

II.C | PRODUCTION OF DOCUMENTS AT DEPOSITIONS

1 - Scheduling. Consistent with the requirements of Rules 30 and 34, Federal Rules of Civil Procedure, a party seeking production of documents and other matters from another party in connection with a deposition should schedule the deposition to allow for the production in advance of the deposition.

2 - Option to Adjourn or Proceed. If requested documents that are discoverable are not timely produced prior to the deposition, the party noticing the deposition may either adjourn the deposition until after such documents are produced or, without waiving the right to have access to the documents and to subsequently examine the deponent regarding the documents, proceed with the deposition.

3 - Non-Parties. For non-parties, a subpoena is required to obtain documents or testimony. (see section V)