Discovery

The Court expects parties and counsel to conduct discovery cooperatively and fairly, consistent with Federal Rule of Civil Procedure 1: "To secure the just, speedy, and inexpensive determination of every action."

Discovery must be served sufficiently in advance of the discovery cutoff so as to allow the opposing party sufficient time to respond under the Federal Rules of Civil Procedure prior to the close of discovery. The Court will not order discovery to take place after the discovery cutoff date. Parties may agree to extend the discovery cutoff date provided the extension of time does not affect the motions cutoff, final pretrial conference, or trial dates.

Disclosures pursuant to the Federal Rules of Civil Procedure must strictly comply with Rule 26, including the information required to be disclosed and the timing for such disclosures.

Discovery motions shall not be filed without leave of the Court and until the parties have first met and conferred in a good faith effort to resolve the differences without Court intervention. An email is not a meet and confer. Failure of a party to make itself available for this conference may result in sanctions. In the event the good faith efforts are unsuccessful, the moving party must schedule a telephone conference with the Court in further effort to resolve the dispute prior to filing any motion. If the dispute still cannot be resolved, the Court will grant leave to file a discovery motion, which it will either entertain or refer to a magistrate judge for resolution.