



## LT20 Discovery Code Set

A category of procedural devices employed by a party to a civil or criminal action, prior to trial, to require the adverse party to disclose information that is essential for the preparation of the requesting party's case and that the other party alone knows or possesses.

- LT20.10      **Written Discovery /Interrogatories**  
Developing, responding, or objecting to interrogatories or request to admit and summarizing interrogatories and admissions received.
- LT20.15      **Document Production**  
Developing, responding, objecting to, and negotiating document request. Includes identifying and reviewing documents for production, identifying and reviewing documents for privilege, preparing and drafting request to produce, preparing and drafting response for request to produce, preparing and drafting notice of non-party production (NPP), preparing and drafting subpoena and authorization, obtaining non-subpoenaed documents (i.e. tax returns, work comp, disability, court files), and reviewing summarizing subpoenaed documents.
- LT20.20      **Depositions**  
Preparing deposition notices and subpoenas, communicating with opposing and other party's counsel on scheduling and logistics, planning and preparing to take the deposition, discussing deposition strategy, preparing witnesses, reviewing documents for deposition preparation, travel to/from and attending depositions, and drafting deposition summaries.
- LT20.25      **Expert Discovery**  
Preparing expert discovery notices, communicating with expert on scheduling and logistics, discussing expert strategy, preparation and consultation with expert, reviewing expert documents, records, or films, and drafting expert summaries and independent medical examinations (IMEs).
- LT20.30      **Discovery Motions**  
Developing and responding to or arguing motions that arise from discovery protective order process.
- LT20.35      **Discovery On-Site Inspections**  
Attending, travel to/from, and summarizing results from site inspections.