[plaintiff/firm name]

[address]

[city], [state] [zip]

[telephone]

[fax]

IN THE DISTRICT COURT OF GUAM

TERRITORY OF GUAM

) CIVIL CASE NO. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

)

Plaintiff(s) )

)

vs. ) SCHEDULING AND PLANNING

) CONFERENCE REPORT

)

Defendants(s) )

)

1. **Meeting.** In accordance with Rule 26(f) of the Federal Rules of Civil Procedure, and CVLR 16-1 for the District Court of Guam, a meeting was held on Click here to enter a date and was attended by:

*(Insert attorneys’ names and parties represented)*

1. **Disclosures.** The information required by Fed.R.Civ. P. 26(a):
2. Has been exchanged by the parties.
3. Will be exchanged by the parties on or before Click here to enter a date.
4. **Nature and Basis of Claims and Defenses:**
5. The nature of the case is as follows: (*Insert description)*
6. The posture of the case, including hearings and motions (whether resolved or pending), is as follows: (*Insert description*)
7. **Waiver of Pretrial Requirements:**

The parties request the court  waive  do not waive the pretrial requirements of CVLR 16-1(e) through (h). (*If the request is made, the Scheduling and Planning Conference Report shall contain a comprehensive discovery schedule that will permit the trial to be set within six (6) months of the date of the Scheduling Conference.)*

1. **Discovery Plan:**The parties jointly propose to the court the following Discovery Plan.
2. The parties expect that discovery will be needed on the following issues: (*Insert discovery issues*)
3. Are there issues about preserving discovery information?  Yes  No. If Yes, explain. (*Insert explanation*).
4. Disclosure or discovery of electronically stored information should be handled as follows: *(Description of Parties' Proposal)*
5. Claims of privilege or of protection of trial preparation materials.

1.  There is no indication that this will be an issue.

2.  The parties have entered into a confidentiality agreement.

3.  The parties will submit their proposed confidentiality agreement on or before: Click here to enter a date.

E. Disclosure of expert reports:

1. By all parties on or before: Click here to enter a date.
2. By plaintiff(s) on or before: Click here to enter a date.
3. By defendant(s) on or before: Click here to enter a date.
4. Rebuttal reports on or before: Click here to enter a date.
5. Time for completing discovery:

1. Fact discovery will be completed on or before: Click here to enter a date;

2. Expert discovery will be completed on or before: Click here to enter a date;

3. All discovery will be completed on or before: Click here to enter a date*.*[[1]](#footnote-1)

G. Optional Modifications on Discovery.

1.  The limitations contained in Fed. R. Civ. P. 26(b), 30, and 33 will apply except as indicated below.

2.  The maximum number of depositions by each party will not exceed Click here to enter number.

1. Depositions will not exceed Click here to enter number hours as to any deponent.
2. Depositions will not exceed Click here to enter number hours as to non-party deponents.
3. Depositions will not exceed Click here to enter number hours as to party deponents.[[2]](#footnote-2)
4. The maximum number of interrogatories posed by each party will not exceed Click here to enter number.
5. The maximum number of requests for admissions posed by each party will not exceed Click here to enter number.
6. Other limitations: (*Insert other limitations*).

VI. **Pretrial Motions**.

A. All motions to add parties shall be filed on or before Click here to enter a date.

B. All motions to otherwise amend pleadings shall be filed on or before Click here to enter a date.

C. All discovery motions shall be filed on or before Click here to enter a date.

D. All dispositive motions shall be filed on or before Click here to enter a date.

VII. **Trial**.

A. The case is expected to take Click here to enter number days to try.

B. 1. A jury trial has been demanded.  Yes  No.

2. The right to a jury trial  is  is not disputed.

C. The parties request a trial date of Click here to enter a date.*[[3]](#footnote-3)*

VIII. **Other Provisions**:

1. The parties do not request a conference with the court before the entry of a Scheduling and Planning Order for the following reason: (*Insert explanation*).

B. The disclosure requirements of Fed. R. Civ. P. 7.1, if applicable:

1.  Have been complied with.

2.  Compliance will be accomplished on or before Click here to enter a date.

C. Early settlement/alternative dispute resolution.

1.  The parties certify that they have complied with the provisions of CVLR Rule 16-2(c)(1).

2. Do the parties wish to consider  private mediation,  arbitration, or settlement conference with a judicial officer of this court? Yes  No. If No, explain. (*Insert explanation*).

1. The parties present the following suggestions for shortening trial. *(Insert explanation)*.
2. The following issues will also affect the status or management of the case: *(Insert explanation)*.

Dated:

*Signature block for plaintiff's attorney*

Dated:

*Signature block(s) for defendant's attorney*

1. Defined as the last day to file responses to discovery. [↑](#footnote-ref-1)
2. Unless otherwise specified, the court will consider corporate officer, Rule 30(b)(6) witness, and expert witness depositions to be subject to the time limitation applicable to party depositions. [↑](#footnote-ref-2)
3. In no event shall the trial be later than eighteen (18) months after the complaint is filed, unless the Court otherwise allows). [↑](#footnote-ref-3)