

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

_____ ,

Debtor(s).

_____ ,

Plaintiff,

v.

_____ ,

Defendant.

Case No. _____-R

Chapter _____

Adv. No. _____-R

JOINT REPORT AND DISCOVERY PLAN

Plaintiff _____ ("Plaintiff") and Defendant _____

("Defendant"), through counsel, provide the following Joint Report under Federal Rule of Civil Procedure 26(f) pursuant to the Order Concerning Compliance with Rules 26(a)(1) and (f) and Order Setting [Telephonic] Rule 16(b) Scheduling Conference entered on _____ (Doc. _____).

1. *Set forth the jurisdictional basis of the proceeding, citing specific statutes.*
2. *Describe the nature of the proceeding, including the factual and legal basis of each claim.*
3. *List **each element of each claim** set forth in the complaint with citations to relevant legal authority (i.e., statutory or case law). For those claims in which the burden of proof shifts, the elements that the opposing party must prove shall be listed. Set forth any affirmative defenses to each claim with citations to relevant legal authority.*
4. *State the factual and legal issues genuinely in dispute and whether such issues may be narrowed by stipulation or motion.*
5. *State when the initial disclosures required by Rule 26(a) were made.*
6. *Set forth proposed deadlines for discovery and, if applicable, dispositive motions and/or disclosure of expert testimony.*

7. *Specify the number of hours required to present evidence in this proceeding.*
8. *Describe the prospects for settlement, including any request to have a settlement conference before a settlement judge or adjunct settlement judge.*
9. *Describe any other matters which may aid the Court in resolving the dispute in a just, speedy, and inexpensive manner.*

Dated this _____ day of _____, 20____.

s/ _____
Attorney Name, OBA # _____
[Address/Telephone/Fax/Email]
ATTORNEY FOR PLAINTIFF

s/ _____
Attorney Name, OBA # _____
[Address/Telephone/Fax/Email]
ATTORNEY FOR DEFENDANT