IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

)

)

Plaintiff, ) Case No.

)

vs. )

)

)

)

Defendant. )

 **FORM OF JOINT CASE MANAGEMENT PLAN**

**(PLEASE SKIP ANY QUESTION WHICH IS NOT APPLICABLE)**

1. The names of counsel or pro se parties who attended the Rule 26(f) meeting and assisted in developing this Case Management Plan.

Response:

2. A list of the parties in the case, including any parent corporations or entities (for recusal purposes).

Response:

3. A short statement of the nature of the case (2 pages or less), including a description of the claims and defenses.

Response:

4. A statement describing the basis for jurisdiction and citing specific jurisdictional statutes. If jurisdiction is based on diversity of citizenship, the report shall include a statement of the citizenship of every party and a description of the amount in dispute. The parties are reminded that (1) a corporation is a citizen of the state where it is incorporated and the state of its principal place of business, and (2) partnerships and limited liability companies are citizens of every state in which one of their partners or members resides. *If a party is a partnership or limited liability company, and the pleadings do not allege the citizenship of the partners/members, the parties shall include a statement of whether all partners/members are diverse from the opposite side.*

Response:

5. A list of any parties who have not been served, and an explanation of why they have not been served. Also a list of any parties who have been served, but have not answered or otherwise appeared.

Response:

6. A statement of whether any party expects to add additional parties to the case or otherwise amend pleadings (the Court will set a deadline to join parties or amend pleadings at the conference).

Response:

7. Whether there are dispositive or partially dispositive issues appropriate for decision by motion or by agreement. Note that effective September 2022, **each party – and parties represented by the same counsel – is limited to filing no more than one motion for summary judgment. Parties wishing to file more than one summary judgment motion must first obtain the Court’s leave.**

Response:

8. Whether the parties have complied with self-executing routine discovery exchange (initial disclosures) as required by Rule 26(a), and if applicable, the Court’s *General Order re Initial Discovery Protocols for Employment Cases Alleging Adverse Action* (available on the Judge’s webpage).

Response:

9. Whether the parties can stipulate to any facts to avoid or minimize discovery; the nature and type of discovery each party intends to pursue, whether proportionality of discovery is an issue, whether the parties anticipate any issues with discovery of electronically stored information and whether the discovery should be limited in any manner.

Response:

10. The status of related cases pending before other courts or other judges of this Court.

Response:

11. Proposed specific dates for each of the following, keeping in mind that trial should occur within nine (9) months from the date of the Initial Pretrial Conference, unless there are unusual or unique circumstances. Parties should be prepared to address any issues that require additional time at the Initial Pretrial Conference.

a. Date for motions to amend pleadings under Rule 15(a) or to join parties, and

to exchange (not file) proposed stipulations of fact to reduce discovery;

b. Dates for full and complete expert disclosures under Federal Rule of Civil Procedure 26(a)(2)(A)‑(C);

c. A deadline for the completion of fact discovery;

d. A deadline for filing dispositive motions;

e. A date for a dispositive motion hearing (the parties may choose not to have a hearing, in which case replies will be allowed);

f. A date for the final pretrial conference; and

g. A date for trial.

Response:

12. The estimated length of trial and any suggestions for shortening the trial.

Response:

13. The prospects for settlement, including any request of the Court for assistance in settlement efforts.

Response:

14. Any other matters that will aid the Court and parties in resolving this case in a just, speedy, and inexpensive manner.

Response:

Counsel for Plaintiff(s) Date

 Counsel for Defendant(s) Date