UNITED STATES BANKRUPTCY COURT **R.I. Bankr. Form O.2**

FOR THE DISTRICT OF RHODE ISLAND *See, LBR 7026-1(c)*

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In re: :

: BK No. Debtor Chapter

:

Plaintiff : A.P. No. v.

:

Defendant :

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**DISCOVERY PLAN PURSUANT TO FED. R. CIV. P. 26(f)**

Pursuant to Fed. R. Civ. P. 26(f) incorporated into bankruptcy by Fed. R. Bankr. P. 7026, the parties hereby submit their Discovery Plan in accordance with R.I. LBR 7026-1(c):

1. The parties state that all disclosures under Fed. R. Bankr. P. 7026(a) have been made or the parties agree that all disclosures under Fed. R. Bankr. P. 7026(a)(1) will be made on or before -or- that by written stipulation in accordance with Fed. R. Bankr. P. 7026(a)(1) , which was filed with the Court on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, the parties have stipulated that none of the specified disclosures will be made.

2. The parties will conduct discovery concerning the following subjects:\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *See,* Fed. R. Bankr. P. 7026(f)(2).

3. The parties anticipate that discovery will be completed within \_\_\_ days and agree to a discovery closure date of .

4. The parties \_\_\_ DO \_\_\_\_ DO NOT believe they need a deadline to join other parties or amend the pleadings as such actions are not contemplated at this time. If applicable, the deadline for joinder of parties or to amend pleadings is on or before \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

5. The parties agree that the deadline to file dispositive and pretrial motions shall be \_\_\_\_\_\_\_\_\_\_\_\_\_.

6. The Parties agree that a Joint Pretrial Statement shall be filed on or before \_\_\_\_\_\_\_ provided that no dispositive motions are filed by that date. If a dispositive motion is filed, the parties respectfully request the Court to set a joint pretrial statement deadline in any decision or order denying dispositive relief.

7. The parties believe that referral of this matter for mediation \_\_\_\_ WOULD \_\_\_\_ WOULD NOT be helpful [and, if applicable, both parties consent to such referral. Due to outstanding discovery requests, the parties ask that the referral not be made until \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. It is the parties’ understanding that such a referral will not suspend the other deadlines in this case unless the parties make such a request by written motion].

8. The parties \_\_\_ DO \_\_\_\_ DO NOT believe that a pretrial conference before the Court would serve any purpose at this time.

Respectfully submitted this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_\_,

Plaintiff: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Defendant:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

BY: Signature and Address of Signature and Address of

Attorney for Plaintiff Attorney for Defendant

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