

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

[illegible]

PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

1. Summary of Claims, Defenses, and Relevant Issues.

Plaintiff/Defendant (circle one)

2. I understand my obligation to and am preserving relevant information.

Plaintiff/Defendant (circle one)

3. Proposed Schedule

All discovery should be completed by _____

- a. Depositions: Depositions shall be completed by _____
- b. Neither party may take more than _____ depositions. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.

- c. Initial Requests for Documents must be made by _____.
- d. Responses to Requests for Documents must be made by _____.
- e. Documents from third-parties (such as doctors) will/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.

- f. Subpoenas requesting Documents from third-parties must be served by _____. Documents obtained from third-parties must be provided to all parties in this matter.
- g. Privilege logs to describe the materials withheld on grounds of privilege will be provided by _____
- h. There will/will not (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify

4. Early Settlement or Resolution

The parties have/have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than _____. The following information is needed before settlement can be discussed:

5. Other Matters

Plaintiff(s)/Defendant(s) (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

Respectfully submitted this ____ day of _____.

Name

Address

Phone number

Email

Party representing (if applicable)