

Discovery

i. Early discovery: The court expects the parties to conduct early discovery by agreement although Rule 26(d) does not authorize court-sanctioned discovery prior to the initial attorney conference.

ii. Scheduled discovery: The court insists that cases move as rapidly as practical, and does not allow long discovery periods in simple cases, even if counsel so stipulate. Generally, counsel will have about four months discovery for simple cases, about six months for standard cases, and about nine months for unusual or complex cases. The court fairly often holds telephone conferences to discuss the progress of discovery. Requests or stipulations to extend a discovery cut-off date are not frequently granted, and must be supported by good cause. Filing a motion does not suspend the clock or change the discovery deadline.

iii. Disputes: The parties must first attempt to narrow issues of disagreement with respect to discovery. [E.D. Mich. LR 37.1](#) The court sometimes refers discovery matters to a Magistrate Judge for resolution, but more often maintains personal supervision of such matters. The court will often resolve deposition disputes by telephone. A printable comprehensive guide to this court's expectations relative to discovery practices is available [here](#).