IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

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)

Plaintiff(s), ) Case No.

)

vs. )

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)

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Defendant(s). )

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)

 **JOINT CASE MANAGEMENT PLAN**

**(The parties’ proposed plan is subject to revision and modification by the Court at the Initial Pretrial Conference)**

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

**Response:**

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

**Response:**

3. List any cases related to this one that are pending in any state or federal court with the case number and court, and state how they are related.

**Response:**

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

**Response:**

5. 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:**

6. 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:**

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

**Response:**

8. Please specify if this is a Jury Trial or a Bench Trial.

**Response:**

9. Discuss whether or not the case is complex. If the parties believe that the case is complex, explain why and be prepared to address this issue, including scheduling and case management considerations in particular during the Initial Pretrial Conference.

**Response:**

10. Whether there are dispositive or partially dispositive issues appropriate for decision by motion or by agreement.

**Response:**

11. Whether the parties have complied with self-executing discovery (initial disclosures) as required by Rule 26(a).

**Response:**

12. 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 (ESI), and whether the discovery should be limited in any manner.

**Response:**

13. Proposed specific dates for each of the following, keeping in mind that trial should occur within approximately 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. Proposed dates for full and complete expert disclosures under Federal Rule of Civil Procedure 26(a)(2)(A)‑(C);

b. A proposed deadline for the completion of fact discovery; and

c. A proposed date for trial.

**Response:**

14. Indicate any other matters peculiar or unique to this case, including discovery, that deserve the special attention of the Court at the Initial Pretrial Conference.

**Response:**

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

**Response:**

16. The prospects for settlement (good, fair, or poor), including any request of the Court for assistance in settlement efforts.

**Response:**

17. 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