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

		X	
against	Plaintiff,	:	CIVIL ACTION NO.:
	Defendant.	: : : X	

PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

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

Plaintiff/Defendant (circle one)

3. Proposed Schedule

All discovery should be completed by _____

- a. <u>Depositions</u>: 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. 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)