

**APPENDIX M**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

	)	
	)	CASE NO.
	)	
Plaintiff,	)	
	)	JUDGE
v.	)	
	)	<u>REPORT OF PARTIES' PLANNING</u>
	)	<u>MEETING UNDER FED. R. CIV.</u>
	)	<u>P. 26(f) AND LR 16.3(b) and 23.1</u>
Defendant.	)	(For Use in Putative Class Actions)
	)	

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b) and 23.1, a meeting was held on \_\_\_\_\_, 20\_\_\_\_, and was attended by:

\_\_\_\_\_, Counsel for plaintiff(s) \_\_\_\_\_

\_\_\_\_\_, Counsel for plaintiff(s) \_\_\_\_\_

\_\_\_\_\_, Counsel for defendant(s) \_\_\_\_\_

\_\_\_\_\_, Counsel for defendant(s) \_\_\_\_\_

2. The following motions are pending:

- Motion to Dismiss (Dates Filed \_\_\_\_; Opposed \_\_\_\_; Reply \_\_\_\_)
- Motion to Remand (Dates Filed \_\_\_\_; Opposed \_\_\_\_; Reply \_\_\_\_)
- Other: \_\_\_\_\_

3. The parties:  
\_\_\_\_\_ have exchanged the pre-discovery disclosures required by Rule 26(a)(1);  
\_\_\_\_\_ will exchange such disclosures by \_\_\_\_\_, 20\_\_\_\_;  
\_\_\_\_\_ object that initial disclosures are not appropriate in this action.

4. The parties recommend the following track:  
\_\_\_\_\_ Expedited                      \_\_\_\_\_ Standard                      \_\_\_\_\_ Complex  
\_\_\_\_\_ Mass Tort

5. This case is suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms:  
\_\_\_\_\_ Early Neutral Evaluation                      \_\_\_\_\_ Mediation                      \_\_\_\_\_ Arbitration  
\_\_\_\_\_ Summary Jury Trial                      \_\_\_\_\_ Summary Bench Trial  
\_\_\_\_\_ Case not suitable for ADR

6. Recommended cut-off date for amending the pleadings (including proposed class definition) and/or adding additional parties: \_\_\_\_\_.

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

8. Recommended Case Management Plan:

The parties recommend:

- Discovery on issues related to remand be completed by \_\_\_\_\_.
- Plaintiff's Response Brief due: \_\_\_\_\_.
- Defendants' Reply Brief due: \_\_\_\_\_.
- Discovery relevant to appropriateness of certification of the proposed class be completed by: \_\_\_\_\_, including:
  - plaintiff(s)' depositions by: \_\_\_\_\_
  - defendant(s)' 30(b) depositions by: \_\_\_\_\_
  - plaintiff(s)' expert reports by: \_\_\_\_\_
  - defendant(s)' expert reports by: \_\_\_\_\_
  - expert depositions by: \_\_\_\_\_
- Plaintiff's motion for class certification to be filed by \_\_\_\_\_.
- Defendant's opposition to motion for class certification to be filed by: \_\_\_\_\_.
- Daubert* hearing date, if any: \_\_\_\_\_
- Class certification hearing date: \_\_\_\_\_

9. Recommended dispositive motion date, if any: \_\_\_\_\_

10. Recommended date for a Status Hearing: \_\_\_\_\_

11. Other matters for the attention of the Court:

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Attorney for Plaintiff

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Attorney for Plaintiff

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Attorney for Defendant

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Attorney for Defendant