

1 **Rule 31. Depositions upon written questions.**

2 (a) A party may depose a party or witness by written questions. Rules 30 and 45
3 apply to depositions upon written questions, except insofar as by their nature they are
4 clearly inapplicable.

5 (b) A party taking a deposition using written questions shall serve on the parties a
6 notice which includes the name or description and address of the deponent, the name
7 or descriptive title of the officer before whom the deposition will be taken, and the
8 questions to be asked.

9 (c) Within 14 days after the questions are served, a party may serve cross
10 questions. Within 7 days after being served with cross questions, a party may serve
11 redirect questions. Within 7 days after being served with redirect questions, a party may
12 serve re-cross questions.

13 (d) A copy of the notice and copies of all questions served shall be delivered by the
14 party taking the deposition to the designated officer who shall proceed promptly to ask
15 the questions and prepare a record of the responses.

16 (e) During standard discovery, a deposition by written questioning shall not
17 cumulatively exceed 15 questions, including discrete subparts, by the plaintiffs
18 collectively, by the defendants collectively or by third-party defendants collectively.
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