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4 UNITED STATES DISTRICT COURT  
5 NORTHERN DISTRICT OF CALIFORNIA

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7 ) Case Number: C 18-xxxx  
8 )  
9 ) **JOINT CASE MANAGEMENT**  
10 ) **STATEMENT & [PROPOSED] ORDER**  
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13 )  
14 )  
Plaintiff(s),  
vs.  
Defendant(s).

15 The parties to the above-entitled action jointly submit this JOINT CASE  
16 MANAGEMENT STATEMENT & PROPOSED ORDER pursuant to the Standing Order for All  
17 Judges of the Northern District of California and Civil Local Rule 16-9.

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19 1. Jurisdiction & Service

20 *The basis for the court's subject matter jurisdiction over plaintiff's claims and defendant's counterclaims, whether*  
21 *any issues exist regarding persona jurisdiction or venue, whether any parties remain to be served, and, if any*  
22 *parties remain to be served, a proposed deadline for service.*

23 2. Facts

24 *A brief chronology of the facts and a statement of the principal factual issues in dispute.*

25 3. Legal Issues

26 *A brief statement, without extended legal argument, of the disputed points of law, including reference to specific*  
27 *statutes and decisions.*  
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1       **4.       Motions**

2       *All prior and pending motions, their current status, and any anticipated motions.*

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4       **5.       Amendment of Pleadings**

5       *The extent to which parties, claims, or defenses are expected to be added or dismissed and a proposed deadline for amending the pleadings.*

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7       **6.       Evidence Preservation**

8       *A brief report certifying that the parties have reviewed the Guidelines Relating to the Discovery of Electronically Stored Information (“ESI Guidelines”), and confirming that the parties have met and conferred pursuant to Fed. R. Civ. P. 26(f) regarding reasonable and proportionate steps taken to preserve evidence relevant to the issues reasonably evident in this action. See ESI Guidelines 2.01 and 2.02, and Checklist for ESI Meet and Confer.*

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10       **7.       Disclosures**

11       *Whether there has been full and timely compliance with the initial disclosure requirements of Fed. R. Civ. P. 26 and a description of the disclosures made. For ADA and employment cases, see General Order Nos. 56 and 71.*

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13       **8.       Discovery**

14       *Discovery taken to date, if any, the scope of anticipated discovery, any proposed limitations or modifications of the discovery rules, a brief report on whether the parties have considered entering into a stipulated e-discovery order, a proposed discovery plan pursuant to Fed. R. Civ. P. 26(f), and any identified discovery disputes.*

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17       **9.       Class Actions**

18       *If a class action, a proposal for how and when the class will be certified.*

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20       **10.      Related Cases**

21       *Any related cases or proceedings pending before another judge of this court, or before another court or administrative body.*

22       **11.      Relief**

23       *All relief sought through complaint or counterclaim, including the amount of any damages sought and a description of the bases on which damages are calculated. In addition, any party from whom damages are sought must describe the bases on which it contends damages should be calculated if liability is established.*

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26       **12.      Settlement and ADR**

27       *Prospects for settlement, ADR efforts to date, and a specific ADR plan for the case, including which ADR process option the parties have selected and a proposed deadline, or if the parties do not agree, each party’s preferred option and timing, in compliance with ADR L.R. 3-5. In addition, the parties should include a description of key discovery or motions necessary to position the parties to negotiate a resolution.*

1      13.     Other References

2      *Whether the case is suitable for reference to binding arbitration, a special master, or the Judicial Panel on*  
3      *Multidistrict Litigation.*

4      14.     Narrowing of Issues

5      *Issues that can be narrowed by agreement or by motion, suggestions to expedite the presentation of evidence at trial*  
6      *(e.g., through summaries or stipulated facts), and any request to bifurcate issues, claims, or defenses. The parties*  
7      *shall jointly identify (in bold or highlight) one to three issues which are the most consequential to the case, and*  
8      *discuss how resolution of these issues may be expedited.*

9      15.     Expedited Trial Procedure

10     *Whether this is the type of case that can be handled under the Expedited Trial Procedure of General Order 64,*  
11     *Attachment A. If all parties agree, they shall instead of this Statement, file an executed Agreement for Expedited*  
12     *Trial and a Joint Expedited Case Management Statement, in accordance with General Order No. 64, Attachments B*  
13     *and D.*

14     16.     Scheduling

15     *Proposed dates for completion of initial ADR session, designation of experts, discovery cutoff, hearing of dispositive*  
16     *motions, pretrial conference and trial.*

17     17.     Trial

18     *Whether the case will be tried to a jury or to the court and the expected length of the trial.*

19     18.     Disclosure of Non-party Interested Entities or Persons

20     *Whether each party has filed the "Certification of Interested Entities or Persons" required by Civil Local Rule 3-15.*  
21     *In addition, each party must restate in the case management statement the contents of its certification by identifying*  
22     *any persons, firms, partnerships, corporations (including parent corporations) or other entities known by the party*  
23     *to have either: (i) a financial interest in the subject matter in controversy or in a party to the proceeding; or (ii) any*  
24     *other kind of interest that could be substantially affected by the outcome of the proceeding.*

25     19.     Professional Conduct

26     *Whether all attorneys of record for the parties have reviewed the Guidelines for Professional Conduct for the*  
27     *Northern District of California.*

28     20.     Other

*Such other matters as may facilitate the just, speedy and inexpensive disposition of this matter.*

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1 Dated:

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Counsel for plaintiff

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4 Dated:

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Counsel for defendant

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7 CASE MANAGEMENT ORDER

8 The above JOINT CASE MANAGEMENT STATEMENT & PROPOSED ORDER is approved  
9 as the Case Management Order for this case and all parties shall comply with its provisions. [In  
10 addition, the Court makes the further orders stated below:]  
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13 IT IS SO ORDERED.

14 Dated:

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UNITED STATES DISTRICT/MAGISTRATE JUDGE