

***** The parties should note that pursuant to the New FRCP 26, the proposed discovery plan must include: “any issues about disclosure, discovery, or preservation of electronically stored information, including the forms or forms in which it should be produced” FRCP 26(f)(3)(C)**

2. DEPOSITIONS AND INTERROGATORIES:

Absent agreement of the parties or Order of the Court to the contrary, the parties shall be limited to no more than **ten (10) depositions** and no more than **twenty-five (25) interrogatories** per side.

3. DISCOVERY DISPUTES:

Counsel shall confer in good faith in an effort to resolve any discovery dispute. If counsel are unable to resolve the dispute, they shall contact chambers to arrange for a telephone conference with the Court and must **JOINTLY** submit, via email to chambers, a clear, concise description of the issues in dispute, along with each party's position on the disputed issues. Once a telephone conference is scheduled, not less than twenty-four hours prior to the scheduled start time, counsel must **JOINTLY** email Courtroom Deputy Sara Moser sarah_moser@dcd.uscourts.gov and provide the court with a SINGLE landline telephone number at which all the parties can be reached for the telephone conference.

Counsel shall not file any discovery-related motion without a prior telephone conference with the Court and opposing counsel.

Counsel are hereby notified that a party who does not prevail in a discovery dispute may be ordered to pay the costs involved, including reasonable attorney's fees.

4. REQUEST FOR APPOINTMENT OF MEDIATOR:

If at any point the parties desire to engage in mediation, with a Magistrate Judge or through the Mediation Program of the Circuit Executive's Office, the parties shall file a joint motion captioned "Joint Motion for Mediation."

Date: May 17, 2016

TANYA S. CHUTKAN
United States District Judge