

c. **Limits.**

(1) Interrogatories. Civil Rule 33(a) allows each party to serve a maximum of 30 interrogatories upon any other party. Responses are due 30 days after service. The parties stipulate to the following changes in these limits:

- No change.
- Maximum of _____ interrogatories.
- Responses due _____ days after service.

(2) Requests for Admission. Civil Rule 36 does not limit the number of requests for admission that each party may serve. Responses are due 30 days after service. The parties stipulate to the following changes:

- No change.
- Maximum of _____ requests for admission.
- Responses due _____ days after service.

(3) Depositions. Civil Rule 30(a) allows each side to depose the following persons as a matter of right: other parties; independent experts expected to be called at trial; treating physicians; document custodians; and any three other persons. The depositions of a party, expert witness, or treating physician may not exceed six hours. Other depositions may not exceed three hours. Civil Rule 30(d)(2). The parties stipulate to the following changes in these limits:

- No change.
- _____ may depose the following additional witnesses:

- Deposition of _____ not to exceed _____ hours.

d. **Other Provisions of Discovery Plan.**

4. **Trial.**

a. Complete either (1) or (2). (You must tell the judge when the case will be ready for trial or for a trial setting conference. Civil Rule 16(b)(1)(G).)

(1) The case will be ready for trial by _____

Estimated trial time ("Trial time" for any party includes the party's opening statement, closing argument, and direct and cross-examination of all witnesses.):

Plaintiff(s) _____ days
Defendant(s) _____ days
Other parties _____ days

(2) Trial cannot be scheduled now because _____

_____ The case will be ready for a trial setting conference by _____

b. Jury trial requested not requested disputed.
Explain: _____

5. **Proposed Pretrial Deadlines.**

	Plaintiff(s)	Defendant(s)
a. Joinder of parties	_____	_____
b. Amendment of pleadings	_____	_____
c. Preliminary witness lists	_____	_____
d. Expert witness lists under Rule 26(a)(2)(A)	_____	_____
e. Expert reports under Rule 26(a)(2)(B)	_____	_____
f. Dispositive motions	_____	_____
g. Other motions	_____	_____
h. Final witness lists under Rule 26(a)(3)	_____	_____
i. Final exhibit lists under Rule 26(a)(3)	_____	_____
j. Objections under Rule 26(a)(3): _____ days after disclosure of relevant list.		

6. **Settlement.**

a. The parties have discussed the possibilities for a prompt settlement or resolution of the case, including the following alternative dispute resolution procedures (check all that apply):

- settlement conference
- mediation
- non-binding arbitration
- other: _____

Comments:

b. Settlement Conference.

- The parties request a settlement conference.
- The parties agree that the deadline for requesting a settlement conference will be: _____
- Other: _____

c. Mediation.

- The parties request appointment of a mediator under Civil Rule 100.
- The parties agree that the deadline for requesting appointment of a mediator will be: _____
- Other: _____

7. **Pretrial Scheduling Conference.** The parties waive do not waive a conference with the court before entry of the scheduling order. (Note: The judge may hold a pretrial scheduling conference notwithstanding the parties' waiver. Parties should plan to attend the conference unless otherwise notified by the court.)

8. **Other Orders.** (List any other orders that should be entered by the court under Rule 26(c) (protective orders) or Rule 16(b) and (c) (pretrial orders).)

_____ Date	_____ Signature of Attorney/Unrepresented Party
	_____ Type or Print Name
	Representing _____

_____ Date	_____ Signature of Attorney/Unrepresented Party
	_____ Type or Print Name
	Representing _____

_____ Date	_____ Signature of Attorney/Unrepresented Party
	_____ Type or Print Name
	Representing _____

Instructions: Attorneys of record and unrepresented parties are jointly responsible for attempting in good faith to agree on a proposed discovery plan and for submitting to the court within 10 days after the meeting a written report outlining the plan. Civil Rule 26(f).