

This is an excerpt from the 2-page Discovery Deadline Chart

DISCOVERY DEADLINES

NOTE: These are just a few of the dates to calendar during discovery. The list is by no means exhaustive. All of the notice dates are the minimum required. Try to give more notice where possible. Plan ahead to serve requests for documents (and set production dates) well in advance of the date you need the documents. Always keep in mind the discovery cut-off and motion to compel cut-off dates, and the effect of C.C.P. § 1013 when you serve discovery.

<u>Commencing Discovery</u>	<i>Discovery is commenced when the discovery request is served.</i>
Deposition (“depo”)	<ul style="list-style-type: none"> Plaintiff may not serve notice of depo earlier than 20 days after defendant is served or appears in the action. No time restriction on defendant.
Interrogatories (“Rogs”); Requests for Admission (“RFA’s”); Requests for Production (“R/P”)	<ul style="list-style-type: none"> Plaintiff may not serve Rogs, RFA’s, or R/P earlier than 10 days after defendant is served or appears in the action, whichever is first. No time restriction on defendant.
Demand to exchange list of experts	<ul style="list-style-type: none"> Must be served within 10 days after setting of initial trial date, or 70 days before that trial date, whichever is closer to trial date. Exchange date must be within 50 days before initial trial date, or 20 days after service of demand, whichever is closer to trial date. Supplemental list of expert witnesses may be served within 20 days after the initial exchange.
<u>Completing Discovery (“Discovery Cut-off”):</u>	<i>A depo is “completed” on the day it begins. Written discovery is “completed” on the day the responses are due. See note re effect of C.C.P. § 1013 below.</i>
Non-expert discovery	<ul style="list-style-type: none"> Must be completed at least 30 days prior to initial trial date.
Expert discovery	<ul style="list-style-type: none"> Must be completed at least 15 days prior to initial trial date.
<u>Noticing Depo:</u>	<i>See note re effect of C.C.P. § 1013 below.</i>
Depo of party (appearance only)	<ul style="list-style-type: none"> Notice of depo must be served at least 10 days prior to depo.
Depo of party where documents are sought	<ul style="list-style-type: none"> Notice of depo must be served at least 10 days prior to depo (and consider need to add reasonable time for deponent to locate, produce documents, and travel to depo).