

IN THE COMMON PLEAS COURT OF AUGLAIZE COUNTY, OHIO  
CIVIL DIVISION

\_\_\_\_\_, :  
Plaintiff(s), : CASE NO. \_\_\_\_ CV \_\_\_\_  
: Judge Frederick D. Pepple  
v. :  
: **LOCAL RULE 11(I)** -- FORM FOR  
\_\_\_\_\_, : "RULE 26(F) REPORT OF THE PARTIES"  
Defendant(s). :

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Pursuant to the requirements of Civ. R. 26(F), the parties, whose signatures appear below, conferred on \_\_\_\_\_, 202\_\_, and considered the nature and basis of the claims and defenses for the above captioned-matter. The parties respectfully propose the following discovery plan:

1. **Initial Disclosures.**

- The parties have provided the pre-discovery disclosures required by Civ. Rule 26(B)(3).
- The parties have agreed to exchange such disclosures by \_\_\_\_\_, 202\_\_.
- An exemption to initial disclosures applies under Civ. R. 26(B)(3)(b).

2. **Settlement:**

- Plaintiff has made a settlement demand.
- Plaintiff will make a settlement demand on or before \_\_\_\_\_, 202\_\_.
- Defendant has made a settlement offer.
- Defendant will make a settlement offer on or before \_\_\_\_\_, 202\_\_.
- The parties request mediation be scheduled through the Court.
- Other matters related to settlement/mediation:

**3. Proposed Discovery Plan:**

- (a) Recommended date for disclosure of lay witnesses: \_\_\_\_\_, 202\_\_
- (b) Recommended date for disclosure of plaintiff(s)'s experts: \_\_\_\_\_, 202\_\_
- (c) Recommended date for disclosure of defense(s)'s experts: \_\_\_\_\_, 202\_\_
- (d) Earliest recommended date for mediation: \_\_\_\_\_, 202\_\_
- (e) Recommended date of motions for joinder or to amend: \_\_\_\_\_, 202\_\_
- (f) Recommended date for report of plaintiff(s)'s experts: \_\_\_\_\_, 202\_\_
- (g) Recommended date for report of defendant(s)'s experts: \_\_\_\_\_, 202\_\_
- (h) Recommended discovery deadline \_\_\_\_\_, 202\_\_
- (i) Recommended dispositive motion deadline: \_\_\_\_\_, 202\_\_
- (j) Recommended exhibit exchange deadline: \_\_\_\_\_, 202\_\_
- (k) Recommended date for a final pretrial conference: \_\_\_\_\_, 202\_\_
- (l) Recommended date for trial motions: \_\_\_\_\_, 202\_\_
- (m) Earliest recommended date for trial: \_\_\_\_\_, 202\_\_

**4. Scope of Discovery:**

(a) What changes should be made in the timing, form, or requirement for disclosures under Civ. R. 26(B):

(b) Subjects on which discovery may be needed:

(c) Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced:

(d) Disclosure and exchange of documents obtained through public records requests:

(e) Any issues about claims of privilege or of protection as trial preparation materials:

(f) What changes should be made in limitations on discovery imposed under these rules or by local rule, and any other limitations that should be imposed (number of depositions, interrogatories, etc.):

(g) Any other matter or other orders that the court should issue, including but not limited to, under Civil Rule 26(c) or under Civil Rule 16(B) and (C); and any modifications required or to be requested under any scheduling order issued under Civil Rule 16.

Respectfully submitted:

\_\_\_\_\_ (signature)

\_\_\_\_\_ Firm

\_\_\_\_\_ Name

Attorney Registration No. \_\_\_\_\_

and

\_\_\_\_\_ (signature)

\_\_\_\_\_ Firm

\_\_\_\_\_ Name

Attorney Registration No. \_\_\_\_\_

**Attorneys for Plaintiff(s)**

\_\_\_\_\_ (signature)

\_\_\_\_\_ Firm

\_\_\_\_\_ Name

Attorney Registration No. \_\_\_\_\_

**Attorney for Defendant(s)** \_\_\_\_\_ (list)

\_\_\_\_\_ (signature)

\_\_\_\_\_ Firm

\_\_\_\_\_ Name

Attorney Registration No. \_\_\_\_\_

**Attorney for Defendant(s)** \_\_\_\_\_ (list)

*(Add additional pages if necessary.)*