

## **Important: Shipment Insert**

# **Modern New York Discovery, 2d**

by Anne M. Payne and Arlene Zalayet

Enclosed is 2025-2026 supplement to Modern New York Discovery, 2d. Please note that, for ease of handling, the materials in this shipment may ship in more than one box.

### **Shelving Instructions**

- REMOVE and RECYCLE the 2024-2025 Supplement.
- PLACE the new 2025-2026 Supplement pamphlet next to the main volumes.

### **Highlights**

The 2025-2026 Supplement includes the following new sections:

- 29:5.50 What may be compelled Initial in camera review to set scope of materials to be disclosed
- 37:16 Sample interrogatories False Claims Act
- 38:12 Sample application for disclosure of grand jury documents in civil False Claims Act action
- 38:13 Notice of motion to compel production of statements of witnesses State
- 38:14 Motion for the production of witness interview notes
- 39:9 Sample request for admissions False Claims Act

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