

Discovery Deadlines

Effective for all Cases filed on or after November 1, 2021

	Tier 1 \$50,000 and under	Tier 2 \$50,000–\$300,000	Tier 3 \$300,000+
Plaintiff Initial Disclosures	14 days after service of first answer	14 days after service of first answer	14 days after service of first answer
Defendant Initial Disclosures	42 days after defendant's first answer to complaint	42 days after defendant's first answer to complaint	42 days after defendant's first answer to complaint
Interrogatories	None	10	20
Requests for Admission	5	10	20
Requests for Production	5	10	20
Discovery Requests	The responding party must respond within 28 days as to each of the above three		
Fact Discovery Depositions	3 hours	15 hours – limit 4 hrs for non-party or 7 hrs for party	30 hours – limit 4 hrs for non-party or 7 hrs for party
Limits on Fact Discovery	Limits are per side (Ps collectively, defs collectively and 3 rd Party Defs collectively)		
Fact Discovery Cutoff	120 days after first defendant's first disclosures	180 days after first defendant's first disclosures	210 days after first defendant's first disclosures
Expert Disclosures (Party w/ burden on issue for which Expert is offered)	Within 14 days of close of fact discovery	Within 14 days of close of fact discovery	Within 14 days of close of fact discovery
Election of Expert Report or Deposition	Within 14 days of Expert disclosures by party opposing	Within 14 days of Expert disclosures by party opposing	Within 14 days of Expert disclosures by party opposing
Expert Report or Depo	Within 42 days of election	Within 42 days of election	Within 42 days of election
Opposing Expert Disclosures (Non-burden)	Later of 14 days after (1) due date for disclosure or (2) receipt of report/depo	Later of 14 days after (1) due date for disclosure or (2) receipt of report/depo	Later of 14 days after (1) due date for disclosure or (2) receipt of report/depo
Election of Report or Deposition	Within 14 days of expert disclosures by party opposing	Within 14 days of expert disclosures by party opposing	Within 14 days of expert disclosures by party opposing
Expert Report or Depo	Within 42 days of election	Within 42 days of election	Within 42 days of election
BOP Rebuttal Expert Timeline	Same as Burden of Proof and Non-Burden of Proof timelines		
Expert Depositions	4 hrs per expert witness	4 hrs per expert witness	4 hrs per expert witness