IN THE COURT OF COMMON PLEAS FOR FRANKLIN COUNTY, OHIO
CIVIL DIVISION

_____,

Plaintiff, Case No. _____

vs. Judge _____

_____,

Defendant.

RULE 26(F) CONFERENCE REPORT AND
JOINT DISCOVERY PLAN

The Ohio Civ. R. 26(F) conference was held on _____._____ All counsel or unrepresented parties signing below represent they engaged in a meaningful attempt to meet and confer on the matters outlined below.

1. CONSENT TO MAGISTRATE JURY TRIAL?

Do all parties consent to trial to a Magistrate and Jury pursuant to Civ. R. 53(C)?

_____ Yes _____ No _____ Still Open to Discussion.

2. INITIAL DISCLOSURES

Have the parties agreed to make initial disclosures?

_____ Yes _____ No _____ The case is exempt under R. 26(B)(3)(b).

If yes, such initial disclosures were already made on _____,
[or are Stipulated by all counsel to be made by _____.]

3. VENUE AND JURISDICTION

Are there any contested issues related to venue or jurisdiction?

_____ Yes _____ No _____ Not certain.

a. If yes, briefly describe the issue:

b. If yes, the parties agree that any motion related to venue or jurisdiction shall be filed by _____.

4. PARTIES AND PLEADINGS

The parties agree that any motion or stipulation to amend the pleadings or join new parties shall be filed no later than _____.

If the case is a class action, the parties agree that the motion for class certification shall be filed by _____.

5. PRETRIAL MOTIONS

Are early, potentially case dispositive motions likely (i.e. statute of limitations issue)? If yes, when can the motion(s) realistically be filed?

_____

Opposition filed by? _____

Request for Oral Argument? _____ Yes _____ No

6. DISCOVERY PROCEDURES

The parties agree that all discovery shall be completed by _____.

The parties agree to schedule their discovery in such a way as to require all responses to discovery to be served prior to the cut-off date, and to file any motions relating to discovery within the discovery period unless it is impossible to do so.

a. Do the parties anticipate the production of electronically stored information? _____ Yes _____ No

   If yes, briefly describe the anticipated protocol for such production:

b. Do the parties anticipate disagreements requiring court involvement over electronically stored information claimed not to be reasonably accessible, under R. 26(B)(5)?

c. Do the parties intend to seek a protective order or clawback agreement?

   If yes, a proposed order shall be produced to the Court by _____.

7. DISPOSITIVE MOTIONS

Any dispositive motions shall be filed by _____.

8. EXPERT TESTIMONY

a. Primary experts identity can be disclosed by _____; reports (or records of healthcare providers) will be produced by _____.

b. Rebuttal experts will be disclosed by _____; reports must be produced by _____.

c. An independent medical examination will probably be requested in this case _____ Yes _____ No.

9. SETTLEMENT

Plaintiff(s) will make an initial settlement demand by _____.

Defendant(s) will respond by _____.

The parties will advise the court if they wish to have a court Magistrate conduct a mediation conference. If they elect to retain a private mediator, they will move promptly so as not to delay the trial date, or cause unnecessary motion practice or discovery.

10. RULE 16 PRETRIAL CONFERENCE

Do the parties request a scheduling conference with the court to amend an existing Case Scheduling Order?

_____ Yes, parties request a conference take place in chambers

_____ Yes, parties request a conference take place electronically

_____ No, a Rule 16 conference is not necessary; the court may issue/revise the Case Scheduling Order after considering this Report.

11. <u>OTHER MATTERS:</u> **A**ny other matters for the Court's consideration?

Signatures:

Attorney for Plaintiff(s):

_____

Counsel for _____

Bar # _____

_____

Counsel for _____

Bar # _____

_____

Counsel for _____

Bar # _____

Attorney for Defendants(s):

_____

Counsel for _____

Bar # _____

_____

Counsel for _____

Bar # _____

_____

Counsel for _____

Bar # _____