

## **JOINT INITIAL STATUS REPORT**

### **1. Nature of the Case**

- A. Identify the attorneys of record for each party, including the lead trial attorney.
- B. Identify any parties that have not yet been served.
- C. State the basis for federal jurisdiction. If jurisdiction over any claims is based on diversity or supplemental jurisdiction:
  - i. state whether and, if so, why the amount in controversy exceeds the \$75,000 jurisdictional threshold; and
  - ii. identify the state of citizenship of each named party. For unincorporated associations, LLCs, partnerships and other business entities that are not corporations, the state(s) in which any individual members of the business unit are citizens must be identified.

**NOTE:** The report must address whether there is diversity of citizenship in any case in which supplemental jurisdiction over state law claims is asserted, so that the Court may exercise informed discretion about whether to resolve such claims in the event that the federal question claims are resolved or dismissed.

- D. Describe generally the nature of the claims asserted in the complaint and any counterclaims.
- E. State the major legal and factual issues in the case.
- F. Describe the relief sought.

### **2. Case Plan**

- A. Identify all pending motions.
- B. State whether any defendant anticipates responding to the complaint by motion and, if so, the basis for the intended motion.
- C. Submit a proposed discovery plan, including the following information:
  - i. the general type of discovery needed;
  - ii. whether discovery will encompass electronically stored information (ESI) and any anticipated issues regarding disclosure or discovery of ESI, including the form or forms in which it should be produced;

- iii. any issues or agreements regarding claims of privilege or protection of trial preparation materials, including whether the parties desire that the Court enter an order regarding a procedure to assert such claims after production pursuant to Federal Rule of Evidence 502(d);
- iv. the date(s) on which disclosures under Federal Rule of Civil Procedure 26(a)(1) were made or will be made;
- v. the date by which the parties will complete fact discovery;
- vi. whether expert discovery is contemplated and, if so, dates by which disclosures under Federal Rule of Civil Procedure 26(a)(2) will be made and expert depositions completed;
- vii. what changes, if any, should be made to the limitations on discovery imposed under the Federal Rules of Civil Procedure or the requirements of the Local Rules of the Northern District of Illinois, such as changes in the number of depositions or interrogatories permitted; and
- viii. the date by which the parties must file any dispositive motions.

D. State whether there has been a jury demand and the estimated length of the trial.

### **3. Settlement**

- A. State whether any settlement discussions have occurred and describe the status of any such discussions. Do *not* provide the particulars of any settlement demands/offers.
- B. State whether the parties believe that a settlement conference would be productive at this time.

### **4. Consent to Proceed Before a Magistrate Judge**

- A. State whether counsel have informed their respective clients about the possibility of proceeding before the assigned Magistrate Judge for all purposes, including trial and entry of final judgment, and whether the parties unanimously consent to that procedure. Do *not* indicate which parties consented or did not consent.