### Attachment 1

### IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

	, Defendant.	REPORT OF PARTIES' PLANNING MEETING UNDER FED. R. CIV. P. 26(f) AND LR 16.3(b)(3)
vs.		MAGISTRATE JUDGE JAMES E. GRIMES JR.
	Plaintiff,	DISTRICT JUDGE
	,	CASE NO.

1. Under Fed. R. Civ. P. 26(f) and Local Rule 16.3(b), a meeting was held

on \_\_\_\_\_\_ and was attended by:

\_\_\_\_\_ for Plaintiff(s) \_\_\_\_\_\_

\_\_\_\_\_ for Plaintiff(s) \_\_\_\_\_

\_\_\_\_\_ for Defendant(s) \_\_\_\_\_

\_\_\_\_\_ for Defendant(s) \_\_\_\_\_\_.

2. Initial Disclosures

The parties:

 $\Box$  have exchanged Initial Disclosures as required by Fed. R. Civ. P. 26(a)(1) and the Court's prior Order;

 $\Box$  will exchange Initial Disclosures by \_\_\_\_\_;

 $\Box$  are not required to make Initial Disclosures because

3. Track Recommendation

The parties recommend the following track:

$\Box$ Expedited	$\Box$ Standard	$\Box$ Complex
□ Administrative	$\Box$ Mass Tort	

### 4. Alternative Dispute Resolution

This case is suitable for one or more of the following Alternative Dispute Resolution (ADR) mechanisms:

Early neutral evaluation $\Box$	Mediation $\Box$
Arbitration $\Box$	Summary bench trial $\Box$
Summary jury trial 🛛	

Case not suitable for ADR at this time  $\Box$ 

5. Consent

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

## 6. Recommended discovery plan:

Describe the subjects on which discovery is to be sought and the nature and extent of discovery, including any limitation on the number of interrogatories,

the number and/or length of depositions, and/or the number of requests for admission: Date to amend pleadings and/or add additional parties Fact discovery cut-off date\_\_\_\_\_ Expert report due date for party with burden of proof\_\_\_\_\_ Rebuttal expert report due date\_\_\_\_\_ Expert discovery cut-off date\_\_\_\_\_ Dispositive motion date\_\_\_\_\_ Date for a status conference\_\_\_\_\_

7. Recommended electronic discovery plan.

The parties:

 $\Box$  agree there will be no discovery of electronically-stored information (ESI);

 $\Box$  have agreed to a method for conducting discovery of ESI; or

 $\Box$  have agreed to follow the default standard for discovery of ESI (Appendix K to the Local Civil Rules for the Northern District of Ohio).

### 8. Protective order

The parties:

will file a proposed stipulated protective order governing the designation and disclosure of confidential materials in a form substantially similar to Appendix L to the Local Rules for the Northern District of Ohio on the docket by \_\_\_\_\_;

 $\Box$  will not file a proposed stipulated protective order at this time.

# 9. Demand and offer exchange

The parties have  $\Box$  / have not  $\Box$  exchanged a demand and offer.

10. Other matters for the Court's attention: