

**Proposed Changes To Discovery Rules****Bbwhitmanlaw** to: David_Campbell, John_G_Koeltl,
Judge_Grimm

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Cc: Whits123

Gentlemen

I have been practicing law for over 30 years, mostly as a Plaintiff lawyer, but occasionally on the defense side. My practice includes both criminal and civil law, and many different types of civil cases. I consider myself a trial lawyer, a generalist.

I applaud your attempts to reduce and streamline discovery. I agree with most of the proposals, including especially the presumptive limits on the time of depositions from 7 hours to 4 hours. In fact, I think almost any deposition can be done in 2-3 hours, assuming that the other side has properly provided documentary discovery, and the attorney has properly prepared. I do not see any reason therefore to limit requests for production of documents or requests for admissions, as I seldom see abuse of these discovery tools, and effective use of these tools, especially now with electronic discovery, can help reduce the need for long depositions.

What I am more concerned about, and wish that there was a move to reform, are the needlessly complex, ambiguous and convoluted jury instructions that we are saddled with. I wish we could reduce the language in the instructions and make them more "plain English." I also think we could limit the presumptive number of jury instructions and pages to 10.

With common sense reforms of discovery and jury instructions, I think we would get back to the ideals of an open, accessible, jury friendly and Constitutional system of civil justice.

Thank you.

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