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OCT 17 2019

OFFICE OF THE CLERK
SUPREME COURT
COURT OF APPEALS

October 14, 2019

Clerk of Appellate Courts
Post Office Box 249
Jackson, MS 39205

RE: September 30, 2019 Motion to Amend MRCP 30

Dear Clerk:

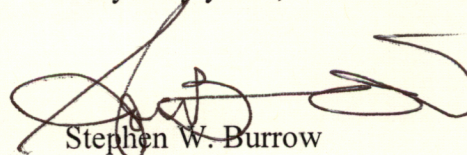
I am writing to comment on the proposed amendment to Rule 30 of the Mississippi Rules of Civil Procedure. I am generally in favor of the Rule. However, I ask that in order to forestall any abuses in questioning deponents, or misuse of objections by other counsel, the following sentence be added at the end of the proposed amendment:

A court is authorized, upon motion, to address questions and objections during a deposition in accordance with MRCP 37(e).

I believe the addition of the above serves two purposes. First, it gives any attorney or party the ability during the deposition to seek court intervention and address inappropriate questions, as well as objections. The second purpose is it should deter any party from abusing the discovery process, whether by questions or objections, in a manner which is not consistent with both the Mississippi Rules of Civil Procedure and the Mississippi Rules of Professional Conduct.

If you have any questions, please do not hesitate to contact me. As always, I am

Very truly yours,



Stephen W. Burrow

SWB/dar

MOTION#

response

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