**IN THE UNITED STATES DISTRICT COURT**

**FOR THE SOUTHERN DISTRICT OF ILLINOIS**

Click here to enter text

**Plaintiff(s),**

**vs.**

Click here to enter text

**Defendant(s)**

**CIVIL NO.** Click here to enter text

**CJRA TRACK:** Click here to enter text

**TRIAL DATE:** Click here to enter text

**JUDGE:** Click here to enter text

**MANDATORY MEDIATION:** Yes

**JOINT REPORT OF PARTIES AND**

**PROPOSED SCHEDULING AND DISCOVERY ORDER**

Pursuant to Federal Rule of Civil Procedure 26(f) and SDIL-LR 16.2(a), an initial

conference of the parties was held on Click here to enter a date with attorneys and/or unrepresented parties Click here to enter text participating.

SCHEDULING AND DISCOVERY PLANS WERE DISCUSSED AND AGREED TO

AS FOLLOWS:

1. A stipulation selecting a mediator shall be filed with the Court by Click or tap to enter a date. (no later than **28 days** following the Rule 16 Conference).
2. Initial interrogatories and requests to produce, pursuant to Federal Rules of Civil Procedure 33 and 34 shall be served on opposing parties by Click here to enter a date.
3. Plaintiff’s deposition shall be taken by Click here to enter a date.
4. Defendant’s deposition shall be taken by Click here to enter a date.
5. Motions to amend the pleadings, including the commencement of a third party action, shall be filed by Click here to enter a date (which date shall be no later than **90 days** following the Scheduling and Discovery conference).
6. Expert witnesses shall be disclosed, along with a written report prepared and signed by the witness pursuant to Federal Rule of Civil Procedure 26(a)(2), as follows:

Plaintiff’s expert(s): Click here to enter a date.

Defendant’s expert(s): Click here to enter a date.

Third Party expert(s): Click here to enter a date.

1. Depositions of expert witnesses must be taken by:

Plaintiff’s expert(s): Click here to enter a date.

Defendant’s expert(s): Click here to enter a date.

Third Party expert(s): Click here to enter a date.

1. The parties **CERTIFY** that they have discussed, in particular, the proportionality of discovery, the burden and expense associated with discovery, and the discovery of electronically stored information (ESI). The parties  do  do not anticipate a need for an ESI protocol. The parties shall submit to the Court any joint proposed ESI protocol no later than Click here to enter a date. (The protocol shall contain mechanisms for addressing necessary topics concerning ESI to include sources of information, search terms, format of production and preservation of ESI by both Plaintiff(s) and Defendant(s)).
2. The **Mandatory Mediation Session** shall be completed by Click or tap to enter a date. (no later than **30 days** before the discovery cut-off).
3. **Discovery** shall be completed by Click here to enter a date (which date shall be no later than **130 days** before the first day of the month of the trial month or the first day of the month of the trial setting). Any written interrogatories or request for production served after the date of the Scheduling and Discovery Order shall be served by a date that allows the served parties the full **30 days** as provided by the Federal Rules of Civil Procedure in which to answer or produce by the discovery cut-off date.
4. The **Mandatory Mediation Process** shall be completed by Click or tap to enter a date. (no later than **15 days** after the discovery cut-off).
5. All **dispositive motions** shall be filed by Click here to enter a date (which date shall be no later than **100 days** before the first day of the month of the trial month or the first day of the month of the trial setting). Dispositive motions filed after this date will not be considered by the Court.

13. The parties should consult Judge Dugan's case management procedures regarding discovery disputes prior to filing any motions concerning discovery.

DATED: Click here to enter a date

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Attorney(s) for Plaintiff(s)

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Attorney(s) for Defendant(s)