# Discovery

The Court expects parties and counsel will conduct discovery cooperatively and fairly. Discovery requests must be made sufficiently in advance of the discovery completion date to permit timely response within the discovery period.

If a district judge has expressly referred all discovery disputes, the court is available to conduct an informal discovery conference to identify and potentially resolve any discovery disputes prior to any motion being filed. The court may schedule such a conference on its own initiative.

On all motions for discovery that have been referred to the court, counsel are required to meet and confer, in accordance with E.D. Mich. LR 37.1 in an attempt to resolve, or at least narrow the disputed issues. The Court requires counsel to engage in a good-faith attempt to resolve all discovery matters before a motion is heard, and to submit a Stipulation and Order Resolving Motion where the parties have been able to work out their differences in advance of a hearing.

If unresolved issues remain, the movant will prepare a Joint List of Unresolved Issues setting forth the issues that remain unresolved. The Joint List must not exceed **five (5)** pages, and should be structured as follows:

Unresolved Issue No. 1: [Recite Issue]

- Movant's position:
- Respondent's position (including any proposal made to resolve movant's request):

No exhibits or attachments shall be filed with the Joint List. The list should be e-filed at least **five (5)** business days prior to the hearing.

Where there are multiple discovery disputes or where many motions are filed, the court may set the matter for a general discovery conference.