

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

_____))
Plaintiff(s),))
v.)) Case No. _____))
_____))
Defendant(s).))

STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(2):

INTRODUCTION

1. In this case, discovery may be needed on the following subjects:

_____.

Unless noted here to the contrary and in more detail, discovery in this matter shall not be conducted in phases or limited to particular, enumerated issues.

2. The parties have conferred about disclosure, discovery, and preservation of electronically stored information (“ESI”). Unless noted otherwise, ESI shall be produced in the following format(s): _____.

3. The parties have conferred about claims of privilege and claims of protection as trial-preparation materials. The parties have agreed on the following procedure to assert these claims after production: _____.

Unless specifically requested in a filing with this court, the parties agreed procedure will not be the subject of a court order under Federal Rule of Evidence 502.

4. Any changes in the limitations on discovery imposed under the Federal Rules of Civil

Procedure or the Local Rules for this District shall be specifically described below.

DEADLINES

5. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before _____.
6. The parties shall serve all interrogatories and requests for production on or before _____.
7. Depositions of all non-expert witnesses shall be completed by _____.
8. Plaintiff shall submit expert witness reports on or before _____.
Depositions of plaintiff's expert witnesses shall be completed by _____.
9. Defendant shall submit expert witness reports on or before _____.
Depositions of defendant's expert witnesses shall be completed by _____.
10. The Early Neutral Evaluation session shall be conducted on _____ at _____ am pm. The parties have agreed that _____ will serve as the early neutral evaluator. (Note: Paragraph 10 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.)
11. The parties shall serve all requests for admission on or before _____.
12. All discovery shall be completed by _____ (no later than 8 months after filing of the Answer or Third-Party Answer).
13. Motions for joinder of parties and amendments to the pleadings shall be filed on or

before _____.

14. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before _____.

15. This case shall be ready for trial by _____.

Date

Counsel for Plaintiff(s)

Date

Counsel for Defendant(s)

APPROVED and SO ORDERED:

U.S. District/Magistrate Judge

Date: _____

Local Form/Rule 26(a)(3)