UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

Plaintiff(s),	)	
	)	
v.	)	Case No.
	)	
Defendant(s)	)	

STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to

Local Rule 26.1(b):

1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before _____. (Include deadlines for disclosure of electronically stored information and any other agreements the parties reach, for example, agreements concerning the form of such disclosures or agreements concerning the assertion of privilege or work product after production.)

2. The parties shall serve all interrogatories and requests for production on or before _____. (Include deadlines for disclosure of electronically stored information and any other agreements the parties reach, for example, agreements concerning the form of such disclosure or agreements concerning the assertion of privilege or work product after production.)

3. Depositions of all non-expert witnesses shall be completed by _____.

4. Plaintiff shall submit expert witness reports on or before ___ _____. Depositions of plaintiff's expert witnesses shall be completed by_____.

5. Defendant shall submit expert witness reports on or before ___

_____. Depositions of defendant's expert witnesses shall be completed by _____.

      6. The Early Neutral Evaluation session shall be conducted on _____ at _____.m. The parties have agreed that _____ _will serve as the early neutral evaluator. **(Note: Paragraph 6 only applies to ENE-eligible cases pursuant to Local Rule No. 16.3.)**

      7. The parties shall serve all requests for admission on or before _____.

      8. All discovery shall be completed by _____ (no later than 8 months after filing of the Answer or the Third-Party Answer).

      9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before _____.

      10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before _____ _____.

      11. This case shall be ready for trial by _____.

_____
Date

_____
Counsel for Plaintiff(s)

_____
Date

_____
Counsel for Defendant(s)

APPROVED and SO ORDERED: _____
                                 U.S. District/Magistrate Judge

Date: _____

Local Form/Rule 26.1(b)