**DETAILED STATUS REPORT**

At [TIME & PLACE] via [in person/telephone/video] conference] the following parties to this action met and conferred on the topics outlined in this report and other case management matters:

[ATTORNEY], counsel for [Plaintiff[ NAME]

[ADDITIONAL PLAINTIFFS AND THEIR RESPECTIVE COUNSEL]

[ATTORNEY], counsel for [Defendant NAME]

[ADDITIONAL DEFENDANTS AND THEIR RESPECTIVE COUNSEL]

CASE#

**I. Nature of Claims, Counterclaims, and Defenses**

This [claim/counter claim] was filed on [DATE].

The parties [have/ have not] demanded trial by jury.

[PLAINTIFF NAME] claims that [CLAIMS AGAINST DEFENDANTS].

[DEFENDANT NAME] respond[s] that [DEFENSES ASSERTED].

[DEFENDANT NAME] further alleges that the Plaintiffs [COUNTERCLAIMS AGAINST PLAINTIFFS.]

[In response, [PLAINTIFF NAME] responds that [RESPONSES TO COUNTERCLAIMS].]

Provide a brief statement on:

1. The theory of damages by any party seeking affirmative relief.
2. The likelihood of appearance in the action of additional parties.
3. Identify any nonparties to whom any of the parties will seek to allocate fault.
4. Proposals to formulate and simplify issues.
5. Proposals for elimination of frivolous claims/defenses.
6. The number and timing of motions for summary judgment or partial summary judgment.

**II. [Initial/Pre-Discovery] Disclosures**

The parties have exchanged the initial disclosures on [DATE].

Pre-suit requirements [have /have not been] completed.

**III. Anticipated Discovery**

The parties jointly propose to the Court discovery on the following topics:

[Plaintiff NAME] plans to conduct discovery on [ANTICIPATED TOPICS].

[Defendant NAME] plans to conduct discovery on [ANTICIPATED TOPICS].

The parties [agree/do not agree] to conduct discovery in [NUMBER] phases:

1. The first phase of discovery will include [DESCRIPTION].
2. The [Second/Final] phase of discovery will include [DESCRIPTION].
3. [ADDITIONAL PHASES].

**IV. Discovery Limits/Protective Orders**

The Parties anticipate moving for the following limitations on discovery:

(e.g. Confidentiality, Trade Secret, Apex Doctrine; etc)

**V. Discovery Schedule**

The parties have discussed the Case Management orders and are in compliance with the deadlines set forth except for the following:

All such motions to modify your Case Management Order/Trial Order must be filed and set for hearing on the UMC in compliance with the Rule.

1. The parties shall serve
   1. Interrogatories by [DATE]. Objections and responses by [NUMBER] days after the interrogatories are served.
   2. Demands for production of documents by [DATE]. Objections and responses by [NUMBER] days after the requests are served
   3. Admission by [DATE]. Objections and responses by [NUMBER] days after the requests are served.
2. The parties shall produce all responsive and non-privileged documents by [DATE].   
   The parties [agree/do not agree] to produce documents on a rolling basis, [beginning DATE].
3. The parties shall serve their notices of deposition on any other party by [DATE].
4. The parties shall serve subpoenas seeking third party documents and/or depositions by [DATE].
5. Depositions of the parties shall begin after [DATE] at mutually convenient dates and times. A party may conduct a nonparty deposition beforehand at a mutually agreed date, time, and place.
6. The parties shall complete all fact depositions by [DATE].
7. The parties shall complete all discovery on class certification by [DATE].
8. The parties shall make expert disclosures by [DATE].
9. The parties shall serve their experts' reports by [DATE].
10. The parties shall serve their rebuttal expert reports by [DATE].
11. The parties shall complete Plaintiffs expert depositions by [DATE] and Defendants expert depositions by [DATE].
12. The parties shall complete ALL discovery including expert reports by [DATE].

The parties, after conferring in good faith, do not agree on the following discovery deadlines:

|  |  |  |
| --- | --- | --- |
| **Issue**  **DEADLINE** | **Plaintiff**  **PROPOSED DEADLINE** | **Defendant**  **PROPOSED DEADLINE** |
|  |  |  |
|  |  |  |
|  |  |  |

**VI. Treatment of Electronically Stored Information**

The parties have discussed the existence of electronically stored information (ESI) in this matter, and have reached the following agreements:

(i.e. extent to which such electronically stored information should be preserved, the form in which such information should be produced, and whether discovery of such information should be conducted in phases or limited to particular individuals, time periods, or sources)

The parties have discussed the existence of electronically stored information (ESI) in this matter, and do not agree on the following:

**VII. Privilege Claims**

The parties acknowledge that they must provide a detailed privilege log with any information withheld from production at the same time production is provided by [DATE].

Any submission to the Court for in camera review must use an index and Bates stamped.

**VIII. Confidentiality**

The parties recognize that they may disclose confidential material in the course of litigation and believe that a confidentiality order is necessary. The parties [jointly request the court's approval of the executed agreement attached hereto as Exhibit [NUMBER]/will submit a proposed order to the court by [DATE].

**IX. Pre-Trial Motions.**

Consistent with the case management order, the parties agree that:

1. The agreed deadline to join other parties and amend pleadings is [DATE]
2. The agreed deadline to identify any nonparty whose identity is known, or otherwise describe as specifically as practicable any nonparty whose identity is not known is [DATE]

For dispositive motions, they must serve moving papers by [DATE]; responding papers within [DAYS] of the motion being served; and reply papers within [DAYS] of the response being served.

[For class certification motions, they must serve moving papers by [DATE]; responding papers within [DAYS] of the motion being served; and reply papers within [DAYS] of the response being served.

For all hearings the parties will provide courtesy hard copies of materials to the Court in advance of the hearing in addition to the electronic submission.

**X. Mediation**

The parties [will mediate / have mediated] the matter on [DATE]. The Parties [have/have not] agreed on a mediator [NAME].

If the parties have not mediated, they should indicate their preference to mediate prior to discovery, deposition, or pre-trial motion.

All mediation reports must be filed within 48 hours of mediation and the parties have set the case for a Status Conference on UMC within 5 days of the same.

**XI. Consent for Magistrate Judge/Special Master.**

In order to adjudicate matters on an expedited basis the parties [DO / DO NOT] consent to the appointment of a special master under Fla. R. Civ. Pro 1.490(b).

The parties make the following suggestions on the advisability and timing of referring matters to a magistrate, master, or mediator:

|  |  |  |
| --- | --- | --- |
| **Issue to be heard** | **Plaintiff[s]** | **Defendant[s]** |
| [issue] | [PROPOSED Special Master NAME] | [PROPOSE D Special Master NAME] |

**XII. Possibility of Settlement**

The parties should not disclose settlement negotiations or mediation, but should indicate if the parties plan to continue discussions or attend another mediation.

The parties must indicate the date of last compliance with Local Rule 4.

**XIII. Stipulations**

Indicate stipulations made regarding:

1. Admissions of fact.
2. Voluntary exchange of documents and electronically stored information.
3. Authenticity of documents, and electronically stored information.
4. Preliminary estimate of the time required for trial and unavailability.

Indicate the need for any advance rulings from the court on admissibility of evidence**.**