

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

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

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. **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.
 - _____.

2. **DISCOVERY ISSUES AND DATES**

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

- B. 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 _____
- C. Disclosure and report of plaintiff expert(s) by _____
- D. Disclosure and report of defendant expert(s) by _____
- E. Discovery cutoff _____
- F. Anticipated discovery problems
- _____
 - None

3. **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).

4. **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).
 - _____.
- The parties anticipate the need for a Court Order under Rule 26(c) for the following reason(s):

- There is no request for a Court Order under Rule 26(c) at this time.

Signatures:

Attorney for Plaintiff(s)

Attorney for Defendant(s)

Attorney for _____

Attorney for Defendant(s)