

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF [REDACTED]**

[REDACTED] Plaintiff, v. [REDACTED] Defendant.	: : : : : : : : : : : : :	CASE NO. [REDACTED] JUDGE [REDACTED] <u>JOINT DISCOVERY PLAN OF THE PARTIES</u>
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Pursuant to Rule 26(F) of the Federal Rules of Civil Procedure, the parties hereby respectfully submit their proposed Discovery Plan.

I. INITIAL DISCLOSURES

The parties shall exchange their initial disclosures by [REDACTED]

II. PROPOSED DEADLINES

The parties suggest the following deadlines be adopted and implemented:

- Plaintiff's deadline to disclose expert witnesses: [REDACTED]; reports, if any, shall be produced by [REDACTED].
- Defendants' deadline to disclose expert witnesses: [REDACTED]; reports, if any, shall be produced by [REDACTED].
- Discovery cutoff: [REDACTED].
- Dispositive motion deadline: [REDACTED].
- The parties will be ready to mediate the case on or after [REDACTED].

III. SCOPE OF DISCOVERY

It is anticipated that discovery will largely focus on the nature and extent of the injuries and damages claimed by Plaintiff. The parties do not believe discovery needs to be conducted in phases.

IV. ELECTRONICALLY STORED INFORMATION

Counsel have conferred and agree this case does not present any unusual issues involving electronically stored information.

V. PUBLIC RECORD REQUESTS

Counsel have conferred and do not believe this case involves any unusual issues involving public record requests.

VI. PRIVILEGE ISSUES

Counsel have conferred and do not believe this case presents any unusual issues of privilege or confidentiality and that no protective order is necessary.

VII. LIMITATIONS ON DISCOVERY

The parties do not believe that any changes need to be made to the limitations on discovery already put in place by either the Federal Rules of Civil Procedure or the local rules.

Respectfully Submitted,

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