

Bullet points, yes. Unnecessary dates, no.

Our writing guru, Joseph Kimble, simplifies and adds punch with some fairly quick fixes. He notes: The opinion deals with Defendant's motion to quash Plaintiff's notice of deposition. Before the excerpt below, the opinion had already set out the date of Plaintiff's medical treatment, May 31, 2016, and explained that she alleged unlawful billing practices by Mercy Hospitals and its billing company, MRA. The judge ultimately limited discovery to matters that occurred after Mercy hired MRA. The various items on the left — four of which are omitted to save space — cry out for a list. Bullets work nicely when the items have no rank order. As for the dates, they seriously distract.

Original

Plaintiff served her Rule 30(b)(6) notice on April 24, 2017. . . . The 30 topics listed in the notice relate to: Mercy's policies and procedures for billing auto insurance medical payments coverage, asserting medical liens, and obtaining patient consent (known as "Consent and Agreement" forms) for patients with health insurance during the periods of December 13, 2013 (the date on which Mercy hired MRA) to the present, and for the three-year period prior to December 17, 2013; Mercy's billing for Plaintiff's medical treatment on May 31, 2016; negotiations between MRA and Mercy prior to December 13, 2013; . . . [four items omitted]; and complaints received by Mercy during the period of December 17, 2013 to May 31, 2016 regarding the billing practices described above.

Better

Hoops served her Rule 30(b)(6) notice a month ago. It lists 30 topics related to the following:

- Mercy's policies and procedures — both before and after December 2013, when Mercy hired MRA — for billing auto-insurance medical-payments coverage, asserting medical liens, and obtaining patient consent for patients with health insurance;
- Mercy's billing for Hoops's medical treatment;
- negotiations between Mercy and MRA before MRA was hired; . . . and
- complaints that Mercy received after it hired MRA and before Hoops's treatment date about the billing practices described above.

Redlined

^① Hoops Plaintiff served her Rule 30(b)(6) notice ^② on April 24, 2017. . . .
 The 30 topics listed in the notice relate to: Mercy's policies and procedures for billing auto-insurance medical-payments coverage, asserting medical liens, and obtaining patient consent (known as ^⑤ "Consent and Agreement" forms) for patients with health insurance ^⑥ during the periods of December 13, 2013 ^⑦ (the date on which Mercy hired MRA) to the present, and for the three-year period ^⑧ prior to December 17, 2013; Mercy's billing for ^① Plaintiff's medical treatment on May 31, 2016; negotiations between MRA and Mercy ^⑧ prior to December 13, 2013; . . . [four items omitted]; and complaints ^⑨ received by Mercy ^⑩ during the period of December 17, 2013 to May 31, 2016 ^⑪ regarding the billing practices described above.

1. Generally prefer names. The opinion would have said earlier, "The plaintiff, Cynthia Hoops."
2. The date doesn't matter.
3. Better to set up the list with introductory words.
4. Use a hyphen with a phrasal (compound) adjective.
5. Unnecessary detail. The form is never mentioned again.
6. A multiword preposition. These gremlins abound in legal writing. They can usually be replaced with a one-word preposition.
7. The opinion seemed inconsistent on the exact day. But it's probably not needed at this point anyway.
8. Another multiword preposition — and one of the most common. Always use *before*.
9. Again, the opinion had already identified the treatment date.
10. There are ten dates in the full list. After the one in the first bullet, I think most of them — and probably all of them — can go. The trouble, of course, is that the reader has to keep going back and tying dates to events.
11. Strongly prefer *on* or *about* to *regarding*. Imagine a play called *Much Ado Regarding Nothing*.