

For all of the foregoing reasons, we urge the Committee to recommend adoption of the attached proposed amendment to Fed. R. Civ. P. 26(a)(1)(A).

Sincerely,

Advanced Medical Technology Association	National Retail Federation
American Property Casualty Insurance Association	New Jersey Civil Justice Institute
American Tort Reform Association	NFIB
Association of Defense Trial Attorneys	Ohio Chamber of Commerce
Computer & Communications Industry Association	Pennsylvania Coalition for Civil Justice Reform
DRI Center for Law and Public Policy	Pennsylvania Chamber of Business and Industry
Federation of Defense & Corporate Counsel	Pharmaceutical Research and Manufacturers of America
Florida Justice Reform Institute	Product Liability Advisory Council
High Tech Inventors Alliance	Small Business & Entrepreneurship Council
Insurance Information Institute	South Carolina Chamber of Commerce
International Association of Defense Counsel	Texas Civil Justice League
Lawsuit Reform Alliance of New York	The State Chamber of Oklahoma
Lawyers for Civil Justice	U.S. Chamber of Commerce
Louisiana Legal Reform Coalition	U.S. Chamber of Commerce Institute for Legal Reform
Michigan Chamber of Commerce	Vegas Chamber
Montana Chamber of Commerce	Virginia Chamber of Commerce
National Association of Mutual Insurance Companies	Wisconsin Manufacturers & Commerce
National Association of Wholesaler-Distributors	

APPENDIX A – SUMMARY OF SIGNATORY ORGANIZATIONS

- **Advanced Medical Technology Association.** The Advanced Medical Technology Association (“AdvaMed”) is the world’s largest trade association of medical device manufacturers. AdvaMed advocates on a global basis for the highest ethical standards, timely patient access to safe and effective products, and economic policies that reward value creation. AdvaMed seeks to advance medical technology to promote healthier lives and healthier economies around the world. AdvaMed’s members range from the largest to smallest medical technology companies doing business in the United States. These companies produce medical devices, diagnostic products and health information systems.
- **American Property Casualty Insurance Association.** The American Property Casualty Insurance Association (“APCIA”) is the primary national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members represent all sizes, structures, and regions—protecting families, communities, and businesses in the U.S. and across the globe.
- **American Tort Reform Association.** The American Tort Reform Association (“ATRA”) is the only national organization exclusively dedicated to reforming the civil justice system. The organization is a nationwide network of state-based liability reform coalitions backed by 135,000 grassroots supporters. ATRA’s membership is diverse and includes nonprofits, small and large companies, as well as state and national trade, business and professional associations.
- **Association of Defense Trial Attorneys.** The Association of Defense Trial Attorneys (“ADTA”) is comprised of some of the finest trial attorneys in the various states of the United States, the District of Columbia, Puerto Rico, Canada and France and The United Kingdom of Great Britain and Northern Ireland and the Republic of Ireland. Founded as the Association of Insurance Attorneys (AIA) in 1941, it has established itself as one of the major defense trial attorney organizations in the legal profession.
- **Computer & Communications Industry Association.** The Computer & Communications Industry Association (“CCIA”) is an international, not-for-profit trade association representing a broad cross section of communications and technology firms. For more than fifty years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. CCIA members are at the forefront of research and development in technological fields such as artificial intelligence and machine learning, quantum computing, and other computer related inventions. CCIA members are also active participants in the patent system, holding approximately 5% of all active U.S. patents and significant patent holdings in other jurisdictions such as the EU and China."
- **DRI Center for Law and Public Policy.** Founded in 2012, the DRI Center for Law and Public Policy (“the Center”)—through scholarship, legal expertise, and advocacy—provided

the most effective voice for the defense bar in the discussion of substantive law, judicial process, constitutional issues, and the integrity of the civil justice system at both the national and state levels. Two of the Center’s three primary committees—Legislation and Rules and Public Policy are comprised of numerous task forces and working groups that undertake in-depth studies of a range of topics and publish comments, articles, and white papers on a variety of issues. These resources serve not only as a practical tool for DRI members, but also as objective counsel to policymakers and effective public education assets. The Amicus Committee files amicus curiae briefs in carefully selected cases that present issues of importance to civil litigation defense lawyers and their clients.

