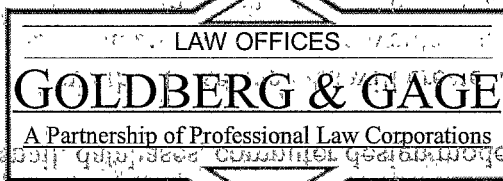


Terry M. Goldberg*

Bradley C. Gage*



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23002 VICTORY BOULEVARD ~ WOODLAND HILLS, CA 91367 ~ (818) 340-9252 ~ FAX (818) 340-9088
 Email: tgoldberg@goldbergandgage.com Email: bgage@goldbergandgage.com

January 31, 2005

04-CV-170

Peter G. McCabe, Secretary
 Committee on Rules of Practice and Procedure
 Administrative Office of the U.S. Courts
 One Columbus Circle, N.E.
 Washington, DC 20544

Re: Opposition to Proposed Changes to Federal Discovery Rules

Dear Mr. McCabe:

In August, 2004, the Advisory Committee on Civil Rules for the federal courts published proposed new rules for the federal courts on electronic discovery ("e-discovery"). If adopted, these changes to the Federal Rules of Civil Procedure will govern all discovery of information stored on electronic media (email, databases, computer design models, test data, etc.).

Many trial lawyers, like me, believe that these changes will create additional discovery abuse, provide certain parties with procedural and substantive advantages, and erode the right to a fair trial. Therefore, I urge you not to enact these changes. Thank you.

Very truly yours,
 Law Offices of Goldberg & Gage
 A Partnership of Professional Law Corporations

By Bradley C. Gage

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