

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiff(s),
-against-

Defendant(s).

No: ___-cv-___ (___) (SDA)

REPORT OF RULE 26(f) MEETING AND [PROPOSED]
CASE MANAGEMENT PLAN

In accordance with Rule 26(f) of the Federal Rules of Civil Procedure, counsel for the parties spoke on _____ and exchanged communications thereafter, and submit the following report of their meeting for the court’s consideration:

1. Summary of Claims, Defenses And Relevant Issues:

Plaintiff [Attach Additional Pages As Needed]: _____

Defendant [Attach Additional Pages As Needed]: _____

2. Basis of Subject Matter Jurisdiction:

The Court’s subject matter jurisdiction is based on _____.

3. Subjects On Which Discovery May Be Needed:

Plaintiff: _____

Defendant: _____

4. Initial Disclosures:

The information required by Rule 26(a)(1) was disclosed by Plaintiff(s) on _____. In addition, on _____, Plaintiff(s) produced/will produce an initial set of relevant documents identified in its Initial Disclosures and will continue to supplement its production.

The information required by Rule 26(a)(1) was disclosed by Defendant(s) on _____. In addition, on _____, Defendant(s) produced/will produce an initial set of relevant documents identified in its Initial Disclosures and will continue to supplement its production.

5. Formal Discovery:

The parties jointly propose to the Court the following discovery plan:

a. All fact discovery must be completed by _____.

b. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the parties on consent and without application to the Court, provided that the parties meet the deadline for completing fact discovery set forth in 5(a) above.

i. Depositions: Depositions shall be completed by _____ and limited to no more than ___ depositions per party. Absent an agreement between the parties or an Order from the Court, non-party depositions shall follow initial party depositions.

ii. Interrogatories: Initial sets of interrogatories shall be served on or before _____. All subsequent interrogatories must be served no later than 30 days from the discovery deadline.

iii. Requests for Admission: Requests for admission must be served on or before _____.

iv. Requests for Production: Initial requests for production were/will be exchanged on _____, and responses shall be due on _____. All subsequent requests for production must be served no later than 30 days before the discovery deadline.

v. Supplementation: Supplementations under Rule 26(e) must be made within a reasonable period of time after discovery of such information.

6. Anticipated Discovery Disputes:

Does either party anticipate discovery disputes or seek limitations on discovery? Describe.

7. Amendments To Pleadings:

a. No amended pleadings may be filed after _____. Any motion to amend after this date will need to meet the good cause requirements of Rule 16(b).

b. No additional parties may be joined after _____. Any motion to join after this date will need to meet the good cause requirements of Rule 16(b).

8. Expert Witness Disclosures:

At this time, the parties [do / do not] anticipate utilizing experts. Expert discovery shall be completed by _____.

9. Electronic Discovery And Preservation Of Documents And Information:

a. Have the parties discussed electronic discovery? [Yes / No]

b. Is there an electronic discovery protocol in place? [Yes / No] If not, when do the parties expect to have one in place? _____

c. Do the parties want the Court to enter a Rule 502(d) Order? (See [Rule 502\(d\) Order](#)) [Yes / No]

d. Will the parties enter into a Protective Order? (See [Model Protective Order](#))? [Yes / No] If yes, the Protective Order shall be submitted no later than _____.

e. Are there issues the parties would like to address concerning preservation of evidence and/or electronic discovery at the Initial Case Management Conference? Describe.

10. Anticipated Motions:

11. Early Settlement Or Resolution:

The parties [have / have not] discussed the possibility of settlement. The parties shall request a settlement conference no later than _____. The following information is needed before settlement can be discussed:

12. Trial:

- a. The parties anticipate that this case will be ready for trial by _____.
- b. The parties anticipate that the trial of this case will require _____ days.
- c. The parties [do / do not] consent to a trial before a Magistrate Judge.
- d. The parties request a [jury / bench] trial.

13. Status Letter (To Be Completed By The Court):

The parties shall file a joint letter regarding the status of discovery on _____.

14. Consent To Proceed Before A United States Magistrate Judge:

The parties are advised that they may consent to Judge Aaron's jurisdiction at any time during the case pursuant to 28 U.S.C. § 636(c). To consent to Judge Aaron's jurisdiction, please utilize the form to [Consent for All Purposes](#) or [Consent For Specific Dispositive Motions](#), which are hyperlinked herein and also available on Judge Aaron's Individual Practices Webpage.

15. **Other Matters:**

Respectfully submitted this ____ day of _____, _____.

Attorney(s) for Plaintiff(s):

Attorney(s) for Defendant(s):

SO ORDERED.

Dated: New York, New York

STEWART D. AARON
United States Magistrate Judge