- **Federation of Defense & Corporate Counsel.** The Federation of Defense & Corporate Counsel (“FDCC”) was founded 75 years ago as an international defense organization dedicated to the principles of knowledge, justice and fellowship. Members include: (1) practicing lawyers actively engaged in the private practice of law who devote a substantial amount of their professional time to the representation of insurance companies, associations or other corporations, or others, in the defense of civil litigation and have been a member of the bar for at least eight years; or (2) corporate counsel and other executives engaged in the administration or defense of claims for insurance companies, associations, or corporations who have national, regional or company-wide responsibility for a company of greater than local significance.
- **Florida Justice Reform Institute.** The Florida Justice Reform Institute (“FJRI”) seeks to improve Florida’s civil justice system by fighting wasteful civil litigation through legislation, promoting fair and equitable legal practices, and providing information about the state of civil justice in Florida. To facilitate these goals, the Institute employs research and advocacy in support of meaningful tort reform legislation.
- **High Tech Inventors Alliance.** The High Tech Inventors Alliance (HTIA) is a consortium of innovative technology companies that include global leaders in software, e-commerce, cloud computing, artificial intelligence, quantum computing, digital advertising and marketing, streaming, networking and telecommunications hardware, computers, smartphones, and semiconductors. HTIA’s mission is to promote technological innovation, economic growth, and American jobs by advocating reforms to achieve a more efficient, effective, and inclusive patent system.
- **Insurance Information Institute.** At the Triple-I (“I.I.I.”), we want the people to have the information they need to make educated decisions, manage risk, and appreciate the essential value of insurance. With more than 60 insurance company members - including regional, super- regional, national and global carriers - we are the #1 online source for insurance information. Our website, blog and social media channels offer a wealth of data-driven research studies, white papers, videos, articles infographics and other resources solely dedicated to explaining insurance and enhancing knowledge.
- **International Association of Defense Counsel.** The International Association of Defense Counsel (“IADC”) has been serving a distinguished membership of corporate and insurance defense attorneys and insurance executives since 1920. IADC’s activities benefit its

approximately 2,500 members and their clients, as well as the civil justice system and the legal profession. Moreover, the IADC takes a leadership role in many areas of legal reform and professional development. IADC's membership consists of partners in large and small law firms, senior counsel in corporate law departments, and corporate and insurance executives. Members represent the largest corporations around the world, including the majority of companies listed in the FORTUNE 500.

- **Lawsuit Reform Alliance of New York.** The Lawsuit Reform Alliance of New York (“LRANY”) is a not-for-profit association of businesses, healthcare professionals, membership organizations, and concerned citizens dedicated to reform of the legal system in order to foster a better business climate, promote job growth and address the growing cost of lawsuit abuse.
- **Lawyers for Civil Justice.** Lawyers for Civil Justice (“LCJ”) is a national coalition of defense trial lawyer organizations, law firms, and corporations that promotes excellence and fairness in the civil justice system to secure the just, speedy, and inexpensive determination of civil cases. For more than 30 years, LCJ has been closely engaged in reforming federal civil rules in order to: (1) promote balance and fairness in the civil justice system; (2) reduce costs and burdens associated with litigation; and (3) advance predictability and efficiency in litigation.
- **Louisiana Legal Reform Coalition.** Since 2008, the Louisiana Legal Reform Coalition (formerly the Louisiana Coalition for Common Sense) (“LLRC”) has worked at the State Capitol to improve the civil justice system and curb lawsuit abuse. More needs to be done. Unless state lawmakers prioritize legal reform, Louisiana will lag in business investment and job creation.
- **Michigan Chamber of Commerce.** The Michigan Chamber of Commerce (“Michigan Chamber”) encompasses approximately 6,600 member employers, trade associations and local chambers of commerce of every size and type in all 83 counties of the state. The Michigan Chamber’s mission is to promote conditions favorable to job creation and business success in Michigan. Michigan Chamber member businesses provide jobs to 1.5 million residents. One of every 2.6 employees in Michigan works for a Michigan Chamber member firm.
- **Montana Chamber of Commerce.** As the leading business advocate, the Montana Chamber of Commerce (“Montana Chamber”) envisions a business climate that is optimal for Montana business prosperity. To create and sustain an optimal business climate, business prosperity, and a strong Montana economy, the Montana Chamber, through advocacy, education, and collaboration, works to provide an empowered and educated workforce, reduce business growth obstacles, and advance positions that promote success for Montana businesses.
- **National Association of Mutual Insurance Companies.** The National Association of Mutual Insurance Companies (“NAMIC”) is the largest property/casualty insurance trade association with more than 1,400 member companies serving more than 170 million auto,

