**IN THE CHANCERY COURT, STATE OF WYOMING**

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| Plaintiff,  vs.  Defendant. | Case No. CH-2022-0000000 |
| **[Model] Joint Case Management Report** | |

The parties submit this Joint Initial Case Management Report for the Court’s consideration in advance of the Case Management Conference scheduled in this matter.

1. **Short Statement of the Case.** Describe the nature and basis of each party’s claims and defenses and identify the key legal issues and central factual disputes.
   1. **Plaintiff’s Statement.** Summarize plaintiff’s claims, identifying the legal theories and facts upon which the claims are based. List the anticipated legal issues and factual disputes that must be addressed to resolve the case expeditiously. Plaintiff’s statement must not exceed 500 words.

* 1. **Defendant’s Statement.** Summarize defendant’s claims or defenses, identifying the legal theories and facts upon which the clams or defenses are based. List the anticipated legal issues and factual disputes that must be addressed to resolve the case expeditiously. Defendant’s statement must not exceed 500 words.

1. **Initial Motions.** Describe any anticipated initial motions—motion to dismiss, motion for temporary restraining order or preliminary injunction, motion to add parties, or motion for leave to file anticipated amendments to the pleadings. The parties should also propose deadlines for any such initial motions.
   1. **Plaintiff’s Initial Motions**. State whether plaintiff plans to file any initial motions and identify the basis for any such motion.
   2. **Defendant’s Initial Motions.** State whether defendant plans to file any initial motions and identify the basis for any such motion.
   3. **Proposed Deadlines Related to Initial Motions**. Propose deadlines for filing and responding to any such initial motions.
2. **Discovery Plan and Schedule.** Set forth a discovery plan with a proposed schedule and limitations on discovery. If the parties fail to agree on any component of the discovery plan and schedule, the parties shall include competing proposals for each disputed item.
   1. **Initial Disclosures.** In addition to information required to be disclosed by Rule 26(a)(1), identify other information and documents (e.g., organizational charts) that if initially disclosed would expedite discovery in this matter.
   2. **Accelerated Adjudication**. State whether the parties authorize the Chancery Court to apply the accelerated adjudication procedures set forth in W.R.C.P.Ch.C. 16(c)(3). If the parties do not so authorize, explain why the parties believe this case is not well-suited to such procedures.
   3. **Phased Discovery.** Address whether and how discovery might be phased to prioritize the exchange of targeted information that would facilitate early settlement.
   4. **Discovery Deadlines**. Propose discovery deadlines, including the following: initial disclosure deadline, discovery cut-off deadline, phased or prioritized discovery deadlines, expert designation and disclosure deadlines, deposition deadlines, and written discovery deadlines. In proposing a discovery timeline, the parties should account for the Chancery Court’s goal to resolve most cases within 150 days of filing. If an initial motion with the potential to delay the start of discovery prevents the parties from setting specific dates, the parties should state the deadlines as numbers of months, weeks, or days.
   5. **Scope of and Limits on Discovery.** Propose the scope of and limits on discovery, including relevant time period, subject matter topics, and number of allowed requests, interrogatories, and depositions. The parties should tailor the scope and limits of discovery to the unique needs of the case, carefully considering the principles of proportionality found in W.R.C.P.Ch.C. 26(b)(1) and the Chancery Court’s goal of expedited resolutions found in W.R.C.P.Ch.C. 1.
   6. **Organization and Delivery of Discovery Responses**. Describe how discovery will be organized, including outlining the bates numbering system and document formatting. Identify the electronic sharing methodology that will be used to deliver any discovery responses that cannot be delivered through the electronic filing system. *See* W.R.C.P.Ch.C. 26(d)(3).
   7. **Confidentiality.** State whether the parties stipulate to the Model Protective Order regarding Confidential Information available on the Chancery Court’s website. If the parties do not so stipulate, they must identify a date by which they will agree on and file a proposed protective order or explain why no order is necessary.

