

Index

ABUSE
Sanctions and Discovery Abuse, this index

ADMINISTRATIVE MANDAMUS
Interrogatories, **3:11**

ADMISSIONS
Requests for Admissions, this index

APPEALS
Inspection and production of documents and things, **5:28**
Interrogatories, discretion of court, **3:15**

ARBITRATION PROCEEDINGS
Service and timing, **1:29**

ASSAULT
Scope of discovery, **2:8**

ASSETS
Interrogatories, **3:38, 12:1**

ATTORNEY-CLIENT PRIVILEGE AND WORK PRODUCT
Generally, **11:1 to 11:20, 11:22, 11:23**
Breach of duty, action against attorney, **11:15**
Client, defined, **11:7**
Common interest doctrine, no waiver, **11:4**
Crime, knowing participation results in no work product protection, **11:12**
Disciplinary charges, proceedings for, **11:14**
Disclosure, inadvertent, **11:10**
Electronic discovery, **9:11, 11:19**
Fraud, knowing participation results in no work product protection, **11:12**

ATTORNEY-CLIENT PRIVILEGE AND WORK PRODUCT—Cont'd
Holder of privilege, **11:8**
In camera hearings, **11:13**
Inspection and production of documents and things, **5:18**
Narrow construction, **11:2**
No adequate substitute, **11:17**
Nonexpert witnesses, identity of, **11:16**
Opposing counsel, discovery from, **11:18**
Physical or mental examinations, waiver of work product privilege, **7:19, 7:21**
Policy and purpose, **11:2**
Restatement of existing law, **11:11**
Subsequent litigation, **11:20**
Unfair prejudice, **11:17**
Waiver generally, **11:3**
coercion, **11:5**
common interest doctrine, no waiver, **11:4**
physical or mental examinations, waiver of work product privilege, **7:19, 7:21**
sanction, waiver as, **11:6**
when waiver prevented, **11:5**
Work product generally, **11:23**
crime or fraud, knowing participation results in no work product protection, **11:12**
Writings and written documentation, **11:9**

BATTERY
Scope of discovery, **2:8**

BLOOD TEST
Paternity, **7:24**

BODILY INJURIES

Interrogatories, prior suits for,
3:57

BURDENS

Interrogatories, this index

BUSINESS RECORDS

Depositions, this index
Interrogatories, **3:39, 12:2**

**CALIFORNIA CIVIL
DISCOVERY ACT**

Purpose and applicability, **1:1**

CHILD SUPPORT

Interrogatories, **3:37, 12:3**

CLASS ACTIONS

Interrogatories, **3:40**
Scope of discovery, **2:11**

**CLERGY-PENITENT
PRIVILEGE**

Generally, **11:34**

COLLATERAL SOURCE RULE

Interrogatories, **3:50**

COMPLETION OF DISCOVERY

Service and Timing, this index

CONCLUSION

Questioning calling for, **10:19**

CONTEMPT

Nonparty depositions, failure to
obey subpoena, **4:49**

COSTS

Depositions, transcription and
records of deposition, **4:23**
Electronic discovery, **9:13.10**

CRIMINAL PROSECUTION

Answer subjecting party to, **10:21**
Self-incrimination, privilege
against, **11:32**

CUTOFF

Discovery cutoff, **1:26**

DAMAGES

Nonparty depositions, failure to
obey subpoena, **4:49**

DEFAULT JUDGMENT

Sanctions for discovery abuse,
1:18

DEFENSES

Interrogatories, **3:42**

DEFINITIONS

Generally, **1:4**
Client, **11:7**
Electronic and electronically
stored information, **9:2**

DEPOSITIONS

Generally, **4:1 to 4:55**
Additional time, **4:12**
Appearance of deponent, nonparty
depositions
contents of subpoena, **4:50**
subpoena for both deponent
appearance and business
records, **4:55**

Approval and signing
stenographic transcript, **4:24**
when no stenographic
transcript, **4:25**

Attendance, **4:11**

Attorney of third-party deponent,
sanctions, **4:21**

Audio and video record distribu-
tion and retention, **4:28**

Business records depositions
contents of subpoena, **4:51**
delivery of records for
photocopying, **4:53**
distributing copies to parties,
4:54

