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|  | Superior Court of New Jersey |
|  | Law Division, Civil Part |
|  |  |  County |
|  |  | Docket Number: L- |  |  |
|  |  | **Joint ProposedDiscovery Plan** |
| Plaintiff(s), |  |
| v. |
|  |  |
|  |  |
| Defendant(s). |  |
| 1. Set forth the name of each attorney appearing, the firm name, address and telephone number and email address of each, designating the party represented.
 |
|  |
| 1. Set forth a brief description of the case, including the causes of action and defenses asserted.
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| 1. Have settlement discussions taken place?
 | [ ]  Yes [ ]  No |
| 1. The Parties [ ]  have [ ]  have not met pursuant to *R*. 4:103-2.
 |
| 1. The Parties [ ]  have [ ]  have not exchanged the information required by *R*. 4:103-1(a)(1). If not, state the reason therefor.
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|  |
| 1. Explain any problems in connection with completing the disclosures required by *R*. 4:103-1(a)(1).
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|  |
| 1. The Parties [ ]  have [ ]  have not conducted discovery other than the above disclosures. If so, describe.
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|  |
| 1. Proposed joint discovery plan:
 |
| * 1. Discovery is needed on the following subjects: (enter text)
 |
| * 1. Discovery [ ]  should [ ]  should not be conducted in phases or be limited to particular issues.Explain:
 |
|  |
| * 1. Proposed schedule:
 |
| 1. *R.* 4:103-1 Disclosures (date).
 |
| 1. Service of initial written discovery (date).
 |
| 1. Maximum of (number) Interrogatories and (number) document requests by each party to each other party. NOTE: Parties are to provide rolling privilege logs within ten (10) days after each production.
 |
| 1. Maximum of (number) depositions to be taken by each party.
 |
| 1. Motions to amend pleadings or to add Parties to be filed by (date).
 |
| 1. Motions to resolve any privilege log disputes to be filed by (date).
 |
| 1. Factual discovery to be completed by (date).
 |
| 1. Plaintiff’s expert report(s) due on (date).
 |
| 1. Defendant’s expert report(s) due on (date).
 |
| 1. Any rebuttal reports due on (date).
 |
| 1. Expert depositions to be completed by (date).
 |
| 1. Discovery end date: (date).
 |
| 1. Dispositive motions to be served within (number) days of discovery end date.
 |
| * 1. Set forth any special discovery mechanism or procedure requested.
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|  |
| * 1. A pretrial conference may take place on (date).
 |
| * 1. Trial Date: (date)
 | [ ]  Jury Trial [ ]  Non-Jury Trial |
| 1. Do you anticipate any special discovery needs (i.e., videotape/telephone depositions, problems with out-of-state witnesses or documents, etc.)? If “Yes”, please explain.
 | [ ]  Yes [ ]  No |
|  |
| 1. Do you anticipate any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced?
 | [ ]  Yes [ ]  No |
| If “Yes”, how will electronic discovery or data be disclosed or produced? |  |
|  |  |
| Describe any agreements reached by the Parties regarding same, including costs of discovery, production, related software, licensing agreements, etc. |  |
|  |  |
| 1. Do you anticipate entry of a Discovery Confidentiality Order? See *R.* 4:104-6 and Appendix XXX.
 | [ ]  Yes [ ]  No |
| 1. Do you anticipate any discovery problem(s) not listed above? If “Yes”, describe:
 | [ ]  Yes [ ]  No |
|  |  |
| 1. Is this case appropriate for bifurcation?
 | [ ]  Yes [ ]  No |
| 1. Is the case appropriate for mediation?
 | [ ]  Yes [ ]  No |
| 1. Do the parties consent to binding arbitration?
 | [ ]  Yes [ ]  No |
| 1. An interim status/settlement conference (with client representatives having settlement authority in attendance), shall be held on (date).
 |
| 1. Identify any other issues to address at the Scheduling Conference.
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| Attorney(s) for Plaintiff(s) |  | Date |
|  |  |  |  |  |
| Attorney(s) for Defendant(s) |  | Name of client |  | Date |