IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

)

)

Plaintiff, ) Case No.

)

vs. )

)

)

)

Defendant. )

 **FORM OF JOINT CASE MANAGEMENT PLAN**

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

1. The names of counsel who attended the Rule 26(f) meeting and assisted in developing the Case Management Statement.

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.

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.

Response:

8. The nature and type of discovery each party intends to pursue and, whether discovery is an issue and whether the discovery should be limited in any manner.

Response:

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

Response:

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

b. A deadline for the completion of fact discovery;

c. A deadline for filing dispositive motions;

d. A date for a dispositive motion hearing (the parties may choose not to have a hearing);

e. A date for the final pretrial conference; and

f. A date for trial.

Response:

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

Response:

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

Response:

13. 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