* 1. **Privilege.** Summarize the parties’ agreement or competing proposals on reviewing discovery for privilege, asserting privilege, and submitting privilege logs during discovery. As part of this summary, identify the scope of any privilege review, note anticipated privilege issues, identify categories of information that may be excluded from any logging requirement, set forth time limits for exchanging privilege logs, and state whether the parties agree to categorical privilege logs. If the parties insist upon a document-by-document logging, the parties must address how the parties will log emails (log top email in chain or log all emails in chain) and attachments (log separately or log as part of email).
  2. **Electronically Stored Information**. Answer whether this case will require discovery of ESI. If the case will require discovery of ESI, identify a date by which the parties will agree on and file an ESI Protocol. A Model ESI Protocol is available on the Chancery Court’s website.
  3. **Expert Discovery.** State whether the case will require expert discovery. If required, identify the issues, claims, or topics that will require expert discovery. Propose dates for expert designations and disclosures.
  4. **Regular Case Management Conferences.** Address whether and how regular case management conferences would advance the timely resolution of this case. If the parties believe that regular case management conferences would be helpful, the parties should identify the frequency with which they should occur.
  5. **Other Matters Regarding Discovery.** Identify any other matters that are significant to discovery management. State whether the court should resolve any areas of disagreement related to discovery, and not identified above, at the case management conference.

1. **Magistrate or Master.** Identify the role that a magistrate or master (referee, auditor, examiner) might play in expediting resolution of the case. In identifying any such role, specify with particularity those matters that are appropriate for reference to a magistrate or master.
2. **Dispositive Motions.** State whether the parties anticipate filing dispositive motions and propose deadlines for filing and responding to any such motions. Identify any set of undisputed facts on which a meaningful and dispositive legal ruling may be made early in the case. Address whether and how dispositive motions might be sequenced and scheduled to most effectively advance settlement discussions.
3. **Alternative Dispute Resolution and Settlement**. Identify dates by which early, interim, and late mediation sessions or settlement conferences must occur. Two of these three sessions or conferences may consist of non-facilitated settlement discussions. But at least one of the three sessions must involve a mediator. This section must also include certification that counsel have given their respective clients good faith estimates of the potential costs and demands of litigation.
4. **Proposed Case Management Schedule.** Propose a schedule, including all deadlines noted above and any additional case management deadlines. If the parties are unable to agree on any deadlines, they should include competing proposals for each disputed deadline. In proposing a schedule, the parties should remember that the Chancery Court aims to resolve most actions within 150 days from filing. If the parties propose a schedule that extends beyond this timeframe, the parties must show cause why the 150-day timeframe is unworkable in this matter. At a minimum, the proposed schedule should contain the following (or variations of the following) deadlines:
   1. Initial motions must be filed by:
   2. Initial disclosures must be made by:
   3. The parties will finalize and propose an ESI Protocol by:
   4. The parties will finalize and propose a protective order addressing confidential information by:
   5. All discovery must be completed by:
   6. Plaintiff’s expert designations and disclosures must be made by:
   7. Defendant’s expert designations and disclosures must be made by:
   8. Dispositive motions must be filed by:
   9. Pretrial disclosures and direct testimony affidavits must be exchanged between the parties (but not filed with the Court) by:
   10. Pretrial meet and confer must be held between the parties by:
   11. Joint pretrial memorandum and all motions in limine, requests for advance rulings, objections to direct testimony by affidavit, and objections to designated deposition testimony must be filed by:
   12. Proposed pretrial conference length and dates:
   13. Proposed trial length and dates:
   14. Proposed findings of fact and conclusions of law must be filed by:
   15. An initial mediation or settlement conference must be held by:
   16. An interim mediation or settlement conference must be held by:
   17. A late-stage mediation or settlement conference must be held by:
5. **Other Matters.** Identify any other matters that are significant to case management and the expedited resolution of this matter. State whether the court should resolve any areas of disagreement, not identified above, at the case management and scheduling conference.

**Submitted by:**

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[Counsel]

Attorney(s) for Plaintiff Date

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[Counsel

Attorney(s) for Defendant Date