professional photocopier
required, **4:52**

subpoena for both deponent
appearance and business
records, **4:55**

Contempt, nonparty deposition,
failure to obey subpoena,
4:49

Contrasted with other discovery,
4:2

Costs, payment of, transcription
and records of deposition,
4:23

Court officer, supervised by, **4:14**

INDEX

DEPOSITIONS—Cont'd

Damages, nonparty deposition, failure to obey subpoena, **4:49**
Date. Notice and date, below
Documents sought at deposition, **12:20**
Electronic means, deposition by, **4:13, 9:9**
Examination of deponent, **4:16**
Expert Witnesses, this index
Foreign country, taking deposition, **4:34**
Forfeiture, nonparty deposition, failure to obey subpoena, **4:49**
In-state depositions, rules governing, **4:7**
Joint use of depositions and interrogatories, **3:47**
Location of deposition, **4:9**
Motion to compel
answers, **4:18**
attendance of deponent, **4:19**
Nonparty depositions
generally, **4:41 to 4:55**
appearance of deponent, above
business records deposition, above
contempt, failure to obey subpoena, **4:49**
damages, failure to obey subpoena, **4:49**
deposition subpoena, **4:42**
Evidence Code, application of, **4:43**
forfeiture, failure to obey subpoena, **4:49**
in California, **4:41**
subpoenas, below
Notice and date
generally, **4:8 to 4:17**
attendance, **4:11**
court officer, supervised by, **4:14**
deponent examination, **4:16**
electronic means, deposition by, **4:13**
location of deposition, **4:9**
oath, giving of, **4:15**

DEPOSITIONS—Cont'd

Notice and date—Cont'd
production of documents, **4:11**
recording of deposition, **4:15**
scheduling deposition date, **4:10**
sealed questions, **4:16**
suspending deposition
testimony, **4:17**
telephone, deposition by, **4:13**
waiver of notice, **4:8**
written questions, **4:36, 4:37**
Oath, giving of, **4:15**
Objecting to Discovery, this index
Opposing counsel, **4:4**
Out-of-state oral depositions
generally, **4:32 to 4:34**
foreign country depositions, **4:34**
outside California, taking deposition, **4:33**
rules governing, **4:32**
Person most qualified, **4:5**
Persons subject to deposition, **4:4**
Physical or mental examinations, use of deposition testimony at trial, **7:10**
Production of documents, **4:11**
Protective orders
generally, **4:22**
written depositions, **4:39**
Record certification, **4:26**
Recording of deposition, **4:15**
Rules governing
generally, **4:1**
in-state oral depositions, **4:7**
out-of-state oral depositions, **4:32**
written questions, depositions by, **4:35**
Sanctions against party giving notice, **4:20**
Scheduling deposition date, **4:10**
Scope, **4:3**
Sealed questions, **4:16**
Subpoenas, nonparty depositions
generally, **4:42**
business records, required contents, **4:51**
deponent appearance, required contents, **4:50**

DEPOSITIONS—Cont'd

Subpoenas, nonparty depositions
—Cont'd
 effect of subpoena service, 4:47
 failure to obey, 4:49
 fees, payment of, 4:48
 issuance, 4:44
 penalties for failure to obey,
 4:49
 service, 4:46
 timing of service, 4:45
Subsequent depositions,
 transcripts and certification,
 4:30
Supervised by court officer, 4:14
Suspending deposition testimony,
 4:17
Telephone, deposition by, 4:13
Terminally ill persons, 4:6
Third party requests for deposi-
 tion, 4:29
Transcripts and certification
 generally, 4:23 to 4:30
 approval and signing, above
 audio and video record distribu-
 tion and retention, 4:28
 costs, payment of, 4:23
 filing not required but must
 retain, 4:27
 record certification, 4:26
 subsequent depositions, 4:30
 third party requests for deposi-
 tion, 4:29
Trial, use of deposition at, 4:31
Waiver of notice, 4:8
Written questions
 generally, 4:35 to 4:40
 additional questions, service of,
 4:37
 governing rules, 4:35
 notice required, 4:36
 previewing written questions,
 4:38
 procedure, 4:40
 protective orders, 4:39
 questions attached to notice,
 4:37

DISCLOSURE

Attorney-client privilege and work
 product, inadvertent

DISCLOSURE—Cont'd

 disclosure, 11:10
 Expert Witnesses, this index
 Inspection and production of
 documents and things, land
 patented or granted by state,
 5:22

DISCRETION OF COURT

 Generally, 1:5
 Interrogatories, burden on appeal,
 3:15

DISMISSAL

 Sanctions for discovery abuse,
 1:18

DISPUTE RESOLUTION

 Informal resolution prior to
 motion, 1:22

DNA TESTS

 Physical or mental examinations,
 7:26

DOCTOR-PATIENT PRIVILEGE

 Generally, 11:28

DOCUMENTS

 Inspection and Production of
 Documents and Things, this
 index

ELECTRONIC DISCOVERY

 Generally, 9:1 to 9:16
 Attorney-client privilege, 9:11
 Costs, 9:13.10
 Defined terms, 9:2
 Deposition by electronic and other
 means, 9:9
 Failure to provide electronically
 stored information, 9:13
 Form of production of electronic
 information, 9:8
 Good faith operation of electronic
 information system, no sanc-
 tions, 9:16
 Motions
 generally, 9:14 to 9:16
 application of discovery
 methods and procedures,
 9:14
 compelling electronic
 discovery, 9:15

