



Proposed Changes to FRCP 30(b)(6)

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to:

Rules_Comments

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Rules Committee,

I strongly oppose such changes as such changes only make it even more difficult for Plaintiffs to obtain justice.

Having to incorporate discussion/plan for 30(b)(6) depositions in the Rule 26 conference and discovery plan at the beginning of the case is senseless as Plaintiff has not had a chance to engage in discovery.

There should be no objection provision as such provision would waste the court's time and act only as a road block to an successful deposition.

There should be no forbidding of contention questions because all facts need to be addressed, including facts in support of Defendant's defenses.

There should be no supplementation rule as this will just add confusion and murky up testimony and allow a rewrite by counsel of the testimony.

Absolutely the testimony should be judicial admissions as this is an opportunity for Plaintiff to establish binding testimony.

In sum, 30b6 should still be allowed to be binding testimony, to narrow the issues, and help streamline the process as allowed by FRCP 1. Please do not make it more difficult for Plaintiff's to gain such important testimony.

Thank you.



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