

**JOINT DISCOVERY/CASE MANAGEMENT PLAN
UNDER FEDERAL RULE OF CIVIL PROCEDURE 26(f)**

Please restate each instruction before furnishing the information.

1. State where and when the conference of the parties required by Federal Rule of Civil Procedure 26(f) was held and identify the counsel who participated for each party.
2. List the cases related to this one that are pending in any state or federal court with the case number and court.
3. Specify the allegation of federal jurisdiction.
4. List anticipated additional parties that should be included, when they can be added, and by whom they are wanted.
5. List anticipated interventions, if any.
6. Describe class-action issues, if any.
7. State whether each party represents that it has made the initial disclosures required by Federal Rule of Civil Procedure 26(a). If not, describe the arrangements that have been made to complete the disclosures.
8. Describe the proposed agreed discovery plan, including:
 - A. Responses to all the matters raised in Federal Rule of Civil Procedure 26(f).
 - B. When and to whom the plaintiff anticipates it may send interrogatories.
 - C. When and to whom the defendant anticipates it may send interrogatories.
 - D. Of whom and by when the plaintiff anticipates taking oral depositions.
 - E. Of whom and by when the defendant anticipates taking oral depositions.
 - F. When the plaintiff (or the party with the burden of proof on an issue) will be able to designate experts and provide the reports required by Federal Rule of Civil Procedure 26(a)(2)(B) and when the opposing party will be able to designate responsive experts and provide their reports.
 - G. List expert depositions that the plaintiff (or the party with the burden of proof on an issue) anticipates taking and their anticipated completion date. *See* Federal Rule of Civil Procedure 26(a)(2)(B).
 - H. List expert depositions that the opposing party anticipates taking and their anticipated completion date. *See* Federal Rule of Civil Procedure 26(a)(2)(B).
9. If the parties are not agreed on a part of the discovery plan, describe each party's separate views and proposals.

10. Specify the discovery beyond initial disclosures that has been undertaken to date.
11. Specify any modifications to the Preliminary Scheduling Order that one or more parties requests.
12. Describe what each party has done or agreed to do to bring about a prompt resolution of the case.
13. State the Alternative Dispute Resolution techniques that are reasonably suitable and state when such a technique may be effectively used in this case.
14. Magistrate judges may now hear jury and non-jury trials. Indicate each party's respective position on a trial before a magistrate judge.
15. State whether a jury demand has been made and if it was made on time.
16. Specify the number of hours presenting the evidence in this case will take.
17. List pending motions that could be ruled on at the Initial Pretrial Conference.
18. List other motions pending.
19. Indicate other matters peculiar to this case, including discovery, that deserve the special attention of the Court at the Initial Pretrial Conference, and/or that could facilitate a prompt, efficient, and cost-effective preparation of the case.
20. List the names, bar numbers, addresses, and telephone numbers of all counsel.