

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

_____	:	Case No.:
	:	
Plaintiff(s),	:	Judge Alan C. Triggs
	:	
-vs.-	:	RULE 26(B) CONFERENCE REPORT
	:	AND DISCOVERY PLAN
_____	:	
	:	(must be filed prior to the initial case
Defendant(s).	:	management 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 Civ.R. 26(F)(3). The parties conducted their discovery conference on _____.

1. **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.

2. **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).

3. **Venue and Jurisdiction**

a. Are there any contested issues related to venue or jurisdiction?

___ Yes ___ No ___ Not Certain

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

_____.

4. **Parties and Pleadings**

- a. The parties agree that any motion or stipulation to amend the pleadings or join new parties will be filed by _____.
- b. The parties agree that any motion directed to the pleadings will be filed by _____.

5. **Pretrial Motions**

- a. Dispositive motions will be filed by _____.
- b. Responses will be filed by _____.
- c. Replies will be filed by _____.
- d. Do the Parties anticipate requesting oral argument?
___ Yes ___ No

6. **Discovery Issues and Dates**

- a. Parties need to conduct discovery on the issues of:

_____.
- b. Recommended deadline for the disclosure and report(s) of Plaintiff(s) expert(s):
_____.
- c. Recommended deadline for the disclosure and report(s) of Defense expert(s):
_____.
- d. Recommended deadline for the disclosure of lay witnesses:
_____.
- e. Anticipated discovery problems:

___ None.
- f. **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 following issues relate 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: _____.

7. **Discovery Procedures**

a. Recommended discovery date: _____.

b. Recommended limitations on discovery:

i. Extension of number of interrogatories (currently 40) to _____.

ii. None

iii. Other _____.

c. Do the parties anticipate production of Electronically Stored Information (ESI)?

Yes No

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

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

Yes No

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

8. **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.

9. **Settlement**

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

___ Yes ___ No

b. Plaintiff(s) will make an initial settlement demand by _____.

c. Defendant(s) will respond by _____.

d. A settlement demand has been made:

___ Yes ___ No

e. A response has been made:

___ Yes ___ No

10. Other Matters Pertinent to Management of this Litigation:

Signatures:

Attorney(s) for plaintiff(s):

Attorney(s) for defendant(s):

Ohio Bar # _____
Attorney for _____

Ohio Bar# _____
Attorney for _____

Ohio Bar # _____
Attorney for _____

Ohio Bar # _____
Attorney for _____

Ohio Bar # _____
Attorney for _____

Ohio Bar # _____
Attorney for _____

Ohio Bar # _____
Attorney for _____

Ohio Bar # _____
Attorney for _____