

**O'Donnell, Shanna**

**From:** Del Ciampo, Joseph  
**Sent:** Sunday, November 3, 2019 10:40 AM  
**To:** Del Ciampo, Joseph  
**Subject:** FW: Standard Discovery in Med Mal cases  
**Attachments:** EMR Draft Rogs and ReqProd Sept 5 2019.docx; Defendant's Form For Plaintiff Med Mal Sept 5 2019.DOCX; Plaintiffs Proposed IRFP Med Mal Sept 5 2019.docx

**From:** Angelo Ziotas- Silver Golub & Teitell <[aziotas@sgtlaw.com](mailto:aziotas@sgtlaw.com)>  
**Sent:** Thursday, September 5, 2019 4:06 PM  
**To:** Stevens, Barry <[Barry.Stevens@jud.ct.gov](mailto:Barry.Stevens@jud.ct.gov)>  
**Cc:** Eric J. Stockman (<[estockman@stockmanoconnor.com](mailto:estockman@stockmanoconnor.com)>) <[estockman@stockmanoconnor.com](mailto:estockman@stockmanoconnor.com)>; Bright, William <[William.Bright@jud.ct.gov](mailto:William.Bright@jud.ct.gov)>  
**Subject:** Standard Discovery in Med Mal cases

Judge Stevens,

First, please accept both of our apologies for the delay in providing you with these draft sets of proposed standard discovery.

While we were part of a small working group that got started on this project before the Civil Commission was disbanded, the participants were not able to reach a final agreement as to a complete set. Our group had difficulty agreeing on a few areas of inquiry as well as whether this set would be comprehensive (and, as such, require a "good cause" showing to file additional written discovery) or whether the parties would be entitled to a limited number of case specific follow up questions. For example, anticipating that follow up would be permitted, at least in some cases, the plaintiffs group drafted a limited set of interrogatories/production requests directed toward electronic medical records, for cases where this information would be needed.

The attached proposals were the among the final drafts exchanged by our group and we have spent the last several months attempting to recreate the input from our various stakeholders.

Our group was not able to reach final agreements but these proposals represent a fair start to the process. Eric and I would welcome an opportunity to meet with you, Judge Bright and/or anyone else that the Chief Justice may have tasked with this worthwhile effort.

Angelo

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