

QUICK DISCOVERY TIME TABLE

Updated 11/08

I. Written Interrogatories

- A) A defendant may propound at any time to a party in the action.
- B) A plaintiff may propound at any time 10 days after service of summons, 5 days in unlawful detainer action.
- C) Response to interrogatories within 30 days after service, 5 days in unlawful detainer action.
- D) Motion to compel further response must be made with in 45 days of service of response or it is waived.
C.C.P. 2030.020 (a), (b) & (c), 2030.260 (a) & (b), 2030.300 (c)

II. Inspection of Documents, Tangible Things, Land or Other Property

- A) A defendant may make a demand for inspection at any time.
- B) A plaintiff may make a demand for inspection at any time 10 days after service of summons, 5 days in unlawful detainer action.
- C) Inspection at least 30 days after service of demand, 5 days in unlawful detainer action – place and time must be reasonable.
- D) Response to inspection demand must be made within 30 days of service, 5 days in an unlawful detainer action.
- E) Motion to compel further response to inspection demand must be made within 45 days of response or it is waived.
C.C.P. 2031.020 (a), (b) & (c), 2031.030 (c), 2031.260, 2031.310 (c)

III. Physical Exams

- A) Demand for a Physical exam must be scheduled for a date at least 30 days after service of demand.
- B) Plaintiff must respond to demand for physical examination within 20 days after service of the demand.
C.C.P. 2032.220 (d), 2032.230 (b)

IV. Request for Admission

- A) A defendant may propound requests for admission at any time.
- B) A plaintiff may propound at any time 10 days after service of summons, 5 days in unlawful detainer action.
- C) Response to requests for admission must be made within 30 days after service, 5 days in unlawful detainer action.
- D) Motion to compel further response must be made within 45 days of service response or it is waived.
C.C.P. 2033.020 (a), (b) & (c), 2033.290 (c)

V. Expert Witness

- A) Demand for exchange of information concerning expert trial witness is made no later than the 10th day after initial trial date set or 70 days before the trial, whichever is closer to trial date.
- B) Date of exchange shall be 50 days before the initial trial date or 20 days after service of the demand, whichever is closer to trial date.
- C) Supplement expert witness list may be made within 20 days of initial exchange.
C.C.P. 2034.220, 2034.230 (b), 2034.280 (a)

VI. Oral Depositions

- A) A defendant may serve a deposition notice at any time after being served.
- B) Plaintiff may serve a deposition notice at any time 20 days after service of summons or appearance.
- C) Oral deposition shall be scheduled for a date at least 10 days after service of deposition notice; in unlawful detainer action 5 days after service of deposition notice, but not later than 5 days before trial.
- D) If deponent is required to produce personal records of a consumer or employment records of an employee deposition shall be scheduled for a date at least 20 days after service of deposition notice
- E) Non-noticing party must give no less than 3 calendar days notice of intent to take video tape deposition.
C.C.P. 2025.210 (a) & (b), 2025.270 (a), (b) & (c), 2025.330 (c)

VII. Time Limitation on Discovery

- A) Discovery is to be complete 30 days prior to initial trial date.
- B) Motions to compel discovery must be heard 15 days before the initial trial date.
- C) Expert witness discovery is to be complete 15 days prior to initial trial date and motions to compel discovery heard 10 days prior to initial trial date.
C.C.P. 2024.020 (a), 2024.030

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