

**IN THE DISTRICT COURT FOR THE SIXTH JUDICIAL DISTRICT
CAMPBELL COUNTY, WYOMING**

PLAINTIFF' NAME,)
)
 Plaintiff,)
)
 v.) Civil Case No. _____
)
DEFENDANT'S NAME,)
)
 Defendant(s).)

**JOINT REPORT OF MEETING
and
PROPOSED JOINT DISCOVERY AND CASE MANAGEMENT PLAN**

1. **List the 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.**
2. **Briefly describe what this case is about.**
3. **Specify any allegations contesting subject matter or personal jurisdiction.**
4. **Discuss whether or not the case is complex. If the parties believe that the case is complex and be prepared to address any special scheduling and case management considerations in particular, during the Initial Pretrial Conference.**
5. **List anticipated additional parties that should be included, when they can be added, and by whom they are wanted.**
6. **List anticipated interventions.**
7. **Describe class-action issues, if any.**
8. **State whether each party represents that it has made the initial disclosures required by Rule 26(a). If not, describe specifically the arrangements that have been made to complete the disclosures.**
9. **Describe the proposed agreed discovery plan, including:**

- a. **Responses to all the matters raised in Rule 26(f).**
- b. **When and to whom the plaintiff anticipates it may send interrogatories.**
- c. **When and to whom the defendant anticipates it may send interrogatories.**
- d. **Of whom and by when the plaintiff anticipates taking oral depositions.**
- e. **Of whom and by when the defendant anticipates taking oral depositions.**
- f.
 - (i) **Specify the date experts for plaintiff (or party with the burden of proof on an issue) will be designated and their reports provided to the opposing party.**
 - (ii) **Specify the date experts for defendant will be designated and their reports provided to the opposing party.**
- g. **List expert depositions the plaintiff (or the party with the burden of proof on an issue) anticipates taking and their anticipated completion dates. See Rule 26(a)(2)(B) (expert report).**
- h. **List expert depositions the defendant (or opposing party) anticipates taking and their anticipated completion dates. See Rule 26(a)(2)(B) (expert report).**

Defendants must designate damage experts and any treating physician experts by November 1, 2013.

- 10. If the parties have not agreed on a part of the discovery plan, describe the separate views and proposals of each party.

11. **Specify the discovery beyond initial disclosures that has been undertaken to date.**
12. **State the date the parties believe planned discovery can reasonably be completed.**
13. **Describe the possibilities for a prompt settlement or resolution of the case that have been discussed including whether either party anticipates requesting required alternative dispute resolution under Wyo. R. Civ. P. 40(b).**
14. **Describe what each party has done or agreed to do to bring about a prompt resolution.**
15. **State whether a jury demand has been made and if it was made on time.**
16. **Specify the number of hours it is expected that it will take to present the evidence in this case.**
17. **List pending motions that could be ruled on at the Initial Pretrial Conference.**
18. **List other pending motions, if any.**
19. **Indicate other matters peculiar or unique to this case, including discovery, that deserve the special attention of the Court at the Initial Pretrial Conference.**
20. **Indicate whether the parties anticipate any amendments to the pleadings.**
21. **List the names, bar numbers, addresses, email addresses, and telephone numbers for all counsel. List the names, addresses, email addresses and telephone numbers for all parties and unrepresented *pro se* litigants.**

Signed, Counsel for Plaintiff

Signed, Counsel of Defendant