

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

vs. Plaintiff,

Judge J. Nicholas Ranjan

Defendants.

Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES

1. Subjects of Fact Discovery:

2. Subjects of Expert Discovery:

3. Can fact and expert discovery occur at the same time? Why/why not?

4. Pre-trial Deadlines:

- a. Date for Initial Disclosures:

- b. Date for joinder/amendment:
 - c. Date for close of fact discovery:
 - d. Date for close of expert discovery, if bifurcated:
5. **Rule 502 Order – Yes or No?**

6. **Are there any ESI disputes? If yes, please explain:**

7. **Protective Order – Yes or No?**

Respectfully submitted,
