
California Civil Discovery

Charts for the Everyday Litigator

Katherine L. Gallo

I. DEPOSITIONS

Type	Commences	Closes	Time Limit	Requirements	MT/Conf.	Op.Part. Remedies	Sanctions
DEPOSITIONS (§§ 2020.010 – 2020.510) (§§ 2025.010 – 2025.620)				<ul style="list-style-type: none"> • 1 depo per deponent (§ 2025.610(a)) • 75 miles from residence or within county in which action is pending and within 150 miles of residence (§ 2025.250(a)) 			
A. DISCOVERY 1. Parties							
a. Testimony Only (§§ 2025.210 – 2025.270)	<ul style="list-style-type: none"> • Defendant: anytime (§ 2025.210(a)) • Plaintiff: 20 days after service of summons or defendant’s appearance in action. (§ 2025.210(b)) • Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> • 30 days before initial trial set (§ 2024.020(a)) or • 15 days before arbitration (CRC 3.822) 	10-day notice (§ 2025.270(a))	Notice to state: <ul style="list-style-type: none"> • nature of deposition • date, time, place • deponent’s rights and duties; and penalties for disobedience • subpoena, witness fee and mileage on or before deposition (§ 2025.220(a)(1) – (6)) 		<ul style="list-style-type: none"> • Written objection due within 3 calendar days (§ 2025.410(a)) • Motion for Protective Order (§ 2019.030) (§ 2025.420) • Motion to Quash (§ 2025.410(c)) 	
b. Testimony and Documents (§§ 2025.210 - 2025.270)	<ul style="list-style-type: none"> • Defendant: anytime (§ 2025.210(a)) • Plaintiff: 20 days after service of summons or defendant’s appearance in action. (§ 2025.210(b)) • Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> • 30 days before initial trial set (§ 2024.020(a)) or • 15 days before arbitration (CRC 3.822) 	10-day notice (§ 2025.270(a))	Documents described with reasonable particularity (§ 2025.220(a)(4))		<ul style="list-style-type: none"> • Written objection due within 3 calendar days (§ 2025.410(a)) • Motion for Protective Order (§ 2019.030) (§ 2025.420) • Motion to Quash (§ 2025.410(c)) 	

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<p>2. Nonparty Witnesses a. Testimony Only (§§ 2020.210 – 2020.310)</p>	<ul style="list-style-type: none"> • Defendant: anytime (§ 2025.210(a)) • Plaintiff: 20 days after service of summons or defendant’s appearance in action. (§ 2025.210(b)) • Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> • 30 days before initial trial set (§ 2024.020(a)) <p>or</p> <ul style="list-style-type: none"> • 15 days before arbitration (CRC 3.822) 	<p>10-day notice (§ 2025.270(a))</p>	<ul style="list-style-type: none"> • Personal service (§ 2020.220(b),(c)) <p>Notice to state:</p> <ul style="list-style-type: none"> • date, time, place (§ 2020.310(a)) • nature of deposition (§ 2020.310(b)(1)) • deponent’s rights and duties (§ 2020.310(b)(2)) • and penalties for disobedience (§ 2020.310(b)(3)) • subpoena, witness fee and mileage on or before deposition (§ 2020.230(b)(3)) • to record audio or video (§ 2020.310(c), (d)) 		<ul style="list-style-type: none"> • Motion to Quash (§ 1987.1)) • Motion for Protective Order (§ 2019.030) (§ 2025.420) 	<p>Contempt (§ 2020.240)</p>
<p>b. Business Records only (§§ 2020.410 – 2020.440)</p>	<ul style="list-style-type: none"> • Defendant: anytime (§ 2025.210(a)) • Plaintiff: 20 days after service of summons or defendant’s appearance in action. (§ 2025.210(b)) • Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> • 30 days before initial trial set (§ 2024.020(a)) <p>or</p> <ul style="list-style-type: none"> • 15 days before arbitration (CRC 3.822) 	<p>15-day after service or 20 days after issuance. (§ 2020.410(c))</p>	<ul style="list-style-type: none"> • Personal service (§ 2020.220(b)) • Documents described with reasonable particularity (§ 2020.410(a)) 		<ul style="list-style-type: none"> • Motion to Quash (§ 1987.1)) • Motion for Protective Order (§ 2019.030) (§ 2025.420) 	<p>Contempt (§ 2020.240)</p>