home and business policyholders. NAMIC promotes public policy solutions that benefit insurance policyholders and the NAMIC member companies that it represents. NAMIC member companies write nearly \$230 billion in annual premiums, and have 54 percent of homeowners, 43 percent of automobile and 32 percent of the business insurance markets. Membership in NAMIC is not restricted to mutual insurance companies and is open to stock insurance companies, reinsurance companies and industry vendor companies.

- **National Association of Wholesaler-Distributors.** The National Association of Wholesaler-Distributors (“NAW”) is a federation of wholesale distribution associations. NAW works with academia and the distribution consulting community to advance the state of knowledge in wholesale distribution. It also represents the wholesale distribution industry before Congress, the White House and the judiciary on issues that affect the industry’s various lines of trade. NAW members represent all lines of trade and include some of the largest wholesaler-distributors in the United States.
- **National Retail Federation.** The National Retail Federation (“NRF”) advances the interests of the retail industry through advocacy, communications, and education. NRF is the world’s largest retail trade association, representing discount and department stores, home goods and specialty stores, Main Street merchants, grocers, wholesalers, chain restaurants and Internet retailers from the United States and more than 45 countries. Retail is the nation’s largest private sector employer, supporting one in four U.S. jobs – 42 million working Americans.
- **NFIB.** NFIB (“NFIB”) is the voice of small business, advocating on behalf of America's small and independent business owners, both in Washington, D.C., and in all 50 state capitals. NFIB is nonprofit, nonpartisan, and member driven. Since its founding in 1943, NFIB has been exclusively dedicated to small and independent businesses, and remains so today.
- **New Jersey Civil Justice Institute.** The New Jersey Civil Justice Institute (“NJCJI”) is the State’s leading organization advocating for the business community on matters of law and legal policy. NJCJI promotes a fair and predictable civil justice system, and defends the value of the rule of law in protecting innovation and fostering economic growth.
- **Ohio Chamber of Commerce.** Since its founding in 1893, the Ohio Chamber of Commerce (“Ohio Chamber”) has been the leading advocate and resource for businesses throughout the Buckeye State. The Chamber has more than 8,000 members, including individually owned and operated businesses serving small communities as well as publicly traded corporations operating on a global scale.
- **Pennsylvania Chamber of Business and Industry.** Founded in 1916, the Pennsylvania Chamber of Business and Industry (“PA Chamber”) has served as “The Statewide Voice of Business™” by advocating public policies that expand private sector job creation and lead to a more prosperous Pennsylvania for all of its citizens. The Pennsylvania Chamber is the largest business association in Pennsylvania, and consists of close to 10,000 member businesses of all sizes and industry sectors throughout the state – from sole proprietors to

Fortune 100 companies – representing nearly 50 percent of the private workforce in Pennsylvania.

