

§ 6.12

Remote Working*E-Discovery and Your Remote Computer***MINIMIZING YOUR EXPOSURE**

Most of discovery can be accomplished via remote working. Documents can be created, sent, and responded to just as if you were in the office, in conjunction with your supervising attorney. While working from home, though, if you use a personal computer that is not dedicated for your work as a paralegal, there may be real concerns over what material could be the subject of e-discovery requests during contentious litigation. Particularly, if you have communication with your client or witnesses over social media using your computer, not only may the social media platforms be subject to discovery, the computer generating the social media content could be vulnerable as well. Especially if you use a personal instead of work computer. To minimize risks, try the following:

1. Ask your firm to **purchase a computer** for you to use at home.
2. Make sure any computer has the **software** you need installed.
3. Ask your firm to **install security and virus software protection**.
4. If your firm cannot pay for a separate computer for your home, and you are forced to use a personal computer, **create and use a different login** for work when you use that computer. By doing so you may limit the amount of access your computer is exposed to in any potential litigation.

CHAPTER 6**Wrap-Up****WHAT YOU SHOULD KNOW**

After reading this chapter you should know the following:

- The various forms of legal writing during litigation
- The purpose and structure of a summons
- How do draft a complaint
- How to draft discovery documents
- How to summarize a deposition
- A basic understanding of E-Discovery

ASSIGNMENTS

- Assignment § 6.6** Due Date: / /
Prepare a Summons and Complaint based on client's case.
- Assignment § 6.7 (Optional)** Due Date: / /
Prepare an Answer, switching sides momentarily or using a classmate's complaint
- Assignment § 6.8** Due Date: / /
Discovery Documents:
 - (a) *Draft a set of Interrogatories (20 questions)*
 - (b) *Draft a set of Requests for Admissions (20 statements)*
 - (c) *Draft a set of Requests for Production (5 requests)*
- Assignment § 6.9** Due Date: / /
Based on the deposition transcript example in the textbook, create a sample deposition summary.