| | | |
|---|---|---|
| **NAMES**, | : | **Case No.: A2XXXXXXX** |
| | : | |
| Plaintiff(s), | : | **Judge Virginia Tallent** |
| 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 <u>not</u> 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<br>   ☐   Jury<br>   ☐   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 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.    <u>Protective Order</u>

☐ 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.    <u>Settlement</u>

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.**      <u>Other Matters Pertinent to Management of this Litigation</u>

_____

_____


**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 _____