INDEX

ELECTRONIC DISCOVERY
—Cont'd
Motions—Cont'd
good faith operation of electronic information system, no sanctions, **9:16**
use of technology to conduct discovery, **9:14**
Objection to inspection or production demand, **9:10**
Permitted, **9:1**
Privileged or protected electronically stored information, **9:7**
Protective order, **9:12**
Work product, **9:11**

EMAIL
Inspection and production, **12:21**

EMINENT DOMAIN
Expert witness information exchange, inapplicability, **8:2**

EMPLOYMENT RECORDS
Inspection and production, **5:36, 12:19**

ENFORCEMENT OF MONEY JUDGMENTS
Scope of discovery, **2:9**

EXAMINATIONS
Physical or Mental Examinations, this index

EXPERT WITNESSES
Generally, **8:1 to 8:40**
Augmenting list, information exchange
conditions for augmenting, **8:30**
motion, **8:26**
sanctions, **8:31**
Civil commitment under the Sexually Violent Predator Act (SVPA)
Generally, **8:38 to 8:40**
state's witness, **8:39**
Completion of expert witness discovery, **1:28**
Declaration, information exchange
generally, **8:8**
amending declaration, **8:26, 8:30, 8:31**

EXPERT WITNESSES—Cont'd
Declaration, information exchange
—Cont'd
content of declaration
disclosure, **8:9**
Depositions
generally, **8:18 to 8:24**
applicability to certain experts, **8:22**
emergency expert deposition, **8:19**
expert as person subject to deposition, **4:4**
fee payment, **8:23 to 8:25**
location of deposition, **8:21**
persons permitted to depose experts, **8:20**
preparation fee, **8:23**
procedural requirements, **8:20**
producing expert for deposition, **8:18**
timely payment of fees and expenses, **8:24**
travel expense payment, **8:23**
Disclosure
exclusion of nondisclosed experts, **8:33**
information exchange, **8:9, 8:11**
physical or mental examinations, professional negligence actions, **7:25**
Exchange of information. Information exchange, below
Exclusion or withdrawal of experts
generally, **8:32 to 8:36**
actions warranting exclusion, **8:32**
failure to timely disclose, **8:33**
late submission, **8:17**
nondisclosed experts, exclusion (not sanctions), **8:33**
protective order, **8:35**
relief from exclusion, **8:34**
withdrawal of expert, **8:36**
Fees
depositions, **8:23 to 8:25**
motion for order setting fee, **8:25**
reasonableness of fee, **8:25**

EXPERT WITNESSES—Cont'd

 Impeachment, use of testimony, **8:37**

 Information exchange

 generally, **8:1 to 8:17**

 augmenting list, above date of exchange, **8:4**

 declaration, above

 demand for exchange, **8:3**

 eminent domain proceedings, not applicable to, **8:2**

 exclusion or withdrawal of experts, above

 filing not required, **8:16**

 good cause showing required, **8:5**

 late submission, exclusion or withdrawal of experts, **8:17**

 method and form of exchange, including declaration, **8:12**

 motions re expert list, below

 privileged nature of undeclared experts, **8:10**

 reports and writings, production of, **8:14**

 retained expert, **8:11**

 retention required, **8:16**

 sanctions, below

 service of demand, **8:7**

 simultaneous exchange, **8:13**

 supplemental lists, **8:15**

 tardy exchange, **8:28 to 8:31**

 timing of demand, **8:6**

 undeclared experts, privileged nature, **8:10**

 Interrogatories

 intention to call expert at trial, **3:44**

 qualifications of expert, **3:45**

 Motions re expert list

 generally, **8:25 to 8:29**

 after proper exchange, **8:26**

 augment list or amend declaration, **8:26**

 expert fee, motion for order setting, **8:25**

 tardy information exchange, below

EXPERT WITNESSES—Cont'd

 Sanctions

 exclusion or withdrawal of experts, above

 list augmentation or declaration amendment, **8:31**

 tardy exchange, **8:29**

 Tardy information exchange

 granting of motion, **8:28**

 motion for leave to submit, **8:28**

 sanctions, **8:29**

 Timing. Tardy information exchange, above

 Use of testimony, **8:37**

 Withdrawal of expert, **8:36**

EXTENSIONS OF TIME

 Generally, **1:24**

 Inspection and production of documents and things, extension of time to respond by agreement, **5:16**

