

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

,  
  
Plaintiff,  
  
v.  
  
,  
  
Defendant.

CASE NO.

JUDGE JAMES R. KNEPP II

**NOTICE OF CASE MANAGEMENT  
CONFERENCE**

This case is subject to the provisions of Local Rule 16.1 of the Northern District of Ohio entitled “Differentiated Case Management” (DCM). Counsel are expected to familiarize themselves with applicable Local Rules and Federal Rules of Civil Procedure. The Court shall evaluate this case pursuant to Local Rule 16.1 and assign this case to an appropriate management track (expedited, standard, complex, mass tort and administrative) described in Local Rule 16.2(a). The track assignment will dictate timelines for discovery, motions and trial. Unless otherwise ordered, discovery shall be guided by Local Rule 26.1 and motion practice shall be guided by Local Rule 7.1.

**SCHEDULING OF CASE MANAGEMENT CONFERENCE**

The Case Management Conference (CMC) shall be held on [DATE and TIME] before Judge James R. Knepp II, United States District Court, 1716 Spielbusch Avenue, Chambers 318, Toledo, Ohio. If settlement discussions would be helpful at this stage of the case, please notify Chambers (419-213-5570) so that additional time can be set aside and party attendance can be secured.

Unless otherwise ordered, the parties need not attend or participate in the CMC. Local counsel must attend the CMC in person; if unable to attend in person, local counsel may make arrangements to participate by telephone by contacting chambers at 419-213-5570. Out of town counsel may make arrangements to participate by telephone by contacting chambers at 419-213-5570.

#### **APPLICATION OF FEDERAL CIVIL RULE 26(a)**

Rule 26(a) mandates required disclosures in lieu of discovery requests unless otherwise stipulated or directed by Order of the Court or by Local Rule. In this case, all disclosures mandated by Rule 26(a) shall apply, including Initial Disclosures, Expert Testimony, and Pre-Trial Disclosures. The disclosures shall occur on or before a date agreed to by all counsel. Failing agreement, the date for disclosures will be set at the CMC.

Prior to the CMC, parties may undertake such informal or formal discovery as mutually agreed. Absent such agreement, no preliminary **formal** discovery may be conducted prior to the CMC except as necessary and appropriate to support or defend against any challenges to jurisdiction or claim for emergency, temporary, or preliminary relief. **Local Rule 30.1 governs conduct at depositions, and counsel shall comply with this Rule.**

#### **TRACK RECOMMENDATION**

Pursuant to Local Rule 16.2(a), and subject to further discussion at the CMC, the Court recommends the following track: Standard, which means the trial date will be no later than [MONTH/YEAR].

### **PREPARATION FOR CMC BY COUNSEL**

The general agenda for the CMC is set by Local Rule 16.3(b). Counsel should be prepared to discuss claims and defenses in detail with the Judge.

Counsel for Plaintiff(s) shall arrange with opposing counsel to hold the meeting required by Federal Civil Rule 26(f) and Local Rule 16.3(b). A Report of this planning meeting shall be jointly signed and filed **at least three (3) days prior to the CMC**. The Report shall be in a form substantially similar to Attachment 1.

### **FILING OF DISCOVERY MATERIALS**

Unless otherwise ordered, initial disclosures and discovery materials shall **not** be filed except where submitted in support of a motion or for use at trial.

SANDY OPACICH,  
Clerk of Court

s/ Jennifer M. Smith  
Courtroom Deputy to  
Judge James R. Knepp II

Plaintiff,

v.

Defendant.

CASE NO.

JUDGE JAMES R. KNEPP II

**REPORT OF PARTIES' PLANNING MEETING**

JUDGE JAMES R. KNEPP II

## REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on \_\_\_\_\_  
and was attended by:  
Counsel for Plaintiff(s) \_\_\_\_\_  
Counsel for Defendant(s) \_\_\_\_\_
2. The parties:  
\_\_\_\_\_ Have exchanged the pre-discovery disclosures required by Rule 26(a)(1) and the  
Court's CMC Notice; or  
\_\_\_\_\_ Will exchange such disclosures by \_\_\_\_\_.
3. The parties recommend the following track:  
\_\_\_\_\_ Expedited    \_\_\_\_\_ Standard    \_\_\_\_\_ Complex  
\_\_\_\_\_ Administrative    \_\_\_\_\_ Mass Tort
4. This case \_\_\_\_\_ is / \_\_\_\_\_ is not suitable for Alternative Dispute Resolution ("ADR")  
(e.g., mediation, arbitration, summary trial).

5. The parties \_\_\_\_do/\_\_\_\_do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636(c).

6. The parties agree that this case \_\_\_\_ does / \_\_\_\_ does not involve electronic discovery.  
**(Counsel are reminded to review the default standard for e-discovery set forth in Appendix K to the Local Rules.)**

7. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought, the nature and extent of discovery and any potential problems: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(b) Describe anticipated e-discovery issues (i.e., what ESI is available and where it resides; ease/difficulty and cost of producing information; schedule and format of production; preservation of information; agreements about privilege or work-production protection, etc.): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Recommended cut-off for amending the pleadings and/or adding additional parties:  
\_\_\_\_\_

9. Expert reports disclosed by:

(a) Plaintiff(s): \_\_\_\_\_

(b) Defendant(s): \_\_\_\_\_

10. Discovery deadlines:

(a) Liability: \_\_\_\_\_

(b) Damages: \_\_\_\_\_

11. Recommended dispositive motion date: \_\_\_\_\_

12. Recommended date for telephone status: \_\_\_\_\_

13. Other matters for the attention of the Court: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

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