## Model Form

		Superior Court of New Jersey Law Division, Civil Part County				
		Docket Number: L-				
	Plaintiff(s),					
	V.	Joint Proposed Discovery Plan				
	Defendant(s).					
1.	Set forth the name of each attorney appearing, the firm name, address and telephone number and email address of each, designating the party represented.					
2.	Set forth a brief description of the case, including	g the causes of action and defenses asserted.				
3.	Have settlement discussions taken place?	☐ Yes ☐ No				
4.	The Parties $\Box$ have $\Box$ have not met pursuant to $R$ . 4:103-2.					
5.	The Parties $\Box$ have $\Box$ have not exchanged the information required by <i>R</i> . 4:103-1(a)(1). If not, state the reason therefor.					
6.	Explain any problems in connection with completing the disclosures required by $R$ . 4:103-1(a)(1).					
7.	The Parties $\Box$ have $\Box$ have not conducted di	iscovery other than the above disclosures. If so, describe.				
8.	Proposed joint discovery plan:					
a) Discovery is needed on the following subjects: (enter text)						
	b) Discovery ☐ should ☐ should not be con Explain:	nducted in phases or be limited to particular issues.				
	c) Proposed schedule:					
	1) R. 4:103-1 Disclosures (date).					
	2) Service of initial written discovery (date).					
	, ————————————————————————————————————	d ( <u>number</u> ) document requests by each party to each other ng privilege logs within ten (10) days after each production.				
	4) Maximum of ( <u>number</u> ) depositions to be	taken by each party.				
	5) Motions to amend pleadings or to add Par	rties to be filed by (date).				
	6) Motions to resolve any privilege log dispu	utes to be filed by (date).				
	7) Factual discovery to be completed by (dat	<u>te)</u> .				

Att	orne	ey(s) for Defendant(s)	Name of client	Date		
Att	orne	ey(s) for Plaintiff(s)		Date		
17.	. Ide	entify any other issues to address at the Scho	eduling Conference.			
16		n interim status/settlement conference (with tendance), shall be held on (date).	client representatives having settlement a	uthority in		
15.	. Do	o the parties consent to binding arbitration?		☐ Yes	□ No	
14.	. Is	the case appropriate for mediation?		☐ Yes	□ No	
13.	. Is	this case appropriate for bifurcation?		☐ Yes	□ No	
12.	. Do	o you anticipate any discovery problem(s) no	ot listed above? If "Yes", describe:	□ Yes	□ No	
11.		o you anticipate entry of a Discovery Confidependix XXX.	lentiality Order? See R. 4:104-6 and	□ Yes	□ No	
		escribe any agreements reached by the Partie scovery, production, related software, licens				
	If '	"Yes", how will electronic discovery or data	a be disclosed or produced?			
10		o you anticipate any issues about disclosure formation, including the form or forms in wl		□ Yes	□ No	
9.		o you anticipate any special discovery needs oblems with out-of-state witnesses or docum		□ Yes	□ No	
	f)	Trial Date: (date)	☐ Jury Trial ☐ Non-Jury Trial			
	e)	A pretrial conference may take place on (d	<u>late</u> ).			
	d) Set forth any special discovery mechanism or procedure requested.					
	13) Dispositive motions to be served within ( <u>number</u> ) days of discovery end date.					
	12) Discovery end date: (date).					
	11) Expert depositions to be completed by (date).					
		10) Any rebuttal reports due on (date).				
		9) Defendant's expert report(s) due on (date				
		8) Plaintiff's expert report(s) due on (date	2)			