

IMPEACHMENT EXHIBITS/EVIDENCE

If a party reasonably anticipates using documents or other evidence not listed on the Pretrial Order or not exchanged in discovery, solely for impeachment purposes, the party must file a motion for leave to file the motion for in-camera inspection under seal, no later than thirty (30) days before trial. The sealed motion must include the documents or other evidence along with a brief explanation of what evidence it is intended to impeach and how it does so.