**IN THE UNITED STATES DISTRICT COURT**

**FOR THE SOUTHERN DISTRICT OF ILLINOIS**

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| Click here to enter text.**,**Choose an item.**,****vs.**Click here to enter text.**,**Choose an item.**.** | **)****)****)****)****)****)****)****)****)****)** | **Case No.** **CJRA Track:** **Mandatory Mediation:** Yes**Presumptive Trial Month:**  |

**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 or tap to enter a date.with attorneys and/or unrepresented parties Click or tap to enter a date. 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** from the date the Joint Report and Proposed Scheduling and Discovery Order is submitted via email to Judge Gilbert).
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 or tap to enter a date..
3. Plaintiff’s deposition shall be taken by Click or tap to enter a date..
4. Defendant’s deposition shall be taken by Click or tap to enter a date..
5. Motions to amend the pleadings, including the commencement of a third-party action, shall be filed by Click or tap to enter a date.(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 or tap to enter a date..

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

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

1. Depositions of expert witnesses must be taken by:

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

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

Third Party expert(s): Click or tap 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 Choose an item.. The parties shall submit to the Court any joint proposed ESI protocol no later than Click or tap 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).

1. **Discovery** shall be completed by Click or tap to enter a date. (no later than **130 days** before the first day of the month of the presumptive 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.
2. 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).
3. All **dispositive motions** shall be filed by Click or tap to enter a date. (no later than **100 days** before the first day of the month of the presumptive 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.
4. The parties are reminded that, prior to filing any motions concerning discovery, they must first meet and confer relating to any discovery disputes and then contact the Court to arrange a telephone discovery dispute conference if they are unable to resolve their dispute. If the dispute cannot be resolved in the first telephonic conference, the Court will establish, with the input of the parties, the mechanism for submitting written positions to the Court on an expedited basis.

DATED: Click or tap to enter a date.

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Attorney(s) for Plaintiff(s)

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Attorney(s) for Defendant(s)