

**RULE 26(f) CONFERENCE CHECKLIST
FOR THE HONORABLE NANCY D. FREUDENTHAL**

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, each topic in the form of joint case management plan available on Judge Freudenthal's webpage and any additional topics identified in Rule 26(f) or Local Rule 26.1. The following checklist summarizes most of the topics but is provided for convenience only and current only as of the date noted in the margin.

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

14. Location of depositions, deposition schedules, deposition costs, utilization of depositions by electronic or other remote means;
15. 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);
16. Need for any claw back agreement or Order under Fed. R. Evid. 502;
17. Discovery issues and potential disputes;
18. Protective orders;
19. Potential dispositive motions;
20. Proposed trial date;
21. Length of trial;
22. Settlement possibilities and a settlement discussion schedule.