

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO	
IN RE: Debtor(s).	Case Number
Plaintiff(s), v. Defendant(s).	Adversary Number

PROPOSED DISCOVERY PLAN

All discovery shall be completed within one hundred twenty (120) days after service of the summons and complaint (“Discovery Completion Date”). **The Discovery Completion Date may be extended only by order of the Court.**

1. The following is the proposed discovery plan of Plaintiff(s) and Defendant(s) pursuant to FED. R. CIV. P. 26(b). If not all parties are proposing this plan, identify the plan proponents:

2. The alleged cause(s) of action are (include citations to statutes and Rules):

3. The asserted defense(s) are:

4. Discovery will be needed on the following subjects:

5. Each party will serve a maximum number of _____ interrogatories on any other party.
6. Each party will make a maximum number of _____ requests for admission on any other party.
7. Plaintiff(s) may conduct a maximum number of _____ depositions.
8. Defendant(s) may conduct a maximum number of _____ depositions.
9. If any party contemplates discovery involving non-parties, identify those non-parties:

10. If any party contemplates the need for expert testimony, identify the issue(s) for which expert testimony will be needed:

11. If any party contemplates discovery involving electronically stored information (“ESI”), identify any agreement(s) of the parties regarding ESI and/or any issue(s) relating to ESI:

12. If the parties are amenable to mediation or other alternative dispute resolution (“ADR”), identify the issue(s) to be mediated or subject to ADR:

13. In the event of a discovery dispute, before a party may move for an order relating to discovery, such party shall contact the Courtroom Deputy at 330-742-0906 to request a status conference with the Court to discuss the discovery dispute.

Counsel for Plaintiff(s)

Counsel for Defendant(s)