

# Comment from Todd Croftchik, NA

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I recommend the Committee limit the presumptive number of Rule 34 requests. The version of the Amendments released for public comment reveals that the Committee studied at length a presumptive limit of 25 Rule 34 requests but ultimately abandoned that limit. Even a reasonable limit of 50 requests would significantly reduce the attorneys' fees and costs expended responding to hundreds of requests for production in a single product liability case.