#### Presentation to:



**38th Annual Corporate Counsel Institute** 

New Discoveries in . . . Discovery

## Presenters

### In Houston:

**Sammy Ford IV,** Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing P.C. **Robert L. Levy,** Exxon Mobil Corporation **Daniel Lim,** Shook, Hardy & Bacon L.L.P.

### In Dallas:

**Sammy Ford IV,** Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing P.C. **Daniel Lim,** Shook, Hardy & Bacon L.L.P. **Rebecca Lorance,** Dell

# I. Polling Questions

## Question 1

What is your current role?

- A) Plaintiff's counsel
- B) Defense counsel
- C) In-House counsel
- D) Other

## Question 2

If you are in-house counsel, do you work with outside counsel to address the scope of preservation for your cases?

- A) Yes
- B) No
- C) It depends

### Question 3

When do you address preservation with opposing counsel in your cases?

- A) Early in the case
- B) At the scheduling conference
- C) Never
- D) Other





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