

**LEGAL MALPRACTICE STATUTES OF LIMITATION - ALFA INTERNATIONAL**

STATE	STATUTE(S)	LENGTH	DISCOVERY RULE	CONTIN. REP.	COMMENTS	ALFA CONTACT
AL	Ala. Code § 6-2-34	2 years	Applies	Not adopted	Discovery rule tolls statute for 6 months from discovery, but not more than 4 years from injury	Chuck Stewart, Esq., Montgomery, AL cstewart@babco.com
AK	AS §§ 09.10.070; 09.10.053.	Tort: 2 years; Contract: 3 years	Applies	Not adopted		Not Available, but please contact John Dalton at johndalton@mhlseattle.com
AZ	A.R.S. 12-542; A.R.S. 12-548	Tort: 2 years; Contract: 6 years	Applies	Not adopted		Jim Blair, Esq., Phoenix, AZ jblair@rcdmlaw.com
AR	Ark. Code § 16-56-105	3 years	Does not apply	Rejected	Discovery rule does not apply absent concealment	John Lile, Esq., Little Rock, AR jlile@wlj.com
CA	Cal Code. Civ. P. § 340.6	1 year/4 years	Applies	Adopted	SOL expires earlier of 1 year of discovery or 4 years from act	Jennifer K. Saunders, Esq., Los Angeles, CA jsaunders@hbblaw.com
CO	CRS 13-80-101	2 years	Applies	Not adopted		John E. Bolmer, Esq., Denver, CO bolmerj@hallevans.com
CT	§ 52-584 C.G.S.	2 years from act or discovery/3 years at most	Does not apply	Adopted	SOL expires after 3 year, regardless of when discovered	Richard Tynan, Esq., Hartford, CT tynan@halloran-sage.com
DE	10 Del c. § 8106	3 years	Applies	Not adopted		James W. Semple, Esq., Wilmington, DE jsemple@morrisjames.com
DC	§ 12-301(8)	3 years	Applies	Adopted		Ira H. Polon, Esq., Washington, D.C. poloni@dicksteinshapiro.com
FL	§ 95.11(4)(a)	2 years	Applies	Not adopted		Nicky Mooney, Esq., Orlando, FL nmooney@deanmead.com
GA	O.C.G.A. 9-3-25, 9-3-24; O.C.G.A. 9-3-33	personal injury damages 2 years; property damages (negligence or oral contract) 4 years; written contract 6 years	Does not apply	Not adopted	SOL begins on date of negligent act/breach of contract unless tolled by separate fraud of defendant.	T. Ryan Mock, Esq., Atlanta, GA mock@hptylaw.com
HI	HRS § 657-1	6 years	Applies	Not adopted		Not Available
ID	IC § 5-219(4)	2 years	Applies	Precluded by Statute		Richard H. Greener, Esq., Boise, ID rgreener@greenerlaw.com
IL	735 ILCS 5/13-214.3	2 years	Applies	Rejected	6 year Statute of Repose	Beth Kamp Veath, Esq., Belleville, IL bveath@bjpc.com
IN	IN Code § 34-11-2-4	2 years	Applies	Adopted		Edward Hearn, Esq., Crown Point, IN hearne@jbltd.com
IA	IA St. §§ 614-1(2), (4)	Tort: 2 years; other COAs: 5 years	Applies	Adopted	5 year SOL applies to unwritten K, fraud, inj.to prop.	Bernard J. (Jerry) Spaeth, Esq., Des Moines, IA spaeth@whitfieldlaw.com
KS	K.S.A. §§ 60-513; 60-512; 60-511	Tort 2 years; other COAs: 3/5 years	Applies	Adopted	3 year SOL applies to unwritten K, 5 years to written K. 10 year statute of repose	Thomas E. Rice, Esq., Kansas City, MO rice@bscr-law.com
KY	Ky.Rev.Stat. § 413.245	1 year	Applies	Adopted		Susan H. Jackson, Esq., Cincinnati, OH susan.jackson@dinsmore.com
LA	LRS 9:5605	1 year from discovery subject to a 3 year cap	Applies	Precluded by Statute unless fraud	Discovery and cap period does not apply to fraud or individuals lacking capacity.	George Fagan, Esq., New Orleans, LA gfagan@leakeanderson.com
ME	14 M.R.S.A. § 752	6 years	Applies	Not adopted	Discovery rule limited by statute	Jonathan W. Brogan, Esq., Portland, ME jbrogan@nhdlaw.com
MD	MD Code §5-101	3 years	Applies	Adopted		J. Snowdwn Stanley, Jr., Esq., Baltimore, MD jstanley@semmes.com
MA	M.G.L. ch. 260 § 4	3 years	Applies	Adopted		Doyle C. Valley, Esq., Boston, MA dvalley@morrisonmahoney.com, (617) 737-8846
MI	MCL 600.5805(6);	2 years	Applies	Adopted	6 year statue of repose, MCL 600.5838b(1).	Jeffrey Hengeveld, Esq., Detroit, MI jhengeveld@plunkettcooney.com
MN	M.S.A. § 541.05	6 years	Applies	Not adopted		Stanley E. Siegel, Esq., Minneapolis, MN ssiegel@nilanjohnson.com
MS	Miss. Code §§ 15-1-49; 15-1-29	3 years	Applies	Not adopted		Terry R. Levy; Jackson, MS tlevy@danielcoker.com
MO	§516.120 R.S.Mo.	5 years	Applies	Not adopted	Statute triggered when damages reasonably ascertainable.	Thomas E. Rice, Esq., Kansas City, MO rice@bscr-law.com
MT	Mont. Code § 27-2-206	3 years	Applies	Adopted	10 year Statute of Repose	T. Thomas Singer, Esq., Billings, MT tsinger@axilonlaw.com

