

DO NOT FILE THIS DOCUMENT WITH THE COURT.

**Cause Number** \_\_\_\_\_

Print cause number and other court information exactly as it appears on the petition filed in this case.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

In the: (check one):

- Justice Court
- District Court
- County Court at Law

\_\_\_\_\_  
Court  
Number

\_\_\_\_\_ County, Texas

### Required Initial Disclosures

In cases filed on or after January 1, 2021, parties to civil suits in Texas must give the other party this information, as required by Texas Rule of Civil Procedure 194.2. It does not apply to all lawsuits. You must carefully read the rule.

You must give this information to the other party no later than 30 days after either party files an answer, waiver of service, or counter-petition with the court clerk. You and the other party may be able to agree to waive discovery.

Keep a completed copy of this form for yourself. Attach documents that are required. You can attach additional pages on separate sheets of paper if you need more space for listing information.

If a question does not apply to your case, write "N/A," "none," or leave it blank.

#### 1. Correct names and addresses of parties to the lawsuit.

See Texas Rule of Civil Procedure 194.2(b)(1).

Plaintiff:

_____	_____	_____	_____
First	Middle	Last	
_____		_____	_____
Street Address		City	State Zip
_____		_____	_____
Phone		Email	

Defendant:

_____	_____	_____	_____
First	Middle	Last	
_____		_____	_____
Street Address		City	State Zip
_____		_____	_____
Phone		Email	

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**2. Potential parties to the lawsuit.**

See Texas Rule of Civil Procedure 194.2(b)(2).

You must provide the names, addresses, and telephone numbers of potential parties.

**List the other potential parties.**

Name	Address	Phone	Role in case
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**3. Legal theories and factual bases of claims or defenses.**

See Texas Rule of Civil Procedure 194.2(b)(3).

**Check all that apply.**

The pleadings in this case contain the legal theories and general factual bases for claims, or defenses.

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**4. Amount and any method of calculating economic damages.**

See Texas Rule of Civil Procedure 194.2(b)(4).

**Check all that apply.**

At the time of this initial required disclosure, economic damages have not been pleaded for as part of this case. No response to this request is needed at this time. If an amended petition or counterpetition is filed that alleges economic damages, a response to this request will be made within 30 days of the filing of the amended petition or counterpetition.

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**5. Persons with Knowledge of Relevant Facts (Potential Witnesses)**

See Texas Rule of Civil Procedure 194.2(b)(5).

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You also need to give the other side the names, phone numbers, and addresses of potential witnesses—that is, people with knowledge of relevant facts. What is each person’s connection with the case? The list should include all potential witnesses regardless of who they would be testifying for.

Name	Address	Phone number	Connection to case

### 6. Documents, electronic items, or tangible things.

See Texas Rule of Civil Procedure 194.2(b)(6).

The following is a list of documents, electronically stored information, and tangible things that have been identified that may be used to support a claim or defense in this case. This Response will be supplemented, as needed, as responsive items are identified

Describe documents, electronically stored information, and tangible things that you have in your possession, custody, or control, and may use to support your claims or defenses. The list of documents, electronic items, or tangible things should include all items in your possession that you might want admitted as evidence in your case.

No.	Item/Name of Item or Document	Type of Item (Document, electronic info, or tangible item)	Location of document or item	Brief Description of document or item
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

### 7. Indemnity and insuring agreements

See Texas Rule of Civil Procedure 194.2(b)(7).

Produce the originals or copies of any indemnity and insuring agreements described in Rule 192.3(f).

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**Check all that apply.**

At the time of this initial response no indemnity and insuring agreements have been identified. This Response will be amended, as needed.

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**8. Settlement agreements.**

See Texas Rule of Civil Procedure 194.2(b)(8).

Produce the originals or copies of any settlement agreements described in Rule 192.3(g) of the Texas Rules of Civil Procedure. Rule 192.3(g) provides in part as follows: Settlement Agreements. A party may obtain discovery of the existence and contents of any relevant portions of a settlement agreement.

**Check all that apply.**

The Parties have not entered into any active settlement agreements that would resolve, or partially resolve, the disputed issues in this case. This Response will be amended, as needed.

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**9. Witness statements**

See Texas Rule of Civil Procedure 194.2(b)(9).

Produce the originals or copies of any witness statements described in rule 192.3(h) of the Texas Rules of Civil Procedure.

**Check one.**

There are no witness statements at this time.

Attached to this response are copies of any witness statements that have been made by any of the individuals identified in the fifth response above. This Response will be amended, as needed, as qualifying witness statements are discovered or obtained in this case.

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**10. Medical records or bills.**

See Texas Rule of Civil Procedure 194.2(b)(10).

Produce copies of all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

At the time of this initial response, this family law case does not allege physical or mental injury, and therefore is not requesting damages resulting from any physical or mental injury. Therefore no response to this request is needed at this time. This Response will be amended, as needed.

Attached

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**11. Medical records or bills from 3rd party authorizations.**

See Texas Rule of Civil Procedure 194.2(b)(11).

Produce copies of all medical records and bills that you have obtained by virtue of an authorization furnished by the other party.

**Check one.**

At the time of this initial response, this case does not allege physical or mental injury, and therefore is not requesting damages resulting from any physical or mental injury. No response to this request is needed at this time. This Response will be amended, as needed.

Attached

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**12. Responsible 3rd parties.**

See Texas Rule of Civil Procedure 194.2(b)(12).

State the name, address, and telephone number of any person who may be designated as a responsible third party.

**Check one.**

At the time of this initial response no responsible third parties have been identified. This Response will be amended, as needed.

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Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I have completed the required disclosures and I have served them on the other party.

Your signature: \_\_\_\_\_

Your printed name: \_\_\_\_\_

### Certificate of Service

I certify that a copy of the Required Initial Disclosures and attached documents were served on \_\_\_\_\_ on \_\_\_\_\_ (date), by:

(Check all that apply).

- electronic file manager (e-filing)
- email
- first class (regular) U.S. Mail
- certified U.S. Mail
- registered U.S. Mail \_\_\_\_\_ (date).
- by fax, to \_\_\_\_\_ (number).
- personal delivery by (me/my agent) (circle one).
- commercial courier delivery service (such as Federal Express).
- giving a copy to the party's lawyer, \_\_\_\_\_ (lawyer's name).

\_\_\_\_\_  
Your signature