

**COURT OF COMMON PLEAS,
HAMILTON COUNTY, OHIO**

	:	Case No.: A _____
	:	
Plaintiff(s),	:	Judge Christian A. Jenkins
	:	
v.	:	Joint Discovery Plan
	:	(Rule 26(F) Report)
	:	(Required Form to be filed not later than
	:	seven days prior to the Rule 16
Defendant(s).	:	conference)
	:	

Now come all parties to this case, by and through their respective counsel, and hereby jointly submit to the Court this Joint Discovery Plan, pursuant to the Court's Trial Procedure Order. The parties conducted their discovery conference on _____.

A. Magistrate Consent

The Parties:

- unanimously consent to the jurisdiction of the Magistrate Judge pursuant to Civ.R. 53(C).
- do not unanimously consent to the jurisdiction of the Magistrate Judge pursuant to Civ.R. 53(C).

B. Rule 26(B) Disclosures

- The parties have exchanged initial disclosures required by Civ.R. 26(B)(3)(a).
- The parties will exchange such disclosures by _____.
- The parties are exempt from disclosures under Civ.R. 26(B)(3)(b).

NOTE: Rule 26(B) disclosures are not to be filed with the Court.

C. Discovery Issues and Dates

1. Parties need to conduct discovery on the issues of:

2. The parties recommend that discovery:
- need not be bifurcated.
 - should be bifurcated between liability and damages.
 - should be bifurcated between factual and expert.
 - should be limited in some manner or focused upon particular issues which relate to _____.
3. Recommended deadline for the disclosure and report(s) of plaintiff(s) expert(s) _____.
4. Recommended deadline for the disclosure and report(s) of defendant(s) expert(s) _____.
5. Recommended deadline for the disclosure of lay witnesses _____.
6. Recommended discovery cut-off date _____.
7. Anticipated discovery problems
- _____
 - None
8. Describe the subjects on which discovery is to be sought and the nature, extent and scope of discovery that each party needs to: (1) make a settlement evaluation, (2) prepare for case dispositive motions, and (3) prepare for trial:
- _____
- _____
9. Discovery of Electronically Stored Information. The parties have discussed disclosure, discovery, and preservation of electronically stored information, including the form(s) in which it should be produced.
- Yes
 - No
- i. The parties have electronically stored information in the following formats:
- _____
- _____

ii. The case presents the following issues relating to disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced:

10. Claims of Privilege or Protection. The parties have discussed issues regarding the protection of information by a privilege or the work-product doctrine, including whether the parties agree to a procedure to assert these claims after production or have any other agreements.

Yes

No

i. The case presents the following issues relating to claims of privilege or of protection as trial preparation materials:

ii. Have the parties agreed on a procedure to assert such claims AFTER production?

No

Yes

Yes, and the parties ask that the Court include the following agreement in the scheduling order:

D. Limitations on Discovery

1. Changes to the limitations on discovery

- Extension of number of interrogatories (currently 40) to _____.
- None

E. Protective Order

- A protective order will likely be submitted to the Court on or before _____.
- The parties currently do not anticipate the need for a protective order. If the parties determine that one is necessary, they will submit a joint proposed order to the Court.

F. Settlement

A settlement demand has been made:

- Yes
- No

A response has been made:

- Yes
- No

A demand can be made by _____.

A response can be made by _____.

G. Motion Deadlines

1. Recommended deadline for motions to amend the pleadings and/or to add parties _____.
2. Recommended deadline for motions relative to the pleadings _____.
3. Recommended deadline for dispositive motions _____.

H. Other Matters Pertinent to Management of this Litigation

Signatures:

Attorney(s) for plaintiff(s):

Attorney(s) for defendant(s):

Attorney for _____

Attorney for _____

Attorney for _____

Attorney for _____

Attorney for _____

Attorney for _____

Attorney for _____

Attorney for _____