- **Pennsylvania Coalition for Civil Justice Reform.** The Pennsylvania Coalition for Civil Justice Reform (“PCCJR”) is a statewide, nonpartisan alliance of organizations and individuals representing businesses, professional and trade associations, health care providers, nonprofit entities, taxpayers, and other perspectives. The coalition is dedicated to bringing fairness to our courts by elevating awareness of civil justice issues and advocating for legal reform in the legislature. Also, as Pennsylvania is one of the few states with a partisan judicial election system, we strongly encourage all citizens to be educated voters and participate in judicial elections.
- **Pharmaceutical Research and Manufacturers of America.** The Pharmaceutical Research and Manufacturers of America (“PhRMA”) represents the country’s leading biopharmaceutical research companies. PhRMA’s mission is to conduct effective advocacy for public policies that encourage the discovery of important new medications for patients by biopharmaceutical research companies. PhRMA members, which include some of the largest pharmaceutical companies in the United States, invest billions in the research and development of innovative medicines that enable patients to live longer, healthier and more productive lives.
- **Product Liability Advisory Council, Inc.** Formed in 1983, the Product Liability Advisory Council, Inc. (“PLAC”) is a non-profit association that analyzes and shapes the common law of product liability and complex litigation. PLAC’s mission is to help members successfully manage every link in the liability chain – from product design to manufacture to distribution through sale to end-users, and on to post-sale responsibilities. PLAC is comprised of more than 100 leading product manufacturers and 350 of the most elite product liability defense attorneys operating in the United States and abroad.
- **Small Business & Entrepreneurship Council.** The Small Business and Entrepreneurship Council (“SBE Council”) is a 501c(4) advocacy, research and education organization dedicated to protecting small business and promoting entrepreneurship. SBE Council educates elected officials, policymakers, business leaders and the public about key policies that enable business start-up and growth. SBE Council’s members include entrepreneurs and small business owners.
- **South Carolina Chamber of Commerce.** The South Carolina Chamber of Commerce (“South Carolina Chamber”) is the leading statewide organization championing a favorable business climate for South Carolina companies and employees. Its mission is to strategically create and advance a thriving, free-market environment where South Carolina businesses can prosper. The South Carolina Chamber represents its members, which include both small and large companies, by assisting them with legislative advocacy and tracking, marketing, connecting and expanding their bottom line.
- **The State Chamber of Oklahoma.** The State Chamber of Oklahoma (“The State Chamber”) has been the state’s leading advocate for business since 1926 and is the guardian

of business in Oklahoma. We work on behalf of our members, the Oklahoma business community, to affect legislative change and create a pro-growth climate statewide. The State Chamber leverages meaningful partnerships, resources and coalitions to achieve legislative results that strengthen Oklahoma's economy.

- **Texas Civil Justice League.** The Texas Civil Justice League (“The League”) is the nation’s oldest and largest state legal reform organization. It has pursued a broad civil justice reform agenda, including successful efforts to enact legislation restricting forum shopping, limiting punitive damages and joint and several liability and deterring frivolous lawsuits. The League’s members include hundreds of corporate businesses of all sizes, law firms, professional and trade associations, health care providers and individuals.
- **U.S. Chamber of Commerce.** The U.S. Chamber of Commerce (“the Chamber”) is the world’s largest business federation, representing the interests of businesses of all sizes, sectors and regions, as well as state and local chambers and industry associations. For more than 100 years, the Chamber has advocated for pro-business policies that help businesses create jobs and grow our economy.
- **U.S. Chamber of Commerce Institute for Legal Reform.** A program of the U.S. Chamber of Commerce, the U.S. Chamber of Commerce Institute for Legal Reform’s (“ILR”) mission is to champion a fair legal system that promotes economic growth and opportunity. The Chamber is the world’s largest business federation, representing the interests of businesses of all sizes, sectors and regions, as well as state and local chambers and industry associations. For more than 100 years, the Chamber has advocated for pro-business policies that help businesses create jobs and grow our economy.
- **Vegas Chamber.** The Vegas Chamber (“Vegas Chamber”) is the largest business organization in Nevada. Founded in the early days of Las Vegas, the Vegas Chamber has effectively protected and strengthened the Southern Nevada business community, helping its member businesses grow and thrive and providing a voice for those businesses in local, state and federal government.
- **Virginia Chamber of Commerce.** The Virginia Chamber of Commerce (“Virginia Chamber”) is the leading non-partisan business advocacy organization in the Commonwealth of Virginia. Working in the legislative, regulatory, civic and judicial arenas at the state and federal level, the Virginia Chamber seeks to promote long-term economic growth in the Commonwealth. The Virginia Chamber’s members include 25,000 Virginia companies, ranging from small businesses to Fortune 500 companies.
- **Wisconsin Manufacturers and Commerce.** Wisconsin Manufacturers and Commerce (“WMC”) is the state chamber of commerce, the state manufacturers’ association and the state safety council. Founded in 1911, WMC is Wisconsin’s leading business association dedicated to making Wisconsin the most competitive state in the nation. The association has nearly 3,800 members that include both large and small manufacturers, service companies, local chambers of commerce and specialized trade associations.