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<p>c. Records and Testimony (§ 2020.510)</p>	<ul style="list-style-type: none"> Defendant: anytime (§ 2025.210(a)) Plaintiff: 20 days after service of summons or defendant's appearance in action. (§ 2025.210(b)) Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	<p>10-day notice unless consumer records involved (§ 2020.510(a)(1) & (c))</p>	<ul style="list-style-type: none"> Personal service (§ 2020.220(b)) Comply with § 2020.310. (§ 2020.510(a)(1)) Designate business records with reasonable particularity (§ 2020.510(a)(2)) Specify any sampling or testing (§ 2020.510(a)(3)) 		<ul style="list-style-type: none"> Motion to Quash (§ 1987.1)) Motion for Protective Order (§ 2019.030) (§ 2025.420) 	<p>Contempt (§ 2020.240)</p>
<p>d. Records of Consumers (§1985.3)</p>	<ul style="list-style-type: none"> Defendant: anytime (§ 2025.210(a)) Plaintiff: 20 days after service of summons or defendant's appearance in action. (§ 2025.210(b)) Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	<p>5-day notice to consumer <i>and</i> 15-days after service or 20 days after issuance (§§ 1985.3(b), 2020.410(c) & (e), 2023.270(c))</p>	<ul style="list-style-type: none"> Personal service (§ 2020.220(b)) Notice of Privacy Rights Service at least 10 days before the date set for production and at least 5 days before service on the custodian of records (§ 2020.410 (c)) 		<ul style="list-style-type: none"> Subpoenaing party's failure to comply with § 1985.3 is grounds not to comply with subpoena. (§ 1985.3(k)) Motion to Quash (§ 1987.1)) Motion for Protective Order (§ 2025.420, 2019.030) 	<p>Contempt (§ 2020.240)</p>

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<p>3. Entity</p>	<ul style="list-style-type: none"> Defendant: anytime (§ 2025.210(a)) Plaintiff: 20 days after service of summons or defendant's appearance in action. (§ 2025.210(b)) Ct. can grant earlier depo with showing of good cause (§ 2025.210(b)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	<p>10-day notice unless consumer records involved (§ 2020.510(a)(1) & (c),)</p>	<ul style="list-style-type: none"> Personal service if entity not a party (§ 2020.220(b)) Notice shall describe with reasonable particularity the matters on which examination is requested. (§§ 2020.410(e) & 2025.230) Notice shall advise the organization of its duty to designate and produce most qualified Person (§§ 2020.310(e), 2025.230) 		<ul style="list-style-type: none"> Written objection due within 3 calendar days (§ 2025.410(a)) Motion to Quash (§ 1987.1)) Motion for Protective Order (§ 2025.420, 2019.030) 	
<p>4. Expert a. Retained</p>		<p>15 days before initial trial set (§2024.030)</p>	<p>10-day notice unless consumer records involved (§ 2020.510(a)(1) & (c), 2024.030)</p>	<ul style="list-style-type: none"> Retaining party to bring expert for deposition within 75 miles of court house where the action is pending (§ 2034.420) Deposing party must tender expert fee prior to deposition (§§ 2034.450, 2034.460) Need subpoena for documents (§ 2034.410 citing §2025.280(b)) Special notice if expert video to be used at trial in lieu of live testimony (§ 2025.620(d)) 		<ul style="list-style-type: none"> Written objection due within 3 calendar days (§ 2025.410(a)) Motion to Quash (§ 1987.1)) Motion for Protective Order (§ 2019.030) (§ 2025.420) 	

