

EXERCISE**RESPONDING TO A CORPORATE DEPOSITION NOTICE*****Background***

You're on a litigation team defending a corporation against an employee discrimination lawsuit. You've been served with a corporate deposition notice that seeks to have someone deposed who knows about your client's HR practices, including hiring, termination, and procedures for handling discrimination complaints.

Your team has already coordinated with the client about the information requested in the notice. You've now been tasked with drafting the response to the corporate deposition notice by letter. A draft is due to your team this week.

Instructions

Come prepared to discuss these questions about how you'll draft the letter:

- What should your responses in the letter cover?
- Will you utilize boilerplate language and objections? Why or why not?