

**RULE 26(f) INITIAL PLANNING REPORT
FOR CASES BEFORE JUDGE BUCKLO IN THE MIDP PROGRAM**

This case has been assigned to the calendar of Judge Elaine E. Bucklo and is part of the Mandatory Initial Discovery Pilot (“MIDP”) program in the Northern District of Illinois. The parties are directed to meet pursuant to Federal Rule of Civil Procedure 26(f) and conduct a planning meeting. At least 3 business days prior to the scheduling conference in this case, the parties shall file a **joint** initial planning report containing the following information:

1. The Nature of the Case
 - A. Identify the attorneys of record for each party, including the lead trial attorney.
 - B. State the basis for federal jurisdiction.
 - C. Describe the nature of the claims asserted in the complaint and any counterclaims.

2. Pending Motions and Case Plan
 - A. Identify all pending motions.
 - B. Confirm that the parties have read the district court’s standing order for the MIDP program. Describe your discussions regarding MIDP, including resolved and unresolved disagreements regarding such discovery.
 - C. Submit a proposal for a discovery plan, including the following information:
 1. The type of discovery needed;
 2. A date to issue written discovery;
 3. A fact discovery completion date;
 4. An expert discovery completion date, including dates for the delivery of expert reports;
 5. A date for final supplementation of MIDP; and
 6. A date for the filing of dispositive motions.
 - D. Discuss the anticipated scope, if any, of electronically stored information (“ESI”) in the case and the potential methodologies for identifying ESI for production. Submit the parties’ agreements regarding ESI and identify any areas of disagreement regarding ESI.
 - E. Indicate whether a jury is requested, the probable length of trial, and the earliest possible date when the case will be ready for trial.

3. Consent to Proceed Before a Magistrate Judge

Indicate whether the parties unanimously consent to proceed before a Magistrate Judge.

4. Status of Settlement Discussions
 - A. Indicate whether any settlement discussions have occurred;
 - B. Describe the status of any settlement discussions; and
 - C. Specify whether the parties request a settlement conference.