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b. Independent		15 days before initial trial set (§2024.030)	10-day notice unless consumer records involved (§ 2020.510(a)(1) & (c))	<ul style="list-style-type: none"> • Personal Service • Witness fee and mileage (§ 2020.230) • May have to be paid expert fees (§ 2034.43) • Special notice if expert video to be used at trial in lieu of live testimony (§ 2025.620(d)) 		<ul style="list-style-type: none"> • Subpoenaing party's failure to comply with § 1985.3 is grounds not to comply with subpoena. (§ 1985.3(k)) • Motion to Quash (§ 1987.1)) • Motion for Protective Order (§ 2019.030) (§ 2025.420) 	
B. MOTIONS 1. Deposition without Documents							
a. Protective Order (§§ 2019.030, 2025.420)		15 days before initial trial set (§2024.020(a))	Promptly (§2025.420)	<ul style="list-style-type: none"> • Good cause • “Unwarranted, annoyance, embarrassment, oppression or undue burden and expense” • (§ 2025.420(b)) • No personal service required (§ 2025.480(c)(3)) 	Yes (§ 2025.420(a))		(§ 2025.420(d)) (§ 2019.030(c))
b. Quash (§§1987.1, 2025.410(c))		15 days before initial trial set (§2024.020(a))		<ul style="list-style-type: none"> • Service problems/technical defects • No personal service required (§ 2025.480(c)(3)) 	Yes (§ 2025.410(c))		(§ 1987.2) (§ 2025.410(d))
c. Compel Answers (§ 2025.480)		15 days before initial trial set (§2024.020(a))	60 days after completion of record of deposition (§ 2025.480(b))	<ul style="list-style-type: none"> • Notice to all parties and deponent (§ 2025.480(c)) • Transcript lodged with court 5 days before hearing (§ 2025.480(d)) • Separate statement of questions in dispute (CRC 3.1345) • No personal service 	Yes (§ 2025.480(b))		(§ 2025.480(f)) (§ 639(e))

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				required (§ 2025.480(c)(3))			
d. Compel Appearance (§§ 2025.430 – 2025.450)		15 days before initial trial set (§2024.020(a))	None	<ul style="list-style-type: none"> Failed to appear Good cause (§ 2025.450(b)(1)) 	Yes (§ 2025.450(b)(2))		Awarded in favor of any party attending (§§2025.430 , 2025.440, 2025.450(c)(2))
2. Deposition with Documents							
a. Compel Documents		15 days before initial trial set (§2024.020(a))		<ul style="list-style-type: none"> Good cause for document production hearing (§ 2025.480(d)) 	Yes (§ 2025.450(b)(1))		Awarded in favor of any party attending (§§2025.430, 2025.440, 2025.450(c)(2))
3. Nonparty Depositions							
a. Quash Subpoena (§§ 1985.3(g), 1987.1)		15 days before initial trial set (§2024.020(a))	Anytime before depo date	<ul style="list-style-type: none"> No good cause required 	No		(§ 1987.2)
b. Protective Order (§§ 1987.1, 2019.030 2025.420)		15 days before initial trial set (§2024.020(a))	Promptly	<ul style="list-style-type: none"> No good cause required 	No		(§ 2019.030(c))
c. Compel Compliance (§ 1987.1)		15 days before initial trial set (§2024.020(a))		<ul style="list-style-type: none"> No good cause required 			Contempt (§1991.1) (§ 2020.240)
4. Expert							
Retained		10 days before initial trial set (§ 2024.030)		<ul style="list-style-type: none"> Motion requirements are same as for party deposition motions 	Yes with counsel who retained expert.		Sanctions are same as for motions against a party.
Independent		15 days before initial trial set (§2024.030)		<ul style="list-style-type: none"> Motion requirements are same as for non-party deponents 	No		Sanctions are same as for motions against non-party.

