

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

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In re: :

Debtor : BK No.  
Chapter

Plaintiff : A.P. No.

Defendant :

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**DISCOVERY PLAN PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(f)**

Pursuant to Federal Rule of Civil Procedure 26(f) incorporated into bankruptcy by Federal Rule of Bankruptcy Procedure 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 Federal Rule of Civil Procedure 26(a) have been made or the parties agree that all disclosures under Federal Rule of Civil Procedure 26(a)(1) will be made on or before \_\_\_\_\_ -or- that by written stipulation in accordance with Federal Rule of Civil Procedure 26(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, Federal Rule of Civil Procedure 26(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  
Attorney for Plaintiff

Signature and Address of  
Attorney for Defendant

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