

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

Plaintiff,

vs.

Civ. No. /WWD

Defendant.

PROVISIONAL DISCOVERY PLAN

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on

_____ at _____ and was attended by:

_____ for Plaintiff(s)

_____ for Defendant(s)

2. Discovery Plan. The parties jointly propose to the Court the following discovery plan: (*use separate paragraphs or subparagraphs as necessary if parties disagree.*)

Discovery will be needed on the following subjects:

(brief description of subjects on which discovery will be needed)

All discovery commenced in time to be completed by _____ date _____. Discovery on (*issue for early discovery*) to be completed by _____.

Maximum of _____ interrogatories by each party to any other party. (responses due _____ days after service).

Maximum of _____ requests for admission by each party to any other party. (response due _____ days after service).

Maximum of _____ depositions by Plaintiff(s) and _____ by Defendant(s)

Each deposition (other than of _____) limited to maximum of _____ hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:

from Plaintiff(s) by _____

from Defendant(s) by _____

Supplementation under Rule 26(e) due _____ (set
time(s) or interval(s)).

3. Other Items. (use separate paragraphs or subparagraphs
as necessary if parties disagree.)

The parties request a settlement conference in

_____.

The parties request a pretrial conference in

_____.

Plaintiff(s) should be allowed until _____ to join
additional parties and until _____ to amend the pleadings.

Defendant(s) should be allowed until _____ to join
additional parties and until _____ to amend the pleadings.

All potentially dispositive motions should be filed by

_____.

Plaintiff(s) shall provide the Pretrial Order to
Defendant(s) by _____ and Defendant(s) shall submit to
the Court by _____.

Settlement (is likely) or (is unlikely) or (cannot be
evaluated prior to _____) or (may be enhanced by use of
the following alternative dispute resolution
procedure: _____).

Attorney for Plaintiff

Attorney for Defendant