

Discovery

1. **Commencement** : Counsel may commence discovery immediately after receipt of the Answer to the Complaint.
2. **Discovery Limitations** : Parties are bound by Fed. R. Civ. P. 30(d)(1) concerning depositions and Fed. R. Civ. P. 33(a) limiting the number of interrogatories.
3. **Discovery Schedule** : Case discovery averages three to four months. Complex cases or cases involving discovery in foreign nations may take six to twelve months. The Court will honor a reasonable discovery schedule suggested by the attorneys in a Rule 26(f) plan.
4. **Allowable Time** : Sufficient time must be given to answer interrogatories and complete depositions by the discovery cutoff date.
5. **Discovery Extensions** : Parties may stipulate to a short extension of discovery, so long as the extension does not necessitate extension of other case management dates. The proposed stipulation and order should be submitted electronically via the CM/ECF Utilities, Proposed Order function.
6. **Protective Orders** : Protective orders may be entered into by stipulation of the parties. However, proposed orders must comply with the provisions of Fed. R. Civ. P. 26(c) and may not contain language that authorizes in advance the filing of documents under seal. Filings under seal are governed by [E.D. Mich. LR 5.3](#). The proposed stipulated protective order should be submitted electronically via the CM/ECF Utilities, Proposed Order function.
7. **Magistrate Judge** : The court routinely refers discovery motions to the magistrate judge. Once a motion has been referred, all communication regarding that motion should be directed to the magistrate judge's chambers