

Discovery Conference Checklist

In conferring, the parties must consider the following:

1. nature and basis of their claims and defenses
2. the possibilities for promptly settling or resolving the case
3. make or arrange for the initial disclosures required by Rule 26(a)(1)
4. discuss any issues about preserving discoverable information
5. develop a proposed discovery plan

Discovery Limitations

1. _____ interrogatories (75 limit)
2. _____ document requests (unlimited)
3. _____ factual depositions (10)
4. _____ requests for admissions (unlimited)
5. _____ other (specify _____)

Changes to Discovery Schedule/Deadlines

Current Deadline: _____

Proposed deadline for completion of non-expert discovery (including service and response to interrogatories, document requests, requests for admission and scheduling of factual depositions):

A discovery plan must state the parties' views and proposals on:

1. what changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;
2. the subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;
3. any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced;
4. any issues about claims of privilege or of protection as trial-preparation materials, including — if the parties agree on a procedure to assert these claims after production — whether to ask the court to include their agreement in an order;
5. what changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and
6. any other orders that the court should issue under Rule 26(c) or under [Rule 16\(b\)](#) and [\(c\)](#).