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II. INTERROGATORIES

Type	Commences	Closes	Time Limit	Requirements	MT/Conf.	Op.Part.Rem.	Sanctions
INTERROGATORIES (§§ 2030.010 – 2030.410)							
A. Discovery							
1. Official Form (§ 2030.030(a)(2))	<ul style="list-style-type: none"> Plaintiff: 10 days after service. Defendant: anytime. (§ 2030.020(b)) Ct. may grant plaintiff leave to propound at an earlier time upon showing of good cause (§ 2030.020(c)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	30-day notice (§ 2030.260(a))	On any party (§ 2030.010(a))		<ul style="list-style-type: none"> Written objections (§ 2030.210(a)(3)) 	
2. Specially Prepared (§ 2030.030(b))	<ul style="list-style-type: none"> Plaintiff: 10 days after service. Defendant: anytime. (§ 2030.020(b)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	30-day notice (§ 2030.260(a))	<ul style="list-style-type: none"> On any party (§ 2030.010(a)) More than 35 interrogatories with declaration <ol style="list-style-type: none"> Complexity or quantity of issues Depos expensive Expedience of discovery method (§ 2030.040) 		<ul style="list-style-type: none"> Written objections (§ 2030.210(a)(3)) Motion for Protective Order (§ 2019.030) (§ 2030.090) 	
3. Supplemental		<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 		<ul style="list-style-type: none"> On any party (§ 2030.070(b)) Twice prior to initial trial setting conference and once after. (§ 2030.010(a)) 		<ul style="list-style-type: none"> Written objections (§ 2030.210(a)(3)) Motion for Protective Order (§ 2019.030) (§ 2030.090) 	

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B. Motions							
1. Protective Order (§§ 2019.030, 2030.090)		15 days before initial trial set (§ 2024.020(a))	Promptly (§ 2030.090(a))	• Good cause (§ 2030.090(b))	Yes (§ 2030.090(e))		(§ 2019.030(c)) (§ 2030.090(d))
2. Compel Answers (§ 2030.290(b))		15 days before initial trial set (§ 2024.020(a))	None	• No response (§ 2030.290(b))	No	• Relief from waiver (§ 2030.290(a))	(§ 2030.290(c))
3. Compel Further Answers (§ 2030.300)		15 days before initial trial set (§ 2024.020(a))	45 days after response or supplemental response (§ 2030.300(c))	• Statement of disputed interrogatories and responses (CRC 3.1345)	Yes (§ 2030.300(b))		(§§ 2030.300(d))

III. INSPECTION DEMAND

Type	Commences	Closes	Time Limit	Requirements	MT/Conf.	Op.Part.Rem.	Sanctions
INSPECTION DEMAND (§ 2031.010 – 2031.510)							
A. Discovery							
1. Demands (§ 2031.030)	<ul style="list-style-type: none"> Plaintiff: 10 days after service of summons Defendant: anytime (§ 2031.020(a)) Ct. may grant plaintiff leave to propound at an earlier time upon showing of good cause (§ 2031.020(c)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	30 days (§ 2024.030(c)(2))	<ul style="list-style-type: none"> On any party (§ 2031.010(a)) No limit on number Time and place for inspection Description by category with reasonable particularity (§ 2031.030(c)) 		Written objections (§§2031.210(3), 2031.240)	
B. Motions							
1. Protective Order (§§ 2019.030, 2031.060)		15 days before initial trial set (§ 2024.020(a))	Promptly (§ 2031.060(a))	• Good cause (§2031.060(b))	Yes (§ 2031.060(a))		(§ 2031.060(d))
2. Compel Answers (§ 2031.300(b))		15 days before initial trial set (§ 2024.020(a))	None	• No response (§ 2031.310(b))	No	Relief from waiver (§ 2031.300(a))	(§ 2031.300(c))
3. Compel Further Answers (§ 2031.310)		15 days before initial trial set (§ 2024.020(a))	45 days after response or supplemental response (§ 2031.310(c))	<ul style="list-style-type: none"> Good cause showing (§ 2031.310(a)) Statement of disputed requests and responses (CRC 3.1345) 	Yes (§ 2031.310(a))		(§ 2031.310(d))

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4. Compel Compliance (§ 2031.320(a))		15 days before initial trial set (§ 2024.020(a))	None		No		(§§ 2031.320(b), & (c))
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IV. PHYSICAL/MENTAL EXAM

