

## INTAKE DISCOVERY FORM

### Request for Propounding discovery:

If you want me to propound "Contention Discovery" (to clarify the basis or scope of the opposing party's legal claims), please review the following:

1. I need the operative complaint that you want to propound discovery on (in Word, Doc, WordPerfect, or PDF)
2. I will isolate the substantive allegations by paragraph number.
3. Based on the isolated factual allegations, in addition to the form interrogatories, I will create the following **three forms of written discovery**: **Special Interrogatories** (with a declaration if it exceeds the 25 question limit), **Document Demand**, and the **Requests for Admissions**.

3a: Declaration for additional special interrogatories: I will use my form/declaration if needed (unless you provide otherwise).

4. Question, how many paragraphs number are in your Complaint? How many substantive paragraphs are there (non-including the jurisdiction, venue, not including reincorporation). What are the paragraphs that are at issue? And/or are there any specific paragraph numbers that require/contain multiple factual allegations that require more discovery request?

5. Verbiage: The contention discovery that I create, I have done with out any issue. However, if you have specific language in the pre-amble of each form of written discovery (i.e., You like it worded in your way) then you need to send me samples of the way you wanted worded before I get started.

6. Defined Terms: I can not divine your defined terms". You must provide a list of defined terms for me to insert in all three forms of discover via Word, WP, Doc, or PDF.

7. In every litigation there are specific factual issues that must be explored creatively beyond the written word. Please let me know if you want me to attempt creative discovery request concerning a specific issue or if you would like to explore together. Otherwise, I will stick to the obvious factual issues.

8. To ensure we are all on the same page regarding the above, I require a brief telephone conversation.

9. Please refer to the samples I have on line at [www.trialsandtimelines.com](http://www.trialsandtimelines.com)