

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).

B. Discovery of Electronically Stored Information. The parties have discussed disclosure, discovery, and preservation of electronically stored information, including the form or forms 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:

_____.

C. Claims of Privilege or Protection. The parties have discussed issues regarding the protection of information by a privilege or the work-product doctrine, including whether the parties agree to a procedure to assert these claims after production or have any other agreements under Fed. R. Evid. 502.

_____ Yes

_____ No

(i) The case presents the following issues relating to claims of a privilege or of protection as trial preparation materials:

(ii) Have the parties agreed on a procedure to assert such claims AFTER production?

_____ Yes

_____ No

_____ Yes, and the parties ask that the Court include the following agreement in the scheduling order:

- D. 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 _____
- E. Disclosure and report of plaintiff expert(s) by _____
- F. Disclosure and report of defendant expert(s) by _____
- G. Discovery cutoff _____
- H. 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 Plaintiff(s)

Attorney for Defendant(s)

Attorney for _____