Type	Commences	Closes	Time Limit	Requirements	MT/Conf.	Op.Part.Rem.	Sanctions
PHYSICAL/MENTAL EXAM (§§ 2032.010 – 2032.650)							
A. Discovery							
1. Physical Exam (§§ 2032.220 - 2032.260)	After defendant has been served or appeared (§ 2032.220(b))	<ul style="list-style-type: none"> • 30 days before initial trial set (§ 2024.020(a)) or • 15 days before arbitration (CRC 3.822) 	<ul style="list-style-type: none"> • 30-day notice (§ 2032.220(d)) • 20-day response (§ 2032.230(b)) 	<ul style="list-style-type: none"> • No painful or protracted intrusive test (§ 2032.220(a)(1)) • Within 75 miles of residence (§ 2032.220(a)(2)) • Licensed physician or other appropriate licensed health care practitioner (§ 2032.020(b)) • Specification of scope and tests (§ 2032.220(c)) • Report due within 30 days after demand or within 15 days of trial, whichever is earlier (§ 2032.610) 		<ul style="list-style-type: none"> • Response in 20 days (§ 2032.230) • Relief from waiver (§ 2032.240(a)) 	
2. Mental Exam (§ 2032.310))	After defendant has been served or appeared (§ 2032.220(b))	<ul style="list-style-type: none"> • 30 days before initial trial set (§ 2024.020(a)) or • 15 days before arbitration (CRC 3.822) 	<ul style="list-style-type: none"> • 30-day notice (§ 2032.220(d)) • 20-day response (§ 2032.230(b)) 	<ul style="list-style-type: none"> • Court order (§ 2032.310(a)) • Specification of scope and tests (§ 2032.310(b)) • Good cause (§ 2032.320(a)) • Physician or clinical psychologist (§ 2032.020(c)) • No observers (§ 2032.530(b)) • May audiotape (§ 2032.530(a)) 	Yes (§ 2032.310(c))	Plaintiff stipulation 1. no claim for unusual mental and emotional distress. 2. No expert testimony regarding the usual mental and emotional distress (§ 2032.320(c))	

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B. Motions							
1. Protective Order (§ 2019.030)		15 days before initial trial set (§ 2024.020(a))	promptly	No authority under § 2032; Maybe § 2019.030	Yes (§ 2019.030(b))		(§ 2019.030(c))
2. Compel Response (§ 2032.240(b))		15 days before initial trial set (§ 2024.020(a))	None	No response (§ 2032.240(b))	None		(§§ 2032.240(c), 2032.410, 2032.420)
3. Unsatisfactory Response, Compel Attendance (§ 2032.250)		15 days before initial trial set (§ 2024.020(a))	None	Response (§ 2032.250(a))	Yes (§ 2032.250(a))		(§§ 2032.250(b), 2032.410, 2032.420)
4. Enforcing Delivery of Report (§ 2032.620)		15 days before initial trial set (§ 2024.020(a))	None	Demand copy of report (§ 2032.610)	Yes (§ 2032.620(a))		(§ 2032.620(b))

V. REQUEST FOR ADMISSION

Type	Commences	Closes	Time Limit	Requirements	MT/Conf.	Op.Part.Rem.	Sanctions
REQUEST FOR ADMISSION (§§ 2033.010 – 2033.080)							
A. Discovery							
1. Truth or Facts (§ 2033.010)	<ul style="list-style-type: none"> Plaintiff: 10 days after service of summons (§ 2033.020(a)) Defendant: anytime (§ 2033.020(b)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	30-day notice (§ 2033.250)	<ul style="list-style-type: none"> Another party in the action (§ 2033.010) 35 limit (§ 2033.030(a)) Declaration of necessity “complexity or the quality of the existing and potential issues” (§§2033.030(a), 2033.050) 		Object in lieu of admitting or denying (§ 2033.230))	
2. Genuineness of Documents (§ 2033.010)	<ul style="list-style-type: none"> Plaintiff: 10 days after service of summons (§ 2033.020(a)) Defendant: anytime (§ 2033.020(b)) Ct. may grant plaintiff leave to propound at an earlier time upon showing of good cause (§ 2033.020(c)) 	<ul style="list-style-type: none"> 30 days before initial trial set (§ 2024.020(a)) or 15 days before arbitration (CRC 3.822) 	30-day notice (§ 2033.250)	<ul style="list-style-type: none"> No limit (§ 2033.030(c)) Availability of originals (§ 2033.060(g)) 		Object in lieu of admitting or denying (§ 2033.230))	

