



Invitation for Comment on Possible Issues Regarding Rule 30(b)(6)

17-CV-AAAA

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Dear Members of the Advisory Committee,

I write to urge the Committee to reject the proposed changed to Rule 30(b)(6) set forth in the May 1, 2017 "Invitation to Comment". In particular, the proposals to render testimony of a party no longer binding on that party and forbidding contention interrogatories would have the sole purpose of gutting the use of Rule 30(b)(6) depositions to gather evidence. While it is understandable that parties subject to depositions under the rule would wish to limit the admissibility of damaging testimony and to shield themselves from thorough deposition, the self-interested litigation strategy of an adverse party should not be a foundation for determine the appropriate balance between the utility and burden of a discovery method.

Thank you,

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