

Preface

In order for this book to be useful and practical, and in only one slim volume, I will make reference to certain rules of civil procedure and evidence, as necessary, and on occasion supporting law. But be aware that in many instances you will have to do further research. For example, can you support your belief that you don't have to produce a particular document because it is subject to the attorney-client privilege?

I will raise issues like this that will arise during discovery, but I will not attempt anything near an exhaustive discussion. (Edna Epstein's marvelous book, *Attorney-Client Privilege*, and its supplements, delves into this topic definitively and at length.) Similarly, although it's impossible to discuss discovery without mentioning e-discovery, I will discuss it only as it pertains to paper discovery. Because, make no mistake, this book is about PAPER discovery.

If you are lucky enough to have a paralegal or assistant who can help you with discovery, make as much use of him as possible. A good, experienced paralegal can do much more than just Bates stamp documents. He can review documents for entry into a log, can take a first crack at preparing document requests, can make sure that your documents stay organized even after you rifle through them.

I want to thank paralegal extraordinaire Sherrie Ireland for her help through the years and her remarkable organization and insight, despite how messy her office is. I also thank

Nancy Watson for her time and patience. And I dedicate this book to my wonderful family, Gabe Steerman and Wendy Leebov.

This book grew out of an article for *Litigation*, the journal of the Section of Litigation, entitled, “Why I Love Document Reviews.”