 Interrogatories, extension of time to respond, **3:25**

 Requests for admissions, extension of time to respond, **6:18**

FEES

 Expert Witnesses, this index

 Nonparty depositions, **4:48**

FINANCIAL INFORMATION

 Interrogatories, **3:46, 12:1**

FINANCIAL RECORDS

 Inspection and production, **5:30, 12:15**

FORFEITURE

 Nonparty depositions, failure to obey subpoena, **4:49**

HEALTH

 Physical or Mental Examinations, this index

HEARSAY OBJECTION

 Generally, **10:10**

HOSPITALS

 Hospital and staff committee reports, **11:30, 12:4**

INDEX

HUSBAND AND WIFE
Marital privilege, **11:26**

IMPEACHMENT
Expert testimony, use of, **8:37**
Interrogatories, **3:48**

INFORMATION EXCHANGE
Expert Witnesses, this index

INSPECTION AND PRODUCTION OF DOCUMENTS AND THINGS
Generally, **5:1 to 5:36**
Adequate demand, supporting citations, **5:3**
Appeals, **5:28**
Attorney-client privilege, **5:18**
Content of demand, **5:5**
Demand for inspection and production
generally, **5:2**
adequate demand, supporting citations, **5:3**
form and content, **5:5**
inadequate demand, opposition citations, **5:4**
motion to compel compliance with demand, below service of demand, **5:6**
supplemental demands, **5:7**
Deposition, documents sought at, **12:20**
Electronically stored information, privileged or protected, **5:20**
Email, **12:21**
Employment records, **5:36, 12:19**
Extension of time to respond by agreement, **5:16**
Failure to respond, **5:19**
Financial records, **5:30, 12:15**
Form of demand, **5:5**
Governing rules, **5:1**
Inability to comply, statement, **5:13**
Inadequate demand, supporting citations, **5:4**
Insurance documents, **5:35, 12:13**
Land patented or granted by state, time to disclose, **5:22**
Mandamus review, **5:26**

INSPECTION AND PRODUCTION OF DOCUMENTS AND THINGS
—Cont'd
Medical records, **5:32, 12:12**
Mental health records, **5:32.50**
Method for producing documents, **5:17**
Motion to compel compliance with demand
generally, **5:23 to 5:25**
failure to timely respond, **5:23**
motion to compel, **5:24**
sanctions, **5:25**
Objections, **10:3**
Originals, preservation necessary, **5:21**
Photographs, **5:33, 12:17**
Police records, **5:34, 12:18**
Privacy rights, **5:20.10**
Privileged or protected electronically stored information, **5:20**
Prohibition review, **5:26**
Protective orders
generally, **5:8**
grant of order, supporting citations, **5:9**
opposing request for order, opposing citations, **5:10**
Religious freedom rights, **5:20.20**
Responding to requests
generally, **5:11 to 5:22**
attorney-client privilege, **5:18**
compliance statement, **5:12**
content of response, **5:11**
electronically stored information, privileged or protected, **5:20**
extension of time to respond by agreement, **5:16**
failure to respond, **5:19**
form of response, **5:11**
inability to comply, statement, **5:13**
land patented or granted by state, time to disclose, **5:22**
method for producing documents, **5:17**
preservation of originals necessary, **5:21**

**INSPECTION AND
PRODUCTION OF
DOCUMENTS AND THINGS
—Cont'd**

Responding to requests—Cont'd
 privacy rights, **5:20.10**
 religious freedom rights,
 5:20.20
 response filing not required,
 5:21
 signature requirements, **5:14**
 time to respond, below
 waiver of privilege or protection,
 5:19
 work product, **5:18**
Review
 appeal, **5:28**
 mandamus, **5:26**
 prohibition, **5:26**
Rules, **5:1**
Service of demand, **5:6**
Social media records, **5:37.50**
Supplemental demands, **5:7**
Tax returns, **5:29, 12:14**
Time
 generally, **5:15**
 extension of time by agreement,
 5:16
 failure to timely respond, **5:23**
 land patented or granted by
 state, **5:22**
Trade secrets, **5:31, 12:16**
Trust documents, **5:37**
Waiver of privilege or protection,
 5:19
Work product, **5:18**

INSURANCE AND INSURERS

Inspection and production, insurance documents, **5:35, 12:13**
Interrogatories, **3:35, 12:5**
Scope of discovery, **2:7**

INTERROGATORIES

Generally, **3:1 to 3:58, 12:1 to 12:11**
Administrative mandamus actions,
 3:11
Amended interrogatories, **3:8**
Amending responses, **3:27**

INTERROGATORIES—Cont'd

Answer known to person
 propounding interrogatory,
 10:16
Answers
 generally, **3:20 to 3:27**
 amending responses, **3:27**
 content, **3:21**
 documents from which response
 can be derived, **3:22**
 effort to obtain information
 required, **3:21**
 extension of time to respond,
 3:25
 filing not required, **3:26**
 first response, motion to deem
 binding, **3:27, 3:31**
 form, **3:21**
 motion to compel responses and
 further responses, below
 responsiveness, **3:20**
 retention required, **3:26**
 service puts burden on other
 party to answer, **3:19**
 signing of response required,
 3:23
 third party, use of answers as
 evidence against, **3:34**
 time when response required,
 3:24
 using responses, **3:32**
Assets, discovery of, **3:38, 12:1**
Bodily injuries, prior suits for,
 3:57
Both parties, information available
 to, **3:49**
Burdens
 generally, **3:11**
 court's discretion or lack of
 discretion, burden on
 appeal, **3:15**
 expense and research, burden
 where facts are equally
 available to both parties,
 3:17
 facts, burden to show, objecting
 to interrogatory, **3:13**
 lack of willfulness, burden on
 party refusing to answer,
 3:18

