

D3. Disclosure of electronic documents (multi-track cases only)

If you are proposing that the claim be allocated to the multi-track:

- 1. Have you reached agreement, either using the Electronic Documents Questionnaire In Practice Direction 31B or otherwise, about the scope and extent of disclosure of electronic documents on each side? Yes No
- 2. If No, is such agreement likely? Yes No
- 3. If there is no agreement and no agreement is likely, what are the issues about disclosure of electronic documents which the court needs to address, and should they be dealt with at the Case Management Conference or at a separate hearing?

D4. Disclosure of non-electronic documents (all cases)

What directions are proposed for disclosure?

For all multi-track cases, except personal injury.

Have you filed and served a disclosure report (Form N263) (see Civil Procedure Rules Part 31). Yes No

Have you agreed a proposal in relation to disclosure that meets the overriding objective? Yes No

If Yes, please ensure this is contained within the proposed directions attached and specify the draft order number.

E Experts

Do you wish to use expert evidence at the trial or final hearing? Yes No

Have you already copied any experts' report(s) to the other party(ies)? None yet obtained Yes No

Do you consider the case suitable for a single joint expert in any field? Yes No

There is no presumption that expert evidence is necessary or that each party will be entitled to their own expert(s). Therefore, the court requires a short explanation of your proposals with regard to expert evidence.