

Discovery Plan and Report ___/___/___

Plaintiff's Claim Amount:

Defendant's Counterclaim Amount:

Interrogatories

Number Permitted by Scheduling Order: _____

| | Number | Date sent | Response Date | Issues Remaining |
|------------|--------|-----------|---------------|------------------|
| First Set | | | | |
| Second Set | | | | |

Requests for Production

Number Permitted by Scheduling Order: _____

| | Number | Date sent | Response Date | Issues Remaining |
|------------|--------|-----------|---------------|------------------|
| First Set | | | | |
| Second Set | | | | |

Depositions

| | | | | | |
|-----------------------------------|--|--|--|--|--|
| Name of Deponent | | | | | |
| General Subject | | | | | |
| Location of Deposition | | | | | |
| Conditions Precedent ¹ | | | | | |
| Expected/Actual Duration | | | | | |
| Proposed/Actual Date | | | | | |

I certify that I have discussed the costs and attorneys' fees anticipated and incurred by this discovery plan with my client .

¹ Completion of specific written discovery, completion of previous depositions, rulings on issues, etc.

Electronic Discovery Summary:

| | | |
|---------------------------------------|--|--|
| Information sought: | | |
| Repositories: | | |
| Volume of data to be searched: | | |
| Anticipated cost to requesting party: | | |
| Anticipated yield: | | |
| Anticipated cost to responding party | | |

___ This party is not seeking electronic discovery.

I certify that I have discussed the costs and attorneys' fees anticipated and incurred by this discovery plan with my client .