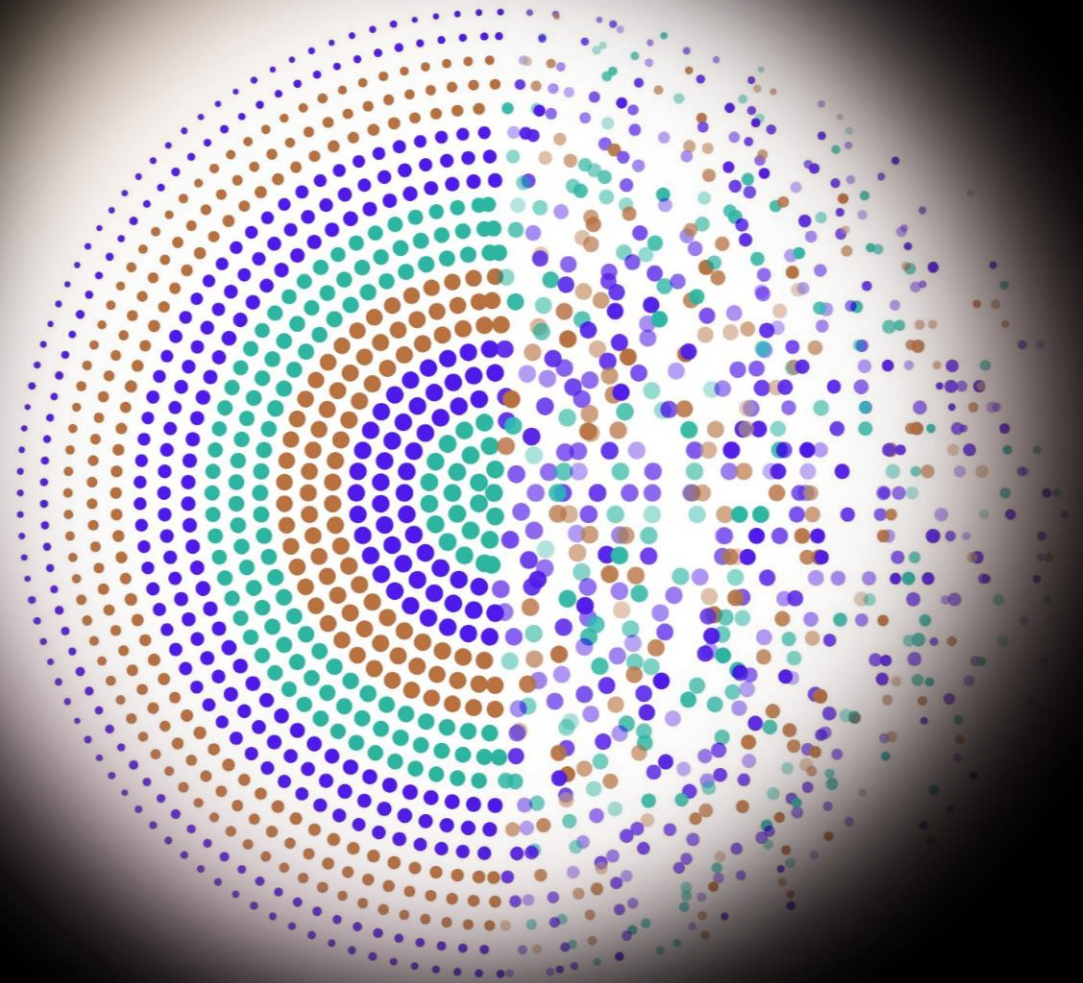


Discovery in the legal aid context



Luke Grundman

Mid-Minnesota Legal Aid

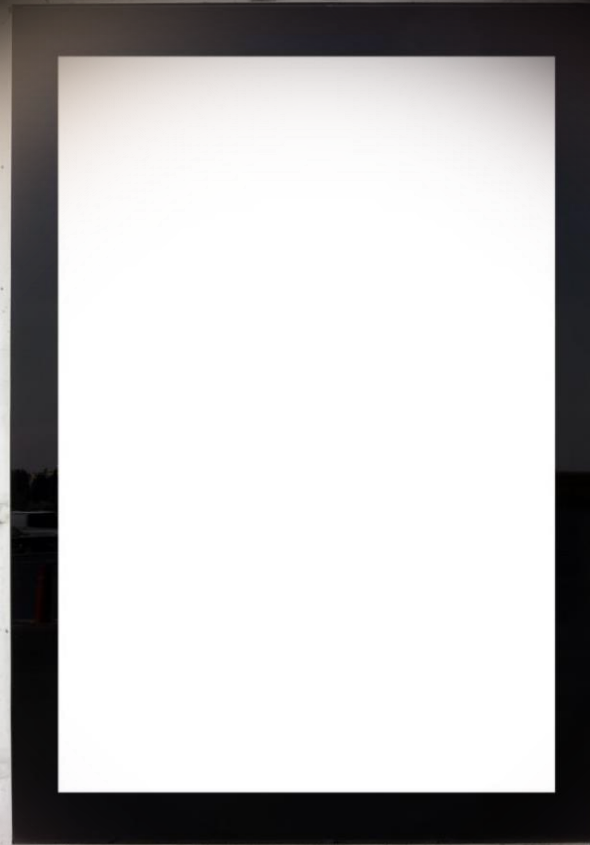
Litigation Director

Framework

Affirmative Case

Overview

Legal Aid Context



Legal Aid Context

- LARGE CASELOADS
- NEVER ENOUGH TIME



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GOALS

“If you don’t know
where you’re going,
you’ll end up
someplace else.”

-Yogi Berra

Common Goals

Minimize
surprises

Fill in the
claim chart

Element	Description	Evidence and Counterevidence
		<u>Evidence:</u> <u>Counterevidence:</u>
		<u>Evidence:</u> <u>Counterevidence:</u>
		<u>Evidence:</u> <u>Counterevidence:</u>
		<u>Evidence:</u> <u>Counterevidence:</u>
		<u>Evidence:</u> <u>Counterevidence:</u>
		<u>Evidence:</u> <u>Counterevidence:</u>

Proof Chart

(Ref. Tiffany Sedillos)

Legal or Factual Issue/Element	Facts that Support	Facts that Detract	Who Says it	What Exhibit

Key Fact <u>In</u> Dispute	Discovery Method(s)	Status
<u>Claim/Defense 1:</u>		
Fact 1:	RFPs: -	
	<u>Rogs:</u> -	
	Depos: -	
	Subpoenas: -	
Fact 2:	RFPs: -	
	<u>Rogs:</u> -	
	Depos: -	
	Subpoenas: -	
Fact 3:	RFPs: -	
	<u>Rogs:</u> -	
	Depos: -	

Key Fact in Dispute

DID FATHER
EXERCISE
PARENTING
TIME?

Key Fact in Dispute

DID THE
LANDLORD
RETALIATE?

Key Fact in Dispute

DID THE TENANT
STEAL THE
PACKAGE?

Toolbox



Docs

Interrogatories

Depositions

Admissions

Subpoenas

Requests for Production

RULE 34



Question: Produce each and every document which shows your internal organizational structure, including but not limited to documents that illustrate your divisions.

