

## Five Tips for Using Proportionality to Limit Wild Goose Chases in Discovery

June 11, 2020

The American Bar Association has published an article written by PS&H partner Paul Kessimian titled, *Five Tips for Using Proportionality to Limit Wild Goose Chases in Discovery*.

The article expands on 5 practical and insightful tips to make discovery more streamlined and efficient:

- Cooperate with Opposing Counsel
- Document Your Cooperation and Disputes
- Meaningfully Respond to Discovery Requests
- Support Any Discovery Motions with Specific Facts
- Consider Reasonable Parameters to Discovery and What Will Be Searched

To read the full article as published, visit <https://www.americanbar.org/groups/litigation/committees/commercial-business-practice/2020/five-tips-proportionality-discovery-litigation>.

<https://www.psh.com/five-tips-for-using-proportionality-to-limit-wild-goose-chases-in-discovery/>