INDEX

INTERROGATORIES—Cont'd

Burdens—Cont'd
 no burden of showing good cause to interpose interrogatories, **3:12**
persuasion, burden of, on party objecting, **3:14**
privilege, burden of asserting or opposing, **3:16**
service puts burden on other party to answer, **3:19**
Business records, **3:39, 12:2**
Child support, **3:37, 12:3**
Class actions, **3:40**
Collateral source rule, **3:50**
Compelling responses. Motion to compel responses and further responses, below
Compound interrogatories, **10:7**
Content, **3:6**
Contentions, **3:41**
Court's discretion or lack of discretion, burden on appeal, **3:15**
Defenses, **3:42**
Deposition, interrogatory answered in, **10:18**
Discovery as matter of right, **3:12**
Documents
 existence of documents, use of interrogatories to discovery, **3:58**
 response, documents from which derived, **3:22**
Evidentiary effect, **3:33**
Expense and research, burden where facts are equally available to both parties, **3:17**
Experts
 intention to call at trial, **3:44**
 qualifications, **3:45**
Extension of time to respond, **3:25**
Financial information, **3:46, 12:1**
First response, motion to deem binding, **3:27, 3:31**
Form interrogatories, **3:7**
General denials, **3:43**
Hospital and staff committee reports, **11:30, 12:4**
Impeachment, **3:48**

INTERROGATORIES—Cont'd

Inadmissible information, **3:51, 10:11**
Insurance, **12:5**
Insurance actions, **3:35**
Joint use of depositions and interrogatories, **3:47**
Lack of willfulness, burden on party refusing to answer, **3:18**
Liabilities, questions regarding, **12:1**
Motion for protective order, **3:10**
Motion to compel responses and further responses generally, **3:28 to 3:31**
 denial of motion, **3:30**
 failure to timely respond, **3:28**
 first response, motion to deem binding, **3:31**
 further response, **3:28**
 inadequate response, **3:28**
 sanctions, **3:29**
Motion to have first response deemed binding, **3:27**
Number allowed, **3:4**
Objecting to Discovery, this index
Objecting to interrogatory
 burden of persuasion, **3:14**
 burden to show facts, **3:13**
Official records, **3:54**
Photographs, **3:55, 12:6**
Prior lawsuits, **3:57, 10:22, 12:7**
Privilege, burden of asserting or opposing, **3:16**
Probate proceedings, **3:36**
Protective order, motion for, declaration required, **3:10**
Public records, **10:15, 12:8**
Rules governing, **3:1**
Service
 party seeking to quash service, interrogatories to, **3:52**
 puts burden on other party to answer, **3:19**
 required, **3:9**
Service of process, interrogatories to party seeking to quash, **3:52**
Shotgun questions, **3:56**
Signing of response required, **3:23**

INTERROGATORIES—Cont'd
Special interrogatories, 3:5
Standard for when information discoverable, 3:2
Supplemental interrogatories, 3:8
Tax information, 11:24, 12:9
Third party, use of answers as evidence against, 3:34
Time when response required generally, 3:24
extension of time to respond, 3:25
Using responses, 3:32
W-2 forms, 11:25, 12:10
When to propound interrogatories, 3:3
Witness names and addresses, 3:53, 12:11

INVESTIGATIONS
Lack of knowledge, requests for admissions, 6:15
Requests for admissions, 6:2, 50, 6:15

JUDGMENTS
Enforcement of money judgments, scope of discovery, 2:9

LAST DAY TO ACT
Service and timing, 1:24

MANDAMUS
Inspection and production of documents and things, 5:26

MARITAL PRIVILEGE
Generally, 11:26

MEDICAL RECORDS
Inspection and production, 5:32, 12:12

MEET AND CONFER
Declaration, 1:22

MENTAL HEALTH AND EXAMINATIONS
Physical or Mental Examinations, this index

METHODS OF DISCOVERY
Generally, 1:33
Depositions, this index

METHODS OF DISCOVERY
—Cont'd
Electronic Discovery, this index
Expert Witnesses, this index
Inspection and Production of Documents and Things, this index
Interrogatories, this index
Physical or Mental Examinations, this index
Requests for Admissions, this index

