

17-CV-UUUUU



30(b)(6)

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Organizations statements in deposition should not be treated differently than individuals. By taking the help of the corporate fiction owners of the entity take on this and many other consequences in exchange for the benefits. All deponents have the ability to change the testimony at a deposition through the eratta sheet . This is adequate to protect an organization from being bound by an incorrect judicial admission. Parties should be entitled to go to a hearing or trial and rely on admissions made by a party at a depositions to alleviate the need to marshal and introduce evidence and instead to rely on the fact that the opposing side has admitted it

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