

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)	
)	
)	
Plaintiff(s),)	No. _____
v.)	Judge Rebecca R. Pallmeyer
)	
)	
)	
Defendant(s).)	

PLAINTIFF(S) AND DEFENDANT(S) JOINT RULE 26(f)(1) REPORT

Now comes the Plaintiff(s) and the Defendant(s) and jointly present their Rule 26(f) Report to the Court as follows:

1. Pursuant to Federal Rule 26(f) a planning meeting was held on _____, at the offices of _____, and was attended by: _____ for the Plaintiff(s) and _____ for the Defendant(s). The conference was productive in establishing a discovery schedule and outlining various issues and positions, but did not result in settlement.
2. The parties jointly propose to the Court the following discovery plan:
 - a. Discovery will be needed on the following subjects:
 1. The design and manufacture of the product at issue;
 2. The development of [the relevant] technology and other related technology, and the negotiations with the product's manufacturer with respect to the implementation of the technology;
3. The Plaintiff's use of the product at issue, and the facts of the occurrence at issue;
4. The Plaintiff's employment history; and
5. The medical care and treatment of the Plaintiff for the injuries suffered.

b. The Defendant will produce its Federal Rule 26(a)(1) disclosures by _____. All discovery to be commenced in time to be completed by _____.

c. The parties believe that it will be necessary to depose a variety of witnesses relative to these issues and that these witnesses are located throughout the United States of America. The parties anticipate that the depositions of the individuals knowledgeable about the design and manufacture of the product, as well as the design and manufacture of [the relevant] technology and discussions with manufacturers, would involve up to 10 to 15 witnesses. The vast majority of these witnesses would be outside the State of Illinois.

It is anticipated that the parties will be deposing _____ and other individuals who developed [the relevant] technology; these individuals are located outside the State of Illinois.

Additionally, the Plaintiff has in excess of \$ _____ in medical expenses for treatment that he contends is related to the injury alleged in the Complaint. The Defendants anticipate that there will be 2 to 5 depositions of medical personnel.

Finally, both parties anticipate that there will be expert discovery and the total number of respective experts will be dependent on the nature and extent of the fact discovery completed. There are hundreds of thousands of pages of documents relative to the product development and the development of [the relevant] technology that will make depositions of various witnesses lengthy.

d. Reports and depositions of retained experts under Rule 26(a)(2) shall be disclosed as follows:

1. The Plaintiff to disclose expert reports on or before _____.
2. Depositions of the Plaintiff's experts to be completed by _____.
3. The Defendants and Third-Party Defendants to disclose expert reports on or before _____.
4. The Defendants and Third-Party Defendants expert witnesses to be deposed by _____.

e. Parties shall be allowed until _____, to join additional parties and to amend the pleadings.

f. Dispositive motions to be filed by _____; *The court will not consider a motion for summary judgment until the parties have first discussed settlement. Any motion for summary judgment must be accompanied by a statement signed by lead counsel for both parties certifying that they have engaged in good faith settlement efforts.*

g. Final pretrial order: Plaintiff shall prepare proposed draft by _____; parties to file joint final pretrial order by _____.

h. The case should be ready for trial by _____, and at this time is expected to take approximately ___ weeks.

3. At this time the parties (do/do not consent) unanimously to proceed before the Magistrate Judge.

Respectfully submitted,
Law Offices of

By: _____
(name)

Address and phone number
of law firm(s):