MOTIONS
Compel, motions to depositions, 4:18, 4:19
sanctions and discovery abuse, 1:19
Completion of discovery, motion to complete close to trial, 1:31
Discovery cutoff, 1:26
Electronic Discovery, this index
Expert Witnesses, this index
Informal issue resolution prior to motion, 1:22
Inspection of documents and things, motion to compel, 5:24
Interrogatories, this index
Physical or Mental Examinations, this index
Requests for admissions, 6:24, 6:25

NEGLIGENCE
Physical or mental examinations, professional negligence action, 7:25

OBJECTING TO DISCOVERY
Generally, 10:1 to 10:23
Admissions, requests for, 10:4
Answer known to person propounding interrogatory, 10:16
Burdensome, 10:6
Compound interrogatories, 10:7
Conclusion, questioning calling for, 10:19
Criminal prosecution, answer subjecting party to, 10:21

INDEX

OBJECTING TO DISCOVERY
—Cont'd
Deposition, interrogatory answered in, **10:18**
Depositions, **10:2**
E-discovery, **9:10**
Expense, **10:6**
Fishing expedition, **10:9**
Form of questions, **10:5**
Hearsay, **10:10**
Inadmissible information, **10:11**
Information not in party's possession, **10:12**
Inspection and production of documents and things, **10:3**
Insufficient response, **10:13**
Interrogatories, **10:1**
Irrelevant or immaterial, **10:8**
Mental processes, question seeking, **10:14**
Opinion, questioning calling for, **10:19**
Oppressive, **10:6**
Pleadings, question pertaining to, **10:17**
Prior litigation, question calling for information on involvement in, **10:22**
Privacy, invasion of, **10:23**
Public records, question calling for subject matter in, **10:15**
Remoteness of information asked for, **10:20**
Requests for admissions, **10:4**

OFFICIAL RECORDS
Interrogatories, **3:54**

OPINION
Questioning calling for, **10:19**

OUT-OF-STATE ACTIONS
Scope of discovery, **2:10**

PATERNITY
Blood test, **7:24**

PERPETUATION OF TESTIMONY
Generally, **1:2**

PERSONAL INJURY PLAINTIFF
Physical or Mental Examinations, this index

PHOTOGRAPHS
Inspection and production, **5:33, 12:17**
Interrogatories, **3:55, 12:6**

PHYSICAL OR MENTAL EXAMINATIONS
Generally, **7:1 to 7:26**
Compliance, motion to compel, **7:12**
Condition must be in controversy, **7:3**
Conduct of examination generally, **7:16 to 7:18**
observers, **7:16**
protective orders, **7:16**
recording mental examinations, **7:18**
X-ray examinations, **7:17**

Demand
examination report, **7:19**
motion re, **7:11**
personal injury plaintiff, demand for examination, **7:6**
Discovery using exams, **7:2**
DNA tests, **7:26**
Expert witness disclosure, professional negligence actions, **7:25**
Governing rules, **7:1**
Mental health records, inspection and production of, **5:32.50**
Motions and sanctions
generally, **7:11 to 7:15**
compliance, motion to compel, **7:12**
demand, motion re, **7:11**
disclosing contents of confidential court-ordered psychological evaluation, **7:15**
physical or mental examination, motion for, **7:13**
report, **7:20, 7:23**
Observers at examination, **7:16**
Paternity blood test, **7:24**

PHYSICAL OR MENTAL EXAMINATIONS—Cont'd

Personal injury plaintiff generally, **7:4 to 7:10**
demand for examination, **7:6**
expended definition of party subject to examination, **7:4**
number of examinations allowed, **7:5**
response of personal injury plaintiff, below scheduling examination, **7:7**
use of deposition testimony at trial, **7:10**
Professional negligence action, **7:25**
Protective orders, **7:16**
Recording mental examinations, **7:18**
Reports generally, **7:19 to 7:23**
demand for report, **7:19**
motion to compel, **7:20**
refusal to deliver, **7:20**
sanctions, **7:20, 7:23**
untimely submission, **7:20**
waiver of work product privilege, **7:19, 7:21**
Response of personal injury plaintiff generally, **7:8**
failure to timely respond, **7:9**
service required, **7:8**
Rules, **7:1**
Sanctions for failure to submit, **7:14**
Work product privilege, waiver of examination report, **7:19**
pending and subsequent actions, **7:21**
X-ray examinations, **7:17**

PLEADINGS
Objecting to question pertaining to, **10:17**

POLICE RECORDS
Inspection and production, **5:34, 12:18**

PRIVACY
Inspection and production of documents and things, privacy rights, **5:20.10**
Invasion of privacy, objection to question, **10:23**
Right of privacy and privilege, **11:31**