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B. Motions							
1. Protective Order (§ 2033.080))		15 days before initial trial set (§ 2024.020(a))	Promptly (§ 2033.080(a))	<ul style="list-style-type: none"> Unwarranted annoyance, embarrassment, oppression or undue burden and expense (§ 2033.080(b)) 	Yes (§ 2033.080(a))		(§ 2033.080(d))
2. Establishing Admissions (§ 2033.280)		15 days before initial trial set (§ 2024.020(a))	None	<ul style="list-style-type: none"> No response (§ 2033.280(a)) 	No	Tardy response defeats motion; response must be substantially in compliance (§ 2033.280(b))	Mandatory (§ 2033.270(c))
3. Compel Further Answers (§ 2030.290(c))		15 days before initial trial set (§ 2024.020(a))	45 days after response or supplemental response (§ 2033.290(c))	<ul style="list-style-type: none"> Statement of requests and response to RFA in dispute (CRC 3.1345) 	Yes (§ 2033.290(b))		Monetary (§ 2033.290(d)) Deemed admitted if court order disobeyed (§ 2033.290(e))

VI. EXPERT WITNESSES

Type	Commences	Closes	Time Limit	Requirements	MT/Conf.	Op.Part.Rem.	Sanctions
EXPERT WITNESSES (§§ 2034.210 – 2034.640)							
A. Discovery							
1. Disclosure List (§§ 2034.210 – 2034.240)	DEMAND --70 days before trial or 10 days after trial settlement conference, whichever is closer to trial date (§ 2034.220)	RESPONSE --50 days before trial or 20 days after demand, whichever is closer to trial date (§ 2034.230)		<ul style="list-style-type: none"> Simultaneous exchange of (1) expert lists (§ 2034.260(b)) (2) declarations (§ 2034.260(c)) (3) reports of experts (§ 2034.270) 			Exclusion of expert by motion in limine (§ 2034.300)
2. Supplemental List (§ 2034.280)	20 days after exchange (§ 2034.280(a))			<ul style="list-style-type: none"> Limited to adding experts in area opposing party named in initial exchange (§ 2034.280(a)) Served expert witness declaration in compliance with CCP § 2034.260 (§ 2034.280(a)) 			

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B. Motions							
1. Protective Order (§ 2034.250)		15 days before initial trial set (§ 2024.020(a))	<ul style="list-style-type: none"> • Promptly (§ 2034.250(a)) 	Good cause (§ 2034.250(b))			(§ 2034.250(c))
2. Augment List (§ 2034.610 – 2034.630)		15 days before initial trial set (§ 2024.020(a))	<ul style="list-style-type: none"> • Sufficient time, before 15-day cutoff (§ 2034.610(b)) 	<ul style="list-style-type: none"> • No prejudice (§ 2034.620(a),(b)) • Excuse or reasonable diligence could not have found out (§ 2034.620(c)(1),(2)) • Information served (§ 2034.620(c)(2)(B)) • Experts available for deposition (§ 2034.620(d)) 	Yes (§ 2034.610(c))		(§ 2034.620(d)) (§ 2034.630)
3. Submit Tardy Expert Information (§ 2034.710 – 2034.730)		15 days before initial trial set (§ 2024.020(a))	<ul style="list-style-type: none"> • Sufficient time, before 15-day cutoff (§ 2034.710(b)) 	<ul style="list-style-type: none"> • No prejudice (§ 2034.720(a),(b)) • Excuse or reasonable diligence could not have found out (§ 2034.720(c)(1),(2)) • Information served (§ 2034.720(c)(2)(B)) • Experts available for deposition (§ 2034.720(d)) 	Yes (§ 2034.710(c))		(§ 2034.720(d)) (§ 2034.730)

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