

4.03 | PREPARING THE DISCOVERY PLAN (RULE 26(F) (2))

The proposed discovery plan is a written proposal on how the parties expect to conduct discovery, i.e. a schedule of when and how the parties will exchange documents and conduct depositions in order to learn the facts of the case. The parties must make a good faith effort to agree on a proposed discovery plan for the judge to review and determine how discovery should proceed. The plan should include each parties' views and proposals about:

1. Changes that should be made in the timing, form, or content of disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;
2. The subjects, timing, and issues for discovery;
3. Limitations on discovery imposed by Federal or Local Rules;
4. Other orders that the Court should consider under Rule 26(c) or under Rule 16(b) or (c).

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Honorable Mention: USNYND, USCAND)