PRIVILEGES
Generally, **11:21 to 11:34**
Attorney-Client Privilege and Work Product, this index Clergy-penitent privilege, **11:34**
Doctor-patient privilege, **11:28**
Hospital and staff committee reports, **11:30**
Inspection and production of documents and things, waiver of privilege or protection, **5:19**
Marital privilege, **11:26**
Privacy rights and privilege, **11:31**
Psychotherapist-patient privilege, **11:29**
Self-incrimination, privilege against, **11:32**
Tax information, privilege regarding, **11:24**
Trade secrets, privilege against divulging, **11:33**
W-2 forms, privilege regarding, **11:25**
Waiver Attorney-Client Privilege and Work Product, this index inspection and production of documents and things, **5:19**
Work product. Attorney-Client Privilege and Work Product, this index

PROBATE PROCEEDINGS

Interrogatories, **3:36**

PRODUCTION OF DOCUMENTS

Inspection and Production of Documents and Things, this index

INDEX

PROFESSIONAL NEGLIGENCE
Physical or mental examinations, disclosure of expert, **7:25**

PROHIBITION
Inspection and production of documents and things, **5:27**

PROTECTIVE ORDERS
Depositions, **4:22, 4:39**
Electronic discovery, **9:12**
Experts, exclusion or withdrawal, **8:35**
Inspection and production of documents and things, **5:8 to 5:10**
Interrogatories, **3:10**
Physical or mental examinations, **7:16**
Requests for admissions, **6:24**
Sanctions and discovery abuse, **2:4, 2:5**

PSYCHOTHERAPIST-PATIENT PRIVILEGE
Generally, **11:29**

PUBLIC RECORDS
Interrogatories, **10:15, 12:8**

REAL PROPERTY
Summary proceedings, **1:30**

RECORDS
Business Records, this index
Employment records, inspection and production, **5:36, 12:19**
Financial records, inspection and production, **5:30, 12:15**
Medical records, inspection and production, **5:32, 12:12**
Official records, interrogatories, **3:54**
Public records, interrogatories, **10:15, 12:8**

RELIGION
Inspection and production of documents and things, religious freedom rights, **5:20.20**

REOPENING DISCOVERY
Generally, **1:31**

REOPENING DISCOVERY
—Cont'd
Agreements to reopen, **1:32**

REPORTS
Expert witnesses, information exchange, **8:14**
Hospital and staff committee reports, **11:30, 12:4**
Physical or Mental Examinations, this index

REQUESTS FOR ADMISSIONS
Generally, **6:1 to 6:29**
Adequate response, supporting citations, **6:11**
Amending admission, **6:26**
Award of expenses, **6:9**
Compelling responses, motion, **6:25**
Conclusiveness of admission, **6:29**
Content
 requests, **6:7**
 response, **6:10**
Contrasted with other discovery, **6:2**
Declaration for discovery to exceed numeric limitation, **6:6**
Deemed admission, failure to respond generally, **6:27**
 relief from deemed admission, **6:28**
Exemption from limitation on number of requests, **6:5**
Expenses, award of, **6:9**
Failure to respond
 deemed admission, **6:27**
 relief from deemed admission, **6:28**
Form
 requests, **6:7**
 response, **6:10**
Governing rules, **6:1**
Inadequate response, opposition citations, **6:12**
Investigations, **6:2.50, 6:15**
Lack of knowledge
 failure to admit or deny based on, **6:14**

REQUESTS FOR ADMISSIONS
—Cont'd

Lack of knowledge—Cont'd
failure to properly admit or
deny, opposition citations,
6:16
proper response based on
knowledge and investiga-
tion, supporting citations,
6:15
Motions
compelling responses, **6:25**
protective order, motion for,
6:24
Number of requests
generally, **6:4**
declaration for discovery to
exceed numeric limitation,
6:6
exemption from limitation on
number of requests, **6:5**
Objections, **10:4**
Protective order, motion for, **6:24**
Purpose, **6:2**
Requesting admissions, **6:3**
Response to requests
generally, **6:10 to 6:23**
adequate response, supporting
citations, **6:11**
content, **6:10**
extension of time, notice
required, **6:18**
failure to respond, **6:27, 6:28**
filing not required, **6:23**
form, **6:10**
inadequate response, opposition
citations, **6:12**
lack of knowledge, above
retention of requests, **6:23**
scope of response, **6:13**
signatures required, **6:22**
time to respond, below
unsworn responses, **6:22**
Rules, **6:1**
Sanctions for failure to timely
respond, supporting citations,
6:20
Scope of response, **6:13**
Service required, **6:8**

REQUESTS FOR ADMISSIONS
—Cont'd

Signatures required on responses,
6:22
Time to respond
generally, **6:17**
extension of time, notice
required, **6:18**
response not untimely, opposi-
tion citations, **6:21**
untimely response, below
Unsworn responses, **6:22**
Untimely response
generally, **6:19**
response not untimely, opposi-
tion citations, **6:21**
sanctions, supporting citations,
6:20
waiver, **6:19**
Waiver of untimely response, **6:19**
Withdrawing admission, **6:26**

