

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

: Civil Action No.
:
Plaintiff(s), : Hon.
:
v. : JOINT DISCOVERY PLAN
:
:
Defendant(s). :

1. Set forth a factual description of the case. Include the causes of action and affirmative defenses asserted.
2. Have settlement discussions taken place? Yes _____ No _____

If so, when? _____

(a) What was plaintiff's last demand?

- (1) Monetary demand: \$ _____
- (2) Non-monetary demand: _____

(b) What was defendant's last offer?

- (1) Monetary offer: \$ _____
- (2) Non-monetary offer: _____

3. The parties [have _____ -have not _____] exchanged the information required by Fed. R. Civ. P. 26(a)(1). If not, state the reason therefor.
4. Describe any discovery conducted other than the above disclosures.
5. Generally, dispositive Motions cannot be filed until the completion of discovery. Describe any Motions any party may seek to make prior to the completion of discovery. Include any jurisdictional Motions and Motions to Amend.
6. The parties proposed the following:
 - (a) Discovery is needed on the following subjects:
 - (b) Should discovery be conducted in phases? If so, explain.
 - (c) Number of Interrogatories by each party to each other party: _____
 - (d) Number of Depositions to be taken by each party: _____

- (e) Plaintiff's expert report due on _____.
- (f) Defendant's expert report due on _____.
- (g) Motions to Amend or to Add Parties to be filed by _____.
- (h) Dispositive motions to be served within _____ days of completion of discovery.
- (i) Factual discovery to be completed by _____.
- (j) Expert discovery to be completed by _____.
- (k) Set forth any special discovery mechanism or procedure requested, including data preservation orders or protective orders:
- (l) A pretrial conference may take place on _____
- (m) Trial by jury or non-jury Trial?
- (n) Trial date: _____.

7. Do you anticipate any discovery problem(s)? Yes _____ No _____
If so, explain.
8. Do you anticipate any special discovery needs (i.e., videotape/telephone depositions, problems with out-of state witnesses or documents, etc.)? Yes _____ No _____
If so, explain.
9. State whether this case is appropriate for voluntary arbitration (pursuant to L. Civ. R. 201.1 or otherwise), mediation (pursuant to L. Civ. R. 301.1 or otherwise), appointment of a special master or other special procedure. If not, explain why and state whether any such procedure may be appropriate at a later time (i.e., after exchange of pretrial disclosures, after completion of depositions, after disposition of dispositive motions, etc.).
10. Is this case appropriate for bifurcation? Yes _____ No _____
11. We [do _____ do not _____] consent to the trial being conducted by a Magistrate Judge.

Plaintiff(s)

Defendant(s)