

GUIDELINES FOR DISCOVERY MATTERS

Should counsel find they are unable to resolve a discovery matter or a matter regarding a protective order,¹ the parties shall file a “[Joint] Motion for Conference To Resolve [Protective Order or Discovery] Dispute.” The suggested text for this motion can be found on the court’s website in the “Forms” tab, under the heading “Discovery Matters–Motion to Resolve Discovery Dispute.”

The following procedures shall apply:

1. Discovery dispute letter submissions shall not exceed four (4) pages, and all printed matter, including footnotes, must appear in at least 12-point font.
2. The moving party should attach a proposed order to its letter brief as an exhibit. In the proposed order, the moving party should clearly set out the nature of the requested relief as to each dispute, including the date by which the requested relief is to be completed.
3. Exhibits to discovery dispute letter submissions are limited to a total of no more than 200 pages, absent leave of court. The parties shall make reasonable efforts to attach only those pages relevant to the discovery dispute as exhibits. Each exhibit shall be filed as a separate, individual attachment within the docket entry for the associated letter submission. The court may strike submissions which exceed the limitation on exhibits, and the hearing may be canceled in that event.

¹ Counsel are expected to first *verbally* discuss the issues/concerns before seeking the court’s intervention.

4. If the discovery dispute relates to certain discovery requests (e.g., interrogatories or requests for production of documents), then the moving party should attach those discovery requests and any relevant responses as exhibits to its letter brief. The responding party should include as exhibits to its letter brief any discovery requests and/or responses that it believes are relevant and that the moving party did not already submit.
5. Motions for sanctions under Fed. R. Civ. P. 37 pertaining to discovery shall be brought in accordance with the Court's discovery dispute procedures.
6. Courtesy copies of discovery dispute letter submissions are to be **hand delivered** to the Clerk's Office **within one hour of e-filing**. Should the court find further briefing necessary upon conclusion of the conference, the court will order it.