

4. PARTIES AND PLEADINGS:

The parties agree that any motion or stipulation to amend the pleadings or join new parties shall be filed by

If the case is a class action, the parties agree that the motion for class certification shall be filed by

5. PRETRIAL MOTIONS:

Are early, potentially case dispositive motions (i.e., statute of limitations issues) likely in this case?

Yes No Not certain

If yes, when can the motion(s) realistically be filed?

6. DISCOVERY PROCEDURES:

A. The parties agree all discovery shall be completed by

All parties agree to schedule their discovery in such a way as to require all responses to discovery to be served prior to the cut-off date, and to file any motions relating to discovery within the discovery period unless it is impossible to do so.

B. Do the parties anticipate production of electronically stored information (ESI) in this case?

Yes No

If yes, briefly describe the anticipated protocol for such production:

C. Do the parties anticipate court involvement over claims that ESI is not reasonably accessible [Civ.R. 26(B)(5)].

Yes No

D. Do the parties anticipate protective orders being filed in this case?

Yes No

If yes, briefly describe the anticipated issues:

7. EXPERT WITNESSES:

A. Is an Independent Medical Exam (IME) likely to be requested in this case?

Yes No

B. Plaintiff(s) shall file a “Disclosure of Expert Witnesses” by

C. Defendant(s) shall file a “Disclosure of Expert Witnesses” by

D. Plaintiff(s) shall submit Expert Reports (or records of healthcare providers [Civ.R. 26(B)(7)(d)] by

E. Defendant(s) shall submit Expert Reports by

8. DISPOSITIVE MOTIONS:

A. Any and all dispositive motions shall be filed by

9. SETTLEMENT:

A. Plaintiff(s) will make an initial settlement demand by

B. Defendant(s) will respond on or before

10. MEDIATION:

A. Do the parties believe mediation will be beneficial to this case? Yes No

B. Do the parties intend to seek private mediation in this case? Yes No

If the parties elect to retain a private mediator, they shall act quickly to select and schedule a mediator so as not to delay the trial or cause unnecessary motion practice or discovery delays.

C. Do the parties wish to utilize the Court’s Mediation Program? Yes No

The Court’s Mediation Program utilizes a list of court-appointed mediators from which the Court shall appoint a mediator to mediate a case. The cost of this program is approximately \$500, which is charged as court costs.

11. OTHER MATTERS:

Indicate any other matters for the Court's consideration:

Respectfully submitted,

Attorney or Self Represented
Party Counsel for
Bar Number:
Address:

Phone Number:
Email:

Attorney or Self Represented Party
Counsel for
Bar Number:
Address:

Phone Number:
Email:

Attorney or Self Represented Party
Counsel for
Bar Number:
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