

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 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

3. The parties recommend the following track:

Expedited                       Standard                       Complex  
 Mass Tort

4. 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

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

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

7. Electronically Stored Information. The Parties: (indicate one):

agree that there will be no discovery of electronically-stored information; or  
 have agreed to a method for conducting discovery of electronically-stored information;  
or  
 have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District of Ohio Local Rules).

8. Recommended Case Management Plan:

- 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:  
\_\_\_\_\_.

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