

Trumbull County Probate Court Local Rules Appendix N

IN THE COURT OF COMMON PLEAS  
DIVISION OF PROBATE  
TRUMBULL COUNTY, OHIO

\_\_\_\_\_) Case No. \_\_\_\_\_  
\_\_\_\_\_)  
Plaintiff \_\_\_\_\_)  
\_\_\_\_\_)  
vs. \_\_\_\_\_)  
\_\_\_\_\_) **Discovery Plan**  
\_\_\_\_\_)  
\_\_\_\_\_)  
Defendant \_\_\_\_\_)

1. The parties agree to address the preservation of electronically stored information and other information held by the parties or third parties as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. The following issues remain as to the preservation of electronically stored information and other information held by the parties or third parties:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. The parties agree to utilize the following methods of search for the discovery of documents and electronically stored information:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. The parties agree to the following limitations for the discovery of documents and electronically stored information:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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5. The following agreements have been made by the parties for how claims of privilege or the protection of designated materials after production will be addressed:

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6. The parties have agreed to the following timeline and procedure for obtaining disclosure of known and reasonably available non-privileged, non-work product documents and things that support or contradict the specifically pleaded claims and defenses:

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7. The parties have agreed to the following timetable and procedure for exchanging lists of lay witnesses, expert witnesses and exhibits for trial:

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8. The parties have agreed to the following procedure for scheduling depositions:

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9. If medical records are expected to be discovered, the parties have reached the following agreements as to how they will be exchanged and handled:

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10. The following additional agreements as to discovery have been reached:

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11. The following concerns about discovery in this matter continue to exist:

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Counsel for Plaintiff  
Printed Name: \_\_\_\_\_

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Counsel for Plaintiff  
Printed Name: \_\_\_\_\_

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Counsel for Defendant  
Printed Name: \_\_\_\_\_

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Counsel for Defendant  
Printed Name: \_\_\_\_\_

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Counsel for Defendant  
Printed Name: \_\_\_\_\_

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Unrepresented Party  
Printed Name: \_\_\_\_\_