

Brief-Writing Assignment

Our client, Michael Carlsen, was sued one year ago by Lindsey Young for damages arising out of a car accident allegedly caused by Carlsen's negligent and reckless driving. Young has alleged that she has suffered great pain and injury and was unable to work for nine months.

During discovery, we requested that Young produce various documents, including all postings and photos posted by her to her Twitter and Facebook accounts relating to physical activities engaged in by Young that would be inconsistent with her allegations concerning the nature and extent of her injuries. Specifically, after another witness testified during a deposition as to the existence of photos, tweets, and posts on social media showing Young after the accident, we requested the production of any materials on Twitter or Facebook showing or discussing Young hiking in Europe, dancing, or riding a motorcycle during the nine months after the accident.

Young refused to produce the documents requested and has claimed that such would be a violation of her right to privacy and is a "fishing expedition" based on Carlsen's mere hope of discovering relevant information.

Please prepare a brief (memorandum of points and authorities) in support of a motion to compel production of documents (under Fed. R. Civ. P. 37) that will persuade the U.S. District Court for the Central District of California that Young must produce the social media documents requested.

Court rules impose a five-page limit on all briefs. In addition, court rules require that the brief be word-processed and double-spaced and that current *Bluebook* citation form be followed.