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|  | | | | Superior Court of New Jersey | | | | | |
|  | | | | Law Division, Civil Part | | | | | |
|  | | | |  | County | | | | |
|  | |  | | Docket Number: L- |  | | | |  |
|  | |  | | **Joint Proposed Discovery Plan** | | | | | |
| Plaintiff(s), | |  | |
| v. | | | |
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| Defendant(s). | |  | |
| 1. Set forth the name of each attorney appearing, the firm name, address and telephone number and email address of each, designating the party represented. | | | | | | | | | |
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| 1. Set forth a brief description of the case, including the causes of action and defenses asserted. | | | | | | | | | |
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| 1. Have settlement discussions taken place? | | | | | | | Yes  No | | |
| 1. The Parties  have  have not met pursuant to *R*. 4:103-2. | | | | | | | | | |
| 1. The Parties  have  have not exchanged the information required by *R*. 4:103-1(a)(1). If not, state the reason therefor. | | | | | | | | | |
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| 1. Explain any problems in connection with completing the disclosures required by *R*. 4:103-1(a)(1). | | | | | | | | | |
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| 1. The Parties  have  have not conducted discovery other than the above disclosures. If so, describe. | | | | | | | | | |
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| 1. Proposed joint discovery plan: | | | | | | | | | |
| * 1. Discovery is needed on the following subjects: (enter text) | | | | | | | | | |
| * 1. Discovery  should  should not be conducted in phases or be limited to particular issues. Explain: | | | | | | | | | |
|  | | | | | | | | | |
| * 1. Proposed schedule: | | | | | | | | | |
| 1. *R.* 4:103-1 Disclosures (date). | | | | | | | | | |
| 1. Service of initial written discovery (date). | | | | | | | | | |
| 1. Maximum of (number) Interrogatories and (number) document requests by each party to each other party. NOTE: Parties are to provide rolling privilege logs within ten (10) days after each production. | | | | | | | | | |
| 1. Maximum of (number) depositions to be taken by each party. | | | | | | | | | |
| 1. Motions to amend pleadings or to add Parties to be filed by (date). | | | | | | | | | |
| 1. Motions to resolve any privilege log disputes to be filed by (date). | | | | | | | | | |
| 1. Factual discovery to be completed by (date). | | | | | | | | | |
| 1. Plaintiff’s expert report(s) due on (date). | | | | | | | | | |
| 1. Defendant’s expert report(s) due on (date). | | | | | | | | | |
| 1. Any rebuttal reports due on (date). | | | | | | | | | |
| 1. Expert depositions to be completed by (date). | | | | | | | | | |
| 1. Discovery end date: (date). | | | | | | | | | |
| 1. Dispositive motions to be served within (number) days of discovery end date. | | | | | | | | | |
| * 1. Set forth any special discovery mechanism or procedure requested. | | | | | | | | | |
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| * 1. A pretrial conference may take place on (date). | | | | | | | | | |
| * 1. Trial Date: (date) | | | | Jury Trial  Non-Jury Trial | | | | | |
| 1. Do you anticipate any special discovery needs (i.e., videotape/telephone depositions, problems with out-of-state witnesses or documents, etc.)? If “Yes”, please explain. | | | | | | | Yes  No | | |
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| 1. Do you anticipate any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced? | | | | | | | Yes  No | | |
| If “Yes”, how will electronic discovery or data be disclosed or produced? | | | | | | |  | | |
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| Describe any agreements reached by the Parties regarding same, including costs of discovery, production, related software, licensing agreements, etc. | | | | | | |  | | |
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| 1. Do you anticipate entry of a Discovery Confidentiality Order? See *R.* 4:104-6 and Appendix XXX. | | | | | | | Yes  No | | |
| 1. Do you anticipate any discovery problem(s) not listed above? If “Yes”, describe: | | | | | | | Yes  No | | |
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| 1. Is this case appropriate for bifurcation? | | | | | | | Yes  No | | |
| 1. Is the case appropriate for mediation? | | | | | | | Yes  No | | |
| 1. Do the parties consent to binding arbitration? | | | | | | | Yes  No | | |
| 1. An interim status/settlement conference (with client representatives having settlement authority in attendance), shall be held on (date). | | | | | | | | | |
| 1. Identify any other issues to address at the Scheduling Conference. | | | | | | | | | |
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| Attorney(s) for Plaintiff(s) |  | | | | | | | Date | |
|  |  | |  | | |  | |  | |
| Attorney(s) for Defendant(s) |  | | Name of client | | |  | | Date | |