

2020-008

**Lorrie Platt**

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**From:** William Gillespie <swampfoxfire@sbcglobal.net>  
**Sent:** Monday, November 23, 2020 10:59 AM  
**To:** RulesComment  
**Subject:** MSJ single statement

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Folks:

If I understand the rule, it requires a single document in chart form specifying disputed facts, and citing to evidence supporting them.

My background is largely in California law. California has required a "separate statement" in msj practice for some decades. It is table with two columns: one is the fact in issue; the second cites to the back-up evidence for (or against) it. Courts of appeal have gone so far as to say "if it is not in the separate statement, it does not exist."

This in my view is a tremendous time-saver. No room for rhetoric or long, emotion-laden sentences. It simply cuts to the chase.

Best Regards,

William G. Gillespie