**LEGAL MALPRACTICE STATUTES OF LIMITATION - ALFA INTERNATIONAL**

STATE	STATUTE(S)	LENGTH	DISCOVERY RULE	CONTIN. REP.	COMMENTS	ALFA CONTACT
NE	R.R.S. Neb. § 25-222	2 years from act; 1 year from reasonable discovery	Applies	Adopted	10 year Statute of Repose	Dallas D. Jones, Esq., Lincoln, NE djones@bayloreenvn.com
NV	NRS §11.207(1)	2 years from discovery; 4 years from damage	Applies	Not adopted	Discovery rule limited to concealment	J. Bruce Alverson, Esq., Las Vegas, NV balverson@alversontaylor.com
NH	N.H. Rev. Stat. § 508:4	3 years	Applies	Not adopted		Marc R. Scheer, Esq., Manchester, NH mscheer@wadleighlaw.com
NJ	N.J.S.A. 2A:14-1	6 years	Applies	Adopted		Richard Granofsky, Esq., New York, NY rgranofsky@lskdnylaw.com
NM	NMSA 1978, §§ 37-1-3, 37-1-4	Tort: 4 years; Written K: 6 years	Applies	Not adopted		Alfred L. Green, Esq., Albuquerque, NM algreen@btblaw.com
NY	NY CPLR 214(6)	3 years	Rejected	Adopted		Adam Cooper, Esq., Albany, NY acooper@carterconboy.com
NC	N.C. Gen. Stat. § 1-15(c)	3 years	Applies	Not adopted	4 year Statute of Repose	Walter E. Brock, Jr. Esq., Raleigh, NC web@youngmoorelaw.com
ND	N.D.C.C. 28-01-18(3)	2 years	Applies	Adopted		Leslie Bakken Oliver, Esq., Bismarck, ND loliver@vogellaw.com
OH	OH Rev. Code § 2305.11(A)	1 year	Applies	Adopted		Susan H. Jackson, Esq., Cincinnati, OH susan.jackson@dinsmore.com
OK	OK.Stat.tit.12, §§ 95(A)(3); (1); (2)	Tort: 2 years; Contract: 3/5 years	Applies	Rejected	Contract SOL: 3 years unwritten K; 5 years written K	Paula J. Quillin, Esq., Tulsa, OK pquillin@tulsalawyer.com
OR	ORS 12.110 (1); ORS 12.080(1)	Tort: 2 years; Contract 6 years	Applies	Not adopted	10 year statute of repose	Nicholas E. Wheeler, Esq., Portland, OR nwheeler@cosgravelaw.com
PA	42 Pa.C.S.A. §§ 5524(7); 5527	Tort: 2 years; Contract: 6 years	Applies	Rejected		Gary H. Hunter, Esq., Philadelphia, PA hunterg@ggmfirm.com
RI	G.L. 1956 § 9-1-14.3	3 years	Applies	Rejected		Stephen B. Lang, Esq., Providence, RI slang@hcc-law.com
SC	S.C. Code Ann. §15-3-530(5)	3 years	Applies	Rejected		D. Jay Davis, Esq., Charleston, SC jdavis@ycrlaw.com
SD	SDCL § 15-2-14.2	3 years	Does not apply	Adopted		M. Daniel Vogel, Esq., Fargo, SD dvogel@vogellaw.com
TN	Tenn. Code §28-3-104	1 year	Applies	Adopted		Marc H. Harwell, Esq., Chattanooga, TN marc.harwell@leitnerfirm.com
TX	Tex. Civ. P & R Code §§16.003; 16.004	Tort: 2 years; other COAs: 4 years	Applies	Adopted	4 year SOL applies to breach of contract, fraud, fiduciary duty	Brian T. Coolidge, Esq., Houston, TX btc@lorancethompson.com
UT	U.C.A. § 78B-2-307	4 years	Applies	Not adopted		Heidi G. Goebel, Esq., Salt Lake City, UT heidi.goebel@chrisjen.com
VT	12 V.S.A. §§ 512(4); 511 12	3 years/6 years	Applies	Adopted	3 years: personal injury; 6 years: other than person injury	John J. Zawistoski, Esq., Rutland, VT jjz@rsclaw.com
VA	Va. Code § 8.01-246	3 years/5 years	Does not apply	Adopted	3 years: oral contract; 5 years: written contract	James W. Morris, III, Esq., Richmond, VA jmorris@morrismorris.com
WA	RCW 4.16.080	3 years	Applies	Adopted		Phillip R. Meade, Seattle, WA pmeade@mhlseattle.com
WV	W. Va. Code §§; 55-2-6 ; 55-2-12	Tort: 2 years; Contract: 5/10 years	Applies	Adopted	Contract SOL: 5 years unwritten K; 10 years written K	Timothy M. Miller, Esq., Charleston, WV tmm@ramlaw.com
WI	Wis. Stat. § 893.53	6 years	Applies	Adopted		Eugenia (Gina) Carter, Esq., Madison, WI ecarter@whdlaw.com
WY	W.S. § 1-3-107	2 years	Applies	Not adopted		W. Henry Combs, III, Esq., Casper, WY whc@murane.com