

DISCOVERY DISPUTE PROTOCOL

To ensure that discovery dispute telephone conferences are effective and efficient, the Court uses the following procedure:

- 1) The party requesting the telephone conference must provide opposing counsel with a 1-2 page description of the following:
 - a. the discovery dispute,
 - b. efforts made by the parties to resolve, and
 - c. legal position of both parties;

- 2) Opposing counsel must then provide the party requesting the telephone conference with a 1-2 page response agreeing with, clarifying, or disputing the written description of dispute, efforts, and positions. If entirely different issues are raised in this response, the party requesting the telephone conference should provide opposing party with a 1-page reply. The parties are directed to confer as soon as possible regarding deadlines for these exchanges;

- 3) The party requesting the telephone conference must then submit to the Court (at least 24 hours prior to the scheduled telephone conference) the written description and response (and reply if applicable). If the dispute concerns an objection to a specific discovery request, the parties are to submit the specific request and objection simultaneously with the description.