

Rule 2. Automatic Disclosures of Information

(a) Content; Timing. Each party shall prepare and serve an Automatic Disclosure of Information within 60 days after filing of the action or, where applicable, filing of the Assignment to ELT. The Automatic Disclosure of Information shall include the following:

(1) A statement summarizing each contention in support of every claim or defense which a party will present at trial and a brief statement of the facts upon which the contentions are based.

(2) The name, address and telephone number of each individual likely to have discoverable information - along with the subjects of that information and any statement from such individual - that the disclosing party may use to support its claims or defenses. However, no party shall be required to furnish any statement (written or taped) protected by the attorney/client privilege or work-product rule.

(3) A copy - or description, by category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses.

(4) If a claim for damages is being made, a description of the precise damages being sought by the party and the method for calculation of said damages. If the party has any liability insurance coverage providing coverage for the claims being made by another party, the name of the insurance company, the limits of coverage, and the existence of any issue that could affect the availability of coverage.

(5) A brief summary of the qualifications of any expert witness the party may call at the time of trial together with a report or statement of any such expert which sets forth the subject matter of the expert witness's anticipated testimony; the substance of the facts and opinions to which the expert is expected to testify, and a brief summary of the grounds for each opinion.

(6) Any offers of stipulation of any fact that is relevant to any claim or defense in the matter.

(7) An estimate of the number of trial days that it will take to complete trial of the matter.

(b) Filing Disclosure; Privacy Considerations. Automatic disclosures under this rule need not be filed with the court unless otherwise ordered by the court. If a court directs the filing of automatic disclosures, the party filing such disclosures shall take necessary and appropriate steps to protect the privacy interests (such as, without limitation, addresses and telephone numbers) of individuals identified in the disclosures.

(Added effective July 1, 2013; amended effective January 1, 2016.)