unintelligible, vague or unclear as written. If the request is indeed intended for Mr. [REDACTED] as a natural person, Mr. [REDACTED] lacks knowledge about what his personal "internal organizational structure" or his personal "divisions" would be other than medical in nature, and asserts that his medical condition is not reasonably calculated to lead to the discovery of admissible evidence in this matter pertaining to financial transactions.



Interrogatories

RULE 33

1 Equity Residential Holdings, Judge Laurie Miller
LLC,
2
Plaintiff,
3
vs. File No. 27-CV-HC-19-3550
4
Candida Mendez-Hernandez, John Doe &
Jane Doe,
5
Defendants.
6

7
8 VIDEO DEPOSITION
9
10
11 The following is the video deposition of
12 STEPHEN FRENZ, taken before Heather E. Carlotto,
13 Notary Public, Registered Professional Reporter,
14 Certified Realtime Reporter, pursuant to Notice of
15 Taking Deposition, at 33 South Sixth Street, Suite
16 4160, Minneapolis, Minnesota, commencing at
17 approximately 8:33 a.m., November 5, 2019.
18
19 * * *
20

Depositions



Deposition of Organization

Federal Rule 30(b)(6)
State Rule 30.02(f)



Trial Depositions

RULE 32

A long, brightly lit hallway with a green carpet and white walls. The hallway is perspective-oriented, leading towards a bright light at the end. On the right side, there is a large window or glass partition showing a view of a city street with buildings and a red fire truck. The ceiling has recessed lighting fixtures.

Requests for Admission

RULE 36

Requests for production;
Interrogatories

Depositions

Admissions

Discovery Timeline



Use the
Court to
help

Questions?

