

IN THE COMMON PLEAS COURT OF GREENE COUNTY, OHIO  
GENERAL DIVISION (CIVIL)

\_\_\_\_\_ ,

Plaintiff(s)

CASE NO. \_\_\_\_\_

JUDGE \_\_\_\_\_

MAGISTRATE \_\_\_\_\_

v.

\_\_\_\_\_

Defendants(s)

RULE 26(F)(3) DISCOVERY PLAN  
(to be filed not later than seven (7)  
days prior to scheduling conference and  
within 14 days after the discovery  
conference is held)

1. Pursuant to Ohio Civ. R. 26(F)(3), the parties held a Civ.R. 26(F) discovery conference on \_\_\_\_\_, which was attended by the following:

\_\_\_\_\_, counsel for the plaintiff(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the plaintiff(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the plaintiff(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the defendants(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the defendants(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the defendants(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the defendants(s) \_\_\_\_\_

\_\_\_\_\_, counsel for the defendants(s) \_\_\_\_\_

2. The parties:

\_\_\_\_\_ have provided the initial disclosures required by Ohio Civ.R. 26(B)(3)(a).

\_\_\_\_\_ will exchange such disclosure by \_\_\_\_\_.

\_\_\_\_\_ are exempt from disclosure under Ohio Civ.R. 26(B)(3)(b).

3. The parties:

\_\_\_\_\_ unanimously consent to the jurisdiction of the Magistrate to preside over the trial of the case if it will be tried to a jury pursuant to Ohio Civ.R. 53(C)(1)(c);

\_\_\_\_\_ do not unanimously consent to the jurisdiction of the Magistrate to preside over the trial of the case if it will be tried to a jury pursuant to Ohio Civ.R. 53(C)(1)(c);

\_\_\_\_\_ unanimously give contingent consent to the jurisdiction of the Magistrate pursuant to Civ.R. 53(C)(1)(c) for trial purposes only in the event the assigned Judge is unavailable on the date set for trial (e.g., because of other trial settings, civil or criminal).

4. Do the parties recommend any change in the timing, form or requirement for disclosures under Civ.R. 26(B)?:

5. Have the parties agreed upon deadlines for discovery, motions to amend the pleadings, motions to add parties, and/or dispositive motions, and if so, please set forth the agreed-upon deadlines for each:

6. Recommended discovery plan (Civ.R. 26(F)(3)):

- a. Describe the subjects on which discovery may be needed, when discovery should be completed, and, if appropriate, whether discovery should be conducted in phases or be limited to or focused on particular issues:

- b. What changes should be made, if any, in the limitations on discovery imposed under the Ohio Rules of Civil Procedure or the local rules of this Court, including the limitation to 40 interrogatories/requests for admissions?
  
  
  
  
  
  
  
  
  
  
- c. Do the parties have a recommended date for identification of Plaintiff's/Plaintiffs' expert(s)? If so, what is the recommendation?:
  
  
  
  
  
  
  
  
  
  
- d. Do the parties have a recommended date for identification of Defendant's/Defendants' expert(s)? If so, what is the recommendation?:
  
  
  
  
  
  
  
  
  
  
- e. The parties have electronically stored information in the following formats:

This case presents the following issues relating to the disclosure or discovery of electronically stored information, including the form or forms in which it should be produced:

- f. The case presents the following issues relating to claims of privilege or of protection as trial preparation materials:

Have the parties agreed on a procedure to assert such claims **AFTER** production?

\_\_\_\_\_ No

\_\_\_\_\_ Yes

\_\_\_\_\_ Yes, and the parties ask that the Court including their agreement in an order.

g. Recommended discovery cut-off date: \_\_\_\_\_

7. Are there any other matters pertinent to scheduling or management of this litigation?:

Signatures:

Attorney for Plaintiff(s)

Attorney for Defendant(s)

\_\_\_\_\_  
Ohio Bar #  
Trial Attorney for \_\_\_\_\_

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Ohio Bar #  
Trial Attorney for \_\_\_\_\_

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Trial Attorney for \_\_\_\_\_

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Ohio Bar #  
Trial Attorney for \_\_\_\_\_