafting error free? Are you looking for little ways to polish your skills? Our seasoned faculty will round up the most common mistakes in pleadings, motions, briefs, citations, and discovery requests and responses. They will also reveal creative ways to fine-tune these documents. Build your drafting awareness and skills - register today!

- Gain new insights on drafting complaints and responses.
- Discover the top 30 legal writing errors you never want to make.
- Learn how to draft better, less-objectionable discovery requests.
- Make the forms do the work: learn how to create templates and use other “shortcuts” in MS Word.

*\*Any mention of specific products in this program is intended as part of a general overview and does not constitute IPE's endorsement or recommendation of any specific product or provider. This program is not sponsored by any technology or electronics provider.*

### **Who Should Attend:**

This **intermediate level course** will assist attendees in advancing their legal document drafting skills. Those who should attend include:

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

### **Event Bio:**

**[Raeann Bromark](#)** is currently employed as an insurance defense litigation (general, products, premises, torts, slip and falls) paralegal at Reitler Kailas & Rosenblatt LLP. She is a graduate of the Norwalk Community College paralegal program in Norwalk, Connecticut. Ms. Bromark has been in the legal field for more than 15 years, always as a paralegal with a wide variety of specialties, including real estate (commercial and residential), corporate, intellectual property (patents, trademarks, copyrights, and franchising), in addition to appellate. She has worked in both Connecticut and New York, and has been very active in the paralegal profession. Ms. Bromark is on the Legal Advisory Council, serving in the role of secretary for Norwalk Community College. She has also been involved at the national level, where she currently is on the NFPA (National Federation of Paralegal Associations) Ethics Committee and Legislative Review Committee. Ms. Bromark is a member of the Fairfield County Bar Association and co-chair of the Paralegals Committee. In addition, she is a board member with the New York City Paralegal Association, holding the following positions; policy and procedures coordinator, membership chairperson and the ESAPA representative. Ms. Bromark was

presented with an honorable mention in the *Legal Assistant Today* Rookie of the Year Contest. That same year, she presented a workshop on Pro Bono at the NFPA Annual Conference in Newport, Rhode Island. Ms. Bromark has been recently featured in a contracts textbook published by Prentice Hall. She presented at the Connecticut Bar Association annual meeting on the subject of social media. Ms. Bromark also presented an Institute for Paralegal Education seminar titled "Trial Basics for Paralegals", and presented at the NYCPA CLE "Trial Bootcamp." This past year, she was one of Paralegal Gateway's "Paralegal Superstars." In addition to all of her legal affiliations, Ms. Bromark also volunteers as a court appointed guardian ad litem with CASA/CIP (Children In Placement) in Connecticut. She earned her A.S. degree from Norwalk Community College and her B.S. degree from Mt. Ida College.

[Jack R. Luellen](#) is special counsel with Buchalter in the firm's Denver Office. His practice is primarily dedicated to oil and gas law, with a particular emphasis on litigation. Mr. Luellen earned his B.S. degree, with distinction, from Colorado State University and his J.D. degree, cum laude, from the University of Minnesota Law School. He is admitted to practice in California, Colorado, Utah and North Dakota. Mr. Luellen is a member of the Rocky Mountain Mineral Law Foundation and Energy Mineral Law Foundation.