

TEXAS DISCOVERY

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LAW

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 - 4. Particularity of Description Required

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13. SPECIFIC EVIDENCE AND THINGS DISCOVERABLE UNDER FEDERAL RULES

- A. Fact Witnesses
- B. Expert Witnesses
- C. Potential Parties
- D. Insurance Policy
- E. Income Tax Returns
- F. Photographs
- G. Contentions of Parties
- H. Similar Incidents
- I. Trade Secrets
- J. Net Worth (Exemplary Damages Claim)
- K. Post-accident Investigation
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15. MATTERS NOT DISCOVERABLE UNDER FEDERAL RULES

- A. Witness Statements
- B. Investigation Conducted in Anticipation of Litigation
- C. Production from a Nonparty
- D. Authorizations to Obtain Medical Records
- E. Depositions of Experts
- F. Report of Expert
- G. Work Product and Identity of Expert Informally Consulted
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 - A. Documents and Things Requested of Defendant Insurance Company
 - B. Request for Production of Injured Worker in Nonsubscriber Action
- 4. REQUESTS FOR ADMISSIONS
 - A. Requests for Admissions to Defendant Insurance Company
 - B. Requests for Admissions to Self-Insured Defendant
 - C. Requests for Admissions to Plaintiff Employee
 - D. Requests for Admissions for Post-Settlement Suit to Recover Unpaid Medical Expenses
- 5. WRITTEN DEPOSITIONS
 - Written Deposition of Nonparty Employer
- 6. CASES

CHAPTER 12

FAMILY LAW

- 1. SCOPE OF COVERAGE
 - Comments
- 2. WRITTEN INTERROGATORIES
 - A. Basic Interrogatories to Spouse
 - B. Optional Interrogatories to Spouse

3. REQUESTS FOR PRODUCTION
 - A. Basic Document Requests
 - B. Optional Document Requests
4. REQUESTS FOR ADMISSIONS
Requests for Admissions to Spouse
5. CASES