SANCTIONS AND DISCOVERY
ABUSE

Generally, **1:6 to 1:20**
Allocating discovery referee fees
not sanction, **1:20**
Approved sanctions, **1:15**
Assault or battery, discovery
regarding, **2:8**
Compel, motion to, **1:9**
Default judgment, **1:18**
Disclosing contents of confidential
court-ordered psychological
evaluation, **7:15**
Dismissal, **1:18**
Disobeying court order, **1:11**
Egregious pattern of discovery
misuse, **1:14**
Evasive response, **1:10**
Expert Witnesses, this index
Extend time or reopen discovery,
1:32
Failure to confer, **1:13**
Failure to respond, **1:8**
Inspection and production of
documents, failure to timely
respond, **5:25**
Interrogatories, motion to compel
further response, **3:29**

INDEX

SANCTIONS AND DISCOVERY
ABUSE—Cont'd
Physical or mental examinations, failure to submit, 7:14
Preclusion of testimony or evidence, 1:17
Protective orders, 2:4, 2:5
Report of physical or mental examination, 7:23
Request for admissions, sanctions for failure to timely respond, 6:20
Request for sanctions, 1:16
Sexual harassment, discovery regarding, 2:8
Unjustified motion, 1:12
Unmeritorious objection, 1:9
Waiver of privilege as sanction, 11:6
Willful or without substantial justification, 1:7

SCOPE OF DISCOVERY
Generally, 2:1 to 2:12
Actions pending outside of California, 2:10
Assault, 2:8
Battery, 2:8
Class actions, 2:11
Enforcement of money judgments, 2:9
Insurance and insurers, 2:7
Jurisdictional, 2:6
Limiting, 2:5
Matters discoverable, 2:2
Out-of-state actions, 2:10
Pendency of anti-SLAPP motion, 2:12
Persons entitled to discovery, 2:2
Restrictions on discovery, 2:4
Sanctions and Abuse of Discovery, this index
Sequence and timing, 2:3
Sexual harassment, 2:8

SELF-INCRIMINATION, PRIVILEGE AGAINST
Generally, 11:32

SERVICE AND TIMING
Generally, 1:23 to 1:32

SERVICE AND TIMING—Cont'd
Arbitration proceedings, 1:29
Completion of discovery completion date, 1:25
expert witness discovery, 1:28
motions to complete discovery close to trial, 1:31
Continuance, 1:27
Cutoff, 1:26
Deposition of nonparty. Depositions, this index
Expert witness discovery, completion of, 1:28
Expert witness information exchange, service of demand, 8:7
Extensions of time, 1:24
Inspection and production, service of demand, 5:6
Interrogatories, this index
Last day to act, 1:24
Physical examination of personal injury plaintiff, service of plaintiff's response, 7:8
Real property, summary proceedings, 1:30
Reopening discovery generally, 1:31
agreements to reopen, 1:32
Requests for admissions, service required, 6:8
Written deposition questions, service of additional questions, 4:37

SEXUAL HARASSMENT
Scope of discovery, 2:8

SOCIAL MEDIA
Records, inspection and production of, 5:37.50

STATUTORY AUTHORITY
Generally, 1:1 to 1:5
California Civil Discovery Act, purpose and applicability, 1:1
Compliance with rules required, 1:3
Definition of terms, 1:4
Discretion of court, 1:5
Perpetuation of testimony, 1:2

CALIFORNIA DISCOVERY CITATIONS

STIPULATIONS

Modification of discovery procedures by stipulation, **1:21**

SUBPOENAS

Nonparty depositions. Depositions, this index

TAXATION

Interrogatories, tax information, **12:9**

Privilege regarding tax information, **11:24, 11:25**

Tax returns, inspection and production, **5:29, 12:14**

W-2 forms, privilege regarding, **11:25**

TIMING

Expert witnesses, information exchange, timing of demand, **8:6**

Expert Witnesses, this index

Extension of Time, this index

Inspection and Production of Documents and Things, this index

Interrogatories, this index

Requests for Admissions, this index

Sequence and timing, **2:3**

Service and Timing, this index

TRADE SECRETS

Inspection and production, **5:31, 12:16**

TRADE SECRETS—Cont'd

Privilege against divulging, **11:33**

TRANSCRIPTS

Depositions, this index

TRUSTS

Inspection and production of documents and things, **5:37**

W-2 FORMS

Interrogatories, **12:10**

Privilege regarding, **11:25**

WAIVER

Attorney-Client Privilege and Work Product, this index

Depositions, waiver of notice, **4:8**

Inspection and production of documents and things, **5:19**

Physical or Mental Examinations, this index

Privileges, this index

Requests for admissions, waiver of untimely response, **6:19**

Sanctions and discovery abuse, **11:6**

WITNESSES

Expert Witnesses, this index

Interrogatories, witness names and addresses, **3:53, 12:11**

WORK PRODUCT

Attorney-Client Privilege and Work Product, this index