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

	Plaintiff, vs.)))))) Judge J. Nicholas Ranjan))
	Defendants.)
	Fed. R. Civ. P. 26(f) REPO	ORT OF THE PARTIES
1.	Subjects of Fact Discovery:	
	Subjects of Expert Discovery: 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.	. Do the parties want a Rule 502 non-waiver order – Yes or No?		
6.	Are there any ESI issues to address? If yes, please explain:		
7.	7. Protective Order – Yes or No? If yes, please explain:		
		Respectfully submitted,	