

Attachment 1

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

<div style="border-bottom: 1px solid black; margin-bottom: 10px;"></div> <div style="text-align: center; padding-bottom: 10px;">Plaintiff,</div> <div style="text-align: center; padding-bottom: 10px;">vs.</div> <div style="border-bottom: 1px solid black; margin-bottom: 10px;"></div> <div style="text-align: center; padding-bottom: 10px;">Defendant.</div>	
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CASE NO. _____

DISTRICT JUDGE _____

MAGISTRATE JUDGE
JAMES E. GRIMES JR.

**REPORT OF PARTIES' PLANNING
MEETING UNDER FED. R. CIV.
P. 26(f) AND LR 16.3(b)(3)**

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:

☐ have exchanged Initial Disclosures as required by Fed. R. Civ. P. 26(a)(1);

☐ will exchange Initial Disclosures by _____, which is at least 5

days before the CMC;

☐ are not required to make Initial Disclosures because _____.

3. *Track Recommendation*

The parties recommend the following track:

☐ Expedited ☐ Standard ☐ Complex
☐ Administrative ☐ 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 ☐ Mediation ☐
Arbitration ☐ Summary bench trial ☐
Summary jury trial ☐
Case not suitable for ADR at this time ☐

5. *Consent*

The parties do ☐ / do not ☐ 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:

State the parties' agreement regarding the timing and method for complying with Fed. R. Civ. P. 26(b)(5) and whether the parties will ask the Court to include their agreement in an order under Federal Rule of Evidence 502 (*see* Fed. R. Civ. P. 26(f)(3)(D)) _____

Date to amend pleadings and/or add additional parties _____

Fact discovery cut-off date _____

Does the party with the burden of proof plan to use an expert? _____

If so, on what topic will the expert opine? _____

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:

- ☐ agree there will be no discovery of electronically-stored information (ESI);
- ☐ have agreed to a method for conducting discovery of ESI; or
- ☐ 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 _____;
- ☐ will not file a proposed stipulated protective order at this time.

9. *Demand and offer exchange*

The parties have ☐ / have not ☐ exchanged a demand and offer.

10. *Other matters for the Court's attention:* _____

