

Model Form

Superior Court of New Jersey
Law Division, Civil Part

_____ County

Docket Number: L- _____

Plaintiff(s),

v.

Defendant(s).

**Joint Proposed
Discovery Plan**

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 the causes of action and defenses asserted.
3. Have settlement discussions taken place? Yes No
4. The Parties have have not met pursuant to *R. 4:103-2*.
5. The Parties have have not exchanged the information required by *R. 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 have have not conducted discovery 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 conducted in phases or be limited to particular issues. Explain:
 - c) Proposed schedule:
 - 1) *R. 4:103-1* Disclosures (date).
 - 2) Service of initial written discovery (date).
 - 3) Maximum of (number) Interrogatories and (number) document requests by each party to each other party. NOTE: Parties are to provide rolling privilege logs within ten (10) days after each production.
 - 4) Maximum of (number) depositions to be taken by each party.
 - 5) Motions to amend pleadings or to add Parties to be filed by (date).
 - 6) Motions to resolve any privilege log disputes to be filed by (date).
 - 7) Factual discovery to be completed by (date).

