

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

NAMES,	:	Case No.: A2XXXXXX
	:	
Plaintiff(s),	:	Judge Jennifer L. Branch
v.	:	
	:	Joint Discovery Plan, also known as Rule
NAMES,	:	26(F) Report
	:	
Defendant(s).	:	(Required Form to be filed not later than
	:	seven days prior to the Case Management
	:	Conference)
	:	

All parties to this case hereby jointly submit to the Court this Joint Discovery Plan required by Civ. R. 26(F) and the Court's Initial Case Order. The parties conducted their discovery conference on _____. At the conference, the parties discussed:

- The nature and basis of their claims and defenses
- The possibilities for promptly settling or resolving the case
- Made or arranged for making initial disclosures required by Civ. R. 26(B)(3)
- Discussed any issues about preserving discoverable information
- Jointly developed this proposed discovery plan

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. Motions Related to the Complaint Deadlines

Deadline to Amend Pleadings or add Parties: _____

Deadline for motions related to Pleadings: _____

D. Discovery Recommended Dates

Deadline for the disclosure of lay witnesses	
Date for Status Report with the Court, preferably 30 days before discovery cut-off:	
Discovery cut-off date	
Deadline for the disclosure and report(s) of primary / plaintiff(s) expert(s)	
Deadline for the disclosure and report(s) of rebuttal / defendant(s) expert(s)	
Deadline for Expert Discovery if different from the discovery cut-off date (deadline should be before the discovery cut-off date)	
Dispositive Motion Deadline	
Date for Final Pretrial Conference	
Recommended dates Trial <input type="checkbox"/> Jury <input type="checkbox"/> Bench	
Estimated Number of days needed for Trial	

E. Discovery Issues

1. Parties need to conduct discovery on the following subjects:

2. Should discovery be conducted in phases or limited or focused on a particular issue?

No
 Yes, in the following manner: _____

3. 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:

4. Describe what and how documents obtained through public records will request will be exchanged, if any: _____
-
5. Describe any issues about claims of privilege or of protection as trial-preparation materials, if any: _____
-
6. What changes should be made in the limitations on discovery imposed under the Civil Rules rules or by local rule, and what other limitations should be imposed, if any? _____
-
7. List any other orders that the Court should issue under Civ. R. 26(C) or under Civ. R. 16(B) and (C) and any modifications requested to the Court's standard Case Scheduling Order issued under Civ. R. 16, if any: _____
-
8. List any anticipated discovery problems, if any: _____
-

F. 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.

G. 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 _____.

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 _____