



☐ Not certain

2. If yes, the parties agree motions related to venue or jurisdiction will be filed by\_\_\_\_\_.

**\* D. Parties and Pleadings**

1. The parties agree that any motion or stipulation to amend the pleadings or join new parties will be filed by \_\_\_\_\_.

2. The parties agree that any motion directed to the pleadings will be filed by\_\_\_\_\_.

**\* E. Pretrial Motions**

1. Dispositive motions will be filed by \_\_\_\_\_.

2. Responses will be filed by \_\_\_\_\_.

3. Replies will be filed by \_\_\_\_\_.

4. The parties anticipate requesting oral argument?

☐ Yes

☐ No

**\* F. Discovery Issues and Dates**

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

2. Recommended deadline for the disclosure and report(s) of plaintiff(s) expert(s)  
\_\_\_\_\_.

3. Recommended deadline for the disclosure and report(s) of defendant(s) expert(s)  
\_\_\_\_\_.

4. Recommended deadline for the disclosure of lay witnesses \_\_\_\_\_.

5. Anticipated discovery problems

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None

6. 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:

**G. Discovery Procedures**

1. Recommended discovery date \_\_\_\_\_.

2. Recommended limitations on discovery

☐ Extension of number of interrogatories (currently 40) to \_\_\_\_\_.

☐ None

☐ Other \_\_\_\_\_.

3. The parties anticipate production of Electronically Stored Information (ESI)?

☐ Yes

☐ No

4. What is the protocol for the production of ESI?

5. Do the parties anticipate disagreements requiring court intervention over ESI claimed to not be reasonably accessible?

☐ Yes

☐ No

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

**H. 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.

**\* I. Settlement**

1. The parties request that this matter be referred to the court's mediation service?

☐ Yes

☐ No

2. Plaintiff(s) will make an initial settlement demand by \_\_\_\_\_.

3. Defendant(s) will respond by \_\_\_\_\_.

A settlement demand has been made:

☐ Yes

☐ No

A response has been made:

☐ Yes

☐ No

**J. Other Matters Pertinent to Management of This Litigation**

Once the form has been completed, file with the Clerk of Courts, and email a courtesy copy to *MRyan@cms.hamilton-co.org*

**Signatures:**

**Attorney for Plaintiff(s)**

**Attorney for Defendant(s)**

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\_\_\_\_\_  
Ohio Bar # \_\_\_\_\_  
Attorney for \_\_\_\_\_

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Ohio Bar # \_\_\_\_\_  
Attorney for \_\_\_\_\_

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