



### WC20 Discovery/Document Production Code Set

Written discovery, document production and acquisition, depositions, expert discovery, discovery motions, discovery on-site inspections and visits, and associated alternative fee arrangements (AFA's).

#### WC20.10 Written Discovery

Preparing, identifying, summarizing, and analyzing written discovery. Includes reviewing responses to written discovery and attending mandatory meet-and-confer sessions.

## WC20.15 Document Production/Acquisition

Preparing and responding and/or objecting to document request. Includes identifying and reviewing documents for production and privilege, and preparation of subpoenas and requests.

### WC20.20 Depositions

Preparing notices, communication and preparation of witnesses, discussing strategy, deposition preparation, attending, and travel to/from depositions.

### WC20.25 Expert Discovery

Preparing notices, communication with experts and opposing counsel, preparing subpoenas, strategy discussions, document review, preparing summaries, scheduling and reviewing IME's and IRE's.

## WC20.30 Discovery Motions

Preparing, responding to, and arguing all motions that arise out of discovery. Includes protective orders.

# WC20.35 Discovery On-Site Inspections/Visits

Attending, traveling to/from, and summarizing results from site inspection/visits.

### WC20.40 Alternative Fee Arrangements (AFA's)

Development, calculation or approval of all non-hourly or other alternative fee arrangements for tasks and activities in this category.