

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

_____	:	Case No. _____
Plaintiff(s)	:	District Judge Susan J. Dlott
v.	:	JOINT DISCOVERY PLAN
_____	:	
Defendant(s)	:	

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 the Court’s Pretrial Procedure Outline. The parties conducted their discovery conference on \_\_\_\_\_.

1. **MAGISTRATE CONSENT**

The Parties:

- unanimously consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636 (c).
- do not unanimously consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636 (c).
- unanimously give contingent consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636 (c), for trial purposes only, in the event that the District Judge assigned is unavailable on the date set for trial (e.g. because of other trial settings, civil or criminal).

2. **RULE 26(A) DISCLOSURES**

- There are no changes that need to be made in the timing, form, or requirement for disclosures under Rule 26(a). All disclosures required by Rule 26(a)(1) have been made by the parties hereto or will be made by the time of the scheduled Preliminary Pretrial Conference.
- The parties agree to delay the initial disclosure until \_\_\_\_\_. The purpose of delay is
  - to give the Court time to rule on the pending dispositive motion.
  - \_\_\_\_\_.

3. **DISCOVERY ISSUES AND DATES**

A. Discovery will need to be conducted on the issues of

\_\_\_\_\_  
\_\_\_\_\_

B. Disclosure or discovery of electronically stored information should be handled as follows

\_\_\_\_\_  
\_\_\_\_\_

C. The parties recommend that discovery

- need not be bifurcated
- should be bifurcated between liability and damages
- should be bifurcated between factual and expert
- should be limited in some fashion or focused upon particular issues which relate to \_\_\_\_\_

D. Disclosure and report of plaintiff expert(s) by \_\_\_\_\_

E. Disclosure and report of defendant expert(s) by \_\_\_\_\_

F. Discovery cutoff \_\_\_\_\_

G. Anticipated discovery problems

\_\_\_\_\_

None

4. **LIMITATIONS ON DISCOVERY**

A. Changes in the limitations on discovery

Extension of time limitations (currently one day of seven hours) in taking of depositions to \_\_\_\_\_.

Extension of number of depositions (currently 10) permitted to \_\_\_\_\_.

Extension of number of interrogatories (currently 25) to \_\_\_\_\_.

Other: \_\_\_\_\_.

None

B. 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 subsequently deem that one is necessary, they will submit a joint proposed order to the Court. Such order will be in compliance with *Procter & Gamble Co. v. Bankers Trust Co.*, 78 F. 3d 219 (6th Cir. 1996).

5. **OTHER COURT ORDERS UNDER RULE 26(C) OR RULE 16(B) AND (C)**

- The plaintiff anticipates the need for the Court to set a deadline to allow for the amendment of the complaint to
  - add parties.
  - add additional claims.
  - add factual allegations to support original claim(s).
  - \_\_\_\_\_.

Signatures:

\_\_\_\_\_  
Attorney for Plaintiff(s)

\_\_\_\_\_  
Attorney for Defendant(s)

\_\_\_\_\_  
Attorney for \_\_\_\_\_

\_\_\_\_\_  
Attorney for Defendant(s)