

MEMORANDUM

TO: File:
27-CV-

FROM:

DATE:

updated:

RE: **Discovery Plan**

1. Timeline

- a. Discovery deadline:
- b. Last day for written requests:
- c. Depo transcripts returned:
- d. Depos completed:
- e. Written discovery completed:
- f. Motions as necessary:
- g. First round served:

2. Cost

- a. Document subpoenas:
- b. Depositions:
- c. Expert:

3. Discovery Method Chart

Key Fact In Dispute	Discovery Method(s)	Status
<u>Claim/Defense 1:</u>		
Fact 1:	RFPs: -	
	Rogs: -	
	Depos: -	
	Subpoenas: -	
Fact 2:	RFPs: -	
	Rogs: -	
	Depos: -	
	Subpoenas: -	
Fact 3:	RFPs: -	
	Rogs: -	
	Depos: -	

Key Fact In Dispute	Discovery Method(s)	Status
	Subpoenas: -	

Key Fact In Dispute	Discovery Method(s)	Status
<u>Claim/Defense 2:</u>		
Fact 1:	RFPs: -	
	Rogs: -	
	Depos: -	
	Subpoenas: -	
Fact 2:	RFPs: -	
	Rogs: -	
	Depos: -	
	Subpoenas: -	
Fact 3:	RFPs: -	
	Rogs: -	
	Depos: -	
	Subpoenas: -	