

## **RULE 1.280. GENERAL PROVISIONS GOVERNING DISCOVERY**

(a) Initial Discovery Disclosure.

(1) In General.

(A) the **name** and, if known, the **address, telephone number**, and **e-mail address** of **each individual likely to have discoverable information**—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

(B) **a copy — or a description by category and location**—of **all documents, electronically stored information, and tangible things** that the disclosing party has in its possession, custody, or control (or, if not in the disclosing party’s possession, custody, or control, a description by category and location of such information) and may use **to support its claims or defenses**, unless the use would be solely for impeachment;

(C) a **computation for each category of damages** claimed by the disclosing party and **a copy of the documents or other evidentiary material**, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; provided that a party is not *required to provide computations as to noneconomic damages*, but the party **must identify categories of damages claimed and provide supporting documents**; and

(D) a copy of any **insurance policy** or agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

***EMPHASIS ADDED***