



## How To Avoid Being A Discovery Pushover, Law360 ft. Dean Herman

Dean B. Herman, partner in KD's Los Angeles office and co-chair of the National Bad Faith/Insurance Practice Group, has been quoted in an article regarding document preservation and production, and how to handle uncooperative opposing counsel. The article was written by Law360's Allison Grande and published on November 24, 2014.

"Both with respect to discovery you propound as well as discovery you respond to, the core issue will be what should reasonably be made available by each side," said Dean Herman, co-chair of the national insurance coverage and bad faith group at Kaufman Dolowich & Voluck. "At the outset of engagement, you should identify documents and data potentially at issue, and create clear lines of communications with your client."