



3. Discovery Plan. The parties jointly propose to the court the following discovery plan:  
[Use separate paragraphs or subparagraphs as necessary if parties disagree.]

a) All discovery shall be commenced in time to be completed by \_\_\_\_\_ (date, ordinarily nine months from the date of this Certification and Report).

[if needed] Discovery on

\_\_\_\_\_  
\_\_\_\_\_  
(identify any issues requiring early discovery) will be completed by \_\_\_\_\_ (date).

b) Discovery Limits:

- 1) Maximum of \_\_\_\_\_ (ordinarily 20) interrogatories by each party to any other party .
- 2) Maximum of \_\_\_\_\_ (ordinarily 20) requests for admission by each party to any other party.
- 3) Maximum of \_\_\_\_\_ depositions by plaintiff(s) and \_\_\_\_\_ by defendant(s) (ordinarily 6 each) [or \_\_\_\_\_ by each plaintiff and \_\_\_\_\_ by each defendant].

c) Reports from retained experts under Rule 26(a)(2) will be due:  
-from plaintiff(s) by \_\_\_\_\_ (date)  
-from defendant(s) by \_\_\_\_\_ (date)  
Supplementations under Rule 26(e) due \_\_\_\_\_ (list time(s) or interval(s))

4. Other Items. [Attach separate paragraphs as necessary if parties disagree.]

a) The parties [ ] request [ ] do not request a conference with the court before entry of the scheduling order.

b) All potentially dispositive motions should be filed by \_\_\_\_\_ (date, ordinarily one month after the close of discovery)

c) Settlement:

[ ] is likely

[ ] is unlikely

[ ] cannot be evaluated prior to \_\_\_\_\_ (date)

[ ] may be enhanced by use of the following ADR procedure:

[ ] Mediated Settlement Conference

[ ] binding arbitration

[ ] judicial settlement conference

[ ] other \_\_\_\_\_



The parties agree that the above selected ADR procedure would be most useful if conducted:

- after resolution of any outstanding dispositive motions, but prior to further discovery;
- after an initial round of preliminary discovery to be completed by \_\_\_\_\_ (date);
- after the completion of discovery;
- after resolution of summary judgment motions, if any
- not applicable.

d) Final lists of witnesses and exhibits under Rule 26(a)(3) are due:  
 from plaintiff(s) by \_\_\_\_\_ (date)  
 from defendant(s) by \_\_\_\_\_ (date)

e) If the case is ultimately tried, trial is expected to take approximately \_\_\_\_\_ days.

5. Please identify any other matters regarding discovery or case management which may require the Court's attention (e.g., concerns re: confidentiality, protective orders, etc., unmovable scheduling conflicts)

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*Plaintiff's Counsel*                      *Party*                      *Date*

\_\_\_\_\_  
*Defendant's Counsel*                      *Party* *Date*

\_\_\_\_\_  
*Plaintiff's Counsel*                      *Party*                      *Date*

\_\_\_\_\_  
*Defendant's Counsel*                      *Party* *Date*

\_\_\_\_\_  
*Plaintiff's Counsel*                      *Party*                      *Date*

\_\_\_\_\_  
*Defendant's Counsel*                      *Party* *Date*

\_\_\_\_\_  
*Plaintiff's Counsel*                      *Party*                      *Date*

\_\_\_\_\_  
*Defendant's Counsel*                      *Party* *Date*

\_\_\_\_\_  
*Plaintiff's Counsel*                      *Party*                      *Date*

\_\_\_\_\_  
*Defendant's Counsel*                      *Party* *Date*

*(attach additional sheets if necessary)*