

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>Plaintiff(s),</p> <p>-against-</p> <p>Defendant(s).</p>

No. __ -cv- ____ () (SDA)

PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

1. Summary of Claims, Defenses and Relevant Issues:

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

Plaintiff(s): Yes or No (circle one)
Defendant(s): Yes or No (circle one)

3. Proposed Schedule:

All discovery should be completed by _____.

a. 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. Anticipated Motions: _____

5. Amendment to Pleadings:

No amended pleadings may be filed after _____. Any motion to amend after this date will need to meet the good cause requirements of Federal Rule of Civil Procedure 16(b).

No additional parties may be joined after _____. Any motion to join after this date will need to meet the good cause requirements of Federal Rule of Civil Procedure 16(b).

6. 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:

7. Status Letter:

The parties shall file a joint letter regarding the status of discovery on _____
(date to be determined by the Court).

8. Other Matters:

The parties 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)

Respectfully submitted this ____ day of _____

Name

Address

Phone number

Email

Party representing (if applicable)