

**RULE 26(f) CONFERENCE CHECKLIST
FOR THE HONORABLE ALAN B. JOHNSON**

Counsel shall be fully prepared to discuss in detail all aspects of discovery during the mandatory Rule 26(f) Conference. The subject matters to be discussed during the Rule 26(f) Conference shall include, but are not limited to, the following:

1. Jurisdiction;
2. Limited Liability Company (LLC) parties – members and their citizenship;
3. Venue;
4. Service of process;
5. Consent to Magistrate Judge pursuant to Local Rule 73.1;
6. Amendments to pleadings;
7. Anticipated addition of parties;
8. Factual and legal contentions that each party believes are material to the case;
9. Initial disclosures (self-executing routine discovery) pursuant to Local Rule 26.1;
10. A proposed plan and schedule for discovery, including dates for completion of fact discovery;
11. The names of all known witnesses to be called to testify at trial. Additional witnesses and summaries of testimony shall be promptly supplemented as ascertained;
12. Electronically stored data and information pursuant to Local Rule 26.1;
13. Formal written discovery – interrogatories, requests for production, requests for admission;
14. Identity and number of potential fact depositions;
15. Identity and number of potential trial depositions;

16. Location of depositions, deposition schedules, deposition costs, utilization of depositions by electronic or other remote means;
17. Identify the number and types of expert witnesses to be called to present testimony during trial (including the identity of treating physicians) (See Local Rule 26.1);
18. Need for any claw back agreement or Order under Fed. R. Evid. 502;
19. Discovery issues and potential disputes;
20. Protective orders;
21. Potential dispositive motions;
22. Proposed trial date;
23. Length of trial;
24. Settlement possibilities and a settlement discussion schedule.