

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

v.	Plaintiffs,	Case No.
		Honorable Shalina D. Kumar
	Defendants.	Magistrate Judge

RULE 26(f) Joint Discovery Plan

Related Cases: _____

Basis for Court's Jurisdiction: _____

Venue: _____

Please provide a brief summary of the Case and Issues:

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1. What changes should be made in the timing, form, or disclosures under Rule 26(a)? Please include when initial disclosures were made or will be made.

 2. What are the subjects on which discovery may be needed? When should discovery be completed? Should discovery be completed in phases or be limited to or focus on particular issues?

 3. Are there any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced?

 4. Are there any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the Court to include their agreement in an order under Federal Rule of Evidence 502?

 5. What changes should be made in the limitation on discovery imposed under these rules or by local rule, and what other limitations should be imposed?

 6. Are there any other orders that the Court should issue under Rule 26(c) or under Rule 16(b) and (c)?

Proposed Dates

Exchange of Initial Disclosures under Fed. R. Civ. R. 26(a)(1):	
Deadline to Amend Pleadings:	
Deadline for identification of all witnesses (including experts):	
Reports pursuant to Red. R. Civ. P. 26(a)(2)(B) or Disclosures pursuant to Fed. R. Civ. P. 26(a)(2)(C). by Plaintiff experts are due:	
Reports pursuant to Red. R. Civ. P. 26(a)(2)(B) or Disclosures pursuant to Fed. R. Civ. P. 26(a)(2)(C). by Defendant experts are due:	
Rebuttal reports are due:	
Deadline for completing discovery :	
Status Conference date and time:	
Dispositive Motions must be filed by:	

Has a jury demand been filed in this case? YES NO

What is the estimated length of the jury trial? _____.

What is the estimated length of the bench trial? _____.

Please review the Court